



P.LE.01

HUMAN RIGHTS POLICY

(REV. 00 - 29/07/2025)

TABLE OF CONTENT

1. PURPOSE AND COMMITMENT.....3

2. SCOPE.....3

3. INTERNATIONAL STANDARDS.....3

4. FUNDAMENTAL PRINCIPLES4

5. DUE DILIGENCE FRAMEWORK.....6

 DUE DILIGENCE IN OUR OWN OPERATIONS (COMPANY)6

 DUE DILIGENCE IN THE SUPPLY CHAIN7

6. STAKEHOLDER ENGAGEMENT.....8

7. AWARENESS AND TRAINING.....8

8. WHISTLEBLOWING CHANNEL.....9

9. CONSEQUENCES OF NON-COMPLIANCE.....9

10. RESPONSIBILITIES.....9

11. COMMUNICATION AND EXTERNAL REPORTING9

12. GLOSSARY10

13. REFERENCE DOCUMENTS.....10

HUMAN RIGHTS POLICY

1. PURPOSE AND COMMITMENT

Brembo recognizes that its global leadership in braking systems is deeply connected to the wellbeing, engagement, and development of its People. This Human Rights Policy, which supersedes the previous Code of Basic Working Conditions, expresses the Company's commitment to upholding the highest ethical standards and embedding respect for human rights across all operations and sharing these principles within its supply chain and third parties. This commitment is supported by other key policies such as the Code of Ethics, Anti-Bribery Code of Conduct, Policy on Non-Discrimination and Diversity, Modern slavery statement, Supplier Code of Conduct for Responsible Business, General Terms and Purchasing Conditions and the Whistleblowing Procedure.

These instruments promote integrity, prevent misconduct, and foster a culture of ethical behavior throughout the organization and within Third parties and Supply chain.

Brembo's commitment is further reinforced by its corporate governance structure, including an Audit, Risk & Sustainability Committee within its Board of Directors responsible for overseeing sustainability-related policies, procedures, and risk management. This committee plays a key role in ensuring Brembo's operations adhere to the highest ethical and social standards.

2. SCOPE

The Policy on Human Rights (the Policy) applies to all members of the Board of Directors (including the Executive Chairman and the Chief Executive Officer), Directors, Coworkers, Agency Workers and Third Parties performing duties for or on behalf of Brembo.

For the purposes of this Policy, "Brembo" refers to Brembo N.V. and all the companies of the Group.

It aims to safeguard the human rights of all individuals impacted by our activities, including those in vulnerable situations, whether or not directly employed by Brembo, in all countries where the Company operates.

Brembo expects all its Stakeholders' behaviors to be aligned with the contents of the Policy.

The expectations about suppliers are aligned with this Policy and are set out in the Group Supplier Code of Conduct for Responsible Business.

3. INTERNATIONAL STANDARDS

The Group utilizes a global approach, together with several tools, procedures, practices and policies, to guarantee proper application of the principles outlined in this Policy.

In preparing the Policy, the Group was inspired by the following International Standards:

- The UN Universal Declaration of Human Rights.

- The UN Guiding Principles on Business and Human Rights (UNGPs).
- The ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
- The OECD Guidelines for Multinational Enterprises.
- The International Covenant on Economic, Social and Cultural Rights.
- The Ten Principles of the UN Global Compact.
- The 2030 Agenda for Sustainable Development, adopted on 25 September 2015 by the United Nations General Assembly, and the 17 related Sustainable Development Goals (SDGs).
- The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

These standards form the foundational framework of Brembo's global values and define the basis for the relationship between the Company and its employees.

Due to the global presence of the Group, the present Policy is a general framework which will allow some local laws and regulations, collective bargaining agreements, and other agreements freely entered by our employees and the Group, to supersede portions of the Policy itself.

