

POLICY
MFE PO-06

HUMAN RIGHTS

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INTRODUCTION

The MFE Group (as defined below), in line with its Code of Ethics, in carrying out its activities, respects the laws and regulations in force in the legal systems of all the countries in which it operates and acts in compliance with the principles of loyalty, fairness, responsibility, freedom, dignity of the human person and respect for diversity, repudiating any form of discrimination based on sex, race, language, personal and social conditions, religious and political belief.

The MFE Group, therefore, bases its activity on respect for universally recognized human rights as essential and indispensable values of its corporate culture and business strategies, promoting and supporting in all relations with its stakeholders the protection of fundamental human rights provided for by the regulatory provisions in force from time to time and in accordance with applicable international standards.

Furthermore, the MFE Group, also in line with the provisions of the Code of Ethics, recognizes people as an essential element for its development and promotes and enhances their skills, competences, commitment, professionalism and creativity, thus guaranteeing adequate working conditions and a protected and safe environment, as well as a shared system of values and principles in terms of legality, transparency and sustainable development.

In addition, the MFE Group is aware that the growth of a company cannot be separated from the responsible management of its business and respect for fundamental human rights: innovation, sustainability and attention to the well-being of people are, therefore, for the Group the fundamental elements that inspire its business choices.

In this context, the MFE Group, through this Human Rights Policy ("Human Rights Policy" or "Policy"), adopted by the MFE Board of Directors, intends to outline the set of commitments and responsibilities undertaken to support, promote, and safeguard human rights, with particular reference to the conduct of business and corporate activities, as well as the standards to which its stakeholders must refer.

The values and principles described in this Policy constitute the cultural heritage of the MFE Group, which undertakes, therefore, to disseminate and implement them at all levels through communication, awareness and training programs, so that they reach the maximum dissemination even beyond its own business context.

1. GENERAL PROVISIONS

PURPOSE AND SCOPE

This Policy aims to express the fundamental principles and values to which the MFE Group is inspired in the field of human rights as well as the commitments and responsibilities that it recognizes, shares and assumes and to which all Recipients, as defined above, are required to comply.

The principles and provisions of this Policy apply to MFE-MEDIAFOREUROPE N.V. (hereinafter also referred to as "**MFE**") and its Subsidiaries¹ (hereinafter, also referred to as "**MFE Group**" or "**Group**"); they are binding for the members of the corporate bodies, for all persons linked by subordinate employment relationships with the MFE Group ("**Employees**") and for all those who work for/with the Group, whatever the relationship, even temporary, that binds them to the same (such as, by way of example, "**Collaborators**", "**Suppliers**", "**Customers**", "**Commercial Partners**", etc.). The set of subjects to which this Policy applies are defined below jointly and for the sake of brevity as "**Recipients**".

REGULATORY FRAMEWORK

In defining this Policy, the MFE Group has referred to the principles defined in the Conventions and Declarations of international and EU law and, in general, in the internationally recognized standards on the subject such as, by way of example, the International *Universal Declaration of Human Rights*, the *European Convention on Human Rights*; the *Declaration on Fundamental Principles and Rights at Work* and the *Fundamental Conventions/Recommendations of the International Labour Organization (ILO)*; the *principles of the UN Global Compact*; the *OECD Guidelines for Multinational Enterprises of 2011*, etc..

The principles and values expressed in this Policy are also integrated with the provisions contained in the Code of Ethics and in the Internal Company Regulations² of the Group companies aimed at ensuring - also in line with the regulatory framework in force in the countries in which they operate - effective, efficient and transparent management of their activities. Specifically, the concrete modalities for applying the principles set out in this Policy are defined and implemented within the framework of Group or local Internal Company Regulations for thematic of competence (e.g., definition and monitoring of KPIs, performance evaluation criteria, compliance systems etc.), thereby ensuring their operational integration and contextual relevance within the various organizational and territorial dimensions of the Group.

