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## ANTARES VISION GROUP'S HUMAN RIGHTS POLICY

Approved by Antares Vision Board of Directors on the 31<sup>st</sup> of January 2023.

### INTRODUCTION & PURPOSE

As an international group operating in a worldwide value chain with people at its core, Antares Vision Group has always been convicted of the relevance of taking a clear position towards the full respect of human rights of all the individuals involved directly or indirectly in its activities all over the world, including local communities and indigenous people, with due regard for the cultural, social, and economic diversities from one country to another.

This awareness has directed Antares Vision Group towards the drafting of this human rights policy (the "**Policy**"), as an integral part of Antares Vision Group's social responsibility and aimed to protect itself and all the individuals involved in its operations.

With the adoption of this Policy, Antares Vision Group intends to:

- reinforce its commitment to safeguard people's human rights in any country where it operates,
- state its awareness of the risks embedded in its business model,
- set boundaries for the application of this Policy through the implementation of specific monitoring and reporting processes, and
- promote the contents of this Policy internally within the group and among its external Stakeholders.

This also implies that each Stakeholder shall operate in full accordance with this Policy, with a particular attention to conflict affected and high-risk contexts.

This Policy has been drawn up in compliance with the main international conventions, standards, and recommendations on the matter, as well as in compliance with Antares Vision Group's internal policies and procedures.

Therefore, the principles contained in this Policy are in line with:

#### Internal references

- Antares Vision Group Code of Ethics<sup>1</sup>.
- Antares Vision Group Diversity, Equity, and Inclusion Policy.

#### International References

- The International Bill of Human Rights of the United Nations:
  - Universal Declaration of Human Rights;
  - International Covenant on Civil and Political Rights;
  - International Covenant on Economic, Social and Cultural Rights.
- The core conventions of the International Labour Organization (ILO) - n. 29, 87, 98, 100, 105, 111, 138, 182 - and the Declaration on Fundamental Principles and Rights at Work.

<sup>1</sup> [Antares Vision Group's Ethical Code](#). The Code of Ethics, approved by Antares Vision and extended to the companies of Antares Vision Group, reports the guidelines of conduct and the common values, such as legality, correctness and transparency, which inspires Antares Vision Group for the attainment of its economic, production and social aims.

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- The United Nations Convention on the Rights of the Child.
- ILO Conventions n. 107 and n. 169 on the Rights of Indigenous and Tribal Peoples.
- The European Convention for the Protection of Human Rights and Fundamental Freedoms (CEDU).

## 1. GLOSSARY

Capitalized words in this Policy have the following meanings, whether used in singular or plural form:

**Affiliates:** means any company in which Antares Vision has a non-controlling interest.

**Antares Vision:** means Antares Vision S.p.A., with its registered office in Via del Ferro 16, Travagliato (BS), registered at no. 02890871201 on the register of enterprises of Brescia.

**Antares Vision Group:** means, collectively, Antares Vision and its Subsidiaries.

**Recipients:** has the meaning ascribed to it in Section 3.

**Stakeholders:** means any party with a direct or indirect interest in Antares Vision Group's business, such as customers, people working for the group, whether they are executives or employees, suppliers, contractors, partners, other companies and trade associations, the financial community, civil society, local, and indigenous and tribal communities, national and international institutions, the media, and the organizations and institutions that represent them.

**Subsidiaries:** means any company in which Antares Vision has a controlling interest. According to Consolidated Financial Statements, Antares Vision controls a subsidiary if, and only if, it has: (i) power over the entity it has invested in (or holds valid rights that give it the current ability to control the significant activities of the entity it has invested in); (ii) exposure or entitlement to variable returns, deriving from its relationship with the entity it has invested in; (iii) the ability to exercise its power over the entity it has invested in to affect the amounts of its returns.

**Suppliers:** means any suppliers of goods and services, including advice and professional services.

## 2. SCOPE OF APPLICATION AND RECIPIENTS

This Policy applies to Antares Vision and its Subsidiaries.

Each company of Antares Vision Group must adopt this Policy in compliance with its corporate governance system.

