HUMAN RIGHTS POLICY

TESMEC

Summary

1 Introduction 3
2 Objectives of the document 3
3 Regulatory framework 3
4 Reference principles 5
5 Monitoring and reporting system 8
6 Scope of application 9
7 Document distribution 9
8 Approval and revision of the Policy 9

1 Introduction

Tesmec[1] strongly believes that preventing violations and strengthening protection of human rights, especially in the workplace, is an indispensable prerogative to undertake any economic and commercial relationship. Respect for human rights is considered a key element in pursuing sustainable development.

Tesmec operates within the framework of the United Nations Universal Declaration of Human Rights, which states that "*every individual and every organ of society, including companies, shall strive by teaching and education to promote respect for human rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance*."

With the aim of supporting and promoting respect for inviolable human rights, Tesmec is committed to guaranteeing professional relations with all its stakeholders based on the respect of the fundamental guarantees recognized to all human beings by national and supranational laws.

Tesmec protects the recognition and safeguarding of dignity, freedom and equality, the protection of work and trade union freedoms, health, safety, the environment, and biodiversity, as well as the circular and efficient use of resources and sustainable development. Consistent with these principles, Tesmec rejects and prohibits the use of child labour, forced or compulsory labour, modern slavery, exploitation and human trafficking, and undertakes not to use them, either directly or indirectly, in its activities and business relationships.

The values and principles described in this Policy represent the Group cultural heritage and are disseminated at all levels through the commitment to organize awareness-raising and training actions.

2 Objectives of the document

Tesmec Human Rights Policy defines the fundamental principles, rules of conduct and human rights commitments that Tesmec recognizes, respects and to which all recipients[2] are required to comply with the aim of preventing, managing and, where possible, reducing the impacts of inappropriate management.

The purpose of this Policy is to make respect for Human Rights an essential requirement in carrying out Tesmec activities.

3 Regulatory framework

Tesmec Human Rights Policy is based on declarations and conventions, standards and principles, generally accepted international guidelines and recommendations, as well as strict compliance with company regulations and procedures.

3.1 National and international regulatory framework

Tesmec promotes the founding principles of conventions and declarations of international and European law and, among others, the International Charter of Human Rights of the United Nations (UN), the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the fundamental conventions of the International Labour Organization (ILO) - n. 29, 87, 98, 100, 105, 111, 138, 182 - and the declaration on Fundamental Principles and Rights at Work. In addition to this, private sector standards and voluntary initiatives have been taken into account in their most up-to-date editions, including, for example, the 10 principles of the UN Global Compact and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

Tesmec also complies with Italian regulations and regulations in the countries in which it operates or may operate, such as, but not limited to:

- Legislative Decree 231/2001 on the administrative liability of entities
- Anti-corruption laws
- Laws on freedom and trade union activity in the workplace
- Laws on health and safety in the workplace
- Working time laws
- Environmental laws
- Privacy and personal data protection laws
- Laws on equal opportunities for men and women
- UNI/PdR 125:2022 – Guidelines on the gender equality management system providing for the adoption of specific KPIs relating to gender equality policies in organizations
- Directive (EU) 2023/970 - Pay Transparency and Legislative Decree 96/2026

3.2 Internal regulatory framework

Tesmec has adopted several internal regulatory instruments, aimed at ensuring effective, efficient and transparent management of its activities, as well as respectful of the values expressed in this Policy.

The following internal documents are linked to the principles listed in this Policy and support its implementation:

- Code of Ethics
- Code of Ethics for Suppliers
- Sustainability Policy
- Health, Safety and Environment Policy
- Management, Quality, Environment and Safety System
- Anti-Corruption Policy
- Whistleblowing Procedure
- Diversity policy in relation to the composition of the administrative and management bodies and control bodies of Tesmec S.p.A.
- Integrated Policy on Quality, Information Security, Corruption Prevention and Gender Equality – Tesmec Automation
- Gender Equality Policy – Tesmec Rail
- Policy for managing dialogue with shareholders in general
- Organization, Management and Control Model pursuant to Legislative Decree 231/2001
- Organizational and privacy management model
- Policies and procedures on information security, personal data protection and responsible information management
- Sustainability Reporting pursuant to Article 4 of Legislative Decree 125/2024

This Human Rights Policy supports the Gender Equality Policies listed among the reference documents and constitutes the Group's overarching framework of principles on personal dignity, equality, non-discrimination, inclusion and equal opportunities. The specific commitments, responsibilities, objectives, indicators and operating procedures relating to the Gender Equality Management System are defined and implemented through the dedicated policies and system documentation compliant with UNI/PdR 125:2022, including the related evidence and records.

