



HUMAN RIGHTS PROTECTION POLICY

Purpose and scope of application

This Human Rights Protection Policy (hereinafter also “Policy”) defines the approach and commitment of the Sesa Group (hereinafter also “Group” or “Sesa”) to promoting and ensuring the protection of human rights, in accordance with applicable national and international laws and regulations. As stated in the Group's Social Responsibility Policy, Sesa is committed to operating in full respect of the individual and human and workers' rights. The Sesa Group recognizes its social responsibility and is particularly aware of its responsibility as a company to uphold human rights and related environmental standards.

This Policy applies to the parent company Sesa S.p.A., its subsidiaries and all their workforce, including members of the Corporate and the Supervisory Bodies, Group personnel (including employees, co-workers, and trainees, hereinafter also “Personnel”), as well as suppliers, consultants, partners and, more generally, all those who act in the name of and on behalf of Sesa (in any country in which the Group operates) or with which Sesa enters into contact through its business (collectively, “Recipients”).

The Group is committed to respecting and protecting human rights in all countries where it operates and will identify, mitigate and, where possible, prevent potential human rights violations in its activities and throughout its supply chain. As a member of the United Nations Global Compact, Sesa is also committed to adopting and promoting sustainable and socially responsible policies, in accordance with the human rights principles recognised by international conventions.

The Group requires its suppliers and business partners to comply with these commitments and will take the appropriate measures to prevent any human rights violations within its operations or supply chain. The publication of this Policy is an important opportunity to set out and disseminate the guidelines and principles that the Group implements to protect and support human rights within its organisation and throughout its value chain, defining the principles to be protected, the main responsibilities and the related implementation strategy.

Reference values and standards

The Group believes that compliance with ethical principles is an essential requirement for the success of its business, also considering the impact that ethical issues can have on the company's image and reputation. The Group's activities are regulated by the Code of Ethics and the Organisation, Management and Control Model adopted pursuant to Legislative Decree 231/2001 and are carried out in accordance with the laws and regulations in force in all countries in which it operates.

The principles relating to respect for human rights to which the Sesa Group is committed are based, among other things, on the following international standards and frameworks:



- The International Labour Organisation (ILO) Fundamental Conventions;
- The United Nations (UN) International Bill of Human Rights, consisting of the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;
- The ILO Declaration on Fundamental Principles and Rights at Work
- The Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises;
- The United Nations (UN) Guiding Principles on Business and Human Rights;
- The United Nations (UN) Global Compact;
- UN Global Compact Ten Principles- 2030 Agenda for Sustainable Development;
- The “Manifesto for People and Society” promoted by UN Global Compact Network Italy;
- Regulation (EU) 2020/852 EU Taxonomy with particular reference to the issue of Minimum Safeguards;
- Proposed Corporate Sustainability Due Diligence Directive CSDD.

The Group has also explicitly stated its commitment to protecting human rights in the following key corporate documents:

- Code of Ethics and Conduct;
- Health and Safety Policy;
- Environmental Policy;
- Quality Policy;
- Gender Equality Policy;
- Sustainable Procurement Policy;
- Whistleblowing Policy;
- Anti-Corruption Policy;
- Organisation, Management and Control Models pursuant to Legislative Decree no. 231/01;
- Conflict Minerals Policy.

The ISO 9001 Quality Certification, ISO 14001 Environmental Management Systems and ISO 45001 Occupational Health and Safety Management Systems, which Sesa adopts in full or in relevant areas of its business, constitute good practices and tools for declaring, protecting and monitoring human rights

General principles and best practices

Through this policy, the Sesa Group outlines its commitment to human rights in order to prevent and manage any direct or indirect negative impacts related to its activities. The Group is aware of its influence in the reference context and aims to promote respect for human rights and freedoms – as defined in the Universal Declaration of Human Rights – operating responsibly in order to create value for the benefit of all stakeholders, respecting their rights and contributing to the development of the territories and the well-being of the communities.