The Policy is addressed to all members of the corporate body, employees, officers, collaborators, suppliers of goods and services, consultants and in general anyone who has a business relationship with Antares Vision Group, regardless of the legal nature of the relationship (the "**Recipients**").

All Recipients are required to know the provisions of the Policy and to actively contribute to its implementation, reporting any flaws or violations. For this purpose, Antares Vision Group undertakes to promote knowledge of the Policy to all Recipients.

This Policy is also brought to the attention of the Affiliates, to promote conduct consistent with those adopted by the entire Antares Vision Group. Therefore, the Affiliates are required to sign a declaration of acknowledgment and knowledge of this Policy, committing themselves to comply with the principles contained therein.

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### 3. ANTARES VISION GROUP'S COMMITMENT TO RESPECTING HUMAN RIGHTS

Antares Vision Group has identified two main spheres of application of the Policy, corresponding with the two potentially most vulnerable elements within its value chain to guarantee the full respect of human rights:

- some key aspects of the employment practices potentially related to Antares Vision Group's activities; and
- the groups of individuals directly or potentially affected by them.

#### 3.1. EMPLOYMENT PRACTICES

##### 3.1.1. FORCED OR COMPULSORY LABOR AND CHILD LABOR

Antares Vision Group rejects the exploitation of any form of forced or compulsory labor<sup>2</sup> and under any circumstances confiscates ID documents to retain workers against their will.

In addition to the provisions above, Antares Vision Group believes that children represent the most vulnerable and potentially affected group. Therefore, with respect to its worldwide business Antares Vision Group fully respect children's rights.

Workers' minimum age is defined by the laws in force in the country where the activities shall be conducted, and in any case, it shall not be lower than the minimum age established by ILO Convention n. 138<sup>3</sup>.

##### 3.1.2. DIVERSITY AND NON-DISCRIMINATION

In accordance with the provisions set forth in the Diversity, Equity and Inclusion Policy, Antares Vision Group respects the fundamental rights of all people, protects their moral integrity, and guarantees equal opportunities.

In Antares Vision Group's business, basic values such as personal dignity, diversity, inclusion, equal treatment, and opportunity are carefully guarded, with the aim of creating a working environment where people are treated fairly and valued for their uniqueness.

Antares Vision Group rejects all forms of behaviour that may result in discrimination in relation to gender, age, disability, nationality, sexual orientation, ethnicity, religion, political opinions, and all other forms of individual diversity, or that is detrimental to people and their convictions or preferences. Therefore, Antares Vision Group fully encourages and values people's freedom of expression.

Antares Vision Group promotes trainings and awareness initiatives related to diversity, with the aim to disseminate an inclusive culture enhancing the principle of equal treatment for all employees based on their professional skills and abilities.

##### 3.1.3. COLLECTIVE BARGAINING

Antares Vision Group considers the social dialogue with workers and their representatives a fundamental aspect to ensure a fair and trustful interaction with them. For this reason, Antares Vision Group is fully committed to ensure the right of workers to form or take part in organizations aimed at defending and promoting their interests.

In this framework, collective bargaining represents the instrument for discussing, setting contractual conditions, and regulating relations between Antares Vision Group's management and unions. Antares Vision Group workers are entitled to be represented by unions or other forms of representation elected in accordance with the law and practices locally in force.

<sup>2</sup> As defined in ILO Convention no. 29 (Art. 2.1), forced or compulsory labour means all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

<sup>3</sup> As defined in ILO Convention no. 138, the minimum age for admission to any type of employment or work which by its nature or the circumstances in which it is conducted is likely to jeopardise the health, safety or morals of young persons shall not be less than 18 years.

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### 3.1.4. HEALTH, SAFETY AND WELL-BEING

Antares Vision Group is devoted to encouraging a strong health, safety, and well-being culture, to ensure hazard-free workplaces and promote a balanced work-life integration. Throughout compulsory and non-compulsory training activities, Antares Vision Group provides full awareness of its workers with reference to the applicable health and safety regulatory frameworks and practices, with the aim to guarantee the strictest respect of these values in each country where the Antares Vision Group operates.

