



CREALIS GROUP
HUMAN RESOURCES MANAGEMENT POLICY

Approved by the Board of Directors Crealis Group
on date 10th of October 2025

Document Code	HRM POL 001
Issue Date	10/10/2025
Revision	01 of 10/10/2025
Signed by CEO Crealis Group	Enrico Bracesco
Date of signature	10/10/2025
Signature	

Index

1. Introduction	3
1.1. Aims of the Policy	3
1.2. Scope and Addressees	3
1.3. Reference Principles.....	3
1.4. Relevant Impacts and Stakeholders	4
2. Group Commitment	5
2.1. Selection processes	5
2.2. Career Development	6
2.3. Performance process.....	7
2.4. Employee well-being.....	7
2.5. Human and workers' rights and adequate wages.....	7
2.6. Occupational Health and Safety.....	8
2.7. Training	9
3. Implementation, control and monitoring	9
3.1. Roles and responsibilities	9
3.2. Reviewing and Updating the Policy	10
3.3. Policy Sharing and Dissemination.....	10
3.4. Complaint and redress mechanisms	10
4. Appendix	12
4.1. Appendix A - Definitions.....	12
4.2. Appendix B - Correspondence with ESRS Standards	13

1. Introduction

The success of the Crealis Group (hereinafter also just “**Crealis**” or “**Group**”) is closely linked to the know-how, skills and contribution of its people. For this reason, the management of Human Resources and the sharing of common values and objectives represent fundamental levers for the Group's competitiveness and sustainability. With this in mind, Crealis has defined this Policy, which outlines the key elements for attracting, enhancing and growing its human capital, consistent with the Group's ethical principles and strategies.

1.1. Aims of the Policy

This Human Resources Management Policy (hereinafter also the “**Document**”) defines the principles, objectives and general guidelines governing the management of people within the Crealis Group. It represents a strategic tool to promote a working environment that is fair, inclusive, stimulating and oriented towards the development of human potential, respecting individual and collective dignity and well-being.

Through this Policy, the Group intends to ensure:

- the alignment of Human Resources management processes with the corporate values and ethical standards adopted;
- alignment with applicable national and international regulatory requirements;
- active contribution to sustainability goals and long-term value creation.

The Policy is part of the Group's broader governance system, in line with the Group's Code of Ethics, the compliance systems adopted at the local level, and the other policies in place.

1.2. Scope and Addressees

This Policy, adopted by **Crealis S.p.A.** (hereinafter also referred to as “**Parent Company**”) applies to all **Companies belonging to the Crealis Group**, within the limits of compatibility with current local regulations and in compliance with the legal and cultural specificities of the different contexts in which the Group operates. Each Group Company is required to transpose and implement this Policy, supplementing it, where necessary, with specific regulations or operating procedures, provided they are consistent with the principles established here and with the applicable local regulations.

This Document refers to all activities and processes concerning Human Resources management and applies to all employees, regardless of role, level or employment contract.

1.3. Reference Principles

The Crealis Group's Human Resources Management Policy is based on shared values and principles formalised in the Group's Code of Ethics and international references on labour rights, ethics, inclusion and sustainability.

The main external references include:

- The United Nations Universal Declaration of Human Rights;
- The OECD Guidelines for Multinational Enterprises;
- The United Nations Guiding Principles on Business and Human Rights (UNGP);
- The Declaration on Fundamental Principles and Rights at Work (ILO, 1998 and updates);
- The principles of the UN Global Compact, to which the Group adheres;

- European and national labour, safety and equal opportunities legislation.

1.4. Relevant Impacts and Stakeholders

As part of the materiality analysis conducted by the Group, the relevant impacts - positive and negative, actual and potential - generated by the activities were identified. In parallel, the Group has identified the main risks associated with the topic. Relevant impacts and risks related to the issue of Human Resources management are illustrated below.

Material topic	Identified impacts or risks	
Working conditions, health, safety and employee well-being	Employee satisfaction through adequate work-life balance and wellness initiatives	Positive impact
	Inadequate working conditions and remuneration, in particular non-compliance with collective agreements or workers' expectations, with reference to insufficient remuneration for employees and collaborators	Negative impact
	Lack of attention to health and safety at work, which could lead to accidents with negative consequences for the health and safety of employees and external workers	Negative impact
	Workplace accidents due to machine use - Increased insurance premiums, regulatory penalties and operational downtime	Risk
	Aging workforce - Retirement cliff in 5-10 years causing operational risk	Risk
	Inability to attract younger talent - Inability to fill roles, loss of innovation and generational disconnect	Risk
	Psychosocial risks and burnout - Increase sick leave, reduced morale and declining engagement or retention	Risk
Diversity, inclusion and talent management	Developing workers' skills through training activities	Positive impact
	Discrimination in inclusion, diversity, pay and career advancement	Negative impact
	High turnover of skilled workers - Lost productivity and institutional knowledge	Risk
	Discrimination claims or workplace harassment - Legal liability, internal conflict, employee turnover and contract fulfilment risk	Risk
	Fragmented or insufficient global DEI strategy - DEI-related legal risk, resistance to change, low employee engagement and attrition	Risk
	Insufficient training and development program - Skills gaps, lower performance and inability to meet evolving sustainability standards	Risk

