

Forced Labour Report of Pirelli Tire LLC

This annual report is prepared by Pirelli Tire LLC (the “Company”) in compliance with Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). It describes the approach and actions taken by the Company to address forced labour and child labour risks in its operations and supply chains during the year ended December 31, 2025.

Who We Are

Pirelli Tire LLC, headquartered in Rome, Georgia, United States of America, manufactures, imports, and sells tires in the US and Canada. The Company includes the Modular Integrated Robotized System facility and research and development center at its Rome, Georgia headquarters, as well as sales, logistics and marketing and agent offices in New York City, Atlanta, Detroit, and Montreal. The Company manufactures, distributes and markets original equipment and replacement tires for car/motorcycle applications. The Company is part of the multinational Pirelli Group, headquartered in Milan, Italy and unless otherwise indicated, follows and adopts Pirelli Group policies, practices and procedures. For more information regarding Pirelli Tire LLC, please visit <https://www.pirelli.com/tires/en-us/car/homepage>.

What We Do

Pirelli Tire LLC’s core activities encompass the production and importation of high-quality tires and related services. The Company is a part of a group that is a globally recognized leader in the tire industry, specializing in products for cars, motorcycles, and bicycles. Pirelli Group is dedicated to manufacturing tires that excel in performance, safety, noise-reduction, and road grip. Pirelli Group technological advancements are also influenced by its extensive experience in motorsports.

Pirelli Group’s sustainable development planning aims to make a tangible contribution to the global effort to achieve the 2030 Sustainable Development Goals presented by the United Nations in September 2015. Pirelli Tire LLC is committed to Pirelli Group’s Sustainability plan, the clear targets of which are fully integrated into the Group Industrial plan.

Pirelli Tire LLC contributes to the reaching of the Group goals with a local plan encompassing environmental and social targets, as well as being committed to human rights and through a number of related policies and practices.

Our Supply Chains

Pirelli Tire LLC’s supply chain involves diverse suppliers for raw materials and services across multiple countries. The Company’s supply chain management emphasizes fairness, impartiality,

and equal opportunities and applies the **Pirelli Group's Suppliers' Code of Conduct** to the Company's suppliers. The Code details what is required of the Company's suppliers, and it covers human rights, labour rights, environmental guidelines, sourcing of materials, and business ethics. The Company, as a part of a global group of companies, is committed to adopting increasingly advanced models of management of the economic, social and environmental responsibility of the supply chain with particular attention to the upstream supply chain. Furthermore, the economic, social, and environmental sustainability of the natural rubber supply chain is among **Pirelli Group's top priorities** with the commitment to increase the transparency and traceability of the natural rubber value chain.

In 2021, **Pirelli Tire LLC** produced the world's first ever **Forest Stewardship Council ("FSC")** certified tire, following an extensive chain of custody audit process. FSC certification confirms that plantations are managed in a way that benefits the lives of local people and workers. This is in line with the **Sustainable Natural Rubber Policy** adopted by the **Pirelli Group**, the first pillar of which is protecting human rights and promoting decent working conditions.

In the area of conflict minerals, **Pirelli Group's** process of risk identification in its supply chain and mitigation, from which the Company benefits, includes:

- **Annual traceability of conflict minerals in the raw materials in the supply chain, aimed at identifying the origin of the minerals up to the mines or smelters and the existence of any conflict minerals. The scope of the process refers to raw materials received in the Pirelli Group's production plants and approved, according to the quality system, to be used in the production cycle as defined by the BOM (Bill of Material) for Pirelli tires.**
- **Assessment of the real necessity for use according to the safety and performance requirements of Pirelli products.**
- **Annual survey of suppliers eligible for reporting associated with Conflict Minerals, using the tools defined by the Responsible Minerals Initiative (RMI), in particular through tools such as the Conflict Minerals Reporting Template (CMRT) for 3TG and the Extended Minerals Reporting Template (EMRT) for other conflict minerals such as Cobalt and Natural Mica. The survey is launched in July of each year, based on raw material input data from the first six months of the year, and completed in the first months of the following year when raw material and supplier data are consolidated for the relevant year.**
- **Analysis and mitigation of risks at Smelter/Refiner (SOR; Smelters Or Refiners) level by verifying compliance with the standards set by the Responsible Minerals Assurance Program (RMAP), also considering the search for alternative sources of supply to support risk mitigation.**

