

## Social Responsibility and Human Rights Protection Policy

Webuild S.p.A. (hereafter Webuild) is a leader in design and construction of large, complex infrastructures and bases its activities on the principles of sustainable development. Guided by its values of "Excellence", "Respect", "Sustainable Innovation", "Integrity" and "Trust", the Group contributes to the economic development and social well-being of the countries in which it operates. In conducting its business, Webuild respects human rights in accordance with the principles contained in the International Bill of Human Rights, the Fundamental Conventions of the International Labour Organisation, the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the following principles:

**1 Child labour** - Webuild does not tolerate any form of child labour and fully respects the minimum age set by applicable legislation. No workers are employed below the age for completing compulsory schooling and, in any case, below 15 years old. The minimum age for performing activities that, due to their nature and circumstances, may affect the psycho-physical health of young workers is determined at 18 years.

**2 Forced labour and human trafficking** - Webuild prohibits all forms of forced, compulsory and illegal labour, as well as slavery and human trafficking. Workers are not required to incur expenses, make cash deposits or hand over their identity documents in order to perform the assigned work, nor are they subject to restrictions on their freedom of movement, except for objective security reasons. Special attention is paid to migrant workers, who receive detailed information on living and employment conditions before leaving their country of origin and are free to resign, subject to the applicable notice period.

**3 Occupational health and safety** - Webuild is committed to providing a healthy and safe working environment, promoting a culture of health and safety in the workplace and ensuring that workers are adequately trained and possess the necessary skills and suitability to perform their assigned tasks.

**4 Freedom of association and right to collective bargaining** - Webuild recognises the right of its workers to form organisations or associations, to join trade union bodies of their choice, to bargain collectively and to form peaceful assemblies, in compliance with applicable legislation. The Company does not discriminate against employees who join trade unions or against workers' representatives. Where these rights are restricted or prohibited by local laws, Webuild is committed to facilitating the adoption of alternative legal methods of worker dialogue.

**5 Non-discrimination and harassment** - Webuild respects the dignity of its workers. It is committed to treating them with fairness and respect, ensuring that they enjoy equal recognition for equal work. At each stage of the employment relationship, all decisions are based on fair and objective criteria, and no form of discrimination is allowed based on gender, nationality, ethnicity, social and civil status, religion or any other characteristic protected by applicable laws or independent of work requirements. Webuild also opposes any attitude detrimental to the person, including harassment, intimidation, threats, coercion, insults and bullying.

**6 Diversity and inclusion** - Webuild is committed to creating and promoting inclusive workplaces where diversity of background, gender, age, experience and thinking is recognised, promoted and valued. It supports its workers in developing their competencies in order to reach their full potential and thus ensure their best contribution to the organisation.

**7 Fair and favourable working conditions** - Webuild is committed to always treating all staff with dignity and respect in disciplinary practices. The company offers fair and favourable living and employment conditions, in compliance with applicable laws on working hours, overtime, holidays, benefits and housing. It also undertakes to pay wages that meet the minimum wages required by applicable laws and collective agreements. Wages are paid directly to workers, regularly and without delay.

**8 Local communities and indigenous peoples:** Webuild respects the rights and culture of local communities and indigenous peoples directly affected by its activities, and acts in accordance with applicable laws, contractual obligations and those arising from environmental and social impact assessments of projects. The company is committed to contributing to the economic and social development of the territories in which it operates by hiring and training local workforce, supporting local suppliers and promoting social initiatives. Webuild also ensures the freedom and safety of the communities surrounding its operations by ensuring that staff are duly informed of the principles of this policy.

**9 Value chain:** Webuild promotes respect for human rights in its value chain, ensuring that suppliers, subcontractors and partners are informed about the content of this policy and encouraged to respect its principles towards all stakeholders, including their workforce and supply chain.

**10 Reporting systems** - Webuild establishes grievance mechanisms accessible to employees and other interested parties in order to collect reports on its operations, guaranteeing reporting parties from any retaliatory action.

Webuild believes that all the above-mentioned, together with the Company's Code of Ethics and the Code of Conduct for suppliers, can make a decisive contribution to improving the general conditions of management and enhancement of human assets and, to this end, is committed to sending a strong message to all interested parties (workers, suppliers, customers, public opinion, trade unions, public authorities, etc.) aimed at the knowledge, respect and application of the requirements of the SA8000:2014 standard. This policy is also the basis for the preparation of Webuild's Integrated Management System in all operational units and for all phases of Projects (from tenders to testing and hand-over to the client) and is made available to all Webuild workers worldwide, as well as to its suppliers and subcontractors.

The Company has set up the Social Performance Team, which periodically carries out a risk assessment related to Social Responsibility and monitors performance. *Webuild's top management monitors the application of this Policy by periodically reviewing its performance against the defined objectives.*

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