

HUMAN RESOURCES POLICY

APPROVED BY THE CHIEF EXECUTIVE OFFICER OF THE MAIRE GROUP
ON 16 DECEMBER 2025



1 SCOPE

The MAIRE group has always recognized the strategic value of people to ensure long-term sustainable growth, ensure the achievement of corporate objectives and face the most innovative challenges. People are the Group's main asset, which is therefore committed to seeking, attracting, retaining, engaging and enhancing the professionalism necessary to preserve and increase competitiveness in a constantly evolving labour market, in compliance with the principles of the Group's Code of Ethics, the regulations in force and the conventions of the International Labour Organization (ILO). The Group promotes and protects, together with professional development, also the health and safety of its people, as well as the well-being of the local communities in which it operates.

The Policy incorporates the principles and values of the Code of Ethics, the Sustainability Policy and the Policies adopted by the MAIRE group, which define its identity and culture, as attested by the references section of the document.

1.1 Applicability and dissemination

This Policy applies to MAIRE and to all Group companies that are committed to promoting its principles to all stakeholders in upstream and downstream activities, along the value chain.

All employees, interns, collaborators, temporary workers and those who work for a company of the MAIRE group and operate in the name and on behalf of the same, are required to strictly observe its principles and to actively apply them in all interactions with colleagues, customers, suppliers, partners, local communities and any other individual or entity involved in their work activities.

This Policy is communicated to all the people who work for the Group, including through dedicated training opportunities, and is made available on the MAIRE corporate website to all stakeholders so that there is full awareness and even greater impetus for its promotion.

1.2 Approval and Review

The Human Resources Policy is approved by the Chief Executive Officer of the MAIRE Group.

The document is revised whenever regulatory updates, strategic developments or contextual changes require or recommend revisions, involving the competent corporate functions.

1.3 Governance

MAIRE is committed to actively orienting its corporate "purpose" towards the integration of sustainability and stakeholder expectations within its business model, acting on both internal and external dimensions of the company.

MAIRE's corporate governance system is structured to ensure an effective and transparent management and control model, oriented towards sustainable success. In line with international best practices and the principles and recommendations of the Corporate Governance Code of Borsa Italiana S.p.A. to which MAIRE adheres (the "Code"), the Company's approach to sustainability is integrated into the corporate strategy, with the aim of generating long-term value for the benefit of shareholders, taking into account the interests of relevant stakeholders.

MAIRE's sustainability governance is based on a system of roles, responsibilities and decision-making processes that ensures the oversight of environmental, social and governance issues within the organisational structure. This system promotes the effective integration of sustainability factors into strategic decisions and in the Company's operational and management management, contributing to the creation of shared value and the mitigation of risks related to the environmental and social impacts of the Group's activities.

MAIRE adopts a structured approach to sustainability management, which involves the Board of Directors, the Control, Risk and Sustainability Committee, management and operational functions, ensuring effective oversight of sustainability issues and, thanks to the Functions in charge, constant monitoring of sustainability performance, in line with the strategic objectives and commitments undertaken by the Group.

In particular, it is the responsibility of the Board of Directors to define and approve, on an annual basis and with the support of the Control, Risk and Sustainability Committee, the so-called "Double Materiality Matrix" for the identification of the impacts, risks and opportunities to be placed at the basis of the Group's long-term sustainability strategies and, consequently, of the MAIRE Group's Sustainability Reporting.

In addition to the above, the Board of Directors monitors the progress of the results with respect to the sustainability objectives, ensuring alignment with the industrial strategy and the reference scenarios. In addition, with the support of the Control, Risk and Sustainability Committee, it annually updates the MAIRE Group's Sustainability Plan, defining the Group's strategic objectives in relation to the relevant sustainability issues in the medium and long term period. These objectives are integrated with the Group's long-term industrial strategies, which are also updated annually by the MAIRE Board of Directors, which, to this end, takes into account, among other things, the evolution of the geopolitical context, the markets and the business sectors in which the Group operates, at a global level.

The proposals for the Board of Directors and the Control, Risk and Sustainability Committee relating to the so-called "Double Materiality Matrix" and the related strategies are defined with the support of MAIRE's Group Sustainability & Corporate Advocacy Function on the basis of the so-called "stakeholder engagement" activities carried out annually by the latter with the involvement of both internal and external stakeholders. The same Function is also assigned the task of planning and monitoring the Group's sustainability initiatives. This Function operates in close coordination with MAIRE's Sustainability Reporting, Performance and Disclosure Function, which is responsible for preparing, with the support of the Group Sustainability and Corporate Awareness Function, the Group's Sustainability Reporting.

