



ROMA 1992

Human Rights Policy

1. Introduction and Principles

Great Lengths considers respect for human rights and the dignity of every person an essential condition for carrying out its business responsibly and consistently with its commitment as a Benefit Corporation and a certified B Corp. This Policy defines the principles and expectations with which Great Lengths guides decisions, processes and business relationships, with the aim of preventing negative impacts and promoting a fair, safe and inclusive work and business environment.

2. Purpose and Scope

The following Policy applies to all individuals and communities potentially affected by Great Lengths' activities, including:

- employees, collaborators, consultants, interns, and management;
- workers employed along the value chain, including activities performed by suppliers, contractors, subcontractors, and business partners;
- customers and end users of products/services;
- local communities and other stakeholders potentially impacted by direct and indirect operations.

All people acting on behalf of Great Lengths, in any capacity, are required to respect the principles described in this Policy and to act in accordance with internal procedures and the applicable Code of Conduct.

Regulatory Compliance

Great Lengths complies with the laws and regulations in force in the countries in which it operates. Where the local regulatory environment differs from the principles described here, the company will apply local law and, where possible, adopt additional

measures to maintain a level of protection consistent with human rights and international standards. When local law provides higher protection, this protection prevails.

3. Adoption of International Frameworks

Great Lengths is inspired and aligned with the following references:

- United Nations Guiding Principles on Business and Human Rights;
- International Bill of Rights, including the Universal Declaration of Human Rights;
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the main fundamental ILO conventions.

4. Our Commitment

Great Lengths publicly declares its commitment to respecting human rights in every aspect of its business, adopting a zero-tolerance approach to:

- forced labor, human trafficking and any form of exploitation;
- child labor, in accordance with applicable laws and international standards;
- discrimination, harassment and violence in any form;
- threats, intimidation or retaliation against anyone who reports, in good faith, potential violations or risks.

Great Lengths recognizes that some groups may be exposed to specific vulnerabilities or barriers (e.g., minors, migrants, minorities, people with disabilities, and people with vulnerable socioeconomic conditions). In its assessments and actions, the company pays particular attention to preventing disproportionate impacts on these groups.

5. Human Rights Risk Assessment and Due Diligence

Great Lengths is committed to carrying out periodic assessments of risks and impacts on human rights, with the aim of:

- identify the salient issues and the areas most exposed to potential or actual risks;
- prevent and reduce negative impacts through operational measures, external stakeholder engagement, contractual requirements and monitoring activities;
- define priorities, responsibilities and improvement plans.

The assessment considers both direct activities and the value chain, with attention to working conditions, health and safety, fair treatment, freedom of association and collective bargaining, privacy and data protection, and potential impacts on communities.

6. Reporting and Complaint Management Mechanisms

Great Lengths considers access to reliable and confidential reporting channels an essential element of human rights protection. Anyone (internally or externally) can report, even anonymously where permitted, suspected violations or risky situations through dedicated channels, such as the use of the whistleblowing tool.

All reports are handled with the utmost confidentiality and impartiality, ensuring:

- protection against retaliation for those who report in good faith;
- proportionate, timely and documented assessments and investigations;
- communication of the results within the limits permitted by confidentiality and legislation.

Commitment to remedy

When Great Lengths determines that it has caused or contributed to a negative impact on human rights, it commits to implementing appropriate and legitimate remedies, which may include corrective action, restoration, compensation, or other measures proportionate to the nature of the impact. Where the company is directly linked to an impact through business relationships, it commits to using its leverage to contribute to prevention and remediation.

8. Roles, Responsibilities and Governance

- **Board of Directors (BoD):** formally approves this Policy and supervises its implementation at least annually, including through periodic updates on the main risks and actions taken;
- **ESG Committee/Team – Sustainability:** coordinates the human rights due diligence approach, supports the updating of the risk assessment, proposes improvement plans and promotes internal training;
- **Business functions (e.g. HR, HSE, Purchasing, Quality, Compliance/Risk):** integrate the principles of the Policy into their relevant processes (supplier selection, working conditions, health and safety, data management, etc.) and collaborate in monitoring;
- **All the people who work with Great Lengths:** are responsible for acting with respect, promptly reporting any concerns, and contributing to a safe and inclusive work environment.

9. Monitoring, Reporting e Continuous Improvement

Great Lengths monitors the effectiveness of the application of this Policy through activities such as:

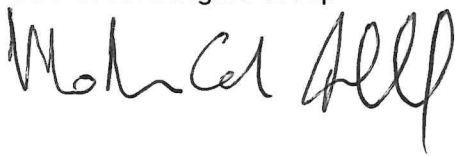
- periodic updating of the human rights risk/impact assessment (at least annually or when the context and activities change significantly);
- engaging suppliers and business partners to understand whether or not they have human rights protection measures in place;
- transparent reporting of progress and key actions taken in relevant communications and reports.

10. Review and Validity of the Policy

The following Policy is subject to periodic review (at least every two years, or sooner if necessary due to regulatory, organizational, or contextual changes). The updated version is made publicly available.

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