In defining this Policy, the Group has taken into account the expectations and needs of its internal stakeholders, particularly employees, through structured listening and dialogue. These include specific activities linked to Company Values:

1. **MAKING THINGS HAPPEN:** Town Hall, Shop Floor monitor/Whiteboards/Newsletter/People News/Staff Meetings
2. **LOOKING FORWARD:** onboarding, Technical Specific Training
3. **INVESTING IN PEOPLE:** Insider, People News, Coffee with Leaders
4. **ENHANCING EXCELLENCE:** Data Governance, Company/Function/Individual Objectives and KPIs, Group Policies.
5. **ENJOYMENT:** well-being and welfare activities. The functions in charge of Human Resources management play a central role in collecting, interpreting and enhancing the feedback from these initiatives to orient policies and processes in a way that is consistent with people's needs.

2. Group Commitment

2.1. Selection processes

Crealis recognises the strategic role of personnel selection as a fundamental lever for the Group's growth and success. This process is based on shared values and principles: **fairness, equal opportunities, transparency, objectivity, non-discrimination and merit orientation.**

The selection processes start with the approval of resource insertion plans, aligned with organizational needs and annual budgets, and continue with the definition of the profiles sought. The selection process involves several interviews, conducted by the local Human Resources departments, the heads of the organisational units concerned and, for the most strategic positions, also by the CEO and/or General Manager.

Candidate selection must always include the screening of multiple profiles for the same position, to ensure a comparative and objective evaluation.

Each selection process is open to all persons with the required qualifications and/or professional experience and is based exclusively on meritocratic criteria. The same principle also guides the assessment of internal growth opportunities, both within an individual Company (mobility between organisational units) and at Group level (intra-group mobility).

The entire selection system is built to go beyond the assessment of **technical competence** alone, in the knowledge that **managerial and leadership skills** are also key elements that must be assessed in a consistent and globally comparable manner.

The selection process is based on a competence-by-role approach. Crealis has defined a clear framework outlining the key competences required for each role, applicable across all levels and geographies. This model is supported by specific KPIs used to guide both external recruitment and the development of internal resources, ensuring consistency and alignment with the Group's leadership expectations.

The candidate evaluation process must be formalised and properly documented, ensuring traceability and compliance with internal standards.

To support the assessment, a set of standardised questions was prepared for consistent use during the interviews. All candidates, regardless of the country in which the selection process takes place, answer the same questions, thus ensuring **impartiality, objectivity and comparability** of assessments.

Through these tools, the Group aims to make the selection process increasingly robust, inclusive and capable of attracting and recognising the best talent in a transparent and meritocratic manner.

The Human Resources functions verify that each job profile is drafted using neutral, non-discriminatory language. This verification also extends to the processes adopted by any external Companies in charge of selection, which must fully comply with the principles of non-discrimination and inclusion.

During interviews, it is forbidden to ask questions that may be discriminatory. By way of example but not limited to, questions concerning sexual orientation, state of health, current or future marital status, expectations or conditions relating to maternity/paternity, care responsibilities towards family members or third parties, religious or political convictions and, in general, any information of a personal and sensitive nature are not permitted.

Recruitment must never be used as a means of exchanging favours, in particular with persons belonging to the Public Administration. Similarly, offers of employment or apprenticeships addressed to customers, suppliers or counterparties must never take the form of undue benefits, potentially comparable to corrupt acts.

Internal processes are designed to prevent any improper use of recruitment and ensure that it is not exploited to obtain or retain unlawful economic advantages. To this end, each recruitment decision must involve several actors and is formalised jointly by the relevant local Human Resources functions and the heads of the organisational units concerned. This approach ensures the transparency, traceability and integrity of the entire selection process.