4. FUNDAMENTAL PRINCIPLES

Brembo's commitment to human rights and fair working conditions is articulated through a series of core principles:

1. **Child labour and young workers:** We will not use child labour. We will never employ any person below the age of 15, unless this is part of a government-authorized job training, training, and apprenticeship program clearly beneficial to the participating person. We will monitor the prohibition of child labour, manage any identified cases, and oversee the programs related to participating persons in accordance with applicable laws and regulations, taking appropriate and timely corrective measures to safeguard the wellbeing of any minors involved.
2. **Forced labour, human trafficking and modern slavery:** We will not use forced labour, regardless of its form, as Brembo is committed to maintaining and ensuring a work environment based on the free choice of employment, prohibiting and not endorsing any forms of servitude or forced labour. We will not tolerate physically abusive disciplinary practices, and we are opposed to all kinds of human trafficking and modern slavery, requiring these principles are upheld by everyone operating on behalf of the company, including service providers and security personnel. This commitment extends to safeguarding individuals in vulnerable situations, such as migrant workers, by forbidding practices like recruitment fees for workers, retention of identity documents, and debt bondage.
3. **Right to Work, Freedom of Association and Collective Bargaining:** We recognize, respect and fully guarantee our employees the right to work and to freely associate by joining or forming trade unions based on applicable regulations in all our facilities. We will work constructively with our employees, or any organization that represents our employees, to promote our employees' best interests. We will seek to

provide opportunities for employees' concerns to be heard. We collectively bargain where law/welfare systems require us to do so.

4. **Diversity, Equity and Inclusion:** We do not tolerate any form of harassment, bullying, intimidation, or discrimination based on gender or gender reassignment, sexual orientation, ethnicity (including ethnic origins and nationality), age, political opinions, religious beliefs, social origin, marital or family status, disability, pregnancy, or any other personal condition. We are committed to maintaining an environment free of discrimination and to promoting a diverse and inclusive workplace, in line with Brembo's zero tolerance approach to any form of misconduct. We ensure fairness in all aspects of work, including hiring, learning, development, and rewarding, basing our decisions solely on people's competences, experience, knowledge, potential, and performance.
5. **Occupational Health and safety:** We will provide and maintain for all employees a safe and healthy working environment that meets or exceeds applicable regulations for occupational safety and health, committing to preventing injuries and occupational diseases, in accordance with our Occupational Health and Safety Policy.
6. **Working schedule:** While fully adhering to all applicable local laws regulating work hours, we are committed to the principles of the International Labour Organization and strive to align our working hour practices with these standard principles, including reasonable limitations on regular hours and adequate rest periods. We guarantee legally mandated and reasonable provisions for breaks, holidays, personal leave, and vacation. All overtime will be consensual, accurately recorded, and compensated according to local labor laws.
7. **Compensation and benefits:** With a focus on promoting our employees' material well-being, we provide compensation and benefits in full compliance with applicable laws and regulations. Our approach seeks fair wages for all, considering legal minimums, collective agreements, and market benchmarks where applicable. We strive for equal pay for equal work and progressive wage improvements, alongside legally mandated social insurance. In addition to fair wages, we may offer supplementary benefits tailored to local practices and regulations, all contributing to a supportive and equitable work environment.
8. **Business integrity:** We will not tolerate the giving or receiving of undue reward to influence the behavior of another individual, organization, politician and/or government body to acquire a commercial advantage, regardless of local rules and habits.
9. **Privacy and Data Protection:** We respect the privacy of our employees, business partners, and stakeholders, ensuring the protection of personal data in compliance with applicable laws and privacy protection requirements.
10. **Responsible AI Use:** At Brembo, we leverage Artificial Intelligence (AI) to empower our processes and workforce, shifting the focus of the people from routine tasks to higher-impact, value-added activities. This commitment to responsible AI use means all deployments shall adhere to the principles outlined in our Code of Ethics, including data privacy and integrity. Moreover, we have established a risk management

framework and corporate training programs to oversee and mitigate risks associated with AI-driven processes and products, ensuring effective governance of AI at Brembo.

- 11. Environment and Energy:** We will conduct business in a responsible way. We will seek to reduce and minimize the impact of our operations on the environment, including society and biodiversity, in accordance with Group Environment and Energy Policy as independently validated by our Environment and Energy Management System Certifications.
- 12. Local population and Communities:** We recognize the importance of the local population and communities as key stakeholders in our activities and projects. We commit to thoughtfully considering their perspectives as we plan and execute our activities. Our aim is to foster open communication and share relevant information about our plans with recognized stakeholders, seeking to understand and address their interests and concerns in a transparent manner.