▪ Rights associated with labour practices

Health and safety at work

Sesa is committed to ensuring health and safety in all its workplaces, both for corporate and third-party company personnel, in compliance with the regulations in force and through the adoption of the best International practices and standards for the prevention of occupational accidents. Sesa strives to constantly improve its risk prevention and management systems and to embed health, safety, and quality targets in its business, with a “zero accidents” target. The achievements in health and safety are measured through dedicated indicators. All personnel is informed about those, as well as about educational training, and awareness-raising initiatives in this area, which also extend to Sesa’s suppliers and subcontractors.

Working conditions

Sesa is committed to ensuring that the working conditions applied to all personnel fully comply with the legal and collective bargaining framework in force in terms of working hours and days, as well as to ensuring adequate rest and fair compensation. Likewise, Sesa demands that third-party companies operating in its building sites, plants, offices, and sites do the same. Furthermore, Sesa is committed to providing safe, functional working environments that promote the physical and spiritual wellbeing of the people who are working in them.

Rejecting child and forced labour

Sesa rejects child labour as defined by the legal framework in force in the countries where it operates, ensures compliance with the legal working age at all times¹ and rejects any and all forms of forced labour² and any other form of employee exploitation.

Guarantee of freedom of association and respect for collective bargaining principles

Sesa is committed to an ongoing, constructive dialogue with employees, their representatives and other interested parties, based on the principles of transparency and trust, respecting their mutual roles and prerogatives, the relevant European and national laws and regulations, and the practices concerning industrial relations and collective bargaining, the latter being considered privileged tools for confronting and preventing potential social conflicts and for managing any risks relating to the development of corporate strategy. Sesa undertakes to respect the autonomy and independence of trade union organisations and likewise, respects the choices of employees to join the trade union they decide to be represented by.

Fight against violence and harassment

Sesa will not tolerate any form of violence or harassment in the workplace and strives to protect all employees from any and all forms of violation. Specifically, Sesa takes all necessary measures in order to prevent and monitor possible harassment cases and any other form of physical and psychological abuse, paying particular attention to gender-based violence, and is committed to raising awareness and educating employees on issues such as harassment risk and the tools to prevent and combat such behaviours.

¹ Currently 15 years (ILO Convention nr. 128) and 16 years according to Italian regulations.

² Any work or service extorted from a person under threat of punishment or for which that person did not volunteer (ILO Convention No. 29).



Respect for diversity and fight against discrimination

As outlined in the Gender Equality Policy, Sesa considers diversity as an opportunity that deserves attention within the professional sphere, and strives to provide an open, inclusive work environment that is based on meritocracy, enhancement of skills, and the active participation of each individual resource to corporate life and endeavours. Within its business, Sesa strives to ensure fair, equal treatment for all employees and rejects any and all forms of discrimination, be it based on someone's gender, age, ethnic and geographical background, religious, political or union convictions, social or cultural conditions, level of education, disability, family conditions, sexual orientation. The company translates its commitment into action with tools such as awareness-raising initiatives, leveraging partnerships with key agencies, as well as education on inclusion practices and support for the professional growth of all employees, and monitors progress through specific indicators.

Human capital development

Sesa is striving to foster the development of skills, the empowerment of workers and their promotion, the spirit of initiative and the ability to innovate on the ground in order to achieve business results, while respecting the need for work-life balance. Professional growth and employability are guaranteed through various people strategy tools, designed to ensure equal opportunities for professional development and growth according to meritocratic principles. Access to training courses is one of the opportunities for building professional development consistent with expectations, aptitudes and skills possessed or to be acquired.

▪ Rights associated with communities, territories, and management of activities

Ethics in business management and fight against corruption

Sesa rejects corruption in all its forms and promotes the principles of integrity, loyalty and transparency among its staff and business partners. Compliance, in all circumstances, with the laws and regulations in force, as well as with the contents of the Code of Ethics - the acknowledgement and acceptance of which is required of all suppliers -, the specific Company Protocols on the subject of Legislative Decree no. 231/2001, the Anti-Corruption Guidelines and the continuous training of all its employees on the subject, constitute the tools for implementing this commitment.