We Are Aware of Risks of Forced Labour or Child Labour Use in Global Supply Chains

The Company is acutely aware of the risk of human rights violations within the supply chains, as well as the risks associated with forced labour and child labour in global supply chains. Likewise, the Company acknowledges that these risks are particularly prevalent in certain geographical areas and sectors, including the harvesting of rubber. As a responsible corporate entity, the Company, as part of a global group of companies, is committed to ensuring that its supply chains are free from such unethical practices. This commitment extends to sourcing materials from ethical suppliers who strictly adhere to internationally recognized labour laws and regulations and uphold high ethical and social standards.

Despite the identification of potential risks, effective safeguard measures have significantly reduced the actual risk levels, including through enhanced training for employees and trainings on Business & Human Rights activated for all raw material suppliers to the Group. In addition, in 2025 the Company offered the same training also to suppliers in the other product categories identified as high potential risk through the Risk Assessment ESG analysis, which combines Country Risk and Business Sector Risk. Furthermore, in 2025 strategic Raw Materials suppliers that had been added to the Company's vendor register following the 2024 training were also involved.

Furthermore, on-site audits are performed at supplier locations in higher-risk countries.

How We Work to Ensure Our Supply Chains Are Free of Forced Labour and Child Labour

1. Our Policies

Several policies in connection to ethics and human rights can be found on Pirelli's website, www.pirelli.com, including the Values and Ethical Code, the Social Responsibility Policy for Occupational Health, Safety and Rights, and Environment, the Global Human Rights Policy, the Diversity, Equity & Inclusion Policy, the Supplier Code of Conduct, the Sustainable Natural Rubber Policy, the Anti-Corruption Program, and the Whistleblowing Policy. These policies are adopted by all group companies, including Pirelli Tire LLC.

The adopted Human Rights Policy implies the identification, assessment, prevention and mitigation of human rights violation risks, promptly implementing corrective actions if these events occur. Among the Policy key elements, it requires:

- The raising of employees' awareness, through information and training, and the conducting of corporate activities with respect to human rights;
- The management of the supply chain in a responsible manner including, in particular, respect for human rights in the supplier selection criteria, in the contractual provisions and in the checks carried out by audit;
- that suppliers implement a similar management model within their supply chains;
- that suppliers conduct proper due diligence within their supply chain in order to certify that the products and materials supplied to Pirelli are "conflict free".

The Supplier Code of Conduct outlines its stance against forced and child labour, detailing requirements in human and labour rights, environmental protection, and business ethics. These policies are enforced through contractual agreements with suppliers and are a cornerstone of our procurement process. The Supplier Code of Conduct includes, among others, the following requirements:

- **Employment Contracts:** Suppliers must provide clear written labour contracts to all employees, ensuring transparency in employment terms, wages, and benefits.
- **Wages and Benefits:** Suppliers are required to offer salaries that meet at least the minimum legal standards and are adequate for a decent standard of living. Compensation must be merit-based and equitable.
- **Working Hours and Overtime:** Suppliers must adhere to legal standards for working hours and overtime. They must ensure fair compensation for overtime and compliance with local laws regarding leaves and work schedules.
- **Child Labour and Young Workers:** Suppliers are obligated to prevent child labour, hiring only workers who meet the legal minimum age. Young workers must be protected from hazardous work.
- **Modern Slavery and Forced Labour:** Suppliers must not engage in any form of forced labour, human trafficking, or other abusive working conditions. Employment relationships must be voluntary with the right to terminate employment reasonably.
- **Health and Safety:** Suppliers should provide a safe and healthy work environment in compliance with national and international standards. This includes adequate facilities, risk management, and training programs.

- **Non-Discrimination and Fair Treatment:** Suppliers are expected to provide equal employment opportunities and ensure a workplace free from discrimination, harassment, and abuse.
- **Freedom of Association and Collective Bargaining:** Suppliers must respect employees' rights to association and collective bargaining as permitted by law.