¹ Company in which MFE directly or indirectly holds the majority of the votes exercisable at the Ordinary Shareholders' Meeting and/or the power to determine the financial and management policies of the same in order to obtain the benefits deriving from its activities

² Internal Company Regulation refers to the set of policies, procedures, operating instructions, manuals, etc. aimed at regulating company behaviors, activities and processes.

2. PRINCIPLES

The human rights Policy of the MFE Group is aimed at promoting and protecting the principles described below, as essential elements for the conduct of business and focuses on the areas that have been identified as relevant with reference to the sectors in which the MFE Group operates.

Integrity and protection of the person

The MFE Group undertakes to ensure its personnel, regardless of the role played and the type of relationship established, a correct and professional work environment and to this end repudiates and condemns any attitude or behaviour harmful to the person, perpetrated by any means and in any manner (physical, verbal or psychological), through violence or harassment, including expressive, of any nature (including sexual) and referring to personal, social and cultural differences (such as, by way of example, physical or mental disabilities and impairments, political affiliation, religious or sexual orientation diversity) or through hostile, intimidating, discriminatory, offensive or otherwise attributable - even in concealed forms - to mobbing, stalking, bullying or similar practices, which are all, without exception, prohibited, regardless of the reasons that determine them.

The MFE Group therefore undertakes to promote at all levels the enhancement of professional and personal dignity and the culture of mutual respect and inclusiveness, inviting Recipients to adopt behaviours based on these values, defining appropriate communication and training initiatives and adopting adequate and effective corrective actions, including disciplinary ones, where necessary.

Particular attention is paid to caring and welfare initiatives, with the aim of promoting employee well-being at all company sites and supporting the reconciliation of personal and professional life needs at all levels.

Non-discrimination

The MFE Group, in ensuring a fair and inclusive environment, rejects and opposes any form of discrimination based on gender identity, age, race, ethnicity, language, nationality, sexual orientation, physical abilities, religious beliefs, political and trade union opinions, social extraction and any other circumstance pertaining to the personal sphere³.

With this in mind, the MFE Group, in carrying out its business activities and in relations with stakeholders, encourages and promotes inclusion and diversity in all areas of the company, inviting all the Recipients of this Policy to commit themselves to prevent the occurrence of discrimination, acts and/or behaviour detrimental to the dignity of the person, contributing to

³ The term discrimination includes any distinction, exclusion, or preference that results in the denial or alteration of equality of opportunity or treatment in employment or occupation (cf. Art. 1, para. 1, ILO Convention No. 111).

the achievement of this objective also through interpersonal relationships and individual accounts respectful of the sensitivity of others, in compliance with Internal Company Regulations.

The MFE Group undertakes to define company policies and implement specific initiatives aimed at promoting equal opportunities with reference to access to employment, working conditions, development and professional growth, remuneration and salaries, training, in full compliance with the legislation in force in the countries in which it operates. In addition, using the company structures in charge, the Group promotes management policies within all organizational areas aimed at ensuring a correct evaluation of people from the selection phase, monitoring growth paths and designing appropriate professional and managerial training courses.

Working conditions

The MFE Group combats all forms of abusive recruitment and irregular employment of workers and actively works to ensure that within its own company and in its supply chain the working conditions, including in terms of remuneration, are fair and respectful of the moral integrity and personal dignity of the individual, in compliance with the legislation in force in the countries in which it operates and the employment contracts - collective and/or corporate - applicable from time to time.

The MFE Group deplors all forms of labour exploitation, including abuse, physical and psychological coercion and violence, punishment and all forms of forced and compulsory labor⁴, both towards its Employees and Collaborators and the workers employed by its Suppliers, Business Partners and Customers, firmly condemning the servitude, trafficking and exploitation of human beings.

In particular, the MFE Group, attaching primary importance to the protection of minors and the repression of any form of exploitation of them, repudiates child labour and respects the legal provisions governing the minimum age for admission to work in the countries in which it operates⁵.