Environmental protection

Sesa is committed to protecting the environment and to ensuring a fair transition to a sustainable and socially responsible transition, by means of an industrial plan that pays special attention to the environmental footprint and the fight against climate change as well as through initiatives and activities aimed at protecting the environment and living species. Sesa works towards the creation of pollution and accident prevention systems and operates in full respect of the environment, the territories, the ecosystems in order to protect biodiversity and natural habitats, in compliance with the regulations currently in force and by implementing internationally acknowledged best practices and standards.

Respect for territories and communities

Recognising the territory and communities in which it operates as relevant stakeholders, Sesa is committed to a responsible behaviour that translates into creating a climate of respect and trust and, where possible,



accommodating emerging expectations through an active dialogue that promotes sustainable development and the creation of shared solutions throughout the life cycle of infrastructures and activities through which the Company's operations are carried out. Sesa is committed to paying special attention to the most vulnerable communities.

Data confidentiality and security

Seeing the protection and processing of personal data and the right to privacy of its stakeholders as a challenge in the age of digitalisation, as well as the confidentiality of information held in its ICT systems as strategic for the sectors in which the company operates, Sesa is committed to properly maintaining and continuously improving its information security management systems. Processes to ensure confidentiality and integrity of information, as well as the security by design approach aimed at maintaining the resilience of all services, are the tools to implement this commitment.

Monitoring and KPIs Reporting

The Group ensures the effective and efficient management of human rights impacts by:

- Continuous monitoring of impacts (current and potential) and risks on human rights – considering the Group's operations and activities, the external context, international changes (e.g. changes in legislation, principles and standards), as well as the results of stakeholder engagement activities – thanks to the contribution of all departments that assess the Group's impacts and risks, including those associated with human rights, as part of their daily activities;
- Adoption of measures to prevent and mitigate potential and actual impacts on human rights, through the identification of appropriate corrective actions and improvement plans aimed at reducing or eliminating the negative impacts identified through monitoring activities;
- Raising awareness among all company departments to participate in the continuous improvement of their operating context and working environment, promoting increasingly sustainable actions in terms of human rights protection.

The performance achieved in managing its impact on human rights is reported in public documents available to the Group's stakeholders, in particular in its sustainability reporting, which requires the involvement of all active stakeholders. This involvement is essential for evaluating the results achieved and identifying new targets and areas of focus, as well as for identifying any new relevant issues, with the aim of raising awareness among stakeholders and increasing management involvement in pursuing the Policy's goals. Based on monitoring results, the Group is committed to updating this Policy in line with changes arising from external or internal factors.

Management of Reports and non-compliance

Sesa prevents, discourages and handles any violation of the abovementioned principles and supports initiatives aimed at reporting to the Company any conduct acted and/or suffered by stakeholders in violation of this Policy, while respecting the principles of privacy of the whistleblower, through the Whistleblowing Policy.



Sesa has an active Whistleblowing System, so anyone can report illegal behaviour or anything that goes against the Code of Ethics and/or Group Policies. For easy access to the system, the reporting procedure is available on the Group's website. The Company also ensures that employees are aware of these tools and how to access them, through training sessions during the onboarding process and regular communications from the company.

During the process of verifying the accuracy of the Report received, the Reporting Person may be contacted by the Supervisory Body to request any additional information that may be necessary.

Communication, review and updating

The Policy is communicated to all Sesa staff, also through specific training sessions, and is made available on the Sesa website to all stakeholders, ensuring full awareness and further promoting human rights as an integral part of Sesa's value system.

This document will be periodically updated taking into account changes in the regulatory framework, the social context of reference, and corporate strategies

Empoli (FI) - April 30, 2025

Sesa S.p.A.

