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POLICY HUMAN RIGHTS

Rev.	Description	Approved	Date
00	First Emission	Board of Directors	24/06/2025

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1. Introduction

This Human Rights Policy represents a fundamental document of the sustainability and social responsibility strategy of Lumson S.p.A. (hereinafter also “Lumson”).

This policy is based on the principles contained in the Corporate Code of Ethics, reflecting Lumson's ongoing commitment to ensuring full respect for human dignity and fundamental human rights in all its business activities and relationships.

The company's human rights policy intends to affirm, formalize and communicate to all stakeholders – internal and external – the values and principles that guide the responsible behavior of the company, contributing to a fair, inclusive and sustainable work, social and environmental context.

2. Reference standards and Regulations

Lumson recognizes the importance of a comprehensive and integrated approach to the protection of human rights and is committed to respecting, promoting and implementing the principles contained in the main international instruments on the subject, such as: the “United Nations Universal Declaration of Human Rights”, the “Charter of Fundamental Rights of the European Union” the “Declaration on Fundamental Principles and Rights at Work of the ILO”.

These references, together with the Code of Ethics and other internal regulatory instruments provided by the Company form the basis of this policy and inspire company practices towards employees, collaborators, business partners, suppliers, the community in which we operate and all interested parties.

3. Purpose and Scope of Application

This Policy applies to:

- Members of the Board of Directors, supervisory bodies, and company management;
- All employees of Lumson, regardless of the contract applied, the job performed or the location of assignment;
- Collaborators, consultants and interns;
- Suppliers, subcontractors, contractors and business partners, who are invited to adopt standards consistent with these principles.

The company reserves the right to apply disciplinary sanctions or suspend or terminate relationships with third parties who do not respect fundamental human rights or who are responsible for serious violations in this regard.

4. Commitments and Responsibilities

4.1. Respect of Human dignity

Lumson considers each person as a bearer of intrinsic and inalienable dignity. The company condemns any form of discrimination, abuse, harassment, physical, psychological or sexual exploitation, whether in the workplace or in relations with local communities and the territories in which it operates.

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4.2. Non discrimination and equal opportunity

The company actively promotes an inclusive work environment, in which access to employment, training, remuneration, career opportunities and any other contractual conditions are based solely on meritocratic criteria, without any discrimination based on gender, sexual orientation, ethnic or national origin, age, religion, disability or marital status.

4.3. Prohibition of child and forced labour

Lumson strongly opposes any form of child labor, forced, in line with ILO Conventions. Every work activity must be based on free and conscious choice, without threats, coercion or undue pressure.

4.4. Freedom of association and collective bargaining

Lumson recognizes and protects the right of workers to freely associate, to elect trade union representatives and to negotiate collectively, in compliance with national regulations and international conventions.

4.5. Occupational Health and Safety

The protection of health and safety is considered a priority responsibility. Lumson guarantees healthy, safe and compliant working environments with current regulations, promoting the culture of prevention, continuous training and risk reporting.

4.6. Protection of human rights in the supply chain

The commitment of human rights' respect, extends to the entire production chain. Lumson, consistently with the control measures already provided for and expressed in the Code of Ethics, in the Anti-Corruption Policy, in the organisation, management and control model pursuant to Legislative Decree no. 231/2001 and in other internal regulatory instruments, selects and monitors its suppliers, through specific due diligence processes, based on ethical and sustainability criteria, promoting the sharing of standards of conduct that reflect the principles of this policy.

4.7. Community and territory

We are aware of the impact our activities can have on local communities. We operate with respect for the territory, promoting sustainable practices and transparent relationships with local stakeholders.

4.8. Data Protection and Privacy

The confidentiality of employees' and stakeholders' personal information is protected through transparent procedures and appropriate tools to ensure data protection, in accordance with the GDPR and applicable regulations.

5. Reporting and Awareness Mechanisms

Lumson encourages an open and transparent dialogue; to this end, we organize training and awareness-raising moments on human rights, the work ethic, equality and the fight against all forms of harassment or abuse.

We have activated a confidential reporting channel, even anonymous, available to anyone who wants to report behavior that is not aligned with this policy. Reports are managed in a serious, transparent way and with absolute protection of the person reporting, in full compliance with the legislation on whistleblowing reports (Legislative Decree 24/2023 on whistleblowing).

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6. Communication

This Policy is:

- given to all workers at the time of hiring;
- published on corporate platforms (SharePoint, HR portal, website);
- posted on company noticeboards;
- promoted through information moment

7. Conclusion

Respect for human rights represents for Lumson an essential value and a central element of its strategic and cultural vision. Only through the active promotion of fair, inclusive working conditions that respect human dignity, is possible to generate value for the company', workers, customers, suppliers and the community.

Lumson is committed, today and in the future, to being a model of social responsibility, contributing to the development of an ethical and sustainable production system, capable of combining innovation, competitiveness and respect for the person.

8. Updates and Revisions

The Policy is subject to periodic reviews and updates to ensure its adequacy and effective implementation in line with evolving international standards and regulatory requirements. All updates must be submitted to the Board of Directors for approval to ensure alignment of the Policy with Lumson's fundamental principles and strategic vision.