2.2. Career Development

The objective of the talent management process is to ensure that each person is in the most suitable role at the right time, with a view to professional growth and in response to the **evolutionary needs** of the Group. This process is based on four key principles that reflect the corporate culture and the centrality of talent:

- ❖ Making Things Happen: You Can
- ❖ Looking Forward
- ❖ Investing in People
- ❖ Enhancing & Excelling

Crealis is committed to enhancing the potential of its employees by exploring the adoption of structured tools for skills assessment and development, such as, for instance, the **9-Box Model**. This model makes it possible to map the **current performance** and **growth potential** of each individual, making it possible to define personalised career paths consistent with each person's characteristics and abilities.

On the basis of the position assigned to each worker within the matrix, targeted actions are defined to support the development of the resource, such as changes of role, involvement in strategic projects, training courses or retention plans. This approach makes it possible to enhance individual potential, pay attention to the specific characteristics of each person and **align the aspirations of employees with the organisational needs of Crealis**.

This approach guides all development initiatives and is the benchmark for professional growth within the Group, with full respect for diversity in all its forms (age, ethnicity, gender, sexual orientation, disability and religion).

2.3. Performance process

The performance appraisal process in the Crealis Group is based on principles of **objectivity, impartiality and transparency**, with the aim of promoting a culture of merit and fair development of people. The aim is to guarantee consistency in professional paths, enhance individual potential and ensure fair and inclusive management of resources, in line with the Group's values.

For employees with Management By Objectives (MBOs), the **Employee Performance Process (EPP)** is adopted, a global system designed to ensure structured and comparable performance analysis. The process includes a **calibration** phase involving multiple stakeholders - including the global HR function - to validate the assessments proposed by direct supervisors, reducing individual subjectivity and ensuring equal treatment. In this context, the Group is also evaluating the progressive introduction of ESG-related targets within the MBO system, reinforcing the alignment between individual performance and the Group's sustainability objectives.

As for white-collar employees not included in the bonus system, performance is assessed based on the competences outlined in their job description. For blue-collar employees, performance evaluation follows locally defined processes.

2.4. Employee well-being

People's well-being is a fundamental pillar of the Group's culture and is in fact embedded in the **"Investing in People"** commitment.

The Group promotes a working environment that fosters the overall well-being of employees, understood as a strategic lever for attracting, motivating and retaining talent, while fostering an inclusive, sustainable working environment that is attentive to individual needs.

In compliance with **local regulations** and **contractual frameworks**, Companies implement measures to promote the physical, mental and social well-being of employees, supporting work-life balance and encouraging the active participation of employees in voluntary activities for local communities.

The Group is committed to complying with the minimum standards required by law in each country in which it operates, ensuring that employee well-being policies are in line with local regulations. The Group's approach is geared towards assessing and, if necessary, developing additional measures to meet the evolving needs of employees, taking into account cultural specificities and the local context, with the aim of promoting a culture of shared support and well-being.

2.5. Human and workers' rights and adequate wages

Crealis strongly condemns all forms of **human rights violations**, including trafficking in human beings, forced or compulsory labour and child labour, and is committed to preventing them within its business activities and, consistently with the Group's internal legal and regulatory framework¹, also along the value chain, promoting respect for human rights in all contexts in which it operates.

The Crealis Group is committed to protecting and promoting the **fundamental rights of workers**, in compliance with local laws and international regulations, guaranteeing an inclusive and respectful working environment. Respect for the integrity, dignity and uniqueness of each person is the basis of a healthy, inclusive and positive working environment in which each worker can feel welcome, safe and valued. Crealis believes that the creation and protection of human value are essential elements for the development of a sustainable and lasting business, based on credibility and consensus. In fact, the Group is committed to ensuring safe and stable employment for all its employees, promoting a healthy balance between professional and personal life, through responsible and respectful management of

¹ Code of Ethics, Responsible Sourcing Policy, Supplier Code of Conduct.

working hours. It also ensures social dialogue with its employees, respecting freedom of association and the right to collective bargaining.

Each Group Company ensures that employment contracts respect the **minimum wages** defined by national legislation and/or collective bargaining, promoting **pay equity**.

The Group has also implemented a global system for payroll and attendance management, which guarantees **uniformity and transparency** in pay in all countries of operation. Crealis is committed to continuously monitoring and optimising its payroll processes to ensure efficiency and compliance with local regulations.

The Group also supports freedom of association, collective bargaining rights, equal opportunities, non-discrimination, and a workplace free from harassment, violence, retaliation, or abusive practices.

2.6. Occupational Health and Safety

Crealis recognises the protection of Occupational Health and Safety as a fundamental and indispensable value for the well-being of people and the proper conduct of its activities. The Group's commitment translates into the promotion of a safety culture based on active participation and the continuous improvement of performance, the dissemination of **responsible behaviour** and the adoption of occupational health and safety **management systems** consistent with the highest international standards, such as ISO 45001 adopted by some companies, in order to ensure healthy, safe and inclusive working environments for all employees, collaborators, and individuals operating on behalf of the Group.