4 Reference principles

The principles included in this section take into account the relevance that these assume in the context of business activities and relationships. Tesmec strives to respect these principles in every country in which it operates, while taking into account local cultural, social and economic diversity, and requires each stakeholder to adopt conduct in line with these principles.

WORKING PRACTICES

4.1 Child labour, forced labour and human trafficking

Tesmec protects the right to free and voluntary work and does not tolerate any form of forced or compulsory labour, servitude, modern slavery or human trafficking, as referred to in ILO Convention No. 29. Conduct based on coercion, threat, deception, abuse of vulnerability or other practices capable of limiting workers' personal or professional freedom is prohibited. Tesmec also rejects any disciplinary practice involving the use of physical violence and opposes any form of exploitation of children, both in relation to its own employees and workers employed along the supply chain.
The Group does not use child labour and ensures, as part of its recruitment processes, that the age and documentary requirements established by applicable law are verified; in any case, the age shall not be lower than the minimum age established by ILO Convention No. 138.

All workers must be employed on a voluntary basis and must be able to terminate the employment relationship in compliance with applicable laws and contractual terms. Tesmec prohibits the retention of identity documents, passports or other personal documents, as well as any practice that may unduly restrict a worker's freedom.
Tesmec promotes ethical and transparent selection and recruitment procedures that are consistent with the principles of this Policy, prohibits charging workers recruitment fees or costs, and ensures that employment conditions are communicated clearly and comprehensibly.

4.2 Respect for diversity and non-discrimination

Tesmec does not tolerate any form of harassment and/or discrimination in the field of gender, age, ethnicity, nationality, religion, physical or psychological disability, membership of trade unions, political affiliation or sexual orientation. Workers must be treated fairly, respectfully and with dignity, guaranteeing equal opportunities for all.

The terms and conditions of employment, including recruitment, training, working conditions, remuneration, allowances, promotion, discipline, dismissal or retirement, shall be based exclusively on the qualifications, performance, skills and experience of each individual.
Tesmec promotes a structured approach to gender equality, aimed at preventing any form of direct or indirect discrimination and fostering equal opportunities in selection, onboarding, training, professional development, performance evaluation, career progression and access to positions of responsibility.
In this context, Tesmec is committed to providing all its employees with a positive and stimulating work environment, free from discrimination, guaranteeing everyone the recognition, respect and enhancement of their dignity, their rights, their cultural and individual diversity, with the aim of creating a strong Group culture.

To this end, the Group undertakes to define measurable objectives, responsibilities and indicators, in line with applicable best practices and the principles of gender equality as required by applicable legislation, with particular attention to the areas of culture and strategy, governance, human resources management processes, opportunities for women's growth and inclusion, pay equity, protection of parenthood and work-life balance.

4.3 Freedom of association and collective bargaining

Tesmec fully recognizes, respects and guarantees freedom of association and the right to collective bargaining, sharing with trade unions a system of industrial relations based on constant and constructive confrontation, in compliance with current regulations and *best practices*.

4.4 Health, safety and well-being

Tesmec is committed to ensuring high standards of health and safety protection at work by guaranteeing all employees a safe, secure, and healthy working environment, which meets the applicable rules on health and safety at work. It adopts appropriate safety procedures, implements all necessary measures to reduce the risk of accidents, injuries or exposures to harmful substances, minimizing the impact of hazardous situations through the implementation of emergency plans and response procedures.

Tesmec recognizes the fundamental role that training plays in identifying and preventing critical issues in the field of health and safety in the workplace. It therefore guarantees continuous training and ensures that employees are duly informed and updated on these issues.

Particular attention is paid to the development of organizational and welfare measures aimed at promoting people's well-being and the reconciliation of private and professional life, as well as compliance with the legislation protecting protected categories.
Where compatible with organizational and operational requirements, the Group promotes flexible working arrangements, supplementary healthcare, initiatives to support maternity, paternity, caregivers and return to work after prolonged periods of absence, ensuring that access to such measures does not result in disadvantages in evaluation, development or career advancement.
Tesmec also promotes initiatives to listen to workers and gather their feedback, including through structured or independent tools where applicable, in order to monitor the internal climate, identify opportunities for improvement and strengthen oversight of working conditions, inclusion and psychological and physical safety.

