



DIVERSITY AND
EQUAL
OPPORTUNITY
POLICY

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1. Purpose and Objectives of the Policy

This Policy reflects the philosophy of SICIT Group S.p.A. (“SICIT”) and its subsidiaries and affiliates (collectively, “SICIT Group”), and defines the guidelines for adopting practices and strategies that promote and enhance diversity while ensuring equal opportunities within the organization.

Specifically, the purpose of this Policy is to establish directives for directors, managers, employees, agents, consultants, intermediaries, controlled joint ventures, and other third-party representatives of SICIT Group, in order to ensure compliance with applicable laws, regulations, and principles relating to diversity and equal opportunity.

Through this document, the Group aims to create a working environment where everyone feels respected, valued, and able to access the same opportunities for growth and development.

By adopting this Policy, SICIT Group commits—throughout the course of its business relationships—to encouraging its business partners to support the principles outlined herein and to promoting the adoption of similar policies within their own organizations.

It is important to note that any violation of applicable laws on diversity and equal opportunity may expose both SICIT Group and the individuals involved to penalties.

2. Scope of Application

This Policy sets out the general guidelines on diversity and equal opportunity that apply to all companies within the SICIT Group.

At the local level, each company is required to adopt stricter rules and procedures, as needed, based on its specific context and in compliance with local laws and regulations.

While exercising its oversight and coordination activities, SICIT Group respects the managerial autonomy of each affiliated company within the Group, while maintaining overall governance and control in line with the legitimate interests of both majority and minority shareholders, and in compliance with applicable local laws and confidentiality requirements.

3. SICIT Group’s Approach to Diversity and Equal Opportunity

Respect for individual diversity and for all stakeholders is a fundamental value for SICIT Group. This value must be protected and promoted through concrete and widespread actions across all organizational and management processes, by fostering understanding, inclusion, and the appreciation of each person’s uniqueness. These values, also expressed in the Group’s Code of Ethics, underpin every business activity carried out by SICIT Group.

The Group views diversity as a source of enrichment that can generate innovative solutions capable of anticipating the needs of its customers and key stakeholders. At the same time, SICIT Group is committed to ensuring that all individuals are treated with dignity and respect, guaranteeing equal opportunities and actively opposing any form of direct or indirect discrimination, including harassment.

Equal opportunity and equal treatment are considered strategic elements that positively contribute to the Group’s business by improving human resource management and enhancing the company’s resilience and competitiveness.

4. Relevant Regulations and Standards

In conducting its activities, SICIT Group is committed to applying and promoting the principles set out in international human rights declarations and relevant regulations, including:

- The **Universal Declaration of Human Rights** (United Nations, 1948);

- The **ILO Declaration on Fundamental Principles and Rights at Work** (1998);
- The **eight core conventions of the International Labour Organization (ILO)** (Nos. 29, 87, 98, 100, 105, 111, 138, 182) and **Convention No. 190** on eliminating violence and harassment in the workplace;
- The **ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy**;
- The **Ten Principles of the United Nations Global Compact (UNGC)**, in particular **Principle 4** on the elimination of all forms of discrimination in respect of employment and occupation;
- The **Women’s Empowerment Principles (WEPs)**, promoted by UN Women and the UN Global Compact;
- **Sustainable Development Goals (SDGs)** 5 (gender equality) and 10 (reduced inequalities) of the **2030 Agenda for Sustainable Development**;
- The **UN Guiding Principles on Business and Human Rights (UNGPs)** and their related **Gender Dimensions**;
- **Directive (EU) 2023/970**, which strengthens the application of the principle of equal pay between men and women;
- **Directive (EU) 2022/2464** on corporate sustainability reporting;
- The **Code of Ethics** adopted by SICIT Group.

5. Principles of Conduct

With regard to diversity and the guarantee of equal opportunity, SICIT Group ensures that its business activities are conducted in accordance with the following principles of conduct:

5.1. Recruitment, Hiring, and People Management

SICIT Group recognizes human resources as a central and essential element for achieving its corporate objectives. Accordingly, the Group adopts recruitment and hiring procedures based on respect for human values, individual autonomy, and personal responsibility.

The recruitment and selection process is conducted in accordance with the principles of non-discrimination, absolute impartiality, autonomy, and independent judgment. These principles ensure that final decisions are made based on the qualifications of the most suitable candidates for the position, while also offering competitive terms in line with market standards and ensuring equal access to job opportunities.

5.2. Non-discrimination and Prohibition of Harassment

SICIT Group prohibits all forms of direct or indirect discrimination based on gender, race or ethnic origin, nationality, religion or personal beliefs, disability, marital status, age, sexual orientation, political opinions, national origin, social background, or any other grounds protected under EU and national legislation.

No form of harassment—whether verbal, physical, or psychological—is tolerated, including sexual harassment or any unwelcome conduct related to sex, gender, or sexual intent that has the purpose or effect of violating the dignity of a worker and creating an intimidating, hostile, degrading, humiliating, or offensive work environment.

Likewise, SICIT Group does not tolerate any form of retaliation or victimization against employees or stakeholders who report discrimination and/or harassment or who provide relevant information.

The Group encourages anyone who has experienced or witnessed any form of discrimination, including sexual harassment, to promptly report the incident using the whistleblowing channel. For further details, see section 6 – Reporting.

5.3. Inclusion and Equal Opportunity

At SICIT Group, women represent an essential part of the workforce, from leadership roles to operational and customer-facing positions.

In this context, the Group is committed to removing any barriers—including cultural ones—that may hinder women’s access to the labour market or limit their ability to engage and grow professionally on equal terms with men.

To that end, SICIT Group has adopted a strategic approach aimed at ensuring equal opportunity regardless of gender, and supports the professional development of women in managerial and leadership roles, based on merit.

The Group also promotes a suitable and accessible work environment for individuals with disabilities, encouraging all departments to recruit people with disabilities, in accordance with their needs and individual skills.

For SICIT Group, the inclusion of persons with disabilities is not only an ethical duty but also an opportunity to enrich the organization with diverse perspectives and skills. The Group actively promotes awareness across the workforce on the importance of inclusion.

At the same time, SICIT Group ensures equal treatment and opportunities for education, training, employment, and career advancement, and condemns any behaviour that may harm the dignity of a vulnerable individual or create an intimidating, hostile, degrading, humiliating, or offensive climate.

This strategy applies to all stages of the employee lifecycle—from recruitment and role assignment to onboarding, access to training, and career progression, including compensation.

In its operations, the Group acts in accordance with the principle of “equal pay for equal work”, in line with applicable laws and regulations, and also takes into account the results of annual performance reviews for each employee.

5.4. Diversity in Governance and Control Bodies

SICIT Group considers diversity a key factor in gaining competitive advantage. For this reason, it strives to ensure that its Board of Directors is diverse in terms of skills and competencies, as well as gender, race, geographic experience, and industry background.

Each board member is appointed based on merit and with consideration of their skills, experience, and independence, in order to ensure the efficiency and effectiveness of the board as a whole.

These differences are taken into account when defining the optimal composition of the Board and, where possible, should be appropriately balanced.

5.5. Diversity and Culture

In line with SICIT Group’s commitment to cultural diversity and integration, SICIT Group is committed to fostering and structuring the combination of different cultural backgrounds within its workforce. It promotes an intercultural vision grounded in dialogue and built on organizational and social cooperation.

SICIT Group embraces the idea that, through an inclusive and intercultural learning process involving the active participation of the entire workforce, prejudice can be overcome while respecting individual differences.

5.6. Adequate Working Environment

A proper and proportionate balance between the different aspects of people’s lives has a positive impact on the work environment, on individual engagement and productivity, and on employees’ sense of belonging—

as well as on their overall quality of life and well-being.

For this reason, SICIT Group is committed to creating and promoting a working environment built on trust, dialogue, and mutual respect—an inclusive environment where all employees can participate fully in company processes without barriers. The Group promotes work-life balance, ensures decent wages, and fair working hours.

Furthermore, personal circumstances related to work-life balance (e.g., pregnancy, maternity/paternity leave, part-time work, flexible working arrangements, etc.) must never be used as grounds for discriminatory treatment.

6. Reporting

SICIT Group encourages anyone who becomes aware of actions or behaviours that violate this Policy—or applicable laws and regulations on diversity and equal opportunity—to file a report.

For activities within Italy, SICIT Group has established a dedicated internal whistleblowing channel to ensure the confidentiality of the information provided and the protection of the whistleblower's identity: Reports can be submitted by filling out the form available on the GLoBaLeaks platform:

<https://whistleblowing.sicitgroup.com/#/>

For foreign subsidiaries, the management of reports concerning violations of this Policy is governed by internal rules and procedures, which guarantee protection against retaliation and define the actions and measures necessary to investigate and, if appropriate, take corrective action.

7. Implementation and Monitoring

SICIT Group is committed to assessing the implications of diversity and inclusion issues within its operations.

Given the potential impact of violations of this Policy, the Group prioritizes actions aimed at identifying, preventing, or mitigating such impacts across its value chains.

SICIT Group periodically reviews and updates the progress of its commitments and communicates results annually through the Sustainability Report and other communication tools.

8. Review, Communication, and Training

This Policy is subject to periodic review to ensure its continued relevance and effective implementation. Any revision will be submitted to the Board of Directors for approval.

SICIT Group is committed to making this Policy accessible and available to all relevant stakeholders, both within and outside the company, through internal communication channels and publication on the corporate website:

<https://www.sicitgroup.com/policy-di-gruppo/>

Employee engagement is considered a key starting point to ensure the full implementation of this Policy. For this reason, SICIT Group provides training and awareness programs to promote understanding of the principles set out herein, as well as of applicable legal requirements and the most rigorous internal standards and procedures.

SICIT Group S.p.A.

Chairman

Rino Mastrotto