



Human Rights Policy

Italian Cable Company

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Human Rights Policy

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HUMAN RIGHTS POLICY

Italian Cable Company S.p.A. (hereinafter referred to as 'ICC' or 'the Company') fosters the dissemination of a culture of respect for human rights, promoting a management approach based on principles of fairness, integrity and respect, which it considers to be essential and indispensable values, both in internal relations and in dealings with third parties.

This policy has therefore been established with the objective of formalizing the Company's commitment to the protection of Human Rights, in line with the principles started in the Code of Ethics and the Supplier Code of Conduct, which guide ICC in carrying out its activities in a transparent and responsible manner.

1. REGULATORY FRAMEWORK OF REFERENCE

ICC's activities comply with the principles established by the standards published by International Organizations of Human Rights , including:

- The United Nations International Bill of Human Rights, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights;
- The Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO);
- The European Convention on Human Rights;
- The United Nations Global Compact.



2. ICC'S COMMITMENT

2.1. DISCRIMINATION AND HARASSMENT

ICC opposes any form of direct or indirect discrimination based on gender, age, ethnic origin, nationality, political and trade union opinions, religious beliefs, gender identity, individual vulnerabilities and any other personal characteristic, and is committed to preventing discrimination in all areas of working life.

The Company actively promotes equal treatment and opportunities through the adoption of transparent procedures and the monitoring of fairness in recruitment, compensation, and professional development processes. ICC also encourages an inclusive environment, where each individual is valued for their abilities and diversity.

Likewise, ICC firmly condemns any form of harassment - whether physical, verbal or psychological - and promotes a safe and respectful workplace for all employees, by providing an anonymous reporting system to ensure the prompt and proper handling of any instances of discrimination or harassment.

2.1.1. GENDER EQUALITY

ICC adopts fair and non-discriminatory practices towards employees of both sexes.

The Company has obtained the UNI/PdR 125:2022 certification on gender equality, as a recognition of its inclusive policies and practices. This achievement highlights the importance placed on promoting a fair and respectful environment, in which gender differences are valued as a source of enrichment.



2.2. CHILD LABOUR, FORCED LABOUR AND HUMAN TRAFFICKING

ICC rejects all forms of worker exploitation, including child labour and forced labour, and condemns human trafficking in all its forms. The minimum working age is regulated by the applicable legislation of the country where the activity is conducted.

The Company requires its suppliers to fully comply with the applicable regulations regarding human rights and working conditions. The Company expects all parties with whom it collaborates to adopt similar ethical standards, such as the prohibition of child or forced labour, and to ensure the respect for workers' dignity and rights throughout their production processes. To this end, ICC reserves the right to include contractual clauses requiring compliance with these principles and to act promptly in case of any reported or detected non-compliance.

2.3. WORKING CONDITIONS

ICC promotes a working environment based on trust, dialogue and mutual respect, and safeguards the well-being of its employees and the balance between private and professional life, in accordance with contractual agreements and local regulations.

The Company is committed to promoting career guidance and training for its personnel with the aim of fostering the development of new skills.

2.3.1. REMUNERATION AND BENEFITS

ICC defines its employee remuneration system based on a set of criteria, including the characteristics of the role, the assigned responsibilities, and the individual's skills, paying particular attention to ensuring impartiality, equal opportunity, and meritocracy, avoiding any logic of discrimination.

2.3.2. WORKING HOURS

The Company complies with the laws, regulations, and applicable collective labour agreements regarding working hours and overtime, including breaks, rest periods, holidays and various types of leave.

2.4. OCCUPATIONAL HEALTH AND SAFETY

ICC considers the health and safety of workers a fundamental value and takes a proactive role in maintaining a safe and healthy working environment, by adopting high standards of prevention, risk assessment, and management, as well as by constantly promoting and disseminating a corporate culture oriented toward health and safety at work.

ICC demonstrates its commitment through the adoption of specific policies and procedures, the organization of regular training programs for employees, and the provision of equipment and tools compliant with current regulations. Furthermore, the Company constantly monitors risks, ensuring compliance with local and international regulations and fostering continuous improvement of safety conditions.



2.5. FREEDOM OF ASSOCIATION

ICC recognizes the right of its workers to form trade union associations and to engage in collective bargaining.

The Company maintains open and transparent relations with trade unions and workers' representatives, in the belief that only through continuous and constructive dialogue can the most balanced solutions be reached with respect to the expectations of all stakeholders.

2.6. PRIVACY

ICC acknowledges the importance of protecting the privacy of individual whose personal data is processed and regards the protection of such rights as a core value.

The Company is committed to processing personal data in accordance with applicable national and international regulations, ensuring the correct, transparent and responsible use of the information collected.

ICC adopts appropriate technical and organizational measures to prevent data security breaches and raises employee awareness about the importance of privacy protection. Furthermore, ICC ensures that all its stakeholders have access to clear and comprehensible information on how data is processed, thereby promoting trust and mutual respect.



2.7. LOCAL COMMUNITIES

ICC ensures the respect for the rights of local communities, safeguarding their environmental, social, and cultural heritage.

The Company is committed to developing its activities in a way that minimize negative impacts and maximise benefits for the communities in which it operates, promoting sustainable and inclusive development.

ICC also promotes the content of this Policy along its supply chain, establishing clear expectations for its business partners to ensure they share the same principles of Human Rights protection and respect for local communities.

2.8. RELATIONSHIP WITH SUPPLIERS

ICC requires its suppliers to comply with the Code of Ethics, the Organization, Management and Control Model, and the Supplier Code of Conduct.

The Company has approved a Supplier Code of Conduct, which establishes the minimum standards the Company expects from its business partners, ensuring that they comply with all applicable laws and regulations concerning human rights.

Through this Code, ICC reaffirms the commitment to collaborating with suppliers who share the Company's values and operate in compliance with international and local regulations.



3. REPORTING AND CONFIDENTIALITY

The Company encourages its stakeholders to report in good faith, including anonymously, any act or omission committed by anyone within ICC, in dealings with the Company, or on its behalf, that constitutes or may constitute a violation or inducement to violate the principles set forth in this Policy.

Any reports of violations of the above principles may be submitted in accordance with the "Whistleblowing Procedure" available on the official company website, in the dedicated section.



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