2. Due Diligence Processes

A rigorous due diligence process is applied for supplier selection, including on-site audits conducted by third parties, particularly for raw materials and high-value goods suppliers. The Pirelli Group due diligence processes cover Human Rights including forced labour and child labour, and are specifically designed to assess, manage, and mitigate risks related to these critical issues within its business and supply chain. Moreover, the Company's human rights commitments are specified in the Terms and Conditions included in contractual agreements with its suppliers who must agree to the Company's Sustainability Clause which includes specific references to prohibitions against forced labour and zero tolerance for any form of child labour.

Whistleblowing Procedure and Monitoring:

- The Company is committed to manage and reduce the potential risk of human rights violations, to avoid causing - or contributing to causing - adverse impacts on these rights and to this aim, it also includes a complaint channel for individuals and groups to voice concerns.
- In 2025, no reports of violations relating to forced and child labour were made to the Company.
- The Pirelli Group Internal Audit Department verifies compliance with human rights and labour rights at its affiliates through audits carried out on the basis of a continuous risk assessment. Auditors carry out their checks using a checklist of sustainability parameters derived from the SA8000® Standard and Pirelli's Social Responsibility and Business Ethics Policies.

Annual Supplier Audits:

- Third-party auditors are used to conduct sustainability audits on a number of tier 1 suppliers. These audits include verification of compliance with laws, regulations and Pirelli

Group policies on human rights including forced labour and child labour. During 2025 no cases of non-compliance on human rights were found along the Company supply chain.

3. Employee Training on Forced Labour and Child Labour

The Company is dedicated to ensuring its employees are well-trained and informed about the critical issues of forced labour and child labour. Pirelli's training programs are designed to educate and sensitize employees on these issues, emphasizing the importance of ethical sourcing and adherence to the Supplier Code of Conduct.

The Company has released a course in which the contents of Pirelli's Policy on Human Rights Management, the regulations underpinning the management model, risk analysis activities and reaction in the event violations are identified and are explored point by point. In addition, the Company has conducted training sessions for various employees, focusing on the principles outlined in its Supplier Code of Conduct and Ethics Code. These training sessions have covered various aspects of social responsibility, including the prevention of forced and child labour.

The Company employs the SA8000® Standard as a reference tool for managing social responsibility at and along its supply chain.

Through these training initiatives, the Company aims to embed a deep understanding and commitment to ethical practices among its employees, particularly concerning the critical areas of forced and child labour.

4. How We Monitor Ourselves and Our Suppliers

The Company bases its activities on respect for human rights and promotes these rights in the international, multicultural, socially and economically diversified context in which it operates. Human Rights related Policies and governance systems are applied to cover the value chain. Pirelli Group's internal monitoring includes regular reporting to senior management and the board on sourcing practices and compliance with ESG criteria. Key performance indicators are used to assess and ensure the effectiveness of Pirelli Group's strategies to prevent forced and child labour in its supply chains.

Pirelli Group utilizes annual Supplier Sustainability Audits by a third-party administrator in order to verify compliance with all sustainability and human rights terms required by laws, regulations, and Pirelli policies.

How We Have Addressed Reported Risks or Use of Forced Labour or Child Labour in our Supply Chains

To date, the Company has not encountered instances of forced or child labour within its supply chain. The Company's commitment to ethical sourcing extends to supporting vulnerable families potentially impacted by measures taken to eliminate forced or child labour in its operations and supply chains.

Further Steps

Following a review of the effectiveness of the steps taken to ensure that there is no forced labour and child labour in the Company or in the supply chains, in association with the Pirelli Group, Pirelli Tire LLC intends to take the following further steps:

- Continue the mapping and traceability of the relevant supply chain, through partnerships with the suppliers and with the aid of advanced mapping systems (including digital); and
- Continue with the third-party audit annual activity.

The Company is committed to working with all relevant bodies to operate to reduce the risk of forced labour and child labour within the business and supply chain.

Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Pirelli Tire LLC. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

By: Maureen S. Kline

Name: Maureen Kline
Title: VP Public Affairs & Sustainability

Date: May 20, 2026

I have the authority to bind Pirelli Tire LLC.