In this perspective, the Group undertakes to:

- Pursue the prevention of accidents and occupational diseases, an essential element for carrying out any work activity.
- Consider occupational safety as a priority in every activity, making it an essential part of company culture.
- Comply with all applicable laws and regulations regarding occupational health and safety, in particular the provisions of Legislative Decree 81/08.
- Eliminate hazards and reduce risks to occupational health and safety, through the systematic identification of hazards, risk assessment, and the implementation of effective preventive and protective measures.
- Allocate adequate resources to the continuous information, training, and instruction of personnel.
- Ensure structured consultation and participation of workers, directly or through their representatives, in all relevant phases of the management system.

Each Group Company adopts policies and measures **in line with local regulations**, integrating common approaches and tools, including periodic risk assessments, specific training programmes, monitoring accidents and defining corrective actions for the continuous improvement of workplace safety. Health and safety committees, present or organised in an equivalent form depending on the context, ensure worker involvement and the sharing of improvement plans.

All new entrants are the recipients of dedicated **training courses**, updated over time and differentiated according to the risks associated with the job. Operational tools, such as information sheets and standardised procedures, are also provided to support the application of preventive measures. Health and Safety performance monitoring is based on key indicators, such as accident frequency and severity

rates, which are used to guide continuous improvement strategies, as well as periodic inspections and internal audits.

The Group also promotes people's overall well-being, through health surveillance programmes, insurance coverage, mental health initiatives and support dedicated to work-life balance. All health and personal data are handled in full compliance with current privacy and data protection regulations.

2.7. Training

Valuing people is a fundamental principle for the Group, which considers training a strategic tool to promote continuous professional development and strengthen competitiveness. In this context, the Group is committed to ensuring equal access to training, promoting transparency, impartiality, inclusion and respect for diversity. Training is geared towards key objectives such as regulatory compliance, the enhancement of technical and transversal skills, internal growth and the dissemination of a shared corporate culture, while empowering each person in their own learning path.

To this end, Crealis adopts a structured training plan aimed at ensuring that all people have the knowledge and skills necessary to perform their activities effectively, safely and responsibly. The plan includes both **compulsory modules**, in line with the regulatory provisions in force in the countries where the Group operates, and **in-depth courses** on key issues for the business, with the aim of offering all people an integrated view of the Company context. Particular attention is paid to disseminating the principles of business ethics and training on the compliance systems adopted by the Group, so that each employee operates with awareness, integrity and in full compliance with the rules and values that guide the organisation.

The training activities are tailored to reflect the specific needs related to the different roles, the skills to be developed and the organisational changes taking place.

3. Implementation, control and monitoring

3.1. Roles and responsibilities

Human resources management is a strategic and transversal process that involves several corporate functions and requires structured governance inspired by principles of equity, inclusion, skills development and people's well-being.

Function/corporate body	Roles and responsibilities in Human Resources
Board of Directors of the Parent Company	• Approves the Group Human Resources Management Policy. • It ensures consistency between the Group Human Resources Management Policy and the strategic and sustainability objectives.
Managing Directors of Subsidiaries	• They transpose the Group Human Resources Management Policy and ensure its implementation at local level.
Group Human Resources Function	• It defines common guidelines for all Group Companies on ○ personnel selection and onboarding ○ development and training ○ performance management ○ remuneration and benefits ○ diversity and inclusion ○ worker employee well-being and well-being • It supports local HR functions in the consistent implementation of policies, ensuring compliance with local regulations.

Local Human Resources Departments	• They implement Human Resources policies in the specific context of the Company or country of reference. • They manage operational processes (recruiting, evaluation, labour relations, etc.) in compliance with this Policy, Group guidelines and current local legislation.
Line manager	• They collaborate with local HR functions to identify training needs, enhance the potential of employees and monitor the internal climate.

3.2. Reviewing and Updating the Policy

This Policy is regularly reviewed to ensure its effectiveness, consistency with corporate values and ongoing adherence to current regulations and *best practices* in the field of Human Resources, at national and international level.

In addition, extraordinary revisions of the Policy may be made in the presence of:

- relevant regulatory changes;
- significant organisational changes within the Group;
- outcomes of internal or external audits that highlight critical issues in HR management processes;
- Relevant reports received through the listening or complaint channels.

Any changes are proposed by the Group Human Resources function, reviewed by the CEO of the Parent Company and submitted for Board approval. Approved updates are implemented by Group Companies in line with local regulations and, if necessary, supplemented through specific operating procedures.