Freedom of association and collective bargaining

The MFE Group protects the right of its personnel to form or take part in associations or organizations aimed at defending and promoting their interests. With this in mind, it is therefore

⁴ Forced or compulsory labor means any work or service exacted from a person under the threat of a penalty and for which the said person has not offered themselves voluntarily (cf. Art. 2, para. 1, ILO Convention No. 29).

⁵ According to the definitions set out in ILO Conventions No. 138 and No. 182, “child labor” shall be understood as: (i) work performed by a child below the minimum age (14, 15, or 16 years) established for a given type of employment (as defined by national legislation in accordance with international standards), which must not compromise the child’s education and full development; (ii) other forms of child labor considered unlawful activities, such as slavery, child trafficking, debt bondage, forced labor, the forced recruitment of children for use in armed conflicts, prostitution and pornography, and, more generally, work which, by its nature or the circumstances under which it is carried out, may harm the child’s health, safety, or morals.

recognised that male and female workers have the right to freely form and/or take part in trade unions and to actively participate in collective bargaining, sharing with such organisations, both at national and company level, a system of relations based on constant, fair and constructive discussion.

Health, safety and well-being

The MFE Group considers the health, safety and physical, psychological and relational well-being of people as a fundamental right and essential asset to be protected in the performance of all business activities.

In accordance with the principles and values expressed in the Code of Ethics and in accordance with the "Health & Safety Principles" adopted, the MFE Group therefore undertakes to maintain a safe and healthy working environment, in compliance with all the laws and regulations governing the matter in the countries in which it operates, setting as its objective the continuous improvement of company performance in terms of prevention and protection in the workplace.

The companies of the MFE Group, according to the national regulations applicable to them, have adopted health and safety management models in the workplace based on internationally recognized standards (UNI ISO 45001), integrated with the operating models of each company and aimed at complying adequately with the regulations, technical standards and good practices applicable from time to time.

Specifically, in order to eliminate hazards and reduce risks to the health and safety of workers, the MFE Group ensures that (i) work environments are suitable, safe and ergonomic for the performance of work activities, ensuring the periodic monitoring of physical, chemical and biological parameters; (ii) effective measures are implemented to prevent accidents, injuries and occupational diseases, also promoting specific health promotion initiatives in general; and (iii) constant and adequate health surveillance is carried out.

Numerous awareness-raising activities are also carried out towards the Recipients, aimed at consolidating the culture of health and safety at work as well as adequate training initiatives with specific reference to the prevention of accidents at work and, in general, to the understanding of the risks associated with work activities and the potential consequences deriving from non-compliance with Internal Company Regulations adopted from time to time.

Environmental protection

The MFE Group considers the environment a primary asset and its protection as a key factor in business activity: therefore, in carrying out its activities it is inspired by the principles of respect and protection of the environment and the territory, seeking a constant balance between economic initiatives and environmental needs.

To this end, the MFE Group strives to ensure that its business activity, in any sector, is carried out in compliance with the regulatory provisions in force from time to time, complies with the highest standards of environmental compatibility and safety, and implemented - through the definition of multi-year plans - by adopting eco-sustainable solutions aimed at minimizing the risks associated with global warming, pollution, and the depletion of resources.

Particular attention is paid to compliance with regulations on electromagnetic emissions, with specific reference to exposure limits, as well as to the collection and disposal of waste generated by company activities, which – where possible – are managed according to the principles of differentiation and recycling, through innovative, progressive, and circular solutions. Energy consumption is managed based on criteria of efficiency and responsibility, with the aim of identifying solutions that minimize environmental impact.

Local communities

The MFE Group is aware of the influence, even indirect, that its activities can have in the communities in which it operates, including local ones. Therefore, the MFE Group is committed to respecting the rights of local communities, striving to contribute to their development and ensuring respect for the needs of all the territories in which it operates. To this end, the MFE Group considers it essential to interact, compare and dialogue with local institutions and authorities to interpret the needs of individual communities, promote their growth and well-being, including by supporting social and cultural initiatives.

