

HUMAN RIGHTS



Summary of rules, codes of
conduct and guidelines
adopted by Interpump Group
S.p.A concerning the Human
Rights

1. Objectives

Interpump Group conducts its business activities in accordance with the human rights contained in the Universal Declaration of Human Rights and the ILO (International Labor Organization) Declaration on Fundamental Principles and Rights at Work, as well as the human rights embodied in other international treaties and regulations.

This document provides an overview of the rules and measures adopted by Interpump Group concerning Human Rights. Interpump Group S.p.A. has chosen to organize, publish and promote this document of summary in order to provide a unique overview with respect to the protection of Human Rights.

Additionally, the Group expects maximum effort to respect human rights from those acting in the name and/or on behalf of Interpump (hereinafter, "Collaborators"), as well as from the consultants, vendors and other third parties, including customers, that maintain relations with Group companies (hereinafter, "Third Parties").

2. Scope of application

The Board of Directors of Interpump Group S.p.A. approved the Human Rights Guidelines ("Guidelines") in February 2020, **which adoption and implementation are mandatory for all Group companies**. Each Group company must adopt these Guidelines promptly, by resolution of the Board of Directors or the corresponding body, if the company does not have a Board. The resolution of the Board of Directors or corresponding body that approves these Guidelines, must be subsequently forwarded to the Group Compliance Function in order to monitor their correct and prompt adoption.

It is the duty of each Interpump Group company to bring these Guidelines to the attention of its Collaborators and Third Parties, including those that only have an occasional or temporary relationship with the company; require Collaborators and Third Parties to comply with the principles and obligations embodied in these Guidelines in the performance of their activities; take the necessary internal steps in the case of omitted or partial satisfaction of the commitment made by Collaborators or Third Parties to comply with the relevant instructions contained in these Guidelines or, in the case of refusal, evaluate the appropriate actions, including termination of the relationship.

Interpump Group respects in full the local regulations in force in the countries in which it operates. In the event of differences between the local regulations and the principles/rules of conduct contained in these Guidelines, the Group companies must inform the Group Compliance Function promptly, so that it can identify alternate solutions that guarantee overriding respect for human rights.

Interpump Group has made public this document of summary to point out the great work and strong position taken in favour of the protection of Human Rights, thereby providing an overview of the Guidelines, organized and applied as instrument of work by all internal or external actors of the Group on a day-to-day basis.

3. Group Code of Ethics

The Code of Ethics consists of a set of principles whose compliance is of fundamental importance for the proper functioning, operational reliability, and corporate image of Interpump Group.

The principles contained within the Code of Ethics (available in Italian and English language on the web-site at the address <https://www.interpumpgroup.it/uk/codice-etico.aspx>) are disseminated and shared among all employees and business partners of Group companies. These principles inspire the operations, conducts and relationships, both internal and external, belonging to the mentioned companies. The Code of Ethics is effective in both Italy and abroad, although in consideration of cultural, social and economic diversities of the different Countries in which the Group operates.

4. Relevant areas and principles of conduct

In the context of its own corporate activities and normal professional relationships, Interpump Group S.p.A. has identified the relevant areas and suitable controls to prevent risks that may impact the protection of Human Rights. Below are the main relevant areas and controls put in place by the Company:

- Freedom of association and collective bargaining

Interpump Group recognizes the right of its employees to form or take part in organizations and associations that defend and promote the rights of workers and their interests.

Discriminatory practices intended to penalize workers based on their membership of or participation in organizations and trade unions are not allowed.

Additionally, the Group recognizes the right of its employees to collective bargaining and to be represented by unions or other forms of representation, whether elected or formed in compliance with the regulations or practices prevailing in the countries in which it operates.

- 5.2. Forced labor

Interpump Group condemns all forms of exploitation of labor, whether forced by threats, intimidation, punishment, reprisals or physical violence, or achieved by the serious restriction of personal freedoms, such as the confiscation of money or identity documents, human trafficking or modern slavery.

Group companies must ensure that their activities and those carried out by Third Parties, especially those in the supply chain, are free from all forms of exploitation of labour. Interpump Group has identified thresholds for specific transactions in the Human Rights Guidelines above which terms of acceptance of principles contained in the Guidelines by the counterparty must be included in the contract.

- Child labor

Interpump Group condemns any form of labour exploitation of workers under the age of 16 and, also, of workers under the age of 18 when the conditions in which the work takes place is likely to compromise the health, safety or morale stature of the worker.

Group companies must ensure that their activities and those carried out by Third Parties, especially those in the supply chain, are free from all forms of exploitation of child labor, as defined in the ILO C138 Minimum Age Convention.

- Working conditions, diversity and non-discrimination

Discriminatory practices in any form are not allowed, whether based on race, religious belief, age, ethnic origin, civil status, disability, sexual orientation, pregnancy or on any other personal condition.

Interpump Group strives to ensure that all employees and candidates for employment at Group companies are treated with full respect for diversity, promoting the principle of equal opportunities both when the working relationship is established and in all subsequent phases.

In order to maintain a working environment that respects the rights of individuals, all forms of physical, verbal, sexual or psychological violence are prohibited, together with all types of abuse, threats or intimidation in the workplace.

Interpump Group companies must ensure that all employees are hired under proper employment contracts, signed in accordance with the legislation in force in the countries in which they work, that define the terms and conditions of their employment, including the number of personal, vacation and rest days available.

Interpump Group also recognizes the importance of professional orientation and training for the development of human resources and their skills, promoting all forms of involvement and participation by employees and their representatives.

The Interpump Group strives to ensure high standards of occupational health and safety. The Group promotes the dissemination and consolidation of a culture of workplace safety, developing

awareness of the risks and promoting responsible behaviour by all, not least by providing relevant information and training.

For this purpose, Interpump Group has established specific rules and principles of conduct with regard to occupational health and safety, which are detailed in the "Health, Safety and Environment Guidelines", which overview is available on the Interpump Group S.p.A. web-site.

- Respect for human rights within the supply chain

Interpump Group promotes respect for human rights by all parties involved in the supply chain. Accordingly, it is a requirement for parties ("Vendors") engaged in procurement relationships with and, in general, that supply goods and/or services to Interpump Group companies, to respect in full the human rights contained in the Universal Declaration of Human Rights and the ILO (International Labor Organization) Declaration on Fundamental Principles and Rights at Work, as well as the human rights embodied in other international treaties and regulations.

5. Additional controls

Interpump Group S.p.A. provides that any whatsoever suspected or known violation of these Guidelines or of any laws in force in such context in the Countries in which Interpump Group operates must be reported immediately using the dedicated channels as defined in the Group Whistleblowing Procedure. If necessary, Interpump Group will adopt adequate disciplinary measures in relation to any employees or collaborators of the Group companies, in compliance with the applicable collective bargaining contracts and national regulations.

Eventually, in order to raise awareness and train employees and collaborators towards the protection of Human Rights, Interpump Group organizes and promotes periodic training courses for all employees and collaborators with reference to the content of these Guidelines.