

Introduction

Comer Industries and Walterscheid Powertrain Group (hereafter “the Company”) are committed to act as an active entity in respecting human rights and safeguarding the well-being of the people and partners working in and for the Company, as well as who live in the community in which it operates.

Therefore, the Company rejects all sorts of discrimination, violence, forced or child labor and undertakes to respect, protect and promote human rights while conducting its business activities, with particular focus on the recognition and safeguarding of the dignity, people’s freedom and equality, the protection of labor and trade union freedoms, health and safety, as well as the values and principles regarding transparency and sustainable development.

Regulatory frame

In actively acting for the respect and protection of fundamental human rights, the Company endeavors to follow and disclose the principles set out in the regulatory standards issued by recognized international organizations and institutions, such as:

- *The Universal Declaration of Human Rights* and subsequent international conventions on civil, political, economic, social and cultural rights;
- *The United Nations Conventions on women's rights*, on the elimination of all forms of racial discrimination, on the rights of the child, on the rights of people with disabilities;
- *The Declaration on Fundamental Principles and Rights at Work* and the eight fundamental *Conventions of the International Labor Organization (ILO)*;
- *The 2030 Agenda for Sustainable Development* adopted by the General Assembly of the United Nations and the related 17 Sustainable Development Goals.

Furthermore, the most recent versions of the following regulations and voluntary initiatives were also considered:

- *The Ten Principles of the United Nations Global Compact*;
- *The of the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises*;
- *The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy* of the International Labor Organization;
- *The United Nations Guiding Principles on Business and Human Rights: implementing the United Nations “Protection, Respect and Remedies” Framework*;
- *UK Modern Slavery Act*;
- *Standard no. 5 of the Performance standards on Environmental and Social Sustainability* of the International Finance Corporation

With reference to internal regulatory frame, this Policy reinforces what has already been stated in the *Company Code of Practice and Conduct*, the *Diversity & Inclusion Policy*, the *Quality, Sustainability and Product Responsibility Policy*, the *Information Security Policy*, the *Anti-Corruption Rule Policy* as well as in the set of Company procedures.

Policy objectives

This Policy, integrated in the *Our Bright Impact* program, outlines the founding principles and actions taken to protect human rights in carrying out Company activities and, in general, in every context in which it operates, involving also the business partners.

The integration of these principles in the organizational processes aims to generate long-term sustainable economic returns as well as to mitigate the risks associated to the violations of human rights along the operations and relevant regulatory standards, always considering the expectations of its stakeholders.

Principles

The Company undertakes to respect and promote in each country in which it operates and among its stakeholders the following principles, with particular attention to high-risk or affected by conflicts contexts and considering the local cultural, social and economic diversities.

Forced, bonded and compulsory labor

The Company rejects the use of any type of forced, bonded or compulsory labor and any form of slavery and human trafficking, as defined by Convention no. 29 of the ILO.

The Company ensures that all employees are not limited by physical restrictions, abuses, threats and practices such as withholding identity documents or valuables, having the right to work freely, to be aware in advance of the working conditions and to be regularly paid. As consequence the work performance, both ordinary and extraordinary, is free expression of the will of the workers and is free of any form of physical or psychological coercion.

The Company undertakes to fully comply with the specific ILO Conventions on this point, or, where more restrictive, with the labor laws applicable in the countries where it operates.

Child labor

The Company recognizes the human rights of children, such as the right to education, the right to play and their basic needs.

The Company does not use any form of child labor, refusing the employment of personnel under the minimum age for entry into the world of work required by law, as defined by the regulations in force in the countries where it operates.

Diversity and non-discrimination

The Company promotes the principles of diversity, inclusion, equal treatment and opportunities in the belief that diversity represents a strategic element for corporate competitiveness and people development. On this regard, the reference is the *Policy on Diversity and Inclusion*.

Freedom of association and collective bargaining

The Company protects the right of its employees to form or take part in organizations aimed at defending and promoting their interests. It also respects workers' right to be represented by trade unions or other forms of representations elected according to the laws and practices in force in the various countries in which they work.

The Company believes that collective bargaining is the preferred tool for determining the contractual conditions of the employees as well as for regulating relations between the Company management and the trade unions. It also endeavors to ensure that persons engaged in the organization or representation of workers are not in any way penalized or subjected to forms of retaliation.

The Company adheres to the ILO Conventions on freedom of association, collective bargaining and workers' representatives, as well as the local legislation of the countries in which it operates and, where applicable, national collective labor agreements and their additions.

Working hours, wages, allowances

The Company guarantees working conditions that respect health, safety, well-being and dignity, maximum number of working hours, rest periods during the day and during the week and a period of paid vacation per year.

The Company ensures aligned remuneration, based on the principles of fair remuneration for work and equal pay by gender and on an objective evaluation of the performances. The minimum remuneration cannot be lower than that provided for by the collective agreements and by the applicable legislative and regulatory treatments in force in the countries in which the work is carried out.

The Company strives to operate in full compliance with the applicable laws on insurance and social security and wage conditions, benefits, working hours and overtime promoting also work-life balance for its employees.

Culture and education

The Company develops systematically initiatives and projects to promote the people's right to education. On this perspective it is committed to promoting the professional and cultural growth of its employees and those involved in the Company's activities by planning training sessions and facilitating exchange programs with higher education institutions.

Rights of communities

The Company is aware of the influence, even indirectly, that its activities can have on the local communities in the countries where it operates; therefore, it undertakes to respect their rights and to reduce the social and environmental impact of its activities.

In addition, according to the targets of sustainability development, the Company contributes to the social and economic growth of local communities developing cultural, social and economic initiatives and promoting the inclusion, with high focus on the area of education and training.

The Company acts to build a solid cooperative relationship with the communities, with the aim of creating long-term value and opportunities for growth and development, as well as to establish an open and transparent dialogue and relationships based on mutual trust.

Health, safety and environment

The Company promotes and spreads a culture of health, safety and well-being as an objective of primary importance for sustainable development, to be achieved in compliance with current legislation and internal policies.

The protection of the environment and natural resources, the fight against climate change, and the contribution to sustainable economic development are recognized as strategic factors in conducting Company business. The Company endeavors to purchase and deliver products and materials complying with the applicable international recognized standards and laws and minimizing social and environmental negative impact.

On this regard, the reference is the *Quality, Sustainability and Product Responsibility Policy*.

Privacy

The Company strives to respect and protect the individual freedom of thought, conscience and religion, expression and information, with high focus on protection of personal data and private life of all stakeholders.

On this regard, the reference is the *Information Security Policy*.

Policy measures

An extensive and systematic process of due diligence is the driver for the deployment and implementation of the commitments expressed in this document. The risk assessment, in combination with the gap analysis, is the base for defining improvement actions to be applied at the local and global level. The risk assessment process is composed of the following steps:

- identification of Company processes and organizational areas, suppliers and partners with potential risk of violation of human rights;
- risk identification and evaluation in terms of magnitude and probability and assessment of the adequacy of the relevant mitigation and remedial measures adopted;
- audits in the areas associated with higher level risks;
- definition of prevention and mitigation action plans, including extension, standardization, reviewing existing procedures and control measures, training and awareness initiatives.

Any stakeholder, whether internal or external, is allowed to report violation of human rights by using the official communication channels reported in the Code of Practice and Conduct. Reports are managed in accordance with all applicable laws and Company procedures.

The Company guarantees the whistleblowers in good faith against any type of retaliation, discrimination or penalization, ensuring the confidentiality of the whistleblower's identity, without prejudice to legal obligations and the protection of the rights of the Company or of the persons wrongly accused or in bad faith pursuant to applicable laws.

In case of human right violation or failure to comply with this Policy, the sanctions reported in the *Disciplinary System* are applied, as an integral part of the contractual obligations of employees, collaborators and, more generally, of all stakeholders.

The Company undertakes to spread the principles of this Policy by using internal and external communication channels.

Approval of Policy

Name: PRESIDENT AND CEO – Matteo Storchi

Date: October 2022

Signature:

