



HUMAN RIGHTS AND WORKING CONDITIONS POLICY

TRIANGLE'S COMPLIANCE 2024

PILLARS OF THE POLICY

We defined 5 core pillars for the Human Rights and Working Conditions Policy.

Respect for all

Everyone deserves respect, a place to belong and the freedom expressing their opinions, regardless of their background or beliefs. We value differences and ensure that everyone has the equal opportunity to thrive.

Safety always

Health and safety are our top priorities. We are constantly seeking ways to make our workplace as safe and pleasant as possible, so everyone can focus on excelling at what they do.

Grow together

We believe in the potential of our people, investing in the acquisition of new tools and skills. With access to training and continuous development, we encourage collective growth so that we can evolve together.

Present and Available

Communication is fundamental. We are interested in your ideas, concerns, and suggestions. Transparency is crucial to us, and a good conversation may be the starting point for great changes.

Fair work, integrated life

We are committed to recognizing and valuing your effort and

dedication, while focusing on the creation of a positive work environment, essential for a healthy integration between work and personal life.

I. SCOPE

1. Triangle's – Cycling Equipments, S.A. (hereinafter, "Triangle's" or "Company") recognizes that respect for human rights, including labor rights, constitute, under the terms set forth in this policy, a foundational principle of its activities and integrates its commitment to sustainable development.
2. This policy serves as a framework and covers Triangle's actions regarding human rights, including labor rights. The Company must adopt principles and commitments considering the context and specificities of its activities, while complying with the applicable legislation.

II. FRAMEWORK

The commitments to respect human rights assumed by Triangle's in this policy have been established in accordance with OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, namely the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO), the eight fundamental ILO conventions, and the international Bill of Human Rights.

III. HUMAN RIGHTS AND WORKING CONDITIONS

The points below establish the attitudes and conduct expected of all Triangle's employees, based on its Values, where commitment, integrity, and Ethics play a fundamental role.

It is the responsibility of all leaders in the organization – Directors, Team Managers, Team Leaders and others – to lead by example in complying

with the premises defined in this Policy, with their actions based on the pillars established herein.

The following points describe the key-elements to respect human rights and ensure working conditions for everyone who is a part of Triangle's.

1. No to child labor and protection of young workers

Triangle's – Cycling Equipments, S.A. does not engage in child labor nor employ workers below the minimum age established by law. For workers under the age of 18 years old, Triangle's ensures that they do not perform any activities that pose increased risks to their health and safety, such as shift work or strenuous tasks. Triangle's fosters close partnerships with various educational institutions, promoting curricular and professional internships, ensuring all associated rights, and providing remuneration that encourages learning and collaboration, whenever permitted by law.

2. No to forced labor and modern slavery

In accordance with international human rights standards, Triangle's opposes all forms of forced labor, including slavery, bonded labor, and human trafficking under any circumstances, and is committed to defending these rights both internally and externally. Employees must be free to move about and leave the workplace once their working hours have ended; forced, compulsory, or illegal labor is strictly prohibited. Whenever necessary, and in accordance with the Code of Conduct and Internal Regulations, disciplinary action will be taken against anyone who is proven to have violated this right.

3. Duty of confidentiality

Triangle's – Cycling Equipments, S.A. does not tolerate any form of harassment and discrimination, whether based on gender, race, age, color, disability, nationality, ethnicity, sexual orientation, religion or any

other grounds, and respects the freedom of thought and expression of all its stakeholder. In accordance with the Ethics and Whistleblower Protection Policy, Triangle's encourages and provides an internal channel for all employees to report any type of harassment or discrimination they have experienced or witnessed, ensuring full protection, anonymity, and confidentiality throughout the investigation process. Triangle's is committed to gender equality and to the workplace well-being of all its stakeholders.

4. For inclusion, diversity, equity and belonging

Triangle's – Cycling Equipments S.A. promotes inclusion, diversity, equity, and belonging among all its stakeholders through representation, best practices, fair treatment, appropriate resources, and working conditions — not only to enhance team dynamics, productivity, and innovation, but above all, to ensure everyone's well-being.

The company also works toward the empowerment of women to guarantee equal opportunities and the full development of the potential of all female employees through fair and transparent hiring processes, the creation of job and training opportunities, awareness-raising initiatives on gender to challenge stereotypes, and gender pay equality.

5. Salary and benefits

Triangle's takes pride in complying with all legal standards and requirements related to employee remuneration. Compensation is provided in a fair manner, supported by a balanced retribution system that is further complemented by a variety of employee benefits. Triangle's guarantees the applicable minimum wage in Portugal, or the amount negotiated through collective bargaining agreement and follows a non-discriminatory wage policy, where performance, effort and dedication are acknowledged and rewarded. Salary deductions as a disciplinary measure are not permitted unless provided for under national legislation. Triangle's – Cycling Equipments, S.A. ensures that its

employees are entitled to at least two days of rest per week, as well as sufficient rest periods between shifts, in accordance with local labor codes and as expressly stated in our Internal Regulations. Employees of other nationalities are entitled to receive the same pay and benefits as any other employee performing the same role and possessing the same qualifications.

6. Training and development

Triangle's – Cycling Equipments, S.A. promotes the continuous development of skills and capabilities of its employees, and provides career growth opportunities, by encouraging internal mobility and personal development as a driver for value creation, knowledge and creativity. Diverse training actions are also organized, aimed at the ongoing qualification and development of its employees.

7. Freedom of association and collective bargaining

Triangle's recognizes the right of its employees to form representative bodies and to engage in collective bargaining regarding their working conditions. The company embraces a culture of collaboration, built on mutual trust and constructive dialogue with employee representatives. Even in the face of controversial issues, Triangle's strives to maintain stable cooperation with such bodies, with the primary goal of ensuring employee well-being. No form of discrimination, positive or negative, is exercised against employees based on their choice to join or not to join a union or workers' representative entity. In situations where no organization representative is designated, Triangle's will promote close dialogue with all relevant stakeholders, while respecting employees' right to abstain from such activities, as well as their freedom of opinion and expression. Triangle's also recognizes the right to strike and will not interfere, hinder or revoke this right, while acknowledging any legal limitations or qualifications that may apply.

8. Working hours

Triangle's – Cycling Equipments, S.A. complies with national legal regulations on working time as a minimum requirement. The defined working hours align with Triangle's core Values, incorporating time for rest, leisure, holidays, and the promotion of a healthy lifestyle. Working and break periods consider not only business needs but also employees' personal needs, and are based on fair criteria, including medically recognized limits regarding physical and psychological stress.

Employees must not be required to work more than 60 hours per week, including overtime, on a regular basis (or more than the regular and overtime limits permitted by national and sectoral laws and regulations), with local national laws taking precedence when setting a lower maximum threshold. Triangle's supports employees in balancing their professional and personal lives by promoting initiatives and activities that foster a healthy work-life balance throughout different stages of life and career, and by providing access to professionals and services dedicated to this area.

9. Safety and health at work

Triangle's – Cycling Equipments, S.A. complies with all applicable requirements regarding the health and safety of its employees, having implemented an effective management and certification system (ISO 45001). In line with applicable legislation, all relevant aspects of occupational health and safety are considered in the design and development of each job role, with a focus on ergonomics to reduce accidents and occupational illnesses.

Employees and leaders receive regular and specific training in this area, and strong investment is made in the relationship between the healthcare professionals working at Triangle's and its employees. Promoting a healthy lifestyle among employees is a continuous priority, with various free services available in this area.

Triangle's maintains a constant focus on ensuring the safety of both

employees and visitors across its entire premises. Specific on-site risk assessments are conducted regularly, and appropriate measures are implemented based on needs and legal requirements. All details related to this matter are outlined in Triangle's Health and Safety Policy.

IV. COMMITMENTS

For the purposes and under the terms set forth in this policy, Triangle's assumes the following commitments regarding human rights, including labor rights:

- a) Comply with applicable legislation and regulations, implement good corporate governance practices, and act with respect for human rights, including labor rights, in the course of its activities, particularly in relation to its employees, collaborators, partners, suppliers, clients, other stakeholders, and local communities;
- b) Not to resort, under any circumstances, to child labor or to forced or coercive labor;
- c) Respect the employees' freedom of association and the right to collective bargaining, recognizing the importance of a constructive and mutually beneficial dialogue between all parties;
- d) Promote dignity and respect for the human being in labor context, not permitting discriminatory acting relating to its employees, namely regarding race, religion, sex, sexual orientation, incapacity, age, nationality, politic conventions or economic or social situation and valuing diversity, gender equality and inclusion, as a way to ensure opportunity equality, concerning disabled people;
- e) Prevent all forms of harassment, abuse and violence in the workplace, condemning and sanctioning any behavior intended to humiliate, threaten or intimidate;
- f) Provide access to decent employment by ensuring employees a safe and healthy work environment, physically and

psychologically, fair and equitable remuneration, personal development and continuous training, protection of personal data privacy, respect for rest periods, access to applicable social protection schemes, and respect for parenting rights, while promoting good balance between professional, family and personal life; and

- g) Respect human rights in all local communities where its activity takes place, namely through the adoption of measures that minimize any potential negative impacts of its operations, while considering local values, culture and traditions.

V. DISSEMINATION, IMPLEMENTATION AND MONITORING

1. Triangle's will promote the dissemination of this policy within the Company and among all those who collaborate or may come to collaborate with Triangle', as well as its incorporation into the company's business culture, namely through training actions and the inclusion of its principles and commitments in operational procedures;
2. The Executive Committee shall approve the necessary actions for the adoption of this policy, particularly through the establishment of appropriate due diligence processes that lead to the implementation of preventive and corrective measures and compliance assessment procedures – destined to identify the main impacts and potential risks of its activity in terms of human rights, including labor rights – as well as the necessary actions to be carried out. It shall also ensure the transparent disclosure of relevant information on this matter;
3. The Executive Committee will also implement concrete measures to promote and ensure compliance with this policy, including the implementation of any necessary mitigation, corrective or remedial actions. It will monitor the execution of this policy and, whenever appropriate or necessary, carry out its review;

4. It is the responsibility of Triangle's employees to report any breaches of the principles and commitments set out in this policy and to identify situations of non-compliance, through the established reporting procedures or via Triangle's Whistleblowing Channel.

VI. APPROVAL AND ENTRY INTO FORCE

This policy was approved by the Executive Committee on March 1, 2024, and entered into force on the date of its approval.

10. Document Control

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