



HUMAN RIGHTS POLICY

CONTENTS

1.Purpose of the Policy	3
2.Scope.....	3
3.Our approach towards respect of human rights	3
4.General principles	4
4.1 Respect of Human Rights	4
4.2 Valuing diversity / Non-discrimination.....	4
4.3 Adequate working conditions.....	4
4.4 Opposition to forced labor and Human Trafficking.....	4
4.5 Work Hours, Wages and Benefits.....	4
4.6 Child Labor	4
4.7 Safe and Healthy Workplaces.....	4
4.8 Workplace Security	5
4.9 Freedom of Association and Collective Bargaining	5
4.10 Privacy.....	5
4.11 Communities and Stakeholder Engagement / Local Communities	5

1. Purpose of the Policy

The purpose of this policy is to provide guidance to to SICIT Group S.p.A. (“SICIT”) and its controlled and affiliate companies (all together “SICIT Group”) directors, officers, employees, agents, consultants, intermediaries, controlled joint ventures, and other third-party representatives to ensure compliance with applicable Human Rights Laws and regulation.

This policy applies to SICIT, its subsidiaries, the entities in which it holds a majority interest, and the facilities that it manages. We are committed to working with and encouraging our business partners to uphold the principles in this Policy and to adopt similar policies within their businesses.

A violation of the applicable human rights regulation potentially subjects both the SICIT and the individual(s) involved to severe criminal and civil penalties. This policy contains principles of conduct that must be followed to comply with all relevant regulations.

2. Scope

This policy applies as a minimum set of rules to all SICIT Group companies.

Locally each company should adopt more stringent rules and procedures, as needed and in accordance with local laws and regulations.

While conducting its management and coordination activities, SICIT Group S.p.A. respects management autonomy of each affiliate within its Group, while managing and controlling the overall business, as per legitimate interests of majority and minority shareholders, considering confidentiality requirements and local applicable laws.

3. Our approach towards respect of human rights

Respect for human rights is fundamental to the sustainability of the SICIT Group and the communities in which we operate. We are committed to ensuring that people are treated with dignity and respect.

Our activities are based on respect for global human rights, which are a non-negotiable fundamental value of our culture and corporate strategy. SICIT Group works to manage and reduce the potential risk of human rights violations, to avoid causing - or contributing to causing - adverse impacts on these rights within the international, multiracial, socially and economically diverse conditions in which it operates.

We base our business activities on the respect of the values set out in our Ethics Code, in the belief that business conduct cannot disregard ethics and the respect of human rights. We are committed to maintaining the highest possible ethical standards and to complying with all applicable laws in all countries in which we do business.

We firmly believe to have the responsibility to operate in compliance with the rules of the countries where we have a presence, distinguishing ourselves as an enterprise capable of exporting the values that permeate our actions, by promoting them in the communities where we operate.

SICIT Group activities are governed by our Ethics Code and it was approved with SICIT Board of Directors motion for the adoption of the Organization, Management and Control Model as per Legislative Decree 231/2001.

We respect and protect the fundamental human rights laid down by the laws and regulations of each country where we operate. Our approach to human rights protection is inspired by international standards, including:

- the United Nations Declaration of Human Rights;
- the United Nations Convention on the Rights of the Child;
- the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and the relevant applicable conventions;
- the European Convention on Human Rights.

4. General principles

As a general rule, our activities are based on respect for global human rights, which are a non-negotiable fundamental value of our culture and corporate strategy.

4.1 Respect of Human Rights

SICIT Group respects human rights. It is committed to identify, prevent, and mitigate adverse human rights impacts resulting from (or caused by) our business activities; before or, if they occur, through appropriate mitigation processes.

4.2 Valuing diversity / Non-discrimination

SICIT Group values the diversity of the people with whom we work and the contributions they make; and is opposed to any form of direct or indirect discrimination on the basis of gender, marital status, sexual orientation, religious or political beliefs, union membership, race, ethnicity, nationality, age, social background and status, physical and mental disability; and is committed to the prevention of discrimination in all areas of working life.

4.3 Adequate working conditions

SICIT Group promotes a working environment based on trust, dialogue and mutual respect and protects the welfare and work-life balance of its employees, ensuring decent wages and fair working hours.

4.4 Opposition to forced labor and Human Trafficking

SICIT Group opposes all forms of labor exploitation, including child labor, forced or compulsory labor and all forms of abuse or mental or physical coercion towards both their workers and workers employed along the supply chain, and strongly condemns all forms of human trafficking and exploitation.

4.5 Work Hours, Wages and Benefits

SICIT Group compensates employees competitively relative to the industry and local labor market. We operate in full compliance with applicable wage, work hours, overtime, and employees' benefits laws.

4.6 Child Labour

SICIT Group prohibits the hiring of individuals that are below the local age requirement.

4.7 Safe and Healthy Workplaces

SICIT Group provides a safe and healthy workplace and complies with applicable safety and health laws, regulations and internal requirements. We consider the health and safety of workers a core value and proactively maintains a safe and healthy working environment by adopting high standards of prevention,

assessment and management of related risks and by fostering and constantly spreading a corporate culture geared towards occupational health and safety.

4.8 Workplace Security

SICIT Group is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy and dignity.

4.9 Freedom of Association and Collective Bargaining

SICIT Group respects our employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment and recognizes the right of its employees to form freely trade unions and to collective bargaining and engages in open and constructive dialogue with representatives of recognized trade unions.

4.10 Privacy

SICIT Group is aware of the importance of ensuring adequate safeguards to the interested parties concerned with the personal data processing operations and respects the right to privacy of all of its Stakeholders, undertaking to use the data and information provided in a correct manner.

4.11 Communities and Stakeholder Engagement / Local Communities

SICIT Group seeks to disseminate and promote its core business values, while respecting local cultures and indigenous people, protecting cultural and natural heritage and local traditions and customs. SICIT contributes to the economic wellbeing and growth of the communities in which it operates by providing support to educational, cultural, and social initiatives for promoting personal development and improving living standards. SICIT believes that dialogue with competent institutions and non-governmental agencies is key to identifying the priority areas for local communities' support.

SICIT Group is engaged in the identification, prevention and mitigation of human rights violation risks, promptly implementing corrective actions if these events occur.

SICIT Group encourages:

- employees' awareness in conducting corporate activities with respect for human rights;
- managing its supply chain in a responsible manner including the respect of human rights as one of its suppliers' selection criteria;
- requires to its suppliers deploying a similar management model.

SICIT Group is open to cooperation with governmental, non-governmental and sectorial and academic bodies for the development of global policies and principles aimed at protecting human rights and regularly informs its Stakeholders about the activities carried out and the performance achieved, primarily through the Group's annual Sustainability Report and the corporate website.

SICIT's Top Management has a strategic role in the full implementation of this Policy ensuring the involvement of all personnel and of those who collaborate with SICIT Group and the consistency of their behavior with the values embodied in this Policy.

SICIT Group S.p.A.

Chairman

Giuseppe Valter Peretti