



GLOBAL HUMAN RIGHTS POLICY

UPDATE JULY 2025

Pirelli's activities are based on respect for global human rights, which are a non-negotiable fundamental value of its culture and corporate strategy. Pirelli works to manage and reduce the potential risk of human rights violations, to avoid causing - or contributing to causing - adverse impacts on these rights within the international, multiracial, socially and economically diverse conditions in which it operates.

This Policy applies to all Pirelli operations, including Pirelli business relationships with third parties; where Pirelli does not have operational control, all business partners (e.g., joint-ventures, suppliers, etc.) are expected to comply with the principles stated in this Policy.

Pirelli Group activities are governed by its Values and Ethical Code and comply with the Sustainability Model envisaged in the United Nations Global Compact; the Company respects and protects the fundamental human rights laid down by the laws and regulations of each country where it operates and contained in applicable international standards, including:

- the United Nations International Bill of Human Rights, consisting of the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;
- the United Nations Convention on the Rights of the Child;
- the ILO Declaration on Fundamental Principles and Rights at Work and the relevant applicable conventions;
- the European Convention on Human Rights;
- the United Nations Convention against Corruption.

Pirelli promotes respect for human rights and adherence to applicable international standards with its Partners and Stakeholders and bases its governance model on the recommendations contained in the UN Guiding Principles on Business and Human Rights, implementing the "Protect, Respect and Remedy" Framework.

PRINCIPLES

- **Non-discrimination** – Pirelli is opposed to any form of direct or indirect discrimination on the basis of gender, gender identity and expression, sexual orientation, marital status, pregnancy status, parenting or care-giving situation, age, disability (whether mental or physical), skin color, ethnic origin, nationality, religious faith, socio-economic and/or cultural background, trade union affiliation, political and other opinions, and is committed to the prevention of discrimination in all areas of working life.
- **Freedom of Association** – Pirelli recognises the right of its employees to form freely trade unions and to collective bargaining and engages in open and constructive dialogue with representatives of recognised trade unions.
- **Opposition to forced labour** – Pirelli opposes all forms of labour exploitation, including child labour, forced or compulsory labour and all forms of abuse or mental or physical coercion both with regard their workers both employed workers along the supply chain, and strongly condemns all forms of human trafficking and exploitation.



- **Adequate working conditions** – Pirelli promotes a working environment based on trust, dialogue and mutual respect and protects the welfare and work-life balance of its employees.
- **Fair and decent wages** – Pirelli offers fair and decent wages, everywhere it operates. Beside compliance with local legislations and contractual agreements, compensation shall be at least sufficient to meet the basic needs of the employees and a decent standard of living for them and their families. Pirelli provides all employees with written labour contracts and a proper payslip, providing clear and transparent information.
- **Equal pay for work of equal value** – Pirelli abides by the principle of equal pay for work of equal value, e.g., between women and men, and bases decisions on employees' career progression exclusively on the skills, experience, and professional potential that people have, and the results achieved.
- **Fair working hours, overtime and leaves** – Pirelli strives to grant reasonable working hours¹ and properly compensates employees for overtime hours¹, paid annual leave, days off and any other due paid leave, in compliance with national, international and/or local applicable laws and regulations and collective bargaining agreements, and any case the ILO applicable Standards.
- **Occupational health and safety** – Pirelli considers the health and safety of workers a core value and proactively maintains a safe and healthy working environment by adopting high standards of prevention, assessment and management of related risks, and by fostering and constantly spreading a corporate culture geared towards occupational health and safety.
- **Local Communities** – Pirelli seeks to disseminate and promote its core business values, while respecting local cultures and indigenous people, protecting cultural and natural heritage and local traditions and customs. Pirelli contributes to the economic wellbeing and growth of the communities in which it operates by providing support to educational, cultural, and social initiatives for promoting personal development and improving living standards. Pirelli believes that dialogue with competent institutions and non-governmental agencies is key to identifying the priority areas for local communities' support.
- **Integrity** – Pirelli rejects all forms of corruption in any jurisdiction, even in places where such activity is acceptable in practice, tolerated, or not pursued in the courts, with the conviction that corruption also undermines human rights. To this end, Pirelli has implemented its "Premium Integrity" program which constitutes the corporate reference for prevention of corrupt practices and represents a collection of principles and rules aimed at preventing or reducing the risk of corruption.
- **Privacy** – Pirelli is aware of the importance of ensuring adequate safeguards to the interested parties concerned with the personal data processing operations and respects the right to privacy of all of its *Stakeholders*, undertaking to use the data and information provided in a correct manner.

¹ 1. Regular working hours must not exceed 48 hours per week and at least 24 consecutive hours of rest every seven days must be guaranteed, as well as paid holidays. Overtime hours shall not exceed the limits provided by laws, regulations, collective bargaining agreements and in any case the ILO applicable Standards.



Pirelli is engaged in the identification, assessment, prevention and mitigation of human rights violation risks, promptly implementing corrective actions if these events occur. In particular:

- raises employees' awareness, through information and training, and in conducting corporate activities with respect for human rights;
- manages its supply chain in a responsible manner including, in particular, respect for human rights in the supplier selection criteria, in the contractual provisions and in the checks carried out by Audit;
- requires that its suppliers implement a similar management model within their supply chains;
- moreover requires that its suppliers conduct proper *due diligence* within their supply chain in order to certify that the products and materials supplied to Pirelli are "*conflict free*" throughout the whole supply chain². Pirelli reserves the right to terminate relations with suppliers in cases where there is clear evidence of supplying conflict minerals and however in case of any violation of Human Rights.

Pirelli is open to cooperation with governmental, non-governmental and sectorial and academic bodies for the development of global policies and principles aimed at protecting human rights and regularly informs its *Stakeholders* about the activities carried out and the performance achieved, primarily through the Group's annual report and the corporate website.

GOVERNANCE AND DISCLOSURE

Pirelli's top management, supported by the Sustainability Department, as well as other departments variously involved (by way of non-limiting example Compliance, Procurement, Human Resources, Health Safety and Environment, Legal Affairs departments), has a strategic role in the full implementation of this Policy ensuring the involvement of all personnel and of those who collaborate with Pirelli, so that they express behaviors coherent with the values contained herein. The plans and performances are discussed and approved by the Sustainability Strategic Committee (a body chaired by the CEO that meets at least semi-annually) and are part of the Sustainability Plans and results presented and discussed by the relevant Board Committee and then presented, discussed and approved by the Board of Directors.

Pirelli reports about its Human Rights Management Model, the activities carried out and the performance achieved in the Group Annual Report, following approval by the Board of Directors, and in the Group website.

REPORTING, CONFIDENTIALITY, NON-RETALIATION AND CONSEQUENCES IN CASE OF VIOLATION

The Pirelli Group encourages the recipients of this document to report in good faith, even anonymously, any act or omission by anyone at Pirelli, in relations with it or on its behalf, which constitutes or may constitute a violation, or inducement to violate the principles contained in this Policy. The [Group Whistleblowing Policy](http://www.pirelli.com), published at www.pirelli.com, in multiple languages, sets out the procedure for submitting reports, how they are managed and how confidentiality and non-retaliation are guaranteed.

² i.e. not coming from mines or smelters operating in conflict zones identified as such in the relevant conflict minerals regulations, unless they are certified as "conflict free".



In case of violation of the present Policy – regardless it is identified through the Whistleblowing process or in different ways – Pirelli will adopt appropriate actions depending on the severity of the case, in line with the applicable legal, regulatory, contractual, and disciplinary system.

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GROUP CHIEF EXECUTIVE OFFICER

Andrea Casaluci