4.5 Fair and favorable working conditions

Tesmec undertakes to request work services in compliance with the provisions of the law and the collective bargaining in force in terms of maximum number of working hours, rest periods during the day and during the week and a period of paid vacation per year.
Employee remuneration considers the principle of fair compensation for work and equal pay for women and men for work of equal value, based on objective evaluation in the work to be carried out (ILO Convention No. 100).
Tesmec applies the relevant national collective bargaining agreement and ensures that workers' economic and regulatory conditions are defined in compliance with the applicable CCNL, legal provisions and collective agreements. This framework supports the application of collectively negotiated wages and adequate pay conditions, even in the absence of a specific formalized process for verifying a subsistence wage or 'living wage'.
Tesmec undertakes to periodically monitor any gender pay gaps, including with reference to job classification, role, responsibilities, bonuses, benefits and career advancement, adopting documented corrective actions where necessary. The Group also promotes transparent and objective criteria for the assessment of skills, assignment of duties, participation in training programs and access to growth paths, in order to support balanced gender representation at different organizational levels and in senior roles.

COMMUNITY AND SOCIETY

4.6 Respect for local communities

Tesmec is committed to respecting the rights of local communities and contributing to their economic and social growth by promoting local development.

As part of its activities, Tesmec is committed to contributing to the well-being of the community in which it operates, ensuring respect for the needs of the territory, with the aim of interpreting its needs also in terms of attention to employment levels, and investing in research and development of innovative technologies from an environmental and energy point of view.
Tesmec values dialogue with stakeholders, relations with customers, public bodies, communities and local partners, as well as any documented engagement or consultation initiatives.

ENVIRONMENTAL PROTECTION

Tesmec adopts an environmental management model aimed at continuous improvement and promotes every action aimed at reducing polluting emissions and those of gases considered responsible for the "greenhouse effect", reducing the use of natural resources, recycling materials, and increasing energy efficiency.

One of the Group's strategic objectives is to reduce the environmental impact of its activities, with the aim of minimizing its carbon footprint.

4.7 Fight against corruption

Tesmec is actively engaged in the prevention and fight against corruption through controls that are an integral part of the Internal Control System. Legality, honesty, integrity, fairness and transparency are some of the general principles on which the Group Code of Ethics and the conduct of corporate activities are based. At Group level, the fight against corruption is a responsibility that falls on any person acting in the name or on behalf of Tesmec.

The approach to preventing and combating corruption is substantiated through the implementation and application of two main tools: the Organizational, Management and Control Model pursuant to Legislative Decree 231/01 (including the Group Code of Ethics) and the Group Anti-Corruption Policy. Several Italian companies are already ISO 37001 certified (Management systems for the prevention of corruption).

The Anti-Corruption Policy, adopted by the entire Group, provides a systematic framework for anti-corruption, and prohibits company personnel and anyone acting in the name or on behalf of Group Companies and/or in the interest of the Group, from offering, paying or accepting, directly or indirectly, money or other benefits, for the purpose of obtaining or securing an unfair advantage in the context of business activities.

Tesmec stakeholders are required not to practice or tolerate any kind of corruption, not to offer or promise money, gifts or other benefits, with the aim, even implicit, of acquiring treatment in their favor or an improper advantage towards third parties.

Specifically, Group companies () adopt a Corruption Prevention Management System supported by documents such as a manual, operating procedures, risk assessment, objectives, action plans, whistleblowing protocols, code of conduct and ISO 37001 certificate. The system includes criteria for identifying, assessing and treating corruption risks, as well as controls for reporting irregularities, protecting whistleblowers, ensuring confidentiality and non-retaliation, and managing sensitive or potentially relevant transactions in dealings with external stakeholders.

4.8 Privacy and confidentiality

Tesmec undertakes to protect and appropriately use confidential and intellectual property information, know-how and trade secrets of its stakeholders and to use them exclusively for authorized purposes.

Tesmec undertakes to process personal data and information in compliance with fundamental rights and freedoms, as well as the dignity of the interested parties, with particular reference to confidentiality, personal identity and the protection of personal data. It ensures that personal data are processed lawfully and in accordance with the provisions of current regulations, ensuring, in particular, the relevance of the data processing with the purposes declared and pursued.
In relation to applicable laws, Tesmec oversees the responsible management of information through policies, procedures and operating instructions relating to information security, the use of company assets, the processing of personal data,

incident management and access control. These documents define responsibilities, operating procedures, protection criteria, and measures to prevent and manage events, providing evidence that can be used to demonstrate the approach adopted in relation to information security, data protection and responsible information management.

4.9 Communication

Tesmec is committed to non-discriminatory corporate and business communication that respects different cultures in line with the principles of clarity, simplicity, transparency, completeness and fairness.

Tesmec S.p.A. is a company listed on the Italian Stock Exchange and communicates in accordance with current regulations on internal and external information flows, with particular reference to confidential information and inside information.

