
M384 Human Rights Policy

1. INTRODUCTION

Silcart is committed to respecting, promoting, and protecting human rights in all its activities and business relationships, in line with the main international standards (UN Human Rights, ILO Conventions, Agenda 2030) and applicable legislation.

Silcart recognizes that the protection of human rights also extends to the supply chain and undertakes to act with an approach based on prevention, due diligence, and continuous improvement.

2. SCOPE OF APPLICATION

The contents of this Policy apply to all Silcart employees and collaborators, regardless of level or hierarchical position, as well as to suppliers, business partners, and other relevant stakeholders, where appropriate.

3. GENERAL PRINCIPLES AND SPECIFIC COMMITMENTS

Silcart promotes a working environment founded on dignity, respect, and equal opportunities. Any conduct that may result in or contribute to violations of human rights is prohibited and actively opposed. In line with these principles, Silcart defines and implements the following specific commitments, applicable to employees and collaborators and, where relevant, to partners and parties operating along the value chain.

Dignity, Non-Discrimination and Inclusion

Silcart is committed to creating and maintaining a working environment based on respect and recognition of the value of every individual. No form of discrimination, harassment, or behavior harmful to personal dignity is tolerated. Professional relationships must be based on fairness, loyalty, and mutual recognition of each person's contribution.

Child Labor, Forced Labor, Servitude and Human Trafficking

Silcart strictly prohibits and categorically rejects any form of child labor, as defined by applicable national and international legislation, and adopts appropriate controls to prevent and identify related risks, including along the supply chain.

Silcart does not accept, under any circumstances, forced labor or work performed without the free and informed consent of the individual, nor situations of servitude or human trafficking.

Health, Safety and Well-Being

Silcart considers the protection of health and safety a non-negotiable value and is committed to:

- Complying with applicable regulations;
- Adopting preventive and risk mitigation measures;
- Ensuring information and training;
- Promoting a psychologically healthy environment and fostering organizational well-being.

Freedom of Association and Social Dialogue

Silcart recognizes workers' right to freely establish and join trade union organizations and to participate in collective dialogue.

All interactions with such representatives take place in a climate of cooperation, transparency, and mutual respect, with the aim of fostering constructive relationships.

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Equal Treatment and Inclusion

Silcart is committed to ensuring equal opportunities for access, professional development, and treatment, regardless of personal characteristics such as gender, ethnicity, religion, sexual orientation, age, disability, or opinions. All decisions must be based exclusively on professional and merit-based criteria.

4. DUE DILIGENCE AND SUPPLY CHAIN

Silcart adopts a risk-based due diligence approach to prevent and mitigate negative impacts on human rights along the supply chain.

In particular, Silcart requires acceptance of minimum principles (e.g. supplier code of conduct/contractual clauses), may request documentary evidence and activate checks or audits based on risk, and defines corrective actions and improvement plans in the event of serious violations or lack of cooperation.

5. GRIEVANCE AND REPORTING MECHANISMS

Silcart encourages reporting, including on a confidential basis, of suspicious or non-compliant behavior with respect to this Policy, ensuring confidentiality, protection of the reporting party, and prohibition of retaliation.

Reports may be submitted through dedicated company channels. Operational guidelines on the management of reports (whistleblowing), including submission methods, investigation procedures, and safeguards, are published and available in the “Compliance Documents” section of the company website:

<https://www.silcartcorp.com/compliance-documents/>.

Reports are handled with impartiality and confidentiality, in compliance with applicable legislation, and may result—where necessary—in corrective actions and disciplinary or contractual measures.

6. MONITORING AND CONTINUOUS IMPROVEMENT

The effectiveness of this Policy is periodically monitored through internal controls, reviews, and, where applicable, targeted checks or audits. The results feed corrective actions and continuous improvement initiatives.

7. VIOLATIONS AND SANCTIONS

Failure to comply with this Policy may result in disciplinary and contractual measures, in accordance with applicable regulations.

8. APPROVAL, COMMUNICATION AND REVIEW

This Policy is approved by Top Management, communicated internally, and made accessible to stakeholders (e.g. company website / intranet). It is reviewed at least annually or in the event of significant regulatory or organizational changes.

Place and date

Carbonera, 23/09/2025

SILCART SPA