5. DUE DILIGENCE FRAMEWORK

Brembo has established a comprehensive due diligence framework to safeguard human rights across its operations and supply chain. This approach is embedded in the Company's broader sustainability and compliance systems and is designed to ensure continuous improvement, transparency, and accountability.

DUE DILIGENCE IN OUR OWN OPERATIONS (COMPANY)

- **Risk Identification and Assessment:** We regularly assess human rights risks within our operations using a Double Materiality Assessment (CSRD/ESRS aligned) aligned with ESRS standards. This process identifies and prioritizes actual and potential human rights impacts such as working conditions, health and safety, equal treatment, child labour, forced labour, freedom of association, and privacy. These topics are assessed based on severity, scope, and irremediability. The risk assessment methodology is in accordance with Brembo's Enterprise Risk Management (ERM) metrics, which include the evaluation of Impact and Likelihood for each risk event, in the short and medium term. Moreover, the Group relies on annual internal assessments (SSA) across countries focusing on topics such as training, freedom of association, child labour, agency workers, employment, working hours, compensation, forced labour, non-discrimination, traineeships and apprenticeships and disciplinary practices. For M&A and Venture Capital projects, Business Development (BD) GCF leads risk assessments, including ESG considerations, with oversight from the CEO and Executive Committee.
- **Impact Prevention and Mitigation:** We apply robust policies and procedures concerning employee-related processes, promoting diversity, equity and inclusion and fostering a positive environment. Our commitment to health and safety in the workplace is paramount, managed through a dedicated Occupational Health and Safety Policy based on ISO 45001 standard, supported by regular independent third-party audits. Similarly, environmental impact prevention and reduction, including energy efficiency, are guided by our Group

Environment and Energy Policy and our robust, certified and integrated Environment & Energy Management System (according to ISO 14001 and ISO 50001). This certification provides a structured framework for continuously improving our environmental and energy performance. We implement specific actions to mitigate human rights risks, including mandatory Code of Ethics training for all employees and anti-bribery protocols, specific Diversity, Equity and Inclusion initiatives and conducting third party sustainability audits received regularly by our customers following Responsible Business Alliance and/or Responsible Supply Chain Initiative methodology, therefore including human rights aspects and requiring where necessary a corrective action plan based on non-conformities identified to involved internal parties.

- **Effectiveness Tracking and Remediation:** We track effectiveness through ongoing monitoring of internal processes (e.g., ERM), tools (e.g., SSA), and whistleblowing channel. Initiated and existing planned activities are regularly reviewed for effectiveness, including human rights topics (e.g., through internal audits by the Internal Audit GCF) and adjusted as necessary. If adverse impacts occur, we activate a structured remediation process, involving local management and corporate functions. More in detail, depending on the nature and severity of the issues identified, the relevant local and global functions escalate the matter to the appropriate Chief Officer, Committees, and if necessary, the CEO, and the Executive Chairman. The effectiveness of the remediation actions is assessed to ensure that the needs of affected individuals are properly addressed and that the response aligns with Brembo's social responsibility standards. We commit to remediating the impacts we cause or contribute to, following Crisis Management Guidelines if necessary, and expect the same from our business partners.

DUE DILIGENCE IN THE SUPPLY CHAIN

- **Risk Identification and Assessment:** We regularly assess supplier risks using sustainability performance data based on self-assessment questionnaires, third-party audits (that includes topics such as working conditions, compensation, working hours, health, safety, and environmental practices), certifications, and information from our whistleblowing channel.
- **Impact Prevention and Mitigation:** Our suppliers are required to comply with our Supplier Code of Conduct for Responsible Business outlining human rights standards and legal compliance requirements, including prohibiting child/forced labor, promoting diversity, ensuring safety, environmental protection and protecting data integrity. We require suppliers to uphold these standards and promote sustainable practices across their own supply chain. Brembo's supplier qualification process involves registration on the Group's e-procurement platform, completion of preliminary ESG assessment questionnaires, and adherence to minimum sustainability score thresholds based on company size. Additionally, third-party audits are conducted to evaluate suppliers' ESG performance, prioritizing high-risk suppliers based on criteria like country of origin, turnover, and production process risks.