The Board of Directors also periodically supervises, with the support of the Control, Risk and Sustainability Committee and the Functions in charge: i) the status of implementation of the strategic sustainability initiatives defined for the Group, on the basis of the so-called "Double Materiality Matrix" approved, and ii) any updates made to the assessments relating to risks and opportunities.

MAIRE is also equipped with an internal control and risk management system intended as the set of rules, procedures and organizational structures aimed at effective and effective identification, measurement, management and monitoring of the main risks, in order to contribute to the sustainable success of the Company defined in line with the Company's strategies, including those of sustainability, whose adequacy and effectiveness are verified every six months.

In addition to the Board of Directors and the Control, Risk and Sustainability Committee, the subjects of the internal control system described above also include - among others - the Board of Statutory Auditors, the Chief Executive Officer (in his capacity as Chief Executive Officer of MAIRE), the Manager responsible for preparing the company's financial reports and MAIRE's Group Risk Management, In Country Value and Special Initiatives of Maire; this Function which, inter alia, has the role of supporting in the process of identifying impacts, risks and opportunities relevant to the updating of the MAIRE Group's Sustainability Plan.

The Company, in defining its governance system, has also established:

- an Internal Sustainability Committee, a strategic advisory body at the service of MAIRE's Chief Executive Officer, with the task of providing support in the definition of policies and strategies aimed at the sustainable management of the business, development programmes, guidelines and objectives, including in terms of Corporate Giving, monitoring their achievement, as well as analysing the dynamics of interaction with stakeholders.
- an Internal Committee to oversee the Internal Control and Risk Management System, with advisory functions, in which the main corporate functions part of the System participate, at the service of the Chief Executive Officer of MAIRE, with the task of supporting the corporate functions involved in the internal control and risk management system (including those related to sustainability issues).
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2 COMMITMENT

The MAIRE group is committed to promoting an ethical, inclusive and respectful working environment for the dignity of each individual, based on principles of respect, integrity, merit and equal opportunities. The Group condemns all forms of discrimination, violence, abuse and intolerance, valuing diversity, guaranteeing safe and respectful environments and equal access to opportunities for professional growth in full compliance with national and international regulations.

The selection and management of personnel are based on objective criteria of merit and alignment with corporate values, with a view to sustainability and lasting relationships. The Group protects health and safety in the workplace through prevention and continuous training initiatives and adopts fair remuneration policies to ensure long-term sustainability. The Group also promotes the well-being of the communities in which it operates.

MAIRE's commitment translates into concrete and continuous initiatives, implemented in a structured way by its Functions and in synergistic collaboration with the Group companies, testifying to responsible governance and sustainability-oriented.

3 OBJECTIVES AND STRATEGIES

In pursuing sustainable and responsible growth, the Group defines its strategic objectives aimed at creating long-term value, focusing on people, work ethics and respect for fundamental rights. These objectives translate into concrete initiatives aimed at ensuring an inclusive, safe and meritocratic work environment, promoting professional development, health protection and the enhancement of diversity.

The adoption of responsible and transparent practices is fully integrated into MAIRE's strategic vision, in line with its Code of Ethics, the Diversity, Equity and Inclusion Policy and the other Group Policies.

The Group periodically renews its commitment to compliance with the Ten Principles of the *UN Global Compact* and promotes a solid *vision* on Sustainability, closely related to the corporate strategy, with commitments and objectives specifically related to each Sustainable Development Goal. In accordance with the Diversity, Equity and Inclusion Policy, the implementation of MAIRE's strategy translates into compliance with the following principles, which are fully implemented in the initiatives and activities indicated below:

Respect for the individual: The Group respects the individual in his or her dignity and values, repudiating and condemning any form of intolerance, violence, abuse and discrimination. The Group guarantees an inclusive work environment that allows each individual to express their human and professional qualities to the fullest, and promotes the reconciliation of the needs of private and professional life and a structured welfare system. The Group also guarantees compliance with national and international legislation governing employment relationships and recognises all forms of free association between workers, in compliance with the regulations in force in the countries in which it operates. The Group does not tolerate any form of discrimination based on gender, race, nationality, age, political opinions, religion, sexual orientation, health or socioeconomic conditions, and any form of violence, harassment, abuse and intolerance.

Merit and equal opportunities: The Group places merit at the centre and offers the same professional opportunities to all employees, collaborators, interns and apprentices, as well as to those who apply for a specific job opportunity. It guarantees a system of selection, management and development of personnel that is based exclusively on merit, avoiding favoritism, preferential or discriminatory treatment of any kind. Ensuring equal opportunities in the Group is an essential prerequisite in everyday work and is a transversal requirement of activities, processes and mechanisms adopted within the Group.