Fight against corruption

The MFE Group rejects and deplores the use of illegitimate or incorrect behaviour to achieve its economic objectives and adopts organisational tools to prevent the Recipients, in all countries where the Group operates, from violating the provisions of the law, the principles and values expressed in the Code of Ethics, in compliance programs and, specifically, in the Internal Company Regulations adopted from time to time, monitoring their implementation and compliance and adopting adequate and effective corrective actions, including disciplinary ones, where necessary.

The MFE Group considers corruption as one of the main factors undermining society and institutions, the well-being and development of any company or entity and, therefore, deplores and condemns any behaviour or activity carried out for corruptive purposes (such as, but not limited to, illegitimate favouritism, collusive behaviour, solicitations – directly and/or through third parties – of personal advantages of any kind for itself and/or for others) for the achievement of its economic objectives and, to this end, has adopted specific procedures - in accordance with the regulations in force in the countries in which it operates - in which the ethical-behavioural requirements are indicated to which the Recipients must strictly comply in order to comply with the provisions of the specific regulations, as well as specific indications

both on the preventive controls to be implemented and on the operational methods to be observed in order to prevent the possible commission of offences.

Therefore, all actions and operations carried out and the conduct of each of the Recipients in the performance of their work and/or their assignment or function in the context of relations with the MFE Group must be inspired by the principles of legality, loyalty, fairness, transparency, integrity and mutual respect, according to the rules in force in the reference countries and in accordance with Internal Company Regulations, also in order to protect the company's assets and image.

Business relations

For the MFE Group, free and fair competition is a decisive factor in market growth and constant improvement of the company. In this regard, in carrying out business relations, the Group is inspired by the principles of legality, loyalty, fairness, transparency, efficiency and cost-effectiveness, which therefore characterise its development model and the related strategic choices, rejecting conduct that favours the conclusion of business in violation of the regulations in force in the countries in which it operates.

In addition, the MFE Group strives for a responsible management of its supply chain, based on the dissemination and promotion of the ethical principles and values expressed in this Policy, on the one hand, using a certification process of its Suppliers, sub-Suppliers and/or Business Partners that provides, in addition to the verification of their reliability and seriousness, also compliance with the current regulations applicable to them, and, on the other hand, including in the selection parameters applied and in the contractual clauses respect for the fundamental freedoms, human rights, inspiring principles and values contained in the Code of Ethics, in this Policy and in the Internal Company Regulation, as well as adequate social, labor and environmental standards, in every formal and substantial respect. The MFE Group also verifies, over time, the maintenance by all third parties in its supply chain of the requirements subject to certification and selection.

If irregularities, contractual violations or, in general, conduct not in line with the principles contained in this Policy are established against a Supplier, Sub-Supplier and/or Business Partner, the MFE Group adopts the measures deemed most appropriate, such as - in the most serious cases - the termination of existing contracts until the exclusion of further opportunities for supply and/or collaboration, without prejudice to compensation for any damages suffered.

Confidentiality and protection of personal data

In the context of carrying out its business activities, the MFE Group undertakes to process the personal data of its stakeholders and the confidential information acquired for various reasons, in compliance with the rights, fundamental freedoms and dignity of the interested parties, in

compliance with all current regulations - at national and international level - on the protection of personal data and best practices for the protection of confidentiality, in order to avoid improper and/or even illegal uses.

The MFE Group, recognizing the centrality of individuals, strives to ensure that natural persons can have control of their personal data and ensures that such data is processed lawfully, ensuring, in particular, the relevance of the processing of the same for the purposes declared and pursued and believing that the identification and adoption of adequate measures for the protection of such data can contribute to the generation of value⁶.