- **Effectiveness Tracking and Remediation:** Suppliers with non-conformities must develop and implement corrective action plans (CAPs) and those with low sustainability performance are required to undergo follow-up audits. The resolution of the detected non-conformities is monitored by Brembo and third parties' assessors' overtime. We work collaboratively with our suppliers to improve their sustainability performance. Failure to resolve identified issues may lead to suspension or termination of the business relationship.

6. STAKEHOLDER ENGAGEMENT

Brembo acknowledges the crucial role of stakeholder dialogue in upholding human rights. We are committed to maintaining open and constructive communication with all relevant stakeholders. This engagement is essential for understanding and addressing the potential human rights impacts of our operations and ensuring our policies and practices are effective and responsive to their expectations.

To this end, Brembo pledges to:

- Establish and maintain effective channels of communication with all relevant stakeholders, including, but not limited to, employees, customers, suppliers, shareholders, workers' representatives, local communities.
 - Actively involve employees through regular consultations, surveys, focus groups, and other participatory mechanisms.
- Ensure that stakeholder concerns regarding human rights are taken seriously and addressed in a timely and appropriate manner through a whistleblowing channel.

7. AWARENESS AND TRAINING

Brembo offers various opportunities for employees and relevant stakeholders to be informed about the principles on human rights and ethical conduct through a structured training and awareness program.

- **Mandatory training:** Employees worldwide receive mandatory training on our Code of Ethics, covering ethical conduct with specific focus on how to report concerns.
- **Ongoing Learning:** We offer ongoing learning opportunities through workshops, seminars, and internal resources to deepen understanding of ethical and human rights topics.
- **Policy updates:** We regularly inform employees and collaborators of any updates to our policies, particularly the Code of Ethics, through dedicated internal communications and following training sessions.

Through our Supplier Code of Conduct for Responsible Business, we require suppliers to uphold Brembo's standards, encouraging them to disseminate these principles through appropriate training of their employees and their own supply base.

Through these comprehensive initiatives, Brembo fosters a culture of responsibility and respect, promoting the highest standards of human rights and working conditions across its operations and supply chain.

8. WHISTLEBLOWING CHANNEL

Brembo is committed to providing accessible and effective channels for all internal and external stakeholders to report human rights concerns or any unlawful or unethical situations. In compliance with Directive (EU) 2019/1937, Brembo has adopted a Whistleblowing Procedure which outlines the use of dedicated reporting channels, such as the Legality Whistleblowing web platform and App Mobile. These tools adhere to core principles guaranteeing anonymity and confidentiality for the reporting person, adequate protection against retaliation, and consideration of detailed anonymous reports. Reports concerning Group Companies can be directed to the Parent Company, Brembo N.V., or, if available, to a local internal channel. All reports received through the official channels are managed by Internal Audit GCF, in accordance with the specific Whistleblowing Procedure, ensuring prompt investigation.

9. CONSEQUENCES OF NON-COMPLIANCE

Violations of this Policy or applicable human rights laws will not be tolerated. Brembo promptly investigates all reports of violations adopting appropriate actions based on the severity of the case and in line with applicable legal, regulatory, contractual, and disciplinary systems. Appropriate disciplinary actions will be taken against employees, while for suppliers and business partners, violations may result in requests for improvement plans, suspension, or termination of contracts. Brembo is deeply committed to not tolerating any retaliation against individuals who report an issue in good faith, protecting their confidentiality in accordance with its Whistleblowing Procedure.

10. RESPONSIBILITIES

Responsibility for the implementation, monitoring, and review of this human rights policy is distributed at various levels within Brembo.

The Board of Directors is responsible for the approval and the periodical monitoring of the respect of this policy.

Each GBU/GCF/Geography is responsible for the operational implementation of the principles of this policy in their respective areas.