Diversity, Equity & Inclusion (DE&I): The Group takes a proactive and conscious approach to supporting DE&I, integrating these principles into its business activities, operating methods and relations with stakeholders. This commitment translates into concrete actions aimed at building an inclusive working

environment, which allows everyone to fully express their abilities, eliminating cultural, organizational or structural obstacles that may limit effective equal participation.

The Group aims to promote moments of dialogue that reflect the variety of internal and external stakeholders, recognizing the value of different skills and opinions as fundamental elements to foster innovation and collective growth.

Protection of health and safety in the workplace: The Group is committed to ensuring the protection of health and safety in the workplace, both in offices and on construction sites, and to disseminating a culture of safety in line with the HSE&SA and Security Policies, and in compliance with national and international laws and standards. As a result, the Group promotes initiatives such as the implementation of prevention measures and the carrying out of training activities on the subject, in order to maintain optimal working conditions.

Personnel selection and management: The Group guarantees a personnel selection and management system based exclusively on merit criteria and free from favouritism, facilitation and discrimination of any kind. In the selection process, candidates are chosen on the basis of their professional characteristics and evaluating, at the same time, their sharing of corporate values and culture, with the aim of establishing a lasting professional relationship and ensuring a sustainable investment in the long term.

Staff development and training: The Group offers its employees equal opportunities in terms of professional development and growth, encouraging the strengthening of individual skills, abilities and potential through specific training and development programs - also in collaboration with national and international institutions. It also recognises and promotes *diversity, equity* and *inclusion* as an essential element for the Group's growth.

Remuneration policy: The Group, through the remuneration system, aims to attract and retain people with the necessary professional characteristics to operate successfully. The Group therefore adopts a balanced remuneration system that provides for fixed and variable components in the short and long term, aimed at ensuring fairness and sustainability in the long term.

The remuneration system, structured in such a way as to recognise the added value and contribution guaranteed by employees to the achievement of the Group's objectives, is based on the assessment of specific professionalism, experience gained and merit demonstrated by the individual, as well as on the achievement of specific corporate objectives.

Protection of personal data: The Group, in carrying out its activities, collects personal data relating to its employees and third parties. The information collected is processed in compliance with the fundamental rights and freedoms as well as the dignity of the parties concerned, in accordance with the provisions of the applicable laws and regulations. The management of personal data must be carried out correctly and in accordance with the laws in force, collecting and recording only the data necessary and for specific, explicit and legally permitted purposes. To this end, the Group adopts and implements organisational and technical measures aimed at ensuring the absolute confidentiality and security of personal data, as well as compliance with the relevant regulatory and legal provisions on *privacy*.



4 TRANSPARENCY AND REPORTING MECHANISMS

Stakeholders who become aware of any violation of the principles set out in this Policy are invited by the Group to make a report.

These reports can be made - even anonymously - through the following channels:

- Whistleblowing platform, available at the link: [MAIRE Group – Whistleblowing](#);
- Form SA 8000, available at the link [Human Rights and Social Accountability | MAIRE](#);
- Ordinary mail: MAIRE S.p.A., Group Corporate Affairs, Governance, Ethics & Compliance Department, Via Gaetano De Castillia 6/A, 20124, Milan, (Italy).

Reports are managed in accordance with the provisions of the Group's "Whistleblowing" Procedure and the Social Accountability 8000 management system for certified MAIRE group companies.

Any form of direct or indirect retaliation, discrimination or penalization is prohibited against those who have made a report, for reasons directly or indirectly related to the report.

5 REFERENCES

This Policy is based on internationally recognised principles and standards and is integrated with the policies and regulatory instruments adopted by the Group.

In particular, the Policy is inspired by:

- Agenda 2030 delle Nazioni Unite – Sustainable Development Goals (SDGs)
- Universal Declaration of Human Rights (UN, 1948)
- ILO (International Labour Organization) Convention
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- *Women's Empowerment Principles (UN Women & UN Global Compact)*
- EU Diversity Charter / Charter for Equal Opportunities and Equality at Work
- UNI/Pdr 125 Guideline on the management system for gender equality
- ISO 45001 – Occupational health and safety management systems
- Social Accountability 8000 Standard

This Policy is supplemented by the following Group strategic documents:

- Code of Ethics
- *Business Integrity Policy*
- Sustainability Policy
- Human Rights Policy
- Diversity, Equity and Inclusion Policy
- Whistleblowing procedure
- Politica Anti-Harassment
- HSE&SA Policy

This Policy is implemented in the Manual of the Diversity, Equity & Inclusion Management System and related internal organisational procedures of the MAIRE group.

In addition, this Policy contributes to the implementation of the management systems to support the sustainability reporting required by Directive (EU) 2022/2464 (CSRD) and the commitments provided for by Directive (EU) 2024/1760 (CSDDD).