



DIVERSITY POLICY

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1. Purpose of the Policy

The purpose of this policy is to provide guidance 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 to SICIT compliance with applicable Diversity Laws and regulation and principles.

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 diversity 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 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 diversity

Respect of the diversity people is a fundamental value of the SICIT Group and the communities in which we operate. We are committed to ensuring that people are treated with dignity and respect.

For SICIT Group, it is a requirement to enhance the diversity of all stakeholders and oppose any form of direct or indirect discrimination based on gender, marital status, sexual orientation, religious or political beliefs, trade union membership, race, ethnicity, nationality, age, background and social status, physical and mental disability and is committed to preventing discrimination in all areas of working life.

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 and diversity. 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 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 diversity protection is inspired by international standards, including:

- the United Nations Convention on the Elimination of All forms of Discrimination Against Women;
- the United Nations Conventions on the Rights of Person with Disabilities;
- the United Nations Declaration of Human Rights;

- 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 rule, our activities are based on respect for diversity and inclusion, which are a non-negotiable fundamental value of our culture and corporate strategy.

In our strategies and operations, we consider the following principles:

4.1 Non-discrimination and promotion of diversity

In SICIT Group, are not eligible forms of discrimination based on race, color, sex, age, religion, physical condition, marital status, sexual orientation, citizenship, ethnic origin, or any other discrimination against the law. In internal and external working relationships, there must be no harassment, such as the creation of an intimidating or hostile work environment. It will not be put in place or tolerated within the Group, any form of retaliation against employees and stakeholders who have complained of discrimination or harassment; or towards employees and stakeholders who have provided information on the matter.

4.2 Inclusion and equal opportunities for women

SICIT Group adopts a strategic approach aimed at the effective realization of equal opportunities starting from the diffusion of a corporate culture and policies of inclusive human resources, free from discrimination and prejudices, favoring the development and professional growth of women in order to balance the composition of gender in managerial and management positions.

We are committed to supporting women in all phases of the employment relationship, from the selection process to the assignment of roles (both genders will be equally represented in staffing and recruiting process), to professional development, to salary, in order to guarantee fairness in according with the principle “*equal pay for equal work*” to all levels of the Group and with applicable laws and regulation.

4.3 Inclusion and equal opportunities of people with different abilities

SICIT Group intends to continue and further develop its employee reception policy with different skills through recruitment, integration and career development, encouraging the different departments companies to the hiring of disabled resources respecting the needs and skills of each individual providing an adequate work environment.

4.4 Interculturalism

In line with the value of integrating different cultures and experiences, SICIT Group is committed to fostering and systematizing the mix of different cultures within the workforce by promoting an intercultural vision that is open to multi-level dialogue and based on organizational and social cooperation.

4.5 Corporate Board Diversity

SICIT Group recognizes and embraces the benefits of having a diverse Board and sees increasing diversity at Board level as an essential element in maintaining a competitive advantage. A truly diverse Board will include and make good use of differences in the skills, regional and industry experience, background, race, gender and other distinctions. These differences will be considered in determining the optimum composition of the

Board and when possible should be balanced appropriately. All Board appointments are made on merit, in the context of the skills, experience, independence and knowledge which the Board requires to be effective.

4.6 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.

SICIT Group believes that an adequate and proportional balance of different aspects of people's lives has an impact positive in the workplace, on commitment, on productivity and on the sense of belonging to the company, as well as improving the quality of life and well-being of employees. For this reason, SICIT is committed to creating an environment of inclusive work in which all employees have the opportunity to participate in business processes without barriers, promoting work-life balance as a key factor to support the needs of integration between private life and professional for the full expression of the potential of each individual.

4.7 Raising staff awareness

We are committed to engaging our people at every level in implementing its diversity policy through all appropriate measures and initiatives. These include information and training efforts specifically aimed at promoting respectful behaviour, compliance with legal requirements and with the most stringent internal rules/procedures and ensuring that this policy is followed at all levels in the SICIT Group.

4.8 Communication

We are committed to making our diversity policy document accessible to all interested parties, internally and externally.

SICIT Group S.p.A.

Chairman

Giuseppe Valter Peretti