

Giordano Controls Human Rights Policy

Document Control

Field	Information
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Review frequency	Every two years or whenever significant changes occur; next [date]
Document classification	Public

1. Purpose

The purpose of **Giordano Controls Human Rights Policy** is to establish a framework for action to guide Giordano Controls in respecting human rights recognized in international reference frameworks in all its activities and in all markets where it operates. This Policy defines the principles and establishes the commitments, which are materialised through specific goals, strategies and lines of action integrated into the Company's business and management strategies.

2. Field of application

The scope of this Policy covers the parent company in Italy; its subsidiaries; and those investee companies over which it exercises control. It also extends to our business partners, suppliers and third parties acting on behalf of Giordano Controls.

It applies to all areas of the company: its own operations; value chain; products and services; and stakeholders, as well as all employees, managers and collaborators of the Company, regardless of their geographical location or role within the organisation.

3. Commitments

The Giordano Controls' commitments in **human rights management** are:

- In our relationships with our employees:
 - **reject any discrimination** based on gender, sexual orientation, ethnic origin, religion, age, disability, ideology, nationality, marital status or any other distinction of the person;
 - **reject any form of harassment**, forced labour and any form of labour exploitation, especially that of children, promoting decent employment;
 - respect **freedom of association**, the right to collective bargaining and the exercise of trade union activity; and
 - ensure **occupational health and safety**, and a **healthy environment**, complying with legal requirements, adopting relevant standards and procedures, and promoting a safety culture.

- In relations with different stakeholders:
 - require the **supply chain** to comply with our code of conduct and demonstrate the highest level of integrity and ethical conduct in all its business activities; and
 - recognize and strengthen respect in local communities for the rights of **ethnic minorities** and **indigenous peoples** in the places where it operates.
- **Impact, risk and opportunity management:** identifying, assessing, managing and remedying impacts, risks and opportunities, both in our own operations and in the value chain, considering the recommendations of leading organisations.
- **Awareness, training and involvement:** establishing training and information programmes, as well as channels for participation, so that everyone at Giordano Controls takes responsibility for carrying out the actions planned to comply with the policy, objectives and management system.
- **Transparency and disclosure of results:** disclose results and progress achieved in a transparent and regular manner.

4. Approval and follow-up

- **Approval:** this Policy has been developed by Giordano Controls' Sustainability Committee, which is responsible for its implementation, thus reflecting senior management's commitment to **human rights management** and ensuring its integration into the company's overall strategy. It is approved by the Board of Directors of Giordano Controls S.p.A.
- **Follow-up:** the Sustainability Committee will oversee the implementation of this Policy. It is composed of representatives from different areas of the company and reports directly to the Giordano Controls Board of Directors.
- **Review:** this Policy is reviewed periodically, and at least every two years, by the competent Policy Owner. Where necessary, it is updated to reflect Giordano Controls' commitments and objectives in this area, changes in applicable legislation, organisational developments and relevant comments or suggestions received from stakeholders. Substantial revisions are submitted to the Board of Directors for approval. Editorial or non-substantial updates may be managed by the competent corporate functions, if they do not alter the scope, commitments or responsibilities defined by this Policy.
- **Availability:** Giordano Controls makes this Policy available on its website to interested parties who may be affected and to interested parties who should contribute to its implementation.

5. Revision History

Version	Date	Approved by	Description of changes
v1.0	16/09/2026	Board of Directors	First issue