3. RISK ASSESSMENT, IMPLEMENTATION AND MONITORING

Human rights risk assessment and management

In carrying out its activities, the MFE Group constantly evaluates and monitors the real and potential impacts on human rights, committing itself to implementing actions and interventions aimed at preventing behaviour detrimental to these rights and, in general, to the fundamental freedoms of the individual, both within its own organisation (MFE Subsidiaries) and in relations with its main stakeholders. In particular, the MFE Group carries out assessment activities with respect to the supply chain aimed at identifying and subsequently managing the overall risk profile of its suppliers, reserving the right to carry out suitable interventions and audit activities where required by existing contractual agreements.

Risks related to the issue of respect for human rights may also be subject to specific assessment as part of the second and third level control activities provided for by MFE's Internal Control and Risk Management System.

In particular, the issue of human rights is the subject of a specific analysis - updated annually - in compliance with the applicable regulations in force from time to time, aimed at identifying the potentially relevant impacts, risks, and opportunities for the Group within the scope of the Consolidated Sustainability Reporting. Based on the materiality identified, the assessment of residual human rights risk may be subject to periodic monitoring and evaluation within the framework of the Enterprise Risk Management (ERM) process adopted and implemented by the Group.

Implementation and monitoring

The implementation and monitoring of the commitments expressed in this Policy are based on adequate due diligence and gap analysis processes, implemented by the competent company functions, as highlighted above. Consequently, downstream of these processes, the MFE Group

⁶ In line with these objectives, the Group has defined and continuously updates personal data management models (the so-called "Privacy Models"), in compliance with EU Regulation 2016/679 and local regulations, applying the principles of "privacy by design" and "privacy by default", which are also an integral part of its digitalization processes.

undertakes to implement all the necessary corrective actions, aimed at mitigating the potential impacts of the identified human rights risks, also maintaining a continuous internal and external monitoring system, to verify compliance with fundamental rights and prevent any irregularities and abuses.

Communication and training

The MFE Group promotes and guarantees an adequate dissemination and knowledge of the human rights Policy and a constant awareness of the issues it deals with through specific communication activities aimed at all Recipients, inviting them to share and respect the principles and values expressed therein as well as to promote their application and strict observance. For this purpose, this Policy is published with adequate prominence on the MFE Group website (<http://www.mfemediaforeurope.com/it/governance/compliance/>), as well as in dedicated sections of the company intranet, where present.

In addition, in order to ensure a complete and correct understanding of the contents of this Policy and an effective and concrete application of the same, the MFE Group guarantees – with the help of the competent functions – specific training initiatives aimed at the entire company population, carrying out any diversification of in-depth studies according to the areas of activity, roles, responsibilities and tasks assigned.

Reports

Each Recipient may report violations or alleged violations of the principles contained in this Policy using the internal channels (dedicated IT platforms, email addresses including certified, etc.) prepared by the MFE Group companies in accordance with EU provisions as well as the regulations in force in the countries in which it operates regarding whistleblowing ("**Internal Channels**"), according to the methods and terms indicated in the appropriate company procedures adopted from time to time. All information regarding these procedures, the internal Channels and the committees in charge of managing reports can be found in the appropriate section of the MFE Group's corporate website, available at <https://www.mfemediaforeurope.com/it/governance/compliance/> and in the dedicated sections of the companies' corporate intranet, where present.

The reports received that, after carrying out accurate investigative activities, are well-founded are managed in accordance with the laws in force, ensuring absolute confidentiality on the identity of the reporting parties and on the content of what has been reported and guaranteeing them maximum protection from retaliatory acts or any form of discrimination or penalty.

Upon the outcome of the assessment of the reported violations, the MFE Group undertakes to implement appropriate corrective actions and to apply to the persons responsible for such violations the measures deemed most appropriate from time to time, in order to protect the

interests of the MFE Group Companies and compatible with the provisions of the regulatory framework in force in the reference countries.

Process Owner: *Direzione Affari Legali di Gruppo - Direzione Compliance, Diritto del Lavoro e Operazioni Straordinarie*

Approved by the Board of Directors of MFE in the meeting of 24/09/2025