Brembo reserves the right to review and amend the Policy from time to time to ensure that it adequately promotes human rights protection.

11. COMMUNICATION AND EXTERNAL REPORTING

We will regularly review and update the progress on our efforts and annually communicate the results through our annual report and other communication tools. Where we identify that we have caused or directly contributed to adverse human rights impacts, we would engage in appropriate remediation processes by ourselves or in cooperation with other stakeholders.

12. GLOSSARY

Agency Worker: A person employed by an employment agency and assigned to work at Brembo, under its supervision, while remaining contractually linked to the agency.

Brembo/Company/Group: Brembo N.V. and its companies worldwide.

Employees/Coworkers: All subordinate workers performing duties on behalf of Brembo.

Migrant worker: a person who crosses an international border to engage in employment in a country other than their country of origin.

Third Parties: Agents, brokers, partners, coworkers, consultants (both natural and corporate), contractors, suppliers and other representatives performing work on behalf of and/or for the benefit of Brembo.

Young worker: Employee/worker between 15 and 18.

13. REFERENCE DOCUMENTS

Document type	Document code	Document title	Storage path
Code	-	Code of Ethics	on Company's Intranet: http://red-portal/sites/services/Principi%20e%20Codici/Fo-rms/ AllItems.aspx on Group's website: https://www.brembo.com/en/company/corpor-ate-governance/ governance-documents
Policy	P.HRO.01	Policy on Non-Discrimination and Diversity	on the Company's Intranet: http://red-portal/sites/HR/development/SitePages/Principi,%20Valori%20e%20Competenze.aspx on the Group's website: https://www.brembo.com/en/company/corpor-ate-governance/ codes-policies
Code	-	Brembo Anti-Bribery Code of Conduct	on the Company's Intranet: http://red-portal/sites/services/Principi%20e%20Codici/Fo-rms/AllItems.aspx on the Group's website: https://www.brembo.com/en/company/corpor-ate-governance/ codes-policies

Procedure	-	Whistleblowing Procedure	on the Company's Intranet: Canale di Segnalazione - Whistleblowing Channel - Home on the Group's website: Canale di Segnalazione Brembo - Official Website
Statement	-	Brembo Modern Slavery Statement	on the Group's website: https://www.brembo.com/en/company/corporate-governance/codes-policies
Policy	-	Occupational Health and Safety Policy	on the Company's Intranet: Portal/sites/documents/SE/Forms/AllItems.aspx?RootFolder=%2fsites%2fdocuments%2fSE%2fOCCUPATIONAL%20HEALTH%20AND%20SAFETY%20POLICY&FolderCTID=0x012000A499E2984C64194B8635DC094C2F8CD4 on the Group's website: https://www.brembo.com/en/company/corporate-governance/codes-policies
Policy	P.E&E.W – 01	Environment and Energy Policy	on the Company's Intranet: http://red-portal/sites/documents/Environment/P.E&E.W%20%E2%80%93%2001%20Group%20Environment%20and%20Energy%20Policy%20rev%2001.pdf#search=environment%20and%20energy%20policy on the Group's website: https://www.brembo.com/en/sustainability/governance/codes-policies
Code	CC.PRC.01	Supplier Code of Conduct for Responsible Business	on the Group's website: https://www.brembo.com/en/company/corporate-governance/codes-policies
Policy	GL.LCA- 03	Brembo's Personal Data Protection Policy	on the Company's Intranet: http://red-portal/sites/documents/Leg/ENG/GUIDELINES/GL.LCA-03%20Brembo%20Privacy%20Policy/Privacy%20Policy

			20Policy%20Brembo_GL.LCA-03_EN_21.10.2022_Final.pdf#search=data%20privacy%20policy
General Terms and Conditions	-	General Terms and Conditions of Purchase Direct Materials and Services	on the Group's website: https://www.brembo.com/en/company/suppliers/general-termsand-conditions-of-purchase
Guidelines	GL.SUST&RISK – 03	Guidelines for Working Conditions and Business Ethics principles application	On the Company's Intranet: http://red-portal/sites/documents/Risk/Forms/Grouped.aspx