ACCESS TO INNOVATION AND INCLUSION

Tesmec mission is to provide solutions to drive the growth and modernization of each Country, promoting innovative, digital and sustainable technologies in the field of infrastructure for the transport of energy, data and materials.
The strategy pursued can be summarized in the term "Glocal": being global but having local presences in areas of the planet to better meet the needs of individual markets. Cultural differences and various skills are reflected in business decisions.

The Group business model is focused on integration between the main players in the market. The goal is to create an inclusive, high-performance environment that supports sustainable progress.

5 Monitoring and reporting system

Tesmec is aware of the importance of a control system that guarantees that human rights performance is supervised and that any risks and negative impacts on human rights are properly monitored and, if present, managed. In fact, Tesmec establishes collaborative relationships with counterparties of consolidated reputation, setting up these relationships in compliance with current legislation and the inspiring principles of this Policy.

To minimize the risks of human rights violations in its supply chain, Tesmec shares with its suppliers the Code of Ethics, which describes the values and expectations of the Group in terms of ethical, environmental and social standards. The Group may carry out assessment and monitoring activities on suppliers and subcontractors to identify, prevent and mitigate the risks of exploitation, forced labour and human trafficking, requiring respect for internationally recognized human rights and the adoption of preventive measures consistent with this Policy.

Tesmec verifies the effectiveness of the approach adopted mainly through dedicated tools, which consist of procedures for the identification and periodic assessment of risks inside and outside the Group, a violation reporting system, a sanctioning system and dialogue activities with stakeholders.
Tesmec maintains documentary and information oversight to support the monitoring of human rights, labour practices, ethics and inclusion policies, including for the purposes of ESG questionnaires and sustainability assessments. This oversight includes the collection, verification and retention of evidence such as certifications, audits, policies, procedures, registers, risk analyses, KPIs, reports, HR documentation, and data relating to training, health and safety, collective bargaining, reporting systems and anti-corruption controls.
The process involves the competent internal contacts, control of document versions and validity, traceability of the responses provided, and updating of evidence that is no longer current. As part of this oversight, the Group may collect and analyze gender equality indicators and, where applicable, use the results to define improvement objectives, action plans, responsibilities, implementation timelines and methods for verifying effectiveness.
Monitoring may also use, where relevant, information available in the Sustainability Reporting and the Group's whistleblowing system, with reference to the types of reports received, management methods, protections provided for whistleblowers, absence of retaliation, and any corrective or preventive actions implemented.
Tesmec provides confidential reporting channels, including through the Group's whistleblowing system, to report suspected cases of exploitation, forced labour, human trafficking or other violations of the principles of this Policy, ensuring whistleblower confidentiality and prohibiting retaliation.

The Group promotes periodic awareness-raising and training activities for employees, managers and functions involved in purchasing and supply chain management processes, in order to strengthen knowledge of the risks related to human rights, forced labour, human trafficking and modern forms of slavery.
Where necessary, Tesmec may collaborate with competent authorities, specialized organizations and qualified stakeholders to prevent and combat exploitation, forced labour and human trafficking. In its relations with suppliers, the Group may provide for corrective measures, suspension or termination of the contractual relationship with parties involved in such practices or other serious human rights violations.
Listening activities and permanent dialogue with stakeholders are also a valid system for monitoring and managing human rights. As required by the Code of Ethics, Tesmec makes available, on the dedicated pages of the Group's institutional websites, systems suitable for receiving reports from stakeholders, protecting the whistleblower in line with current legislation. The reporting process allows the use of dedicated internal channels and, in the cases and manner provided for by applicable law, external channels to the competent authorities. The management of reports is entrusted to the Internal Audit Function which, having verified their relevance and validity on precise factual elements, submits these cases to the attention of the corporate function or the competent corporate bodies, which evaluate the activation of legal actions or the adoption of measures in accordance with the provisions of the law and with the contractual regimes.

Human rights are also subject to specific assessment as part of the double materiality analysis presented in the Sustainability Reporting, prepared pursuant to Legislative Decree 125/2024.

6 Scope of application

The Human Rights Policy applies to all companies of the Tesmec Group, including those based abroad, considering the differences existing from a regulatory, social, economic and cultural point of view.

7 Document distribution

Tesmec undertakes to promote and guarantee adequate knowledge of the Human Rights Policy, disseminating it through the appropriate tools to reach the entire company population, such as, for example, publication on the intranet for employees and publication on the corporate website for external stakeholders.

8 Approval and revision of the Policy

This Policy was approved by the Board of Directors of Tesmec S.p.A. on November 6, 2026. The document will be revised and/or amended whenever necessary, taking into account the internal changes of the Group companies, as well as the external context, enhancing the progress of human rights standards and practices.