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HUMAN RIGHTS POLICY



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1. Introduction

- 1.1. **Eurotherm S.p.A** (“the Company”) and its subsidiaries recognize human rights as a fundamental value. It is committed to upholding, protecting, and promoting the human rights of its employees as well as people within the communities and sphere of influence within which it operates. This commitment is enshrined in the **Eurotherm S.p.A** Code of Conduct and Business Ethics.

2. Purpose

- 2.1. The purpose of this policy is to stipulate the Company’s’ multinational stance in ensuring responsible business practices in upholding human rights within all our operations.
- 2.2. The Company is committed to respect, protect, and promote human rights and to avoid complicity in human rights abuses.
- 2.3. This policy sets out the various areas that impact human rights and the perspective of the Company in this regard.

3. Objective

- 3.1. The primary objectives of this policy are:
 - To provide guidance to employees on the behaviours expected in accordance with the Company’s culture and/or values, as set out in the Code of Business Conduct & Ethics;
 - To promote fair and sound human rights practices within the Company, and;
 - Give effect to the United Nations Global Compact Principles insofar as it relates to human rights.

4. Definitions

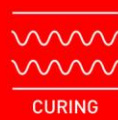
- 4.1. In accordance with the Universal Declaration of Human Rights compiled by the United Nations, “Human rights are rights that belong to an individual or group of individuals as a consequence of being human.”

5. Scope

- 5.1. This policy applies to all employees, contractors, service providers and customers of the Company.

6. References

- 6.1. This policy must be read together with and reinforces the following existing policies of the Company in which human rights are embedded:
- 6.2. Code of Conduct and Business Ethics;
- 6.3. Safety, Health, and Environmental Policy, and;
- 6.4. The above list is not exhaustive but is illustrative of the fact that various elements of human rights have been interwoven and integrated into the Company policies, practices, and standards.
- 6.5. In developing this Policy, we are guided by the principles of the following human rights standards:
 - The Universal Declaration of Human Rights



- UN Guiding Principles on Business and Human Rights
- The Constitution of Italy
- Legislation pertaining to human rights in the countries where we operate

7. Responsibility

- 7.1. The Human Rights Policy is overseen by the leadership of the Company.
- 7.2. The Executive, Country Managing Directors, General Managers and Senior Managers are responsible for ensuring that this policy is implemented and adhered to at each operational workplace and within the various functions and disciplines.

8. Policy Statement

The manner in which the Company seeks to give effect to its commitment is illustrated but not limited to the areas listed below:

8.1. Ethics

The Company expects all employees, contractors, and suppliers to share its commitment to high moral, ethical and legal standards and creates conditions where all can work with dignity.

8.2. Diversity and Inclusion

The Company promotes diversity and inclusion and strives to maintain workplaces that are free from unfair discrimination or harassment based on race, sex, colour, nationality, religion, age, sexual orientation, gender, marital status, family status, disability, or any other arbitrary grounds.

8.3. Freedom of Association and Collective Bargaining

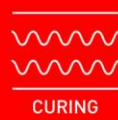
The company respects the employees' right to join, form or not to join a labour union. It is committed to establishing constructive dialogue with organized labour and the freely chosen representatives of employees and to bargain in good faith within the appropriate national legal frameworks.

8.4. Safe and Healthy Workplace

The safety, health and wellbeing of employees is a top priority. The company aims to provide and maintain a safe, healthy, and productive workplace that complies with applicable laws, regulations, and internal standards. Working together with employees and contractors it continually aims to proactively identify and eliminate/reduce risks of accidents, injury, and health impacts.

8.5. Forced and/or Compulsory Labour

All forms of forced and/or compulsory labour are prohibited.



8.6. Child Labour

Children up to and below 18 years of age are forbidden from employment at any Company operations.

8.7. Working Hours, Pay and Benefits

The Company complies with applicable labour and employment legislation and strives to remunerate employees competitively relative to comparable industry and market norms.

8.8. Security

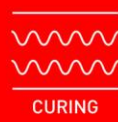
Security procedures are in place to protect employees and assets and to provide a secure and sustainable environment in which the business can operate.

8.9. Conducting Business as a Responsible Member of Society

The Company respects the rights of people in the communities impacted upon by its activities. It seeks to identify risks and adverse impacts that may potentially affect local communities. It finds ways to consult and engage with said communities with the intention of crafting workable solutions to address/avoid/minimise and or mitigate concerns.

9. Implementation Procedures

- 9.1. In the fulfilment of their daily tasks and activities managers and employees are expected to observe and respect human rights and continuously assess opportunities to improve processes in order to prevent human rights violations to people within the business and the value chain.
- 9.2. Where necessary the Company shall ensure that employees, contractors, and service providers are familiarised with human rights issues that are relevant to their activities.
- 9.3. Where relevant the Company will conduct awareness and communication campaigns for contractors, service providers and employees.
- 9.4. Employees, contractors, and service providers are encouraged to report any suspected violations of the policy by the Company, its representatives or suppliers and service providers to the relevant executives or senior managers.
- 9.5. The Company undertakes to provide for and cooperate in reasonable, fair and/or equitable remediation where adverse human rights impacts have been caused by or resulted from its business activities.



10. Non-compliance

- 10.1. Non-compliance with this policy and the procedures associated with it may result in disciplinary action and even dismissal.
- 10.2. Any transgressions by contractors, service providers and suppliers will result in the implementation of appropriate corrective and remedial action.

11. Communication of Policy

- 11.1. For the policy to be sustainable, it must be supported by a structured education, communication, and awareness program, primarily driven by the activities undertaken by Human Resources.

12. Administration

- 12.1. Eurotherm S.p.A has the overall responsibility for the maintenance and operation of this policy.

13. Policy Review

- 13.1. This policy shall be reviewed as and when required to factor in any changes in legal frameworks, organizational development, and economic trends.

We request that our Staff, Volunteers, Member and Visitors respect this Policy, a copy of which will be available on demand.

Approved by the Management

Paolo Giuliani

Signature and name of a senior executive/CEO representing the company.