Antares Vision Group's commitment to ensure health and safety also includes practices involving its Suppliers. Antares Vision Group applies a rigorous selection and monitoring process of Suppliers, in sharing knowledge and in constantly benchmarking practices on such matters. All Suppliers involved in operations with Antares Vision Group must show proven responsibility for their workers' health, safety, and well-being.

## 3.2. COMMUNITIES AND SOCIETY

### 3.2.1. ENVIRONMENT

Thanks to its business model, as well as to the products and innovative technologies which represents its core business, Antares Vision Group is a natural enabler of sustainable resources and transition to a circular economy. Indeed, Antares Vision Group's business model can generate positive impacts for the quantification, management, and minimization of the carbon footprint of each production unit, as well as tracking the entire life cycle.

Such capabilities reflect Antares Vision Group's commitment to protect the environment, the natural resources, and to preserve biodiversity all over the world, with a particular focus on undertaking actions to reduce carbon emissions directly and indirectly connected to its activities and to increasingly integrate circularity to its production processes.

### 3.2.2. LOCAL, INDIGENOUS AND TRIBAL COMMUNITIES

Among its activities, Antares Vision Group is committed to respect the rights of local communities and to contribute to their economic and social growth. Moreover, Antares Vision Group is locally involved in activities aimed at promoting cultural, social, and economic enhancement of communities and at advancing social inclusion.

Even though Antares Vision Group activities do not directly affect the rights of Indigenous and tribal communities, it may occur that indirect operations along its value chain may involve the rights of these communities. Therefore, Antares Vision Group is committed to collaborate with Suppliers that respect human rights and contribute to the social-economic development of these communities.

### 3.2.3. PRIVACY

Antares Vision Group respects the right to confidentiality and privacy of all its Stakeholders and is committed to the correct use of their personal data and information to which Antares Vision Group has access for the performance of its business.

Data protection is a key element of Antares Vision Group digitalization processes, as are risk analysis and the protection of sensitive data. Data protection and processing of personal data is conducted by Antares Vision Group in compliance with the main European regulations (EU GDPR) and national regulatory frameworks.

### 3.2.4. COMMUNICATIONS

Antares Vision Group's communication strategies are designed to be inclusive and not discriminate anyone.

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Antares Vision Group communications are intended to act respectfully towards diversities, to the most vulnerable audiences, and they must compulsorily be exhaustive, clear, and understandable, abide by statutory legislation, available on the website, as well as easily accessible for people with disabilities.

#### **4. IMPLEMENTATION AND MONITORING**

To ensure the correct implementation of the Policy, Antares Vision Group may consider the design of a due diligence process providing specific actions for each company of the group and its country of application.

Suppliers' compliance with this Policy is constantly monitored through specific procedures.

Subsidiaries oversee the local implementation of this Policy.

#### **5. REPORTING VIOLATIONS**

The Recipients must promptly report any actual or suspected violations of the Policy.

Reports should be made in writing, preferably in a non-anonymous way. The reports must be made in good faith and must be both specific and detailed. In any event, the information provided will be treated confidentially.

**For this purpose, any violation of the Policy must be reported through Antares Vision Group's whistle blower reporting process, accessible at the following link: <https://www.antaresvision.com/whistleblowing>.**

The confidentiality of the identity of people making reports is in any case guaranteed. Antares Vision Group does not tolerate or admit any retaliation or discrimination measures against Recipients who report violations of this Policy.

#### **6. COMMUNICATIONS AND TRAINING**

Antares Vision Group promotes the awareness of the Policy among all Recipients. For this purpose, the Policy must be made available to all Recipients, according to the procedures that must be defined by each company of Antares Vision Group.

This Policy is also published, in Italian and English version, on the website of Antares Vision Group

Any doubts concerning the application of the Policy shall be addressed to Antares Vision HR Manager.

Antares Vision Group must develop appropriate training and awareness programmes about this Policy, to strengthen its internal culture to embrace values such as inclusion, equality, and non-discrimination, and to increase awareness of this Policy among the entire group.

#### **7. APPROVAL AND REVIEW**

This Policy is approved by the Board of Directors of Antares Vision. Any updates to the Policy will be promptly brought to the attention of the companies of Antares Vision Group, for appropriate adoptions by the respective administrative bodies.