3.3. Policy Sharing and Dissemination

The Group ensures effective dissemination of this Policy at all levels of the organisation and to relevant stakeholders, through both internal and external channels, in line with the principles of transparency and accessibility.

The Policy is published on the Company SharePoint and is an integral part of the *onboarding* materials for new employees. It is the subject of compulsory training for all personnel, with specific in-depth studies aimed at the functions most involved. The Policy is also published on the Group's official website and made accessible to all external stakeholders.

3.4. Complaint and redress mechanisms

Any conduct that does not comply with the principles of this Policy may constitute a breach of the relationship of trust with the Company and may result in disciplinary measures in accordance with applicable legislation and relevant contractual provisions. The Group recognises the importance of providing employees, collaborators and stakeholders with the opportunity to report any behaviour that is inconsistent with the principles of this Policy or other improper practices in Human Resources management.

To ensure the effective and consistent application of the rules, all Group companies adopt the **EQS Integrity Line platform**, which is protected by appropriate security measures, including the use of encryption tools, to safeguard the confidentiality of the reporting party, of any individuals mentioned in the Report, as well as the content of the Reports and any relevant documentation.

Access to the Platform is available directly via the following link: <https://www.crealisgroup.com/en/international/whistleblowing-2/> All necessary instructions for submitting a report are provided upon access.

Crealis encourages all individuals to report, in good faith, any conduct that is contrary to this Policy, with the assurance that they will be protected from any form of retaliation.

4. Appendix

4.1. Appendix A - Definitions

- **Code of Ethics:** a formal document defining the principles, values and rules of conduct that guide the actions of a company, its employees, collaborators and stakeholders.
- **Human Resources:** all the people who work within Crealis Group companies, in any capacity and at any level, including employees, collaborators, trainees and temporary and self-employed workers.
- **Report:** written or oral communication of information on violations made by the reporting subject, through one of the reporting channels provided.
- **Employee Well-being:** set of initiatives implemented by the Company to improve the physical, psychological and social well-being of its employees.

4.2. Appendix B - Correspondence with ESRS Standards

The new *European Sustainability Reporting Standards* (ESRS) approved under the *Corporate Sustainability Reporting Directive* (CSRD) provide Companies with a comprehensive framework of information requirements for reporting on environmental, social and governance issues. Specifically, with a view to aligning with the ESRS standards, this Policy refers to ESRS 2 MDR-P (Policies adopted to manage relevant sustainability issues) and ESRS S1-1 (Policies related to own workforce).

ESRS standards	Information	Section	Page	Comments
ESRS 2 MDR-P	65-a) a description of the main contents of the policy, including its overall objectives and to which relevant impacts, risks or opportunities it relates, as well as its monitoring process;	1 Introduction	3	
		1.1 Policy Objectives	3	
		1.4 Relevant Impacts and Stakeholders	4	
ESRS 2 MDR-P	65b) a description of the scope of the policy or its exclusions, in terms of activities, upstream and/or downstream value chain, geographical areas and, where relevant, stakeholder groups involved;	1.2 Scope and Addressees	3	
ESRS 2 MDR-P	65c) the highest management level in the organisation of the Company that is responsible for the implementation of the policy;	3.1 Roles and responsibilities	9	
ESRS 2 MDR-P	65d) a reference, where relevant, to third-party standards or initiatives that the Company undertakes to comply with through the implementation of the policy;	1.3 Reference Principles	3	
ESRS 2 MDR-P	65e) where relevant, a description of the consideration given to the interests of key stakeholders in policy-making;	1.4 Relevant Impacts and Stakeholders	4	
ESRS 2 MDR-P	65f) if relevant, whether and how the Company makes the policy available to potentially affected stakeholders and the stakeholders whose input is necessary for its implementation.	3.3 Policy Sharing and Dissemination	10	
ESRS S1-1	21) The Company indicates whether and how its policies regarding its own workforce comply with relevant internationally recognised instruments, including the UN Guiding Principles on Business and Human Rights.	1.3 Reference Principles	3	
ESRS S1-1	22) The Company indicates whether its own labour force policies explicitly address human trafficking, forced or	2.5 Human and workers' rights and adequate wages	7	Further details on the Group's commitment to combating forced labour can be found in the Code

	compulsory labour and child labour.			of Ethics, the Responsible Sourcing Policy and the Supplier Code of Conduct.
ESRS S1-1	23) The Company also indicates whether it has an occupational accident prevention policy or management system.	2.6 Occupational Health and Safety	8	