



# HUMAN RIGHTS POLICY

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## 1. Purpose and Objectives of the Policy

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This Policy reflects the philosophy of SICIT Group S.p.A. ("SICIT") and its subsidiaries and affiliates (collectively, "SICIT Group"), establishing the guiding principles and commitments the Group upholds to protect and promote human rights in all business activities and operational contexts.

Its primary goal is to provide clear guidelines for directors, managers, employees, agents, consultants, intermediaries, controlled joint ventures, and other third-party representatives of SICIT Group S.p.A. ("SICIT"), ensuring compliance with applicable human rights laws and regulations.

By adopting this Policy, SICIT Group commits to encouraging its business partners to uphold these principles and to promote similar policies within their own organizations.

Full alignment with this Policy is a key requirement for SICIT Group when establishing and maintaining strong, long-term partnerships that foster mutual improvement in human rights practices.

It is important to note that any violation of applicable human rights laws may expose both SICIT Group and the individuals involved to serious penalties.

## 2. Scope of Application

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This Policy defines the fundamental human rights principles that apply to all SICIT Group companies, including its subsidiaries, majority-owned entities, and managed facilities.

At the local level, each company is responsible for adopting stricter rules and procedures as needed, ensuring alignment with local laws and regulations.

While overseeing and coordinating its operations, SICIT Group S.p.A. respects the managerial independence of each affiliated company within the Group. At the same time, it ensures overall governance and control in line with the legitimate interests of both majority and minority shareholders, while also adhering to confidentiality requirements and applicable local laws.

## 3. SICIT Group's Approach to Human Rights

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For SICIT Group, respecting human rights is a fundamental value. The Group is fully committed to preventing violations by implementing processes designed to identify and assess potential or actual risks and impacts related to its activities.

By promoting human rights, SICIT Group aims to foster sustainable growth that enhances the well-being, inclusivity, and resilience of both the company and the communities in which it operates.

Human rights are a core, non-negotiable element of SICIT Group's corporate culture and strategy.

This Policy, aligned with the ethical principles outlined in the company's Code of Ethics and its internal regulatory framework, provides a structured and integrated vision of how the Group incorporates human rights into its business operations.

SICIT Group actively works to minimize and mitigate human rights risks, ensuring that its activities do not negatively impact—either directly or indirectly—human rights in the diverse international, multicultural, social, and economic contexts in which it operates.

## 4. Relevant Regulations and Standards

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In carrying out its activities, SICIT Group is committed to respecting fundamental human rights as established by the laws and regulations of each country in which it operates, as well as internationally recognized standards, including:

- **Universal Declaration of Human Rights (1948)**
- **International Covenant on Civil and Political Rights (1976)**
- **International Covenant on Economic, Social, and Cultural Rights (1976)**
- **European Convention on Human Rights (1950)**
- **United Nations Convention on the Rights of the Child (1989)**
- **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
- **ILO Declaration on Fundamental Principles and Rights at Work (1998)**
- **SICIT Group's Code of Ethics**

Additionally, SICIT Group adheres to the **Ten Principles of the United Nations Global Compact (UNGC)**, with particular focus on:

- **Principle 1:** Supporting and respecting internationally recognized human rights within its sphere of influence.
- **Principle 2:** Ensuring the company is not complicit, even indirectly, in human rights abuses.
- **Principle 3:** Recognizing workers' freedom of association and the right to collective bargaining.
- **Principle 4:** Eliminating all forms of forced and compulsory labour.
- **Principle 5:** Effectively abolishing child labour.
- **Principle 6:** Eradicating discrimination in employment and occupation.

SICIT Group continuously strives to improve its approach to human rights, ensuring that local operations by promoting the adoption, at the local level, of all necessary practices, procedures, rules, and guidelines to uphold and these principles.

Specifically, SICIT Group aligns with the **International Labour Organization's (ILO) stance** on fair wages, ensuring that salaries enable workers and their families to meet basic needs such as housing, food, healthcare, education, transportation, and clothing.

To uphold this commitment, the company conducts **annual salary reviews** in compliance with national labour laws in each country where it operates.

### 4.1. Principles of Conduct

In line with its commitment to human rights, SICIT Group ensures that its business is guided by the principles of conduct presented in the following paragraphs. These principles reflect the company's core values and corporate strategy, and they are subject to ongoing monitoring to prevent potential violations and to assess the effectiveness of related actions.

#### 4.2. Recruitment, Hiring Practices and Management of Human Resources

Group views its people as essential to achieving corporate goals. For this reason, it adopts recruitment and hiring practices that respect human dignity, individual autonomy, and personal responsibility.

The selection process is based on non-discrimination, impartiality, independence, and fairness—ensuring that hiring decisions are made solely on the basis of qualifications and suitability for the role. The company also offers competitive employment terms and equal access to job opportunities.

#### 4.3. Valuing Diversity and the Principle of Non-Discrimination

SICIT Group promotes and values diversity among its collaborators and opposes all forms of direct or indirect discrimination based on gender, marital status, sexual orientation, religion or beliefs, political views, union membership, race, ethnicity, nationality, age, social background, or physical and mental ability.

For more details on the Group's approach to diversity and equal opportunity, please refer to the dedicated Policy.

#### 4.4. Work-Life Balance

SICIT Group fosters a workplace culture based on trust, dialogue, and mutual respect. It is committed to protecting employees' well-being by promoting a healthy work-life balance.

A proper balance between the different aspects of life has a positive impact on the work environment, employee engagement, productivity, and sense of belonging—ultimately improving overall quality of life and well-being.

Personal circumstances related to this balance—such as pregnancy, maternity/paternity leave, part-time schedules, or flexible working—must never be used as grounds for discrimination.

#### 4.5. Rejection of Forced Labor, Child Labor, and Human Trafficking

SICIT Group strictly condemns and prohibits all forms of labour exploitation, including child labour, forced or compulsory labour, human trafficking, and any form of physical or psychological coercion—whether involving its own employees or those within the supply chain.

The company ensures that all its operations are free from such practices. In compliance with ILO Convention No. 138 (1973) on minimum age, SICIT does not hire anyone below the legal working age in the country where the activity takes place.

#### 4.6. Working Conditions, Working Hours and Fair Wages

SICIT Group ensures that all employees, including agency workers, receive fair compensation, equitable treatment, and equal access to the same pay standards—regardless of gender—while recognizing and valuing their skills and professionalism.

In particular, the Group guarantees a minimum wage that is not lower than the levels set by national collective labor agreements and relevant employment regulations in the countries where it operates, in line with ILO conventions.

Additionally, SICIT Group is committed to ensuring that at least 90% of its employees receive a total gross wage above the living wage thresholds established by the *WageIndicator Foundation*. This is a continuous goal, reviewed annually as part of the company's wage policy.

All employees are also entitled to working conditions that respect the maximum number of working hours, rest periods, shift rotations (where applicable), and paid annual leave.

#### 4.7. Health and Safety at Work

SICIT Group is fully committed to providing a safe and healthy work environment for all employees. In compliance with applicable laws, regulations, and internal standards on health and safety, the Group adopts strict measures for risk prevention, assessment, and management.

A strong safety culture is promoted across the organization through regular training sessions designed to raise awareness among employees about the importance of occupational health and safety.

#### 4.8. Prohibition of Harassment and Violence

SICIT Group is committed to ensuring a work environment free from violence, harassment, intimidation, and any other conditions that may create insecurity or instability, whether caused by internal or external threats. The Group implements appropriate security measures tailored to employees' needs and in full respect of their dignity.

No form of harassment is tolerated—whether physical, verbal, visual, psychological, discriminatory, or sexual—that may contribute to a degrading, hostile, humiliating, intimidating, offensive, or unsafe workplace. SICIT Group encourages anyone who has witnessed or experienced harassment or violence, including sexual harassment, to promptly report the incident through the dedicated whistleblowing channel. For more details, see section 6 “Reporting”.

#### 4.9. Freedom of Association and Collective Bargaining

SICIT Group recognizes the right of all employees to establish and/or join organizations aimed at protecting and promoting their interests. Employees are also free to be represented by trade unions or other representative bodies elected in accordance with the laws and practices of the countries in which they work.

At the same time, the Group considers collective bargaining to be a key instrument for defining employment conditions and for regulating the relationship between company management and workers' organizations.

#### 4.10. Respect for Local Communities

SICIT Group is aware of the direct and indirect impact its activities may have on the local communities where it operates. It actively promotes respect for local cultures and Indigenous peoples as a fundamental value, protecting their cultural and natural heritage, traditions, and customs.

Through educational, cultural, and social initiatives that foster personal development and improved quality of life, the Group contributes to the economic well-being and growth of local communities.

SICIT Group views dialogue with competent institutions and non-governmental organizations as essential to identifying priority areas for community support.

The Group encourages:

- employee awareness and engagement in conducting business activities with respect for human rights;
- responsible supply chain management, including respect for human rights as a criterion for supplier selection and encouraging them to adopt similar management models.

SICIT Group is open to collaboration with governmental, non-governmental, sectoral, and academic organizations to develop global policies and principles for the protection of human rights. It regularly informs stakeholders about its initiatives and performance through its annual Sustainability Report and corporate website

#### 4.11. Privacy and Confidentiality

SICIT Group respects the privacy and confidentiality rights of its stakeholders and is committed to the proper handling of data and information it comes into contact with.

The processing of personal data and information is carried out lawfully and in full compliance with applicable legal provisions, fundamental rights, and recognized principles, including respect for private and family life, home and correspondence, personal data protection, and the freedoms of thought, conscience, religion, expression, and information.

### 5. Reporting

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SICIT Group encourages anyone who becomes aware of actions or behaviors that violate this Policy—or applicable laws and regulations on human rights—to file a report.

For activities within Italy, SICIT Group has implemented a dedicated internal whistleblowing channel that ensures the confidentiality of the information provided and the identity of the reporting party. Reports can be submitted by completing the form available on the GLoBaLeaks platform: <https://whistleblowing.SICITgroup.com/#/>

For foreign subsidiaries, the handling of reports concerning violations of this Policy is governed by internal rules and guidelines, which explicitly prohibit retaliation against whistleblowers and outline the necessary actions and measures to investigate and, where appropriate, take corrective action.

### 6. Implementation and Monitoring

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In line with the United Nations Guiding Principles on Business and Human Rights, SICIT Group is committed to assessing the human rights impacts of its activities. As part of these periodic assessments, the Group may, where appropriate, consult relevant stakeholders, including NGOs and potentially affected groups.

Given the potential consequences of human rights violations, the Group prioritizes actions that help identify, prevent, or mitigate such impacts across its value chains.

SICIT Group regularly evaluates and updates the progress of its human rights commitments and communicates results annually through the Sustainability Report and other communication tools.

If the Group determines that it has caused or directly contributed to negative human rights impacts, it will implement appropriate remediation processes, potentially in collaboration with relevant stakeholders.

### 7. Review, Communication, and Training

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This Policy is subject to periodic review to ensure its relevance and effectiveness. Any revisions 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 organization, through internal communication channels and publication on the corporate website: <https://www.sicitgroup.com/policy-di-gruppo/>

Employee engagement is a key starting point for ensuring the full implementation of this Policy. To promote understanding of its principles—as well as the applicable legal requirements and internal procedures—SICIT Group delivers training initiatives aimed at raising awareness and supporting compliance across the organization.

SICIT Group S.p.A.

Chairman

Rino Mastrotto