



# SUSTAINABILITY REPORT

2024

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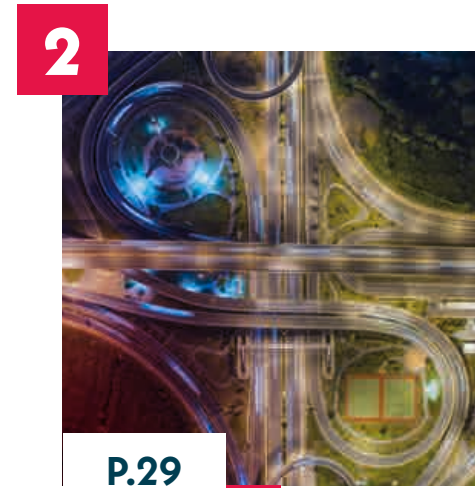
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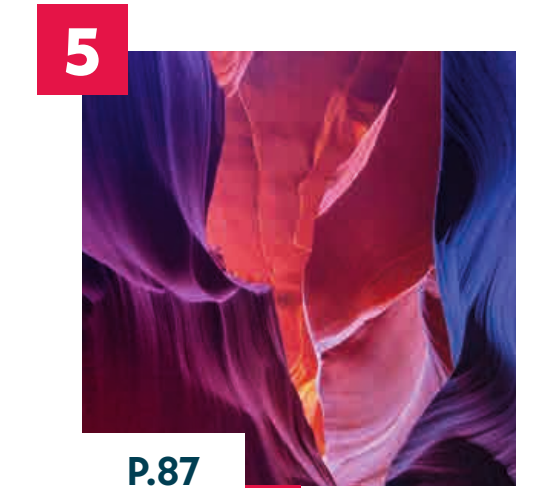
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CEO

# Letter to stakeholders

Dear Stakeholders,

2024 was a year of transformation and growth for STAR7, marked by the consolidation of our strategic vision and the evolution of our solutions to support customers. We have continued to invest in innovation, sustainability and harnessing people's potential, **aware of the role our business can play in generating a positive economic, social and environmental impact.**

At a time when some global choices seem to be going in the opposite direction - with policies that reduce commitment to the environment, technology companies questioning diversity and inclusion, and leaders questioning the foundations of international collaboration - STAR7 chooses to confirm its commitment and **invest in a future based on technology and human value.** Our vision, in this scenario, is distinguished by its orientation towards responsible innovation, combining the potential of

technology with human value in order to contribute concretely to a fairer and more sustainable world.

Generative artificial intelligence is **a key driver of our evolution**, with 7AI at the centre of our innovation strategies. In a rapidly changing technological environment, we have continued on our growth path, investing in research and development, and consolidating our international presence. This has enabled us to strengthen our leadership in the industry, while **maintaining a high focus on the quality and reliability of our services.**

One of our main beliefs is that **technology should enhance the human being, not replace him or her.** With 7AI, we are committed to developing solutions that not only support business processes, but also enhance and amplify the capabilities of people, transforming them into 'augmented humans'. We

believe that artificial intelligence should be seen as an ally that supports our decision-making, creative and operational capabilities, making humans more productive, more effective and better able to tackle global challenges with positive impact.

We face the future with the resolve of those who aspire to be **agents of change.** Our goal is to create value for customers, employees, partners and investors, contributing to a future where sustainability and innovation go hand in hand.

Of course, at times, our commitment to sustainability seems like just a drop in the ocean. But after all, it is of drops that the ocean is made.

And so, without becoming discouraged, **we continue to do our part**, with the conviction that every step, however small, in the right direction contributes to building a better tomorrow, not only for us, but for future generations. Every action we take is a brick we lay towards building a more sustainable and equitable world for all.

**Lorenzo Mondo**  
Chairman and Chief  
Executive Officer STAR7



# Highlights 2024

STAR7’s contribution to sustainable development - SDGs

The services offered by STAR7 focus on **product information**, covering all phases of the product life cycle, from design to after-sales. The STAR7 Group provides a wide range of integrated solutions, encompassing **engineering, technical content creation and editing, language translation and localisation, printing and document management**, through to state-of-the-art **virtual product experience** technologies.

These services have a significant impact **both socially and environmentally**, playing a key role within the production and **value chain** of client companies. In a range of settings, STAR7 **enhances the**

**quality of life for individuals** by facilitating key processes including **social and digital inclusion, as well as education and cultural integration**. Easy access to information is key in ensuring clearer and more effective communication, fostering understanding between individuals of different cultures and languages.

From an environmental point of view, STAR7’s services **reduce the impact of production activities** by optimising information management and favouring the use of digital solutions instead of traditional ones. The adoption of innovative tools enables companies to improve their processes, reducing the use of

resources and limiting waste, thus contributing to a more efficient and responsible management of products and services.



STAR7 used the United Nations 2030 Agenda and its **Sustainable Development Goals (SDGs)** as a reference and guide.

SDGs with prevalent impacts due to business model



SDGs with prevalent impacts due to internal activities





# ESG performance

		2024
Economic	Revenues	€119.8 million
	Economic value generated	€120.9 million
	Economic value distributed	€107.1 million
	Research & Development Investments – 2024	€0.9 million

		STAR7 S.p.A. Management Systems
Governance & Policies	Compliance Programme as per Legislative Decree 231/2001	Quality UNI EN ISO 9001:2015
	Three-star legality rating (maximum score)	Environment UNI EN ISO 14001:2015
		Information security UNI EN ISO 27001
		Translation services ISO 17100:2015/A1:2017
		Post-editing ISO 18587:2017
		Quality medical devices UNI EN ISO 13485:2021

		2024
Social	Quality and conformity of services	
	Non-conformities - Reduction % 2024 vs 2023 related to translation (Service Line Global Content)	10.7%

		2024
Social	Contract workers	
	Number of contract workers (translators - interpreters - DTP)	1766
	Cultural diversity and social inclusion - Number of employees by nationality/geographical origin (% of total)	74% EU 26% non-EU



# ESG performance

## Social

### Human Resources

	2024
Number of employees as at 31 December 2024	1,438
Employment - increase in no. of employees 2022-2024 (%)	67%
Gender diversity - gender quota female (% of total employees)	37%
Gender diversity - share of female gender in managerial positions (% of total)	32%

Cultural diversity and social inclusion -  
No. of nationalities/geographical origin of employees

2024
Over 14 nationalities

New generations/age diversity – share of employees under 30 years of age (% of total)

34%

Training – Average training hours 2024 per employee

19.2

Health and Safety - Accident Frequency Index (number of accidents/hours worked x 1,000,000)

0.8

## Environment

	2024
Paper purchases - Percentage of FSC Chain of Custody Certified purchases	76%
Percentage of waste sent for recovery (%)	96%

Total direct energy consumption - GJ

21,871

Total direct (GHG Scope 1) and indirect (GHG Scope 2 location-based) emissions/t CO2e

1,270



# Objectives

Sustainability plan objectives



## Environmental

Material topic	Description/Actions	Time span
Energy, emissions and climate change	<div><div></div>The goal is to increase the use of renewable energy sources and to secure electricity supply contracts with a Guarantee of Origin.</div>	2023-2025
	<div><div></div>Mapping GHG Scope 3 emissions along the value chain.</div>	
	<div><div></div>Evaluation of the partial renewal of the STAR7 Printing fleet in order to achieve a reduction in energy consumption.</div>	2024-2026
Responsible use of natural resources	<div><div></div>Improving material utilisation processes and waste management in line with circular economy models. In this context: identifying and implementing measures to eliminate or reduce paper waste is crucial for printing companies.</div>	2023-2025



S

Social

Material topic	Description/Actions	Time span
Human resources: talent attraction and retention	↷ Group onboarding sessions (virtual and/or in-person) of new STAR7 resources and evaluation of their effectiveness.	2023-2025
	↷ Maintain an active communication network with schools and universities in order to attract young talent.	Continuous
Development, training and enhancement of human resources	↷ Introduction of new internal training process management tools.	2023-2025
	↷ Implementation of a performance evaluation system that involves most of the STAR7 staff.	
	↷ Creation and updating of an internal register of trainers – on-the-job training plays a key role in STAR7.	Continuous
Equity, diversity and Inclusion	↷ Adoption of a Group-wide Diversity, Equity and Inclusion Policy.	2023-2025
	↷ Gender Gap analysis activities and subsequent evaluation of obtaining Gender Equality certification.	
Health and safety in the workplace	↷ Maintain high safety standards and minimise accident rates.	Continuous



S

Social

Material topic	Description/Actions	Time span
Quality and reliability of products and services	Ensure that the products and services offered maintain and improve their high standards of quality and reliability.	Continuous
	To improve customer satisfaction and reduce the number of product non-conformities, we have implemented a dedicated internal quality control resource and strengthened our quality control system.	
Innovation, R&D for the development of new products and service	R&D activities, for the development of innovative solutions to improve service delivery and their ability to generate positive social and environmental impacts.	Continuous
	Project '7AI&Innovation' development activities related to innovative technologies with specific focus on generative artificial intelligence technologies related to the generation and management of multi-format, cross-functional, multi-purpose digital content.	2024-2026
Protection of privacy, IT security and data protection	Protect sensitive customer and company data with effective security measures and in compliance with regulations and the Management System.	Continuous
	Training activities for all staff in order to raise awareness on cyber security and the adoption of an e-Learning platform to make employees aware of all cyber security issues.	2023-2025
	Adoption of Data Loss Prevention (DLP) systems to automatically identify, monitor and protect sensitive data in the company.	2024-2026



S

Social

Material topic	Description/Actions	Time span
Sustainability in the supply chain	<div></div> Adoption and dissemination of a Code of Conduct to be signed by suppliers (new and pre-existing).	2023-2025
Protection of intellectual property	<div></div> Adopt STAR7 intellectual property protection policies. <div></div> Monitoring and verification of possible intellectual property infringement offences Compliance Programme as per Legislative Decree 231/2001.	2023-2025 Continuous

G

Governance

Material topic	Description/Actions	Time span
Economic performance: generation and distribution of value	<div></div> Actions aimed at developing and enhancing the competitive position strategy.	Continuous
Transparency, ethics and integrity in the conduct of business	<div></div> Establish an internal Risk and Sustainability Control Committee to manage the positive and negative impacts generated by STAR7. <div></div> Implementation of a compensation policy and performance assessment for the Board of Directors.	2023-2025





# Methodological note

## GRI Standard

2-1

2-2

2-3

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3-1

The Sustainability Report 2024 of STAR7 S.p.A. and its subsidiaries (hereinafter also referred to as "STAR7", the "STAR7 Group") is published annually. STAR7 S.p.A. has been listed on the Euronext Growth Milan market since 23 December 2021 and therefore does not fall under the reporting requirements of Legislative Decree 125/2024, which transposed the EU Directive 2022/2464 Corporate Sustainability Reporting Directive (CSRD) into Italian law. Sustainability performance reporting is on a voluntary basis and does not therefore represent Sustainability Reporting under Legislative Decree 125/2024.

The Sustainability Report provides details on environmental, social, economic, and governance topics to help readers gain a comprehensive understanding and evaluate the activities, performance, results, and impact of the STAR7 Group. By reporting on the significant impacts of business activities and relationships on the economy, environment, and people (including human rights), a company can provide a clearer understanding of its overall performance and value. This is because these impacts can have financial implications over time.

The Sustainability Report for 2024 has been created following the methodologies and principles outlined in the GRI Sustainability Reporting Standards. These standards have been defined by the Global Reporting Initiative (GRI Standards), and the report has been prepared in accordance with the reporting option that aligns with these standards. The Sustainability Report includes various chapters that report on specific GRI Standards or aspects of their content. Additionally, the GRI Content Index, which is an essential part of this document, provides a summary of these Standards.

For sustainability reporting, the GRI standards published in 2021 were applied. The general principles are defined by the GRI 1 Foundation 2021 (Reporting Principles): accuracy, balance, clarity, comparability, completeness, sustainability context, timeli-

ness and verifiability. The GRI Standards and performance indicators chosen and reported are representative of the sustainability issues (material topics) that have been analysed and are consistent with STAR7's business and related impacts. The process of analysis, identification, evaluation and prioritisation of material topics, as described in Chapter 5 - Material topics - Impacts and material topics, was conducted as required by the GRI Standards, taking into account the reporting option adopted.



The Sustainability Report follows the reporting standards (GRI Standards) and is structured in the following way:

Chapters 1-4	General Disclosures (GRI 2)
Chapter 5	Material topics: process and list of topics (GRI 3)
Chapters 6-9	Performance analysis of material topics (GRI 200 – GRI 300 – GRI 400)
GRI Content Index	List of GRI indicators reported (GRI 1)

The qualitative and quantitative data and information in this report covers the performance of STAR7 S.p.A. and its subsidiaries, which are consolidated on a line-by-line basis according to the Group’s consolidated financial statements as of 31 December 2024. This reporting covers the entire period from 1 January 2024 to 31 December 2024. The figures for own employees and environmental data do not include Star7 Technology India, a company that entered the scope in August 2024 and had no employees of its own until 31 December 2024.

To allow for the assessment of STAR7’s performance and the comparison of data over time, we have included comparative data for the two preceding years. This document makes reference to the potential use of estimates for certain quantitative information throughout its various paragraphs. These comments are intended to provide context for the presented data.

It is important to note that the STAR7 Sustainability Report, which has been created voluntarily, does not contain the information that is mandated by Article 8 of the EU Regulation 2020/852 on the European Union’s Taxonomy of Sustainable Activities. This is because STAR7 does not fall within the obligations to publish such reports.

The document was drafted by the heads of the different functions of STAR7 S.p.A., the parent company, and its subsidiaries.

The STAR7 Board of Directors approved the Sustainability Report on 25 March 2025, and it did not undergo a limited audit by an independent auditor.

The Sustainability Report can be found on the STAR7 corporate website at:  
<https://www.star-7.com/en/esg/sustainability-report>.

More information on this can be obtained by writing to the following e-mail address:  
**[esg@star-7.com](mailto:esg@star-7.com)**.

STAR7 S.p.A. informs the Global Reporting Initiative (GRI) that it is utilising the GRI Standards and has provided a Statement of Use.





**EU Corporate Sustainability Reporting Standards Directive (CSRD) 2022/2464 and ESRS criteria**

The EU Directive 2022/2464 CSRD (Corporate Sustainability Reporting Directive) approved by the European Parliament in November 2022 and transposed into Italian law with Legislative Decree 06 September 2024, no. 125 (Legislative Decree 125/2024), in the text currently in force, envisages for large companies<sup>1</sup> such as STAR7, starting with the reporting of the financial year 2025, the obligation to publish a Sustainability Statement as an integral part of the Management Report to the Annual Report, and the adoption of the European Sustainability Reporting Standards (ESRS) as the criteria for drafting and reporting on sustainability/

ESG issues. It should be noted that the legislative text of the CSRD is currently being reviewed by the relevant bodies of the European Union (European Commission, Council of Europe, European Parliament) and that this review could lead to a postponement of the date of entry into force of the reporting obligation.

The set of ESRSs was adopted by the European Commission on 31 July 2023, with the publication of the corresponding Delegated Regulation EU 2023/2772 in the Official Journal of the European Union on 22 December 2023, supplementing the EU Directive 2013/34 of the European Parliament and of the Council. In 2024, STAR7 conducted a gap analysis of the CSRD and ESRS reporting requirements, with the aim of strengthening its

sustainability profile, regardless of current regulatory obligations. Based on the findings, an action plan was defined to ensure full regulatory compliance.

<sup>1</sup>According to Art 1 of the EU Directive 3, large enterprises are those enterprises which on reporting date, on a consolidated basis, exceed the numerical limits of at least two of the following three criteria, as amended by the EU Delegated Directive EU Commission 2013/34 17 October 2023: a) total assets €25 million; net revenues €50 million; c) Employees: 250



1


# STAR7: People of Content





1

STAR7: People of Content

Material topic	Objectives
<b>Innovation, R&amp;D for the development of new products and service</b>  SDGs 	<ul style="list-style-type: none"><li>R&amp;D activities, for the development of innovative solutions to improve service delivery and their ability to generate positive social and environmental impacts.</li><li>Project '7AI&amp;Innovation' development activities related to innovative technologies with specific focus on generative artificial intelligence technologies related to the generation and management of multi-format, cross-functional, multi-purpose digital content.</li></ul>



# Profile and identity



STAR7ENGINEERING	Product and process engineering
STAR7PRODUCT KNOWLEDGE	Technical product expertise
STAR7GLOBAL CONTENT	Advanced language services
STAR7PRINTING	Printing, packaging and kitting services
STAR7EXPERIENCE	VR, AR, 3D and computer graphics

For over two decades, STAR7 has been providing services that cater to every aspect of **product information**, from design to after-sales. Our services include **creating and authoring technical content, translation, printing, and virtual experience**.

Through its five Service Lines, designed and created to accompany customers' projects throughout their entire life cycle, STAR7 is able to build up the body of content that products need alongside them to be a success.

The hallmark of STAR7 has always been an approach capable of combining specific know-how, technology and a holistic vision to offer the best possible solutions to the needs of customers and the global market. This approach has seen STAR7 strike major partnerships with leading international companies, establishing it as a reliable and credible global partner.



# Growth and development

€119,823,830

Group Revenues

1,438

Employees

597 in Italy

841 abroad

Over time, the company has pursued a strategy of expansion and integration through mergers and acquisitions, as well as diversifying its areas of expertise. This has involved developing new business lines to provide customers with the best possible solutions, setting the Group apart as a distinctive partner in the market.

In pursuing its development path, STAR7 aims to expand its **geographical presence** and into new **end markets**; to offer greater **quality** in terms of the delivery of the various services, with an approach aimed at their integration

and constant value creation through the product information lifecycle, aspects that also translate into cost reduction opportunities for the customer; and to place special emphasis on **innovation**, especially new experience solutions, through virtual training, cloud services, AI and digital packaging.

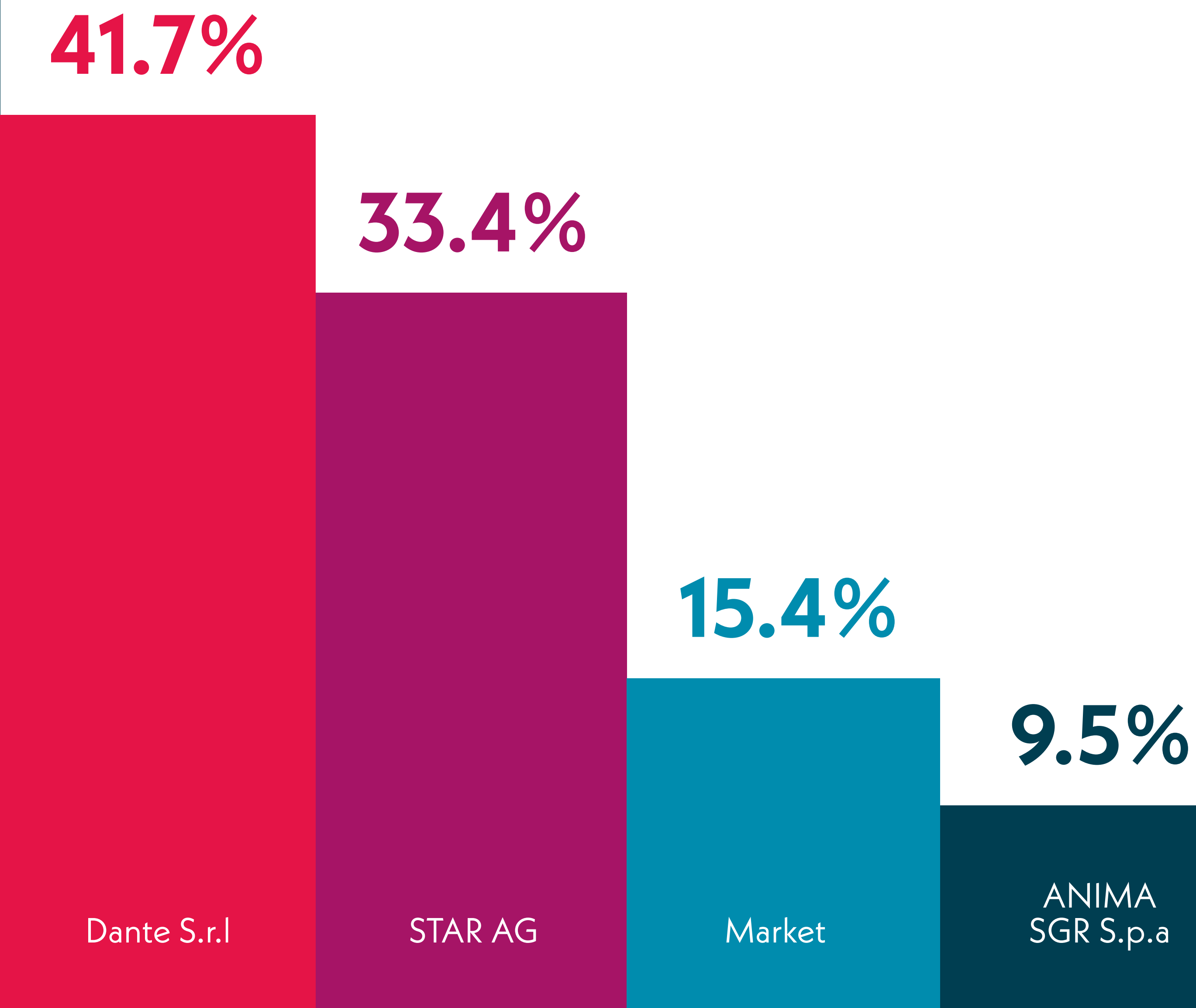
As of 2021, STAR7 S.p.A. is listed on the Euronext Growth Milan, a multilateral trading system that is organised and managed by Borsa Italia. The company has its registered office in Alessandria (AL), Italy.

The Group’s consolidated revenue for the financial year 2024 was **€119,823,830**. As of 31 December 2024, the company had a total of **1,438** employees. Out of these, **597** were based in Italy and **841** were working at foreign subsidiaries.

# Shareholding structure

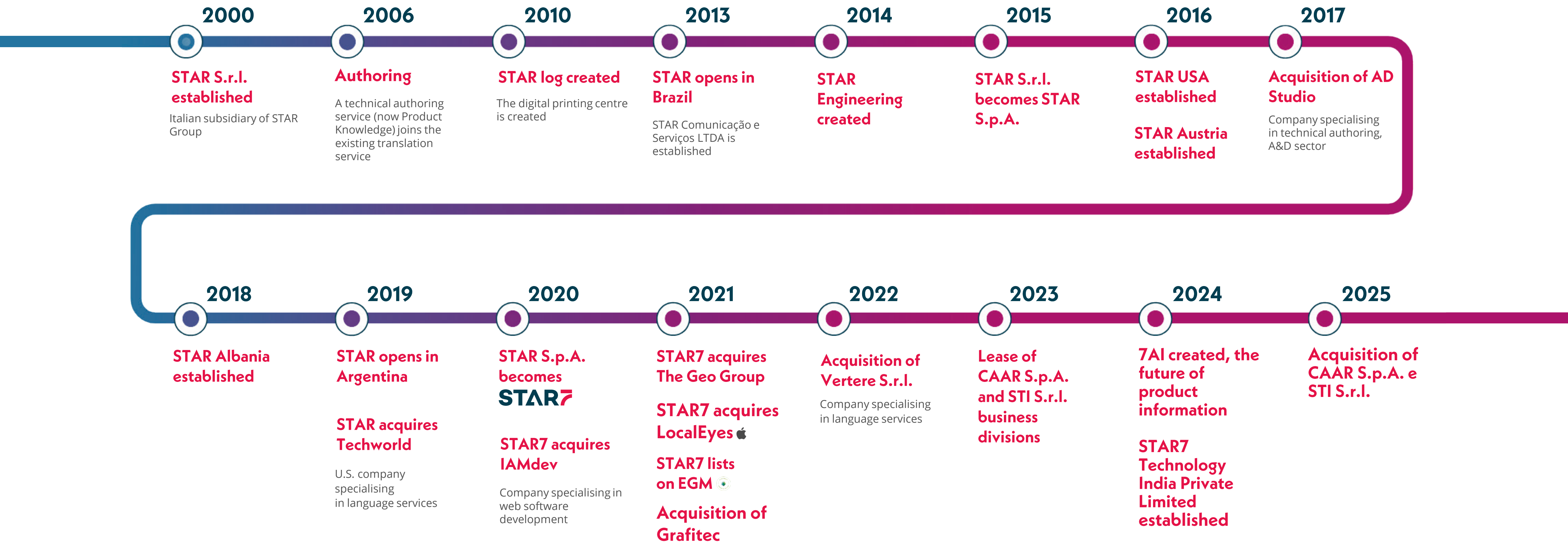
As of 31 December 2024, the share capital of the parent company STAR7 S.p.A. was **€599,340**, consisting of **8,999,752** ordinary shares.

The largest shareholder Dante S.r.l. holds a **41.7% stake**.





# Group History



# Group History

## 2000

STAR7 was established in 2000 by Lorenzo Mondo, who is currently the Chairman and CEO. The Swiss company STAR AG, owned by Josef Zibung, was also involved in the founding of the company. During its initial phase, the company focused on being a Language Service Provider (LSP) that offered translation and localisation services.

## 2006

In 2006, STAR7 began diversifying its business model by integrating translation services with technical and commercial authoring services.

## 2010

In 2010, the company founded STAR7 Printing S.r.l. (formerly known as STAR log S.r.l.), which offers logistics, printing, distribution, and digital archiving services to its clients.

## 2013

In 2013, it acquired a controlling interest in the Brazilian company STAR Comunicação e Serviços LTDA, which operates in the printing & logistics sector.

## 2014

In 2014, the Issuer created STAR7 Engineering S.r.l., a subsidiary that offers Process and Product Engineering services, as well as augmented and immersive reality solutions. This subsidiary is wholly-owned by the Issuer.

## 2015

On 7 July 2015, STAR S.p.A. became a joint-stock company after acquiring a majority stake in Call Comunicação e Serviços LTDA, a Brazilian company located in Belo Horizonte.

## 2016

In 2016, it continued its process of expansion and affirmation in the international market by setting up the American company STAR USA LLC, based in San Francisco(California, USA) and the Austrian company STAR Austria GmbH, based in Linz (Austria).

## 2017

In 2017, the company acquired AD Studio S.r.l., which specialises in technical authoring activities. It then went on to sign a business unit lease agreement for System Data Service S.r.l., which focuses on technical authoring activities in the Aerospace and Defence sector.

## 2018

In 2018, our growth and development strategy is set to continue with the acquisition of Grafica e Editoria Colibri LTDA, a Brazilian company based in Belo Horizonte, and the establishment of a new company in Argentina called STARCOM Argentina SAS, which will be headquartered in Cordoba. Later that year, it purchased all the shares of RESS.r.l., a company based in Alessandria that specialises in technical authoring activities.

## 2019

In 2019, the company successfully acquired 100% of Techworld Language Services Inc, a US-based company located in Troy, Detroit, Michigan. This acquisition allowed the company to expand its international presence and establish a new company in Albania, known as STAR Albania SHPK, which is based in Tirana.

## 2021

In 2021, the company made two significant acquisitions - The Geo Group, an American language services provider, and the Irish LocalEyes Group, also specialising in language services. Towards the end of the year, the company completed its transition to the regulated market in Euronext Growth Milan.

## 2022

In 2022, STAR7 continued to expand by acquiring Vertere S.r.l., a company that specialises in language services. In 2023, the company signed a lease agreement for a business branch with the CAAR S.p.A. group. This move has greatly enhanced its engineering services in Italy and Brazil.

## 2023

The “UNCHARTED” company convention was held in 2023, bringing together more than 500 attendees and as many participating from abroad via live streaming, a unique opportunity to share the year’s results, reflect on challenges and chart the way forwards for the Group.

## 2024

In 2024, STAR7 strengthened its international expansion with the opening of STAR7 Technology India, confirming its plan to grow in Asian markets. In addition, in October, it organised '7AI Day', an event dedicated to a number of leading customers, at which the new STAR7 service offering integrating generative AI was presented.

## Today

STAR7's robust expansion continues, with a presence in over 15 countries and 10 offices in Italy, 21 offices worldwide, over 1,400 employees. We have established important partnerships with leading industrial companies.



# A global network

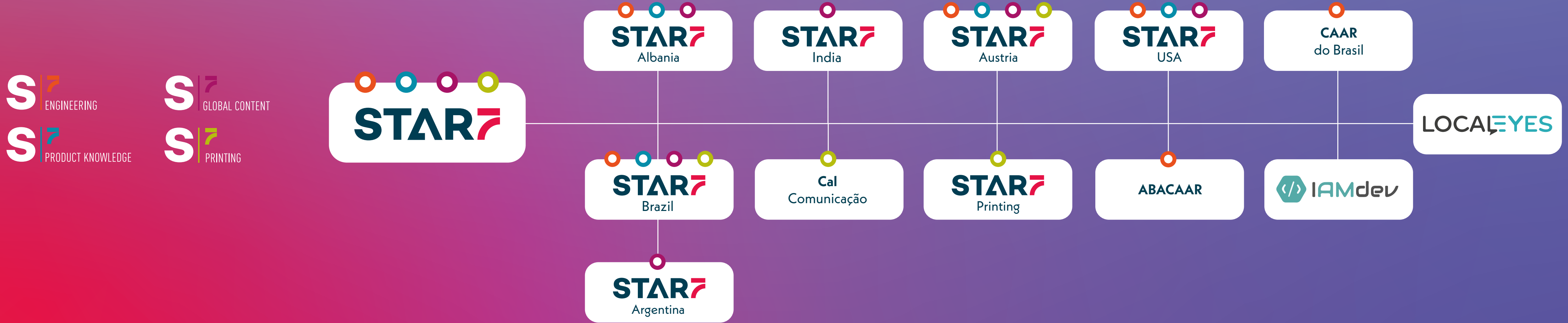
STAR7 is part of the STAR Group, a global network with an established presence in more than 30 countries around the world, which stands out for its ability to combine an international vision with strong local roots.

Thanks to its offices in Italy, Austria, the USA, France, Spain, Germany, Denmark, Ireland, Finland, Sweden, the Netherlands, Albania, Brazil and Argentina, Serbia and India, STAR7 can respond effectively to the specific needs of each market, while ensuring high quality and standards wherever it operates.

As of 31 December 2024, the STAR7 Group had two production units for digital printing services of technical and commercial documentation, in addition to its offices in the various countries.

Company	Registered office	Country
STAR7 Printing S.r.l.	Asti	Italy
STAR Comunicação e Serviços LTDA	Belo Horizonte	Brazil





As of 31 December 2024, the Group comprised 20 companies, including the parent company, located across four different continents: Europe, North America, and South America. For a comprehensive list of companies under STAR7, please refer to the Consolidated Financial Statements as of 31 December 2024.

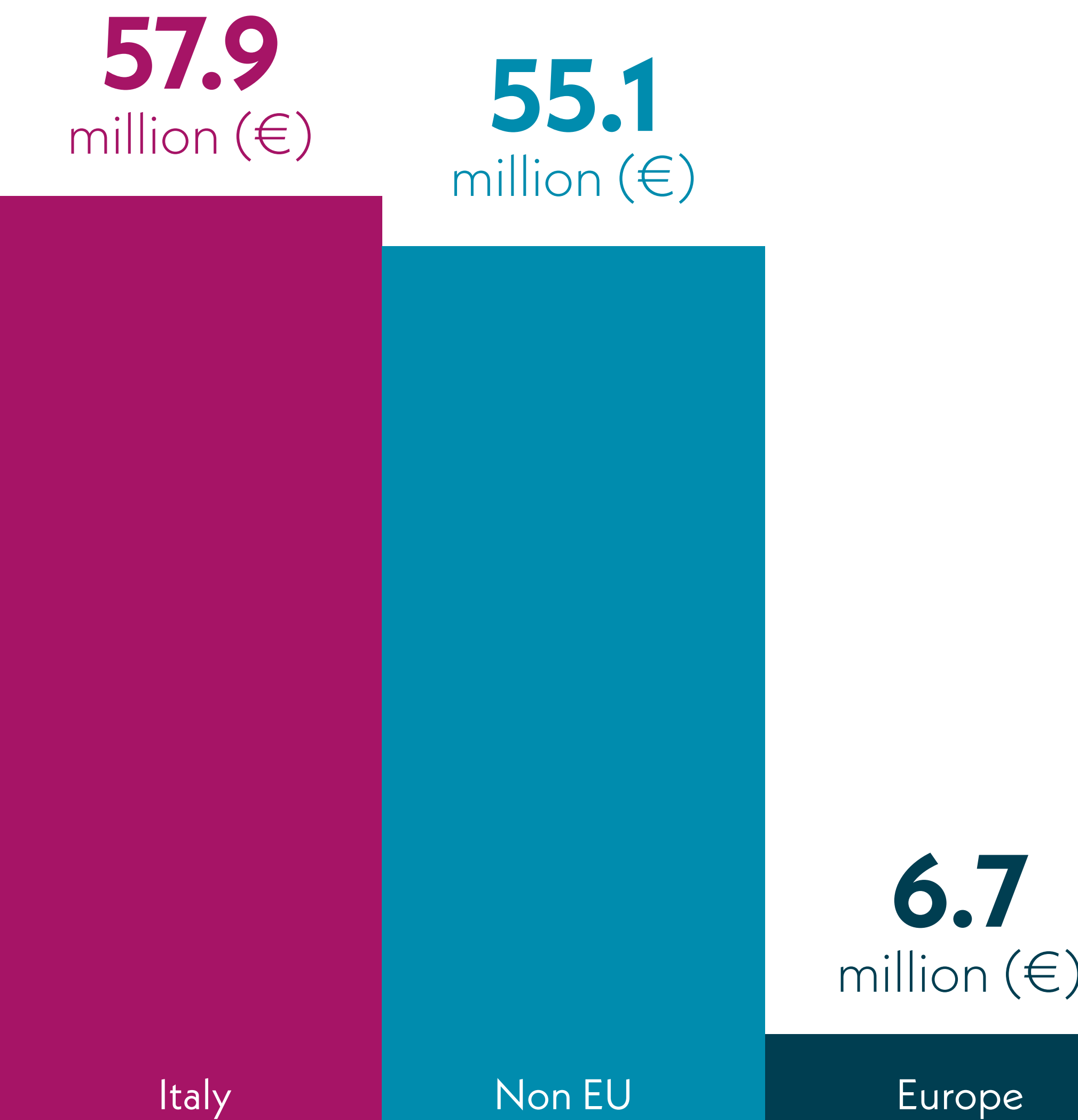
The companies belonging to the Group operate in specific fields of competence and are characterised by their presence in diverse sectors. This differentiation strategy enables them to offer customers highly specialised solutions and services with high added value. In particular, the Group is active in several areas, including **printing, logistics, process engineering, virtual reality (VR), augmented reality (AR), immersive reality (IR), technical writing and translation**. Thanks to this wide range of skills, the Group's companies are able to respond effectively to the needs of an increasingly dynamic and competitive market, guaranteeing innovation, quality and reliability in every area of activity.



# Revenues by geographical area

The table below shows the Group's revenue development by geographic area for the three-year period 2022-2024. The data reported offer a detailed view of the distribution of turnover between the Italian, European and non-EU markets, allowing the growth dynamics in the different geographical contexts to be analysed.

Revenues by geographical area	2022	2023	2024
Italy	47,054,679	55,514,623	57,929,314
Europe	3,178,075	6,189,394	6,743,850
Non EU	33,018,424	42,701,617	55,150,666
Total	83,251,178	104,405,634	119,823,830





# Target markets and services

STAR7 consolidated its growth path through a targeted strategy of strategic acquisitions, aimed at strengthening expertise and operational capabilities in key sectors. These transactions, selected with a strategic and **value-creating approach**, have enabled the Group to expand its expertise, strengthen its presence in its target markets and increase the competitiveness of its offer.

Thanks to a **structured international network** and a widespread local presence, **STAR7** has gained cross-industry and multi-sector experience, becoming a partner of choice for companies of all sizes. The Group supports both SMEs and major Italian and international industrial players, offering tailor-made solutions to simplify and optimise business processes. The objective is to **maximise the operational efficiency** of customers and constantly improve the quality and usability of their product content, contributing to their growth and competitive differentiation.

STAR7's service offering is currently focused on the following areas:



Aerospace & Defence



Agriculture & Construction Equipment



Air conditioning & Household appliances



Automotive and transport



Engineering and machine tools



Fashion & Retail



Finance



Food & Beverage



IT, Software & Technology



Life Sciences



Media & Publishing



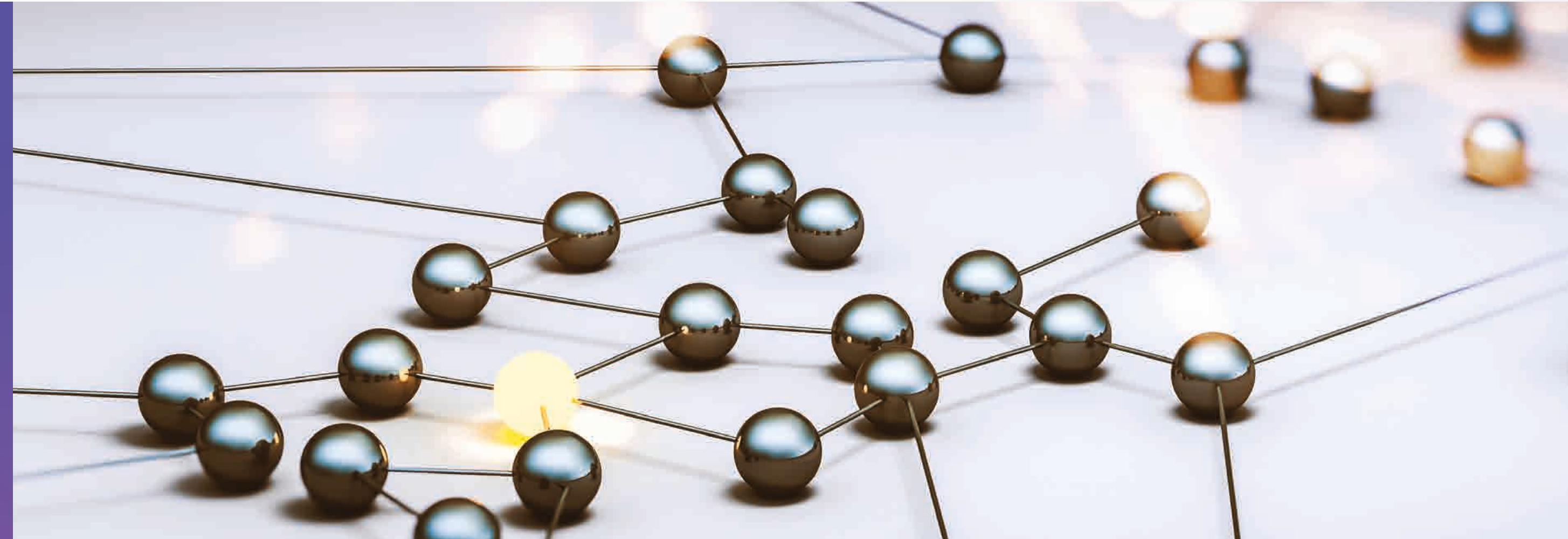
Public Utilities



Sports & Sports Equipment



# STAR7 culture and values



Corporate culture is the foundational identity of an organisation and consists of the shared values that guide its daily actions and strategic choices. It is built on two fundamental pillars: **vision** and **mission**, key elements that define the identity and evolution of a company over time.

The **vision** represents the long-term aspiration of the company, outlining the strategic direction and ultimate goal to be achieved. It guides the business, inspiring innovation and defining the impact the company wishes to have in its industry and society.

The **mission**, on the other hand, translates the vision into a concrete and operational approach. It defines the company's purpose, its role in the market and the value it intends to create for customers, stakeholders and communities. The mission is expressed through strategies, actions and processes aimed at pursuing the set goals, ensuring consistency between future ambitions and day-to-day operations.

The incorporation of these elements into the company's culture cultivates a robust and distinct identity, enhancing employees' sense of belonging and bolstering the company's capacity to adjust to market fluctuations while maintaining a clear strategic direction.





# OUR VISION

STAR7 aims to be the first choice for your product content, thanks to our high-quality services that span the entire information life cycle and our philosophy of delivering maximum efficiency and added value every step of the way.

# OUR MISSION

- STAR7's services cover our clients' entire technical and commercial information life cycle.
- It adopts a modular and integrated approach, combining know-how, network ubiquity and innovative STAR Group technologies.
- The outcome is a comprehensive selection of services that can be tailored to your specific needs, including content creation, localisation, printing, logistics, and multimedia.





# The values of STAR7

STAR7 is built by **people, working *with* and *for* other people**. The significance of human capital is paramount and is evident in all of the Group's activities, where the modus operandi, strategic decisions, and everyday conduct are steered by a set of common principles. These common principles influence the way we operate, our strategic choices and our daily approach to work, inspiring and guiding STAR7 towards continuous improvement.

At the heart of STAR7's culture are seven core values, which are the compass of the organisation and guide its evolution. These values, rooted in the Group's identity, fuel a continuous quest for improvement, fostering innovation, collaboration and long-term success.

## 1 Relationship We're centred on the customer

It's thanks to our customers that we grow in expertise, capacity and ambition. That's why we devote our constant efforts and enthusiasm to seeking the best possible result, for a relationship that's built to last, on trust.

## 2 Responsibility Other people's opportunities and problems are ours too

We believe that the work and conduct of each one of us can make a difference, at our company and with our customers. And we do all we can to act accordingly.

## 3 Listening We listen first, to give valuable answers

Our work is based on relationships between people, customers and colleagues. And we believe that only by listening to people with respect and sensitivity can we appreciate problems and identify solutions.

## 4 Content We believe in the strength of the whole

We've built our identity, our future, our growth and the growth of our customers on the integration of expertise, perspectives, talents and solutions.

## 5 Transparency Conscious and direct, about potential and limitations

We believe in sincerity and fair-dealing as the fast-track to constructive, expeditious communication able to encourage the free exchange of ideas and get results.

## 6 Looking ahead We never stand still

We grow, learn and change continuously to develop together with our customers and their projects in a fast-moving market.

## 7 Creativity Envisioning tomorrow is the driving force that guides us

We strive every day to conceive what no one ever has before and put our creativity to work together with technology to offer simple, new solutions that are truly fit for purpose.



2

# The business model and value chain

Market Scenarios and Trends

Integrale<sup>7</sup>: an integrated approach

The business model:  
Production and delivery of  
products and services

STAR7 people and staff

Suppliers

Customers

Innovation, Research and  
Development and Cutting-  
edge Technologies



# Market Scenarios and Trends

STAR7's target market is constantly evolving, driven by megatrends such as **digitisation, artificial intelligence, augmented and virtual reality, Industry 4.0, e-commerce and digital printing**. Technological innovation is a key driver of transformation, with an increasing impact on many strategic sectors.



## Artificial Intelligence (AI)

Generative artificial intelligence is profoundly redefining the economic and production landscape, becoming one of the most significant technological disruptors worldwide. Its impact is already evident in various sectors, from industrial production and data management to content creation, machine translation and technical documentation. More and more companies are adopting AI solutions to automate the creation and updating of business documentation, improving access to information and operational efficiency.

The adoption of AI is transforming the world of work, creating both opportunities and challenges for companies and professionals.

According to an analysis conducted by McKinsey & Company, **30% of working hours** could be automated by 2030, making a targeted investment in **retraining and upskilling** essential<sup>2</sup>. The introduction of AI in business processes does not only lead to an increase in productivity, but also makes a targeted investment in retraining and upgrading of professional skills

essential. In particular, the regulation of AI, such as the European Union's recent AI Act, is becoming a central issue for companies adopting these technologies, demanding greater transparency and compliance.

In the field of translation, AI has led to the adoption of a **hybrid** model, in which machine translation is complemented by human intervention through **post-editing**, with the aim of combining speed and high quality standards. In this context, STAR7 launched **7AI**, a service ecosystem that combines technology and human expertise, using the “expert in the loop” approach, to offer reliable and tailor-made AI solutions.

Artificial intelligence is also revolutionising the customer experience through advanced chatbots and virtual assistants based on next-generation language models (LLM), capable of handling increasingly sophisticated and personalised interactions.



Virtual reality (VR)  
and Augmented reality (AR)

The AR/VR market sees a growing demand for **head-mounted displays (HMDs) in gaming and entertainment**, but also significant expansion in the industrial sector. The concept of the **industrial metaverse** is gaining ground, with applications ranging from corporate training to manufacturing process simulation and assisted design.

The adoption of augmented and virtual reality is growing in marketing strategies, retail, e-commerce and education<sup>2</sup>, where these technologies improve customer interaction and training effectiveness. A further development is the integration of AI with VR/AR, enabling the automated creation of virtual environments and increased interactivity with users.



<sup>2</sup> McKinsey Report: [The race to deploy generative AI and raise skills](#) | McKinsey  
<sup>3</sup> Market Research Future report, available at the link: <https://www.marketresearchfuture.com/reports/augmented-reality-virtual-reality-market-6884>

Industry 4.0

The term Industry 4.0 refers to the trend in today's **industrial automation** to introduce certain **new production technologies** to improve working conditions, create new business models, increase plant productivity and improve product quality.

The adoption of Industry 4.0 models offers numerous advantages, including increased efficiency and productivity, the creation of new revenue streams, and more customer-focused operations. **Original Equipment Manufacturers (OEMs)** primarily use IoT technology to develop innovative business models. Additionally, these models enable companies to reduce their time-to-market and become more flexible.

The evolution of this paradigm has led to the emergence of **Industry 5.0**, which emphasises the collaboration between man and machine, with a focus on sustainability, personalisation and the centrality of the worker. In this context, a key role is played by **additive manufacturing (3D printing)**, which enables greater production flexibility and waste reduction.

The affirmation of Industry 4.0 models has brought direct benefits to STAR7's business through **the progressive establishment of IoT technologies<sup>4</sup>, as well as the significant need for updates to be made to technical documentation through different channels** (paper/digital) and in different languages (in particular, the implementation of these technologies allows SMEs to produce a high-quality result at reduced costs and with high flexibility).

Digital Printing

The global size of the digital printing market will grow to USD 17.5 billion by 2026 (CAGR 2021-2026 12.1%), thanks to increased demand in textiles, packaging, e-commerce, home furnishings and vehicle wrapping, with particular opportunities coming from emerging economies such as China and India, where rapid industrialisation is also driven by demand for digital printing services.

An emerging trend is the increasing focus on **sustainable digital printing**, with technologies that reduce the use of chemical inks and optimise energy consumption. At the same time, we are seeing the integration of digital printing

and **artificial intelligence**, enabling large-scale customisation, especially in marketing and intelligent packaging.

STAR7 is in a prime position to take advantage of the current growth trend due to the adaptability of its digital printing solutions.<sup>5</sup>



<sup>4</sup> Based on IoTNOW's analysis in the report 'IoT, IIoT, connected industry and Industry 4.0 come together to create a new model for business', available at the link: <https://www.iiot-now.com/2018/10/12/89230-iiot-iiot-connected-industry-industry-4-0-come-together-create-new-model-business/>  
<sup>5</sup> Report "Digital printing market - Forecast (2021-2026)" by IndustryArc.



# Integrale<sup>7</sup>: an integrated approach

STAR7 offers an integrated and distinctive ecosystem for the creation, management and use of product information, adopting an innovative business model covering the entire value chain. With its established expertise and strategic approach, STAR7 is well-equipped to assist companies in enhancing processes associated with technical content and product communication.

Through **Integrale<sup>7</sup>** – a structured and cross-cutting approach – STAR7 supports companies through all phases of the product life cycle, from conception and design to production, marketing and after-sales service. This approach ensures continuity and efficiency between the different activities, responding effectively and purposefully to the needs of each customer.

The STAR7 Group can leverage its model by offering verticality and specificity across complementary areas of expertise, presenting itself to clients as a single partner thanks to significant potential cross-selling between different business lines. Integrale7 is how STAR7 defines its philosophy, calling and DNA: the decision to approach the whole as more than the sum of its parts, moving beyond the concept of an information supply chain.





STAR7 Service Lines

STAR7 operates through **five primary Service Lines**, each with distinct services and stages in the value chain. These Service Lines are interconnected, despite their unique characteristics.

The five Service Lines are designed to support projects throughout the entire product life cycle, creating a strategic content ecosystem for their success. This approach allows synergetic optimisation of product information development and management processes, ensuring efficiency and consistency.

STAR7 covers the entire product information life cycle

Typical product life-cycle

- STAR7ENGINEERING

Product and process engineering
- STAR7PRODUCT KNOWLEDGE

Technical product expertise
- STAR7GLOBAL CONTENT

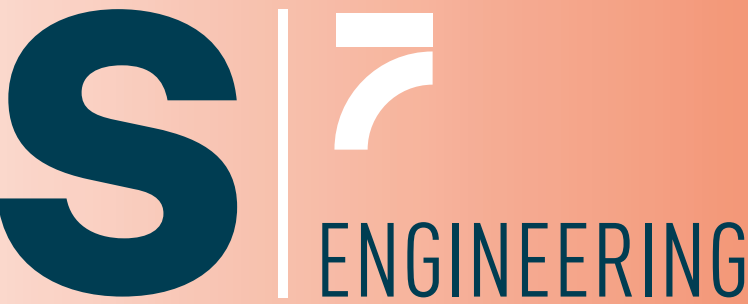
Advanced language services
- STAR7PRINTING

Printing, packaging and kitting services
- STAR7EXPERIENCE

VR, AR, 3D and computer graphics







STAR7 Engineering specialises in process engineering, supporting customers in the industrialisation phase of their products. With over ten years of experience, particularly in the automotive sector, it has developed a consultancy approach that thoroughly understands the needs of designers and engineers, offering advanced solutions for optimising product development processes. This has led to the creation of innovative applications based on virtual and immersive

reality, which allow companies to analyse and refine products before production. The adoption of these technologies reduces time and costs, especially in prototyping, and minimises the consumption of physical resources and limits industrial waste. In addition, virtual simulation allows testing and evaluation without the need for physical components. STAR7 Engineering's approach is based on stable teams that are able to integrate

organically into the client's production chain. These highly specialised professional communities continuously invest in training and further education, becoming true strategic partners in customer projects. Thanks to this model, STAR7 Engineering offers engineering excellence that contributes to strengthening the leadership of its partners globally.

Scope	Service	Assets
Design	Product development	<ul style="list-style-type: none"><li>From the product feasibility study to the CAD of components for making it.</li><li>Engineering for complex industrial projects.</li><li>Advice and assistance in construction, installation and production start-up.</li></ul>
	Electrical & electronic engineering	<ul style="list-style-type: none"><li>Support in designing, developing, integrating and validating electronic control systems and devices.</li><li>Particularly, assistance in developing electronic devices and systems, validation and testing, Hybrid/Electric Traction and ADAS.</li></ul>
	Manufacturing engineering	<ul style="list-style-type: none"><li>Developing aspects connected with product industrialisation and production, including the definition, set-up, design, control and optimisation of industrial processes.</li><li>Optimising production and improving the technical efficiency of the production system.</li><li>Creating the basis for robust and efficient processes and workflows, able to combine economic, operational and design requirements.</li></ul>
	Toolshop	<ul style="list-style-type: none"><li>Designing assembly equipment and servos for military and industrial applications.</li></ul>



S7

PRODUCT KNOWLEDGE

The Product Knowledge division provides a range of services to help create, manage and share technical and commercial information using both traditional and advanced methods. Starting from instruction and maintenance manuals, through the various support services of aftersales, training, help desk, e-learning and integrated logistic support (ILS) up to the more complex consulting activities of advanced project management, STAR7 Product Knowledge follows all phases of defining, writing and managing technical product documentation in a specific, innovative way.

The authoring approach is based on the skills of the team and on cutting-edge technology capable of transforming product technical information into a strategic asset for industrial efficiency, technological implementation, commercial development and support over the operational life of the product.

Scope	Service	Assets
Product information	Product information	Service of authoring, layout and publication of technical documentation from engineering specifications, the use of 3D mathematical models and data and content gathering. Documentation includes user manuals, workshop manuals, spare parts catalogue and other useful information for customers.
	Spare parts catalogues	Spare parts catalogue authoring and design service, starting from the product definition and proceeding to the identification of spare parts and creation of technical illustrations.
	Wiring diagrams	Creation and management of static or interactive wiring diagrams optimised for diagnostic and repair processes.
	Labour time	Measurement, analysis and publication of the labour times needed to diagnose, maintain or repair products.
	NATO Codification system	Procedure for assigning NATO code to all parts that make up military products.
	IT Custom Solution	Customisation service for multilingual portals for interactive and dynamic consultation of technical information by end customers or the assistance network. Customisable consultation of information from any data source.
	Smart diagnostic	Advanced remote diagnosis service for identifying and resolving faults that integrates big data and probabilistic data structure.



S7

PRODUCT KNOWLEDGE

Scope

Service

Assets

After-Sales Support

- Customer care
- Technical help desk

- Multilingual and multichannel support service – e-mail, telephone, messaging – for managing relations with end customers delivered by product experts.
- Multilingual support service for assistance networks for the diagnosis, repair or maintenance of products.

Digital solutions for after-sales

- Virtual Reality
- Artificial intelligence
- Mixed reality

- Thanks to the latest VR technologies, the After Sales Digital Twin software develops an innovative service for creating and managing aftersales documentation. In a completely virtual workshop, a specialist can gain a precise, accurate experience of each operation thanks to the “digital twin” of the product they have to analyse.
- Facilitates and accelerates the work of diagnosis and repair, offering users the information they need on demand and according to their level of experience.
- Digital Wiring 7 (DW7) technology offers an innovative virtual assistance service for diagnosis, superimposing the components and virtual wiring on the physical product and allowing immediate access to the corresponding data, drastically reducing diagnosis and repair times.

Training

- Training & e-learning
- Virtual training

- Training services with a structure of teaching units compliant with SCORM and/or AICC standards, starting from the content produced for the technical documentation and to be reproduced on any LMS (Learning Management System) or e-learning platform.
- Classroom delivery of technical and sales training.
- Virtual training service with an immersive experience in a 3D environment without the need for the physical product.





Scope

Service

Assets

Technical consulting

Service Engineering

A series of activities linked to the preventive and corrective planning of product maintenance, starting with identifying the procedures required to avoid faults (preventive) and the procedures required to restore function in the event of a fault (corrective).

Serviceability Analysis

Virtual and physical analysis and simulation of repair and maintenance procedures to assess the degree of product serviceability.

Technical staffing

High-level consultancy service offered for project management, design or complex analysis activities.

Certifications

CE Certification

- Authoring service for the technical documentation required for the operation of machinery according to CE specifications.
- The technical file is created by analysing specific standards and includes calculation reports, control circuit diagrams, plans, and laboratory tests.





The Global Content division is Italy's top Language Service Provider and holds significant global importance.

Our translation service is seamlessly integrated with our customers' IT systems through our in-house developed online platform, MySTAR. This platform allows for direct transmission of translation requests, real-time interaction between our company and the customer, and automatic continuation of validation, changes or modifications to the text at any time. This optimises processes and saves time for all parties involved.

Scope	Service	Assets
Language Services	Translation	We offer translation services for all types of content, including manuals, websites, press releases, and e-commerce, into any language in the world.
	Software localisation	Translation of labels, messages, online help and screenshotting. For any software application and operating system: Windows, MacOS, Unix, Linux, Android and iOS.
		Integrated management of content, menus, dialog boxes, error messages and all information for the user.
	Copywriting & transcreation	Creation of editorial and communication content in all languages with creative adaptation of the translated texts
	Machine translation & post-editing	Machine translation, both statistical and neural. Use of any type of commercial and/or proprietary engine.
		Integrated translation workflow management.
	Interpreting	Interpreting services for events, meetings, conferences and courses in all fields and languages.
		Real- and semi-real-time transcriptions for general meetings, boards of directors, committees and meetings





Scope	Service	Assets
Consulting	Terminology management	<ul style="list-style-type: none"><li>Management of technical terminology, extraction of terminology databases from any type of source and creation of integrated solutions.</li><li>Creation of terminology workflows, with additions and comments via web.</li><li>In-house terminologist for consulting services at the client's premises, for the management of terminology within complex organisations.</li></ul>
	Translation memory setup	<ul style="list-style-type: none"><li>Retrieving existing translations, subsequent transformation into a database compatible with any CAT tool and quality check (TM Cleaning).</li></ul>
	Web Accessibility Assessment	<ul style="list-style-type: none"><li>Reports on the accessibility compliance of websites, apps and documents, in accordance with international regulations.</li></ul>
Multimedia	Dubbing, voice-over and subtitling	<ul style="list-style-type: none"><li>Dubbing, voice-over and subtitling</li><li>Dubbing, subtitling and voice-over services for all types of multimedia content</li><li>Integrated project management: from translation to time code creation, recording and editing with a wide selection of voice talents.</li></ul>




















STAR7 Printing is a state-of-the-art digital printing centre specialising in the production and distribution of high-quality materials for any industry, offering flexible and customisable solutions.

With over 15 years of experience, STAR7 Printing offers advanced digital printing services and customised logistics solutions. With a just-in-time approach, it optimises production and reduces waste, ensuring efficiency and sustainability.

Through an integrated workflow - including dematerialisation, finishing and kitting - it manages the entire production cycle, from pre-press to delivery, transforming content into market-ready printed products. The adoption of Kanban and SMI systems eliminates stock and obsolescence, implementing a Print On Demand model that ensures production exactly when and in the quantity needed. In addition to traditional printing, STAR7 Printing offers document dematerialisation services, supporting companies in optimising space and archive management to improve efficiency and productivity.

Scope	Service	Assets
Printing	 Digital Printing	 Digital printing services in both black and white and colour, using inkjet technologies that provide ultra HD definition (using MX iQuarius ink), delivered on sheets or web-fed for any print run and type of customisation.
	 Offset printing	 Traditional printing solutions for large runs with any kind of finish.
Logistics	 Customised logistics and kitting	 Distribution chain management services - from receipt to quality control, storage to distribution, guaranteeing a single intermediary to get better results, meeting time frames and optimising costs.
	 Warehousing	 Customised warehouse and shipping solutions with tracking, proof of delivery and detailed reporting of final balances.  Integrated consignment stock, supplier management inventory (SMI) and Kanban solutions
Demateriali- sation	 Paperless solutions	 Dematerialisation, document digitisation and digital archiving service.
	 Physical stock	 Service of storing digitised documentation assets, in venues and with advanced operating systems that guarantee high, flexible and customisable security standards.
	 Data loading and burning	 Customised data loading, duplication, burning on magnetic media and mass storage service.





STAR7 Experience is the Group's creative division that supports companies in the configuration and presentation of products prior to market launch. Through the integration of technical and engineering know-how, STAR7 Experience makes it possible to visualise and communicate a product's features even before it is manufactured, responding to the growing demand for digitised solutions for the use and dissemination of information.

Through the use of advanced 3D graphics and video technologies including Computer-Generated Imagery, visual effects and virtual reality software, STAR7 Experience develops innovative content with versatile applications, ranging from technical fields to virtual training and communication and marketing strategies. STAR7 Experience develops advanced digital experiences, combining technology and creativity to transform imagination into interactive solutions.

Starting from the modelling of specific product components, it enables virtual training programmes within immersive environments, allowing product behaviour to be simulated and tested without the need for physical prototypes. This approach not only optimises development time and costs, but also helps to reduce environmental impact by limiting the consumption of materials and resources associated with traditional prototyping and cutting production waste.

Scope	Service	Assets
Virtual reality	Virtual product configuration	Photorealistic-quality product customisation service before commercial launch.
	Augmented reality	Mixed reality service to correlate 3D technical information with the physical product.
	Immersive reality	Immersive design service for rapid prototyping that allows users to implement and test the features and functionality of a product in the stages before production.
Creativity	CGI, VFX and 3D art	Technologies for creating photorealistic videos and footage that can keep costs down and convey a sense of the product even before production.
	Graphic Design	Creative 2D product communication. From looking for innovative moods and layouts, to proposing high-quality graphic designs
	Video & animation	CGI video production for all sectors of industry and commerce



# The business model: Production and delivery of products and services

For more than 20 years, STAR7 has served its customers as a leader in the product information sector. From product and process engineering support, to the creation and management of technical and marketing content, to translation, printing and virtual experience: with its services, STAR7 is able to support customers' industrial activities throughout the product life cycle, from the design phase to after-sales.

The STAR7 Group places great emphasis on collaboration with its customers, involving them right from the outset in the development of its products and services. This forms the core of its business model.

GRI Standard

2-6



## Customer Acquisition

The commercial growth of the organisation is driven by a team responsible for acquiring new customers through sales activities. This team is situated in the Group's strategic locations both in Italy and overseas. STAR7 creates business opportunities by taking part in conferences, meetings, and industry events. To support active prospecting, which includes lead generation and cold calling, digital marketing campaigns are also utilised with targets for conversion, reputation, and awareness. Thanks to the use of CRM software, STAR7 can easily monitor customer relations and create cross-selling activities between its various Service Lines.

## Execution

The second stage of the value chain is divided into sub-processes that vary depending on the specific division.

### Engineering

- Project Analysis
- Product Development Process
- Definition of Production Processes
- Verification and Approval of Production Processes

The process begins with the group's team of engineers conducting a preliminary analysis of the project to determine its feasibility. During this phase, a virtual simulation of the project is created using 3D technologies. Customers are provided with support during the product development process by creating digital prototypes. This enables them to identify any significant issues and implement solutions. This is then followed by defining the assembly sequences, which are aimed at launching the product and creating the necessary technical documentation to support it. Finally, there is a quality control and approval process for the production that is carried out for the customer's satisfaction.

## Product Knowledge

Product Analysis and Development



Technical Writing



Technical Training



After-Sales Support



Monitoring & Update

The first step involves reviewing the technical specifications and mathematical designs of the products provided by

customers. To develop an in-depth understanding of products, we gather information through interactions with engineers, frequent visits, and surveys. Our team of technicians and engineers are experts in various strategic areas, and are dedicated to supporting our customers in the creation of technical documentation using specialised software. A team is dedicated to the creation and development of training courses by supporting the organisation of training courses.

After-sales services are typically offered on-site at the customer's location through the technical help desk, customer service, and spare parts information support. STAR7 has the capability to monitor all engineering changes and



potentially initiate new activities, thanks to our in-house developed technology known as the Engineering Change Monitoring System.

Experience

Product & 3D Analysis



Briefing & Storyboard



3d Experience creation



User acceptance test



Delivery & Publication

The initial stage of the process involves a thorough analysis of the product. A team of engineers will scrutinise the mathematical properties of the product. To create the storyboard for the virtual or augmented experience, the team begins by assessing the customer’s requirements. The Company’s service line leader then coordinates a team of internal developers for the programming and development of the VR/AR/3D virtual

experience, and then works with individual STAR7 managers on the testing phase, in which end consumers are involved to gather opinions and potential anomalies. Finally, the product is finalised by the team.

Global Content

Data analysis and project evaluation



Vendor management



Project Management



Translation and Quality control



Formatting and delivery

Firstly, the documents that need to be translated are carefully reviewed. This analysis helps to determine the amount of time and cost required to complete the translation task. The company employs a vast network of certified and specialised translators to carry out their translation services.

In most cases, STAR7 acts as project manager, coordinating the management of customers’ translation requests, which are carried out by the network of selected translators. STAR7 manages the translation activities performed by translators, ensuring that the service is provided with speed and precision. Finally, there is a stage where we check that the translation meets the formal requirements of the client and deliver it in the agreed format.

Printing

Pre-press



Planning



Production



Definition



Quality control, packaging & delivery

Firstly, STAR7 analyses the assignment in order to assess its organisational profiles. The team, in coordination with the production managers, manages the production processes of orders in compliance with the agreed deadlines by selecting the machinery to be used for implementation. The service is provided by the two production units at Asti and Belo Horizonte, using digital and offset technology in a wide variety of formats and media. STAR7 also takes care of finishing the printed material (e.g. binding, stapling or punching) and, in the case of a kitting request, of assembly. After completing the necessary preparations, STAR7 verifies the characteristics, quality, production, and packaging of the product. They then handle the logistics involved in delivering the product.

After Sales

In the phase following the provision of its services, STAR7 carries out an analysis of the service provided and the level of satisfaction of its customers, evaluating the correspondence with the agreed quality standards. In particular,

the Company has implemented special systems of business review and performance analysis in order to ensure proper management of customer relations, including in the post-sales phase. In this respect, a person has been appointed who is responsible for each division to monitor performance and a person responsible for quality control with a customer care support function to assess customer satisfaction. In addition, STAR7 organises periodic meetings with customers in order to understand any critical issues arising in the post-sale phase, also providing them with technical assistance or proposing new solutions.

Through these stages, STAR7 is not only able to build customer loyalty by becoming an integrated partner of its customers, but also to improve the quality of its services, which are constantly updated and optimised with respect to specific customer feedback.



# STAR7 people and staff

In 2024, STAR7 recorded a **13% increase** in the total number of employees, reaching 1,438 during the reporting period, of which **597 were in Italy and 841 abroad**. This positive trend represents not only quantitative growth due to acquisition transactions, but reflects a phase of growth and development of STAR7, in terms of expertise and capabilities within the Group.

In total, **97.1%** of the employees are employed on a permanent contract, a figure that will steadily increase over the three-year period **2022-2024**, while **96.2%** have a full-time contract. The share of fixed-term workers is marginal, standing at **2.9%** at the end of the period. Women make up **36.7%** of the workforce.

At the time of publishing this document, STAR7 has not yet established an internal communication protocol for employees who do not identify as male or female. It is worth noting that a procedure is currently being considered to formalise this process. This will support employees and ensure their complete freedom in terms of gender recognition and identity. As of the date, however, no communications have been received from employees declaring that they do not identify themselves in these genders or that they have expressed the wish not to communicate the gender in which they identify themselves, regardless of their personal data and biological sex.



GRI Standard

2-7

2-8



Employees	2022			2023			2024		
Total number of employees at the end of the period/by gender	Women	Men	Total	Women	Men	Total	Women	Men	Total
	386	473	859	490	779	1,269	528	910	1,438
Geographical area									
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Italy	200	272	472	219	393	612	200	397	597
Europe	124	89	213	132	106	238	133	117	250
USA	24	7	31	37	10	47	37	16	53
South America	38	105	143	102	270	372	158	380	538
Total	386	473	859	490	779	1,269	528	910	1,438
Contract/Gender									
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Permanent	367	448	815	477	746	1,223	512	884	1,396
Temporary	19	25	44	13	33	46	16	26	42
Total	386	473	859	490	779	1,269	528	910	1,438



Total number of permanent employees by gender/geographical area

	2022			2023			2024		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Italy	182	254	436	210	382	592	196	391	587
Europe	123	85	208	128	91	219	129	101	230
USA	24	7	31	37	10	47	37	16	53
South America	38	102	140	102	263	365	150	376	526
Total	367	448	815	477	746	1,223	512	884	1,396

Total number of temporary employees by gender/geographical area

	Women	Men	Total	Women	Men	Total	Women	Men	Total
Italy	18	18	36	9	11	20	4	6	10
Europe	1	4	5	4	15	19	4	16	20
USA	-	-	-	-	-	-	-	-	-
South America	-	3	3	-	7	7	8	4	12
Total	19	25	44	13	33	46	16	26	42

Form of employment/gender

	Women	Men	Total	Women	Men	Total	Women	Men	Total
Full-time employment	359	463	822	458	759	1217	490	893	1,383
Part-time employment	27	10	37	32	20	52	38	17	55
Total	386	473	859	490	779	1,269	528	910	1,438



Total number of full-time employees  
by gender/geographical area

	2022			2023			2024		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Italy	184	266	450	198	384	582	178	388	566
Europe	115	88	203	122	102	224	124	115	239
USA	22	7	29	36	10	46	36	16	52
South America	38	102	140	102	263	365	152	374	526
Total	359	463	822	458	759	1,217	490	893	1,383

Total number of part-time employees  
by gender/geographical area

	Women	Men	Total	Women	Men	Total	Women	Men	Total
Italy	16	6	22	21	9	30	22	9	31
Europe	9	1	10	10	4	14	9	2	11
USA	2	-	2	1	-	1	1	-	1
South America	-	3	3	-	7	7	6	6	12
Total	27	10	37	32	20	52	38	17	55



Other workers

The “other workers” category refers to workers who are not employed by the STAR7 Group but are utilised on a continuous basis to perform specific tasks. In detail, 172 individuals not employed were recorded in 2024, referring specifically to interns, project managers, instructors, mechanical and electrical installation workers, and freelancers. As of 2024, the instructor category is no longer considered, as it is no longer active.

Non-employees	2022			2023			2024		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Temporary agency workers	1	1	2	-	-	-	-	1	1
Interns	4	3	7	2	17	19	6	12	18
Other (Collaborators, VAT-registered, Project Managers, Mechanical and Electrical Installers)	237	101	338	62	157	219	56	97	153
Total	242	105	347	64	174	238	62	110	172

The **Group** also makes use of freelancers, including translators, interpreters and DTP (desktop publishing) specialists to carry out its activities.

In **2024**, **STAR7** continued to operate through an extensive network of external professionals, whose total number amounted to **1,766**, divided into **1,542 translators**, **170 interpreters** and **54 DTP specialists**.

In particular, **STAR7 S.p.A.** works predominantly with professionals from the **European Union (EU)**, accounting for **74%** of the total, while **26%** operate from non-EU countries.

Freelancers – Vendors	2024			
	Italy	LocalEyes	Brazil	Total
Translators	1,001	511	30	1,542
Interpreters	84	84	2	170
DTP (desktop publishing)	25	25	4	54
Total	1,110	620	36	1,766

\* The figures reported include the parent company STAR7 S.p.A., the company LocalEyes and STAR Comunicação e Serviços LTDA. With regard to the external employees employed by the parent company and LocalEyes, it is not possible to determine with certainty any overlapping. However, the incidence of this circumstance is estimated to be insignificant, at less than 7%.



# Suppliers

In **2024**, **STAR7** worked with **1,009 suppliers** for the parent company alone, covering **54.41%** of the Group's total costs for the purchase of products and services.

**STAR7** suppliers operate in several strategic areas, contributing to the efficiency and quality of business processes. In particular, suppliers fall into three main macro-categories:

Process area	Activity/type of supplier
Production	<ul style="list-style-type: none"><li>• Translation and interpreting services</li><li>• Authoring services</li><li>• Print services</li><li>• Purchase of printing materials</li></ul>
Production service	<ul style="list-style-type: none"><li>• Purchase of products, machines, equipment</li><li>• Software and IT services that affect the storage and accessibility of data and information</li><li>• Logistics services</li><li>• Professionals and consultants</li></ul>
Company management	<ul style="list-style-type: none"><li>• Office equipment</li><li>• Consumables</li><li>• Maintenance services</li><li>• Spare and replacement parts for maintenance</li></ul>









# Customers

**Corporate reputation** is a key strategic asset for the success and growth of the **STAR7 Group**. To ensure sustainable economic development, the Group continuously invests in building and strengthening customer relationships, adopting an approach based on trust, service quality and innovation.

Over the years, **STAR7** has established long-lasting partnerships with **major national and international players** in a wide range of sectors. To date, the Group's customers number **over 900 companies**, spread across **more than 20 business sectors**.

Commercial relationships are managed through **multi-year contracts or framework agreements**, which guarantee stability and continuity over time. As of **2024**, more than 80% of the **top 20 clients** have been working with **STAR7** for more than **ten years**, demonstrating the trust and satisfaction generated by our services.

Clients typically access STAR7's services through a single service offer, which then gradually and naturally extends to other services manner over time. The STAR7 business model is designed to offer capabilities and services that are carefully targeted across the entire product value chain, using its Integrale<sup>7</sup> approach. In **2024**, there was a clear preponderance of **full-service contracts (74%)**, compared to **single-service contracts (26%)**, confirming the tendency of customers to take advantage of the wide range of competencies offered by the Group in an integrated manner.



# Innovation, Research and Development and Cutting- edge Technologies



## The role of research and development

STAR7 is distinguished by its ability to integrate specialised skills, established technologies and constant innovation, putting these resources at the service of its clients in both the design and evolution of its services. This combination of know-how and innovation enables the development of tailor-made solutions characterised by a high level of technical and technological quality, effectively meeting customers' needs.

The STAR7 Group's focus on research and development is reflected not only in the quality of the solutions offered, but also in the investment dedicated to this strategic area. In the three-year period 2022-2023-2024, the company directed a total of 4,075,765 to R&D activities. In the financial year 2024 alone, the amount of investments reached 922,857, confirming the company's constant commitment to strengthening its technological skills and continuous innovation.

Constant commitment to research and development has been a key factor in the recent strategic acquisitions made by the STAR7 Group, mainly aimed at enhancing the technological value of its services. In particular, the Group strengthened its competencies in the areas of Virtual Training, Virtual Showroom and Product Experience, enhancing the experience gained over time in engineering and technical drafting.

Between 2023 and 2024, STAR7 completed the research and development projects initiated in the previous five-year period. In 2024, the Group pursued significant activities focused on the development of an advanced ecosystem for the integrated management of translations (Translation Management System) and the realisation of IT platforms based on advanced Artificial Intelligence technologies, capable of multilingual translations and the generation of experiential digital content. Other activities involved the integration of innovative Artificial Intelligence, Augmented Reality (AR) and Virtual Reality (VR) technologies, developing immersive solutions with intuitive interfaces to

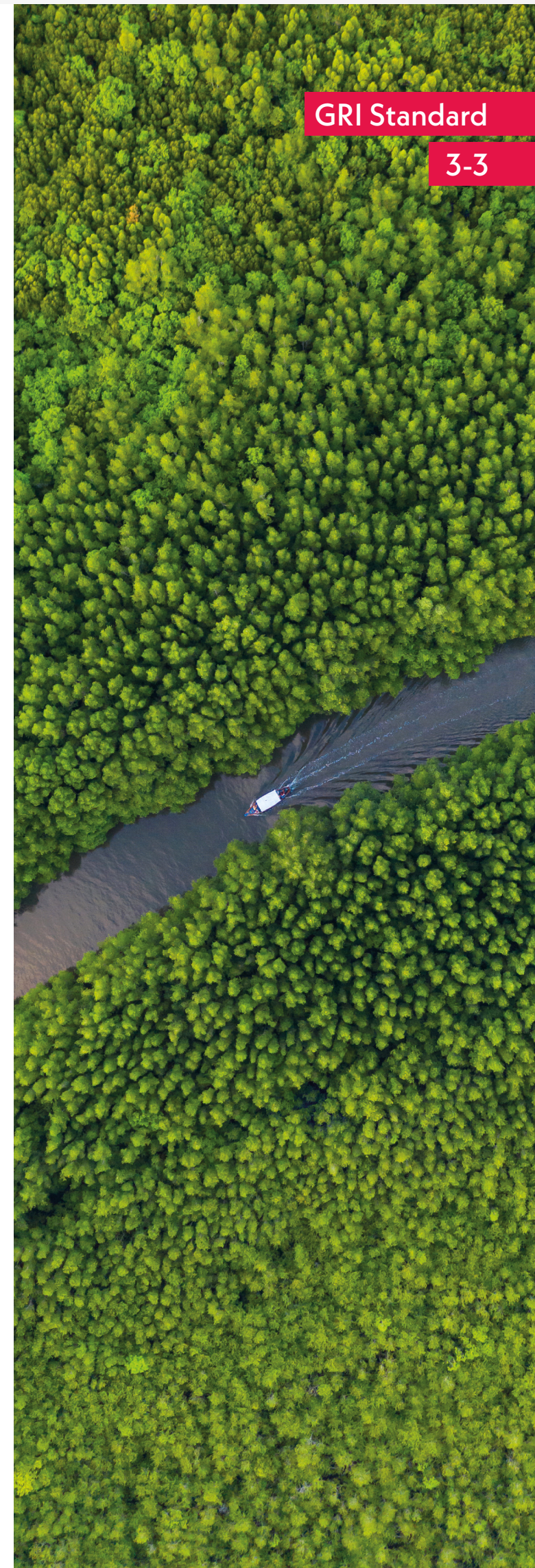
optimise business processes and improve the user experience.

Future challenges for the Group will further involve the exploration and implementation of new technological solutions, including the integration of generative artificial intelligence, with the aim of accelerating digital transformation and stimulating continuous innovation across all service lines.

## Collaboration, partnerships and sustainability

Starting in **2022**, STAR7 has pursued various projects through **collaborations and strategic partnerships**, with the objective of implementing the principles of the **circular economy**. Among them, **three key projects** demonstrate STAR7's commitment to sustainability and innovation.

The **first project**, in collaboration with a customer in the automotive industry, focused on the **industrial battery sector**, with the aim of minimising waste and potential CO<sub>2</sub> emissions in the industrial sector.





During the study, it was found that in **51% of the 2,000 battery packs analysed**, just one module needed to be replaced to enable the battery to be reused in electric vehicles. Furthermore, during the experimental phase it emerged that only 1% of the battery packs required three modules to be replaced, while 40% required other components to be replaced.

**Another project**, launched by STAR7 in **2023** and continuing until November **2026**, is the **partnership with the University of Turin**, aimed at raising awareness and fostering knowledge exchange on innovation and circular economy principles. This has led to collaboration with a PhD student in **Innovation for the Circular Economy**, allowing STAR7 to stay up-to-date on the latest academic research and strengthen ties with academia, creating a bridge between research and industrial application.

The **third project**, which started at the end of **2023** and will continue until **August 2025**, involves a collaboration with the **CIM4.0 Competence Center**, with the aim of integrating advanced technologies, such as artificial intelligence (AI) and Industry 4.0, within the circular economy. In particular, the project focuses on **extending the life of battery modules**, with a focus on repair and reuse before recycling.

This project represents a significant step forward in the practical application of circular economy principles in the transport sector, contributing not only to environmental sustainability but also to economic efficiency through the integration of advanced technologies and the Life Cycle Assessment (LCA) method.

Thanks to the **specific know-how promoting Circular Economy principles (4R)**, customers are supported in adopting circular practices, which helps reduce waste —particularly WEEE— and lowers the need for raw materials in new production.

## 7AI – The Future of Product Information

To make it easier for businesses to adopt artificial intelligence, **STAR7 has created 7AI**, an ecosystem comprising a range of advanced services powered by AI (Artificial Intelligence). This innovative environment is designed to make artificial intelligence technologies more accessible, flexible and functional, offering tailor-made solutions that meet customers' specific needs, ensuring an effective balance between automation and human intervention.

7AI is distinguished by the integration of cutting-edge technology and human expertise, realised through the **Expert-in-the-Loop** model. This approach involves STAR7 experts assisting the AI in the learning process, continuously refining its capabilities to ensure **targeted optimisation and effective and reliable utilisation**. The result is an ecosystem in which automation and human intervention are strategically balanced, ensuring high-performance solutions without sacrificing the control and quality that only the human experience can offer.







7AI Day

In order to promote responsible and informed dissemination of AI, **STAR7 organised the 7AI Day in October 2024**, an exclusive event dedicated to a number of leading customers. This initiative was an important opportunity to illustrate the **potential of generative artificial intelligence** and to present in detail the solutions offered by 7AI, i.e. solutions that STAR7 customers are already familiar with, but with the integration of generative AI. Through practical demonstrations and discussions, participants had the opportunity to gain a concrete understanding of the added value that AI can bring to their businesses.

The event also underlined STAR7's commitment to promoting innovation that combines **technological advancement and sustainability**, with an emphasis on ethical and responsible use of AI. In an increasingly competitive and dynamic global market, 7AI is a strategic resource for meeting the challenges of digitisation with smart, reliable solutions that are seamlessly integrated into business processes.

Corporate Innovation

In 2023, STAR7 embarked on a Corporate Innovation programme that complemented the Creative Lab project with a full-fledged venture builder dedicated to GEN AI solutions: 7AI, thus reinforcing our research and development centre, the innovative driving force behind STAR7. This is where the most futuristic ideas are being developed, alongside research into immersive and augmented reality, the adoption of GEN AI in all STAR7's service lines with the specific aim of increasing the value of STAR7's value proposition in the market. SMART7 IE (Internal Edition) was the first concrete result of the 7AI development team: this version was first tested by a selected group of users who began to familiarise themselves with the potential of GEN AI and to report defects, criticalities and anomalies to the development team and to suggest changes and implementations. This version was the forerunner of the product later offered to STAR7 customers and launched in October 2024.

SMART7 and GLOBAL7: the 7AI tools

SMART7 – AI Knowledge Booster

SMART7 powers up corporate knowledge management and dissemination:

- analyses and generates content related to the company's products and services
- transforms corporate know-how into service applications, customer care and sales support
- adapts to specific company and customer needs
- can be trained ad hoc by expert teams to optimise performance
- integrates seamlessly with other AI technologies
- is a vehicle for STAR7 services, allowing integration with other platform services.

GLOBAL7 – AI Communication Booster

GLOBAL7 is the tool that enhances global cross-media communication and multilingual content generation:

- generates multilingual content for any business context
- combines NMT (Neural Machine Translation) and LLM (Large Language Models) to automate language processes
- reduces production time and increases content quality
- offers advanced cross-media solutions, enhancing global communication.

Both tools are designed to be easily integrated into corporate workflows, without the need for new in-house expertise.



Innovation: development of cutting-edge technologies

Thanks to its membership in the international **STAR Group** network, STAR7's activities and services are integrated with cutting-edge proprietary technology solutions designed to optimise and enhance the entire content and information life cycle of any product. This synergy significantly improves the processes of information creation, management and use, making them more efficient, scalable and adaptable to the specific needs of each sector.

Added to this solid background is the continuous innovation and technological know-how gained within the **Creative Lab**, STAR7's research and development laboratory, dedicated to the company's technological experimentation and evolution. Thanks to this combination of experience and innovation, STAR7 is able to propose advanced solutions that not only meet customers' needs, but often anticipate them, offering a significant competitive advantage.

As a member of the **STAR Group** network, STAR7 can also rely on well-established technological assets in the field of linguistics and technical writing. The solutions developed by the group over the years ensure high quality content, optimised

processes and seamless integration with customers' business systems, contributing to increasingly effective and efficient technical and multilingual communication.

Language Technologies

**STAR CLM** - Language service management platform. It incorporates terminology functions, machine translation, online review and cost and project progress tracking. Interacts with the main CMS (Content Management System). The goal is to enhance efficiency and streamline processes through tailored workflows.

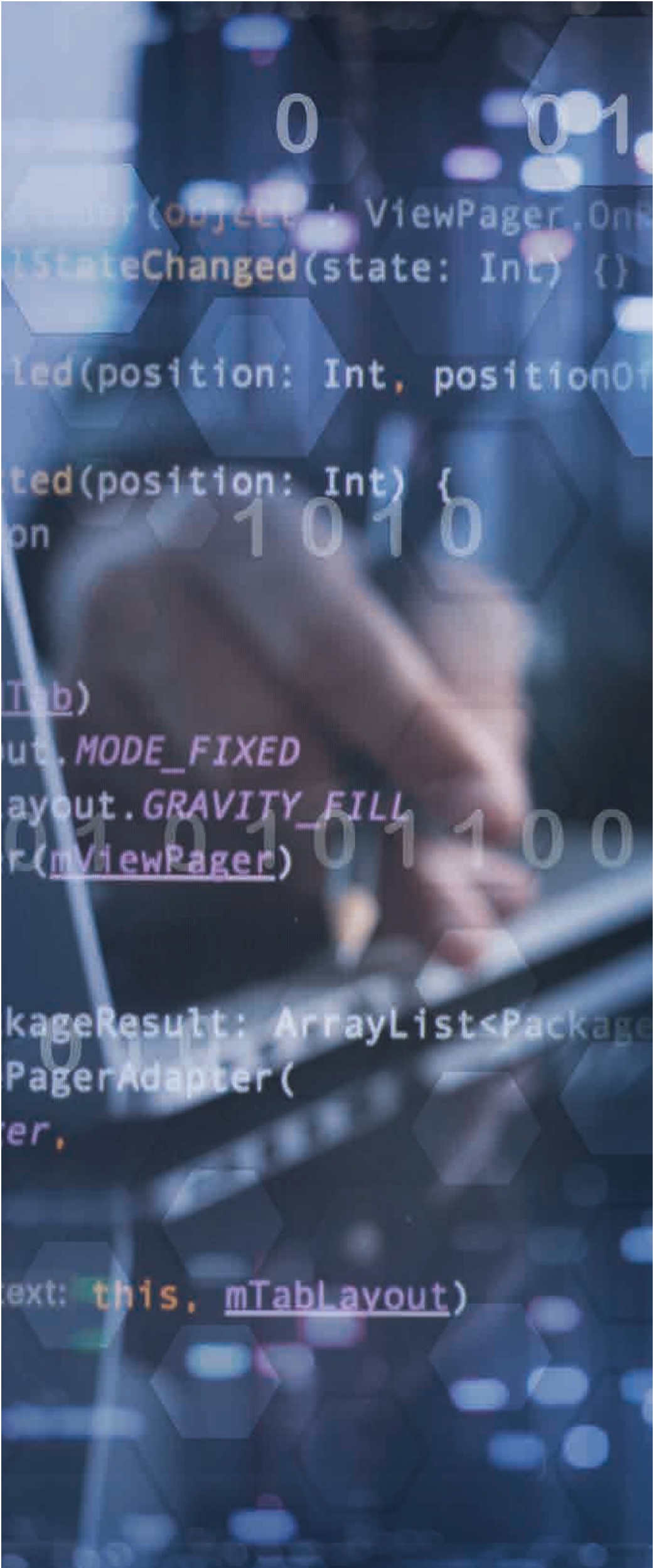
**Transit** - Advanced software that uses translation memory to optimise times and maximise performance. It incorporates localisation, multimedia content management and machine translation functions.

**STAR MT** - Automatic translation tool. It can produce large volumes of translation, considerably reducing costs and facilitating the work of the teams. This tool reduces time-consuming efforts while increasing the quality and consistency of the text in the target language.

**TermStar** - Terminology management tool to make product communication nimble, uniform and unambiguous. It includes terminology analysis functions able to facilitate the work of authors and translators by improving translation quality control.

**WebTerm** - Portal for accessing terminology databases, and for sharing and updating information in real time. It responds to the complex requirements of terminology management, allowing database access to many users working in different parts of the world.

**CLM Web Edit** - Web-based online translation tool that does not require specific software applications for editing and revision. This technology offers editing tools for modifying content and accessing real-time preview and change history, all via web.







## Authoring Technologies

**PRISMA** - Portal for customised, multichannel publication of product documentation with integrated artificial intelligence. It delivers the information users need based on their level of experience and the context in which they are operating.

**SDM** - Technical information life cycle management portal with customisable reporting system. It can produce dedicated reports on the main stages of the authoring, translation and printing processes. It supports the MySTAR and MySTAR Print vertical applications for managing the translation and print-on-demand workflow.

**STAR EC Monitoring System** - A tool designed to monitor and report engineering changes (EC). It interfaces with the customer's engineering tools and allows change tracking, evaluating their impact on the documentation to be produced.

**CMS Custom Solutions** - Customised web-based solutions for creating and managing technical documentation. Starting from the VIN (Vehicle Identification Number), it can manage and present the end user with the spare parts catalogue, the time schedule, the workshop manual, the wiring diagrams and the troubleshooting.

To complete the technology suite, STAR7 has developed its own technology that enables us to support the entire product information lifecycle in a comprehensive and innovative manner.



Product experience technologies



**Alcor** - Immersive virtual reality training platform designed to promote learning and overcome physical distance. The platform features two training solutions, single-player and multi-player, with a structure that offers both on-demand, autonomous use of content and real time participation in a virtual classroom.

**Mizar** - Immersive design software: offers an experience of perceived product quality in the stages before production. Thanks to a virtual room offering a 1:1 scale photorealistic view of the 3D model using VR technology, Mizar enables development in processes by offering the possibility of studying and testing the characteristics and functionality of a product even in the stages before production, providing a hyperrealistic experience of perceived quality. By combining physical and digital workspace, through concrete interaction with the virtual model, it configures the product for the following stages of development, allowing times to be optimised and economic impact on the production cycle to be limited.

**Antares** - Software enabling a 4D product presentation experience. Antares can combine the quality and flexibility of 3D with the fourth dimension: time. The result is an engine capable of providing a real-time, interactive and fully customisable product presentation. Thanks to a digital environment with photorealistic rendering, the interactive



functionality offered by the dashboard and the specific options that can be activated in the case of a VR hardware system, Antares engages the user in a dynamic, in-depth exploration of the details, characteristics and functionality of any kind of product, shifting sales from the perspective of an onlooker to an immediate experience and transporting the user into a new digital reality.

**DW7** - An innovative service developed as a diagnostic support application, which uses mixed reality to superimpose virtual wiring diagrams directly onto the physical vehicle. The flexibility, precision, freedom of movement and intuitive quality of the interface allow users to interact simply, directly and intuitively with every little detail.

**After Sales Digital Twin** – An innovative solution for creating and managing aftersales documentation in a virtual workshop, thanks to VR technology. Creation of a digital twin of the physical product, obtained by simplifying the 3D mathematical models and placed into a “gaming” environment to achieve high performance with commercial tools (workstations, VR helmets), permits advance operation whether or not physical prototypes or models are available.



# 3 Governance

Governance model and corporate bodies

Sustainability governance





3

Governance

Material topic	Objectives
<b>Transparency, ethics and integrity in the conduct of business</b>	<div><div></div>Establish an internal Risk and Sustainability Control Committee to manage the positive and negative impacts generated by STAR7.</div>
<div>SDGs<div><div>16</div>PEACE, JUSTICE AND STRONG INSTITUTIONS</div></div>	<div><div></div>Implementation of a compensation policy and performance assessment for the Board of Directors.</div>



# Governance model and corporate bodies

STAR7 S.p.A. follows a traditional organisational model for its corporate governance structure, which includes the following corporate bodies:

- ↳ The Shareholders’ Meeting
- ↳ The Board of Directors
- ↳ The Board of Statutory Auditors

The Board of Directors and the Board of Statutory Auditors will remain in their positions until the financial statements as of 31 December 2025 are approved. The responsibility for conducting the legal audit of the financial statements as of 31.12.2025 has been assigned to BDO Italia S.p.A. and their approval is required.

GRI Standard
2-9
2-10
2-11
405-1

## Board of Directors

Board of Directors	Position
Lorenzo Mondo	Chairman and Chief Executive Officer
Josef Zibung	Director
Andrea Farina	Director
Roberto Manzoni	Director
Isabella Mondo	Director
Paolo Rebaudengo	Independent director
Maria Luisa Vada	Director



# Board of Directors



As stated in STAR7 S.p.A.'s bylaws, all directors are appointed on the basis of an assessment of their eligibility, professionalism and honourableness, they **remain in office for a period not exceeding three financial years and may be re-elected; their term of office expires on the date of the shareholders' meeting called to approve the financial statements for the last financial year of their office, except for the causes of termination and disqualification provided for by law and the company bylaws.**

The Board of Directors is appointed by the Shareholders' Meeting on the basis of lists submitted by holders of shares which, at the time of submitting the list, individually or jointly hold **at least 5% of the subscribed share capital at the time the list is submitted.**

Please refer to the website [Board of Directors | STAR7](#) for the relevant profiles and information on other important positions held and

commitments undertaken by each member.

The Board of Directors is vested with the broadest powers of ordinary and extraordinary administration of the company, as well as of disposition of the company's assets, and therefore, with the exception of the powers and with the authorisations that the law and the Bylaws expressly reserve for the shareholders' meeting. It can appoint the Chairman, one or more Vice Chairmen, one or more Chief Executive Officers and delegate to them their powers (except for those which are mandatory for them by law), including those related to the issue and revocation – according to the law – of special powers of attorney for specific deeds or categories of deeds, also to non-Company persons; the role of CEO can also be combined with other roles on the Board of Directors.

The Board of Directors may also appoint a permanent Secretary, who may or may not be a Director; the Secretary remains

in office (unless revoked or resigns) until the expiry of the Board of Directors that made the appointment.

The Directors remain in office for a period not exceeding three financial years and may be re-elected; their term of office expires on the date of the Shareholders' Meeting called to approve the financial statements for the last financial year of their office, except for the causes of termination and forfeiture provided for by law and by the Bylaws.

The Board of Directors may delegate its powers, within the limits of the law, to an Executive Committee, made up of Directors, determining its composition and powers. The Chairman, Vice-Chairmen and Chief Executive Officers are entitled to sit on the Executive Committee. The Standing Statutory Auditors must attend its meetings. For the operation of the Executive Committee, the same rules apply as for the Board of Directors.



Board of Directors - Diversity (gender - age groups)	Women		Men		Total	
	No. 2	28.6%	No. 5	71.4%	No. 7	100%
	Under 30		Between 30 and 50		Over 50	
	No. -	-%	No. 1	14.3%	No. 6	85.7%

# Compensation policy and performance assessment for the Board of Directors

As stated in STAR7's Bylaws, the Ordinary Shareholders' Meeting determines the total remuneration due to the Board of Directors and its allocation.

# Board of Statutory Auditors

The Board of Statutory Auditors consists of a total of **three full members** and **two alternate members**, who are appointed by the **Shareholders' Meeting**. They are responsible for supervising the proper management of the company, verifying compliance with current regulations and ensuring transparency and compliance with accounting and administrative rules. Alternate members, on the other hand, take over in the event of the early termination of one of the full members, ensuring the continuity of control and supervision functions.

Board of Statutory Auditors	Position
Fabio Maria Venegoni	Chairman of the Board of Statutory Auditors
Vincenzo Gambaruto	Standing auditor
Alberto Bodiglio	Standing auditor
Stefano Cernuschi	Alternate auditor
Roberto Todisco	Alternate auditor





# Sustainability governance

## The role of the Board of Directors

The Board of Directors approves the Sustainability Report and is committed to ensuring that its knowledge, stakeholder engagement for impact management and oversight of the sustainability reporting process is up-to-date, and in particular that potential or actual negative economic, environmental and social impacts are identified and managed.

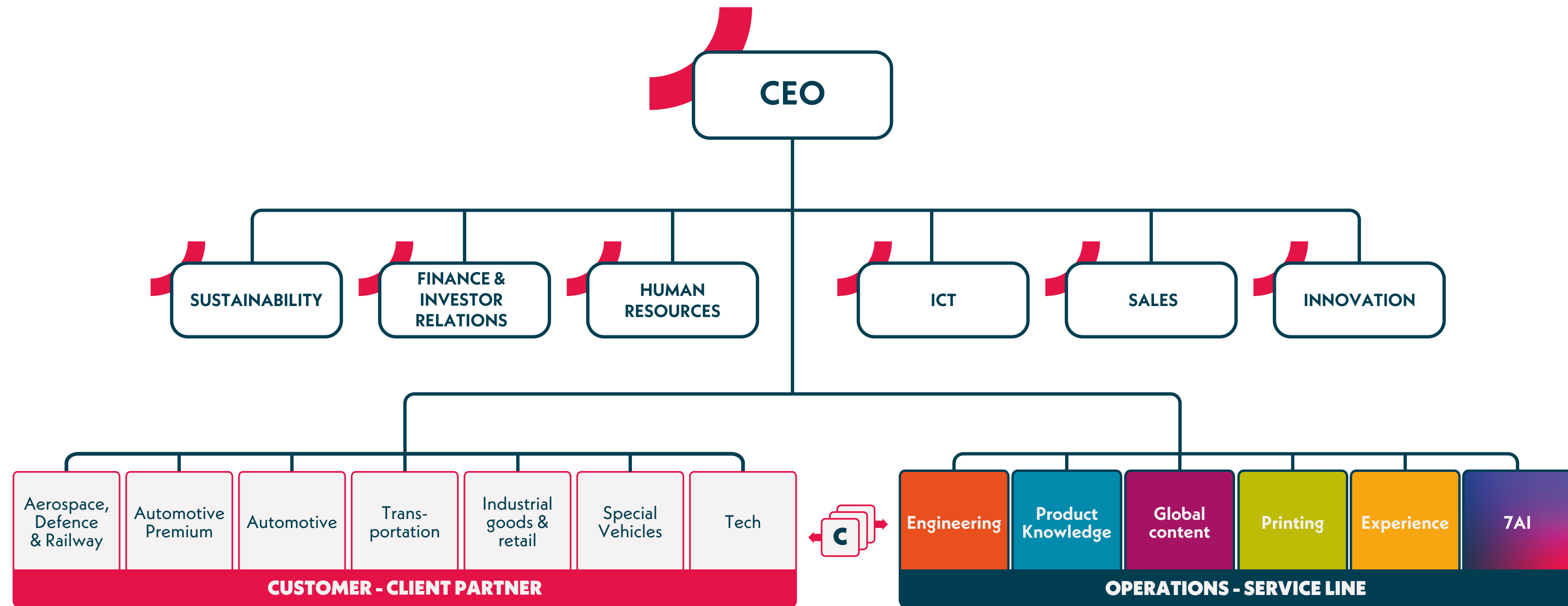
GRI Standard
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2-13
2-15
2-16





# The organisational structure and the delegation process

Below is the organisational structure of the parent company STAR7 S.p.A.





In order to make the business process even more productive, in 2021 STAR7 adopted a new organisational system, whereby **each individual division (Service Line) is led by a Service Line Leader (SLL)** with responsibility for managing resources and the quality and efficiency of the services provided, who liaises with the **Client Partner (CP)**, who is responsible for managing and satisfying the clients of the cluster assigned to him, with the aim of guaranteeing a quality service in compliance with the times and costs established for the order.

The operational governance system is called the Équipe: it consists of the CEO, Client Partner, Service Line Leader and the main staff functions (ESG, HR, ICT, Communication, Sales). The primary responsibility of the Management Team is to

execute the business strategies established by the CEO in collaboration with the Board of Directors. Monthly meetings are organised with the aim of sharing economic and financial reporting, analysing opportunities and critical issues and monitoring the progress of the STAR7 Group's main strategic projects in Italy and abroad. To enhance the effectiveness of implementing operational strategies in foreign markets, a dedicated meeting called the Waypoint meeting is organised exclusively for the Country Managers of the regions where STAR7 operates.

The management team has assigned CP and SLL with the responsibility of managing the organisation's impact on the economy and people. In particular, the Service Lines are responsible for the development and

management of personnel in STAR7, assisted by the HR function; they are entrusted with growth paths and the management of the main issues related to safety and well-being in the working environment, and training needs and paths are identified. Furthermore, the Service Lines are responsible for managing the supply chain. The SLLs, with the assistance of the Purchasing function, are responsible for evaluating and choosing STAR7's supply chain based on STAR7's principles and criteria for supplier selection. The Service Line is responsible for providing services and managing all associated environmental impacts.

Clusters are responsible for both customer satisfaction and the profitability of the activities provided to them, as well as for business

development and growth. Their task, in relation to their functions and objectives, is to incorporate the ESG requirements that customers demand as suppliers/partners, which are becoming increasingly stringent. CPs must be transferred immediately to the governance body of the team so that necessary decisions or corrective actions can be taken. Furthermore, CPs are the main spokespeople of how STAR7's services can play an important social and environmental role in the economic and social context in which it operates and therefore the main contributors to STAR7's ESG identity. Monthly meetings are organised for Cluster and Service Line where the main objectives of each function within the matrix are monitored.





# Communication processes and conflicts of interest



As per the Code of Ethics, all STAR7 Group activities must seek to avoid leaving anyone involved in a conflict of interest. When carrying out their tasks on the STAR7 Group's behalf, all Group company employees must take special care not to take part in any social activity that might lead to conflicts of interest or any other situation that could bring to bear their personal interests or those of other people connected to them.

Group companies must be regularly informed by the Group's leadership and the Supervisory Board of any circumstances that may give rise to a conflict of interest.

Managers must be informed of all potential conflicts, so they can use all the tools at their disposal to prevent these situations occurring.

Furthermore, potential conflicts of interest are prevented and mitigated by the overall system of governance tools and through

the related party procedure. The Board of Directors is responsible for periodically evaluating the effectiveness of the procedure, considering the reports and observations of other corporate bodies. They must also determine the need and advisability of revising the procedure at least every three years.

The RPT Procedure is available for consultation on the [STAR7](#) website.

**During 2024, no reports were received by the Supervisory Board.**



4

# Strategies - Commitments - Policies



The role of STAR7 and its contribution to sustainable development

Responsible business conduct

Management Systems and Certifications

Environmental - Social - Economic Compliance

External Initiatives and memberships

Stakeholders: role and engagement



# The role of STAR7 and its contribution to sustainable development

## The social and environmental impacts of product information

The services offered by STAR7 cover the entire life cycle of product information, from the design phase to after-sales, accompanying customers at every stage of the process. Through a range of integrated solutions, including **engineering, creation and editing of technical and**

**commercial content, translation, printing and development of virtual product experiences,** STAR7 provides support in the effective management and communication of information, ensuring quality, accuracy and consistency.





The evolution of these services is closely related to the **industry mega-trends** and **market scenarios** outlined in the previous paragraphs, reflecting a growing need for **digitisation, innovation and process optimisation**. The adoption of advanced tools makes it possible to respond more efficiently to business needs, improving the use of technical information and adapting to new global market dynamics.

In addition to their strategic relevance, these services have a **significant social and environmental** impact, contributing significantly to improving people's quality of life and encouraging a more conscious management of resources. STAR7, as a key player within **the supply and value chain**, supports **processes of social and digital inclusion**, facilitating access to information and reducing language and cultural barriers. In addition, its services promote **education and cultural integration**, making content more accessible and usable by a wider audience.

On the environmental side, STAR7 contributes to the **mitigation of the impacts of its customers' products and services** by supporting the adoption of solutions that **optimise resource management, reduce waste and limit the use of materials** in production and communication processes. The integration of advanced technologies, such as **product virtualisation and digitisation of technical information**, reduces the need for physical media, improving the overall efficiency and sustainability of business operations.



The following table/infographic summarises the role of STAR7 in the various markets it operates in.

INDUSTRIES

STAR7 SERVICE OFFERING AND ROLE

<b>Aerospace &amp; Defence</b>	<div><div></div><div><b>Legality and safety standards</b></div></div> <p>STAR7 offers a mix of services designed and optimised to support, in strict compliance with rigorous industry standards, all life cycle phases of a complex system, from design to production, through to engineering and integrated logistics support.</p>
<b>Agriculture &amp; Construction Equipment</b>	<div><div></div><div><b>Sustainable agricultural practices - precision farming</b></div></div> <p>The 4.0 precision agriculture market is constantly evolving and demands cutting-edge machinery and digital technology to address not only production challenges, but also social and environmental concerns.</p> <p>Smart connectivity installed in the latest generation of machines enables the exchange of information with databases which monitor quality, product traceability, field treatments and maintenance of agricultural vehicles, with the aim of reducing operating costs and lowering environmental impact.</p>
<b>Air conditioning &amp; Household appliances</b>	<div><div></div><div><b>Product use &amp; customer experience</b></div></div> <p>STAR7 provides its expertise and technologies to ensure smooth and automated processes. In addition, support for product usability using innovative user instructions management, paired with new outputs and channels for sharing content, contribute to improving the customer experience in all target markets. The offer is rounded out by printing and logistics services to deliver technical documentation to production plants.</p>
<b>Automotive &amp; Transportation</b>	<div><div></div><div><b>Sustainable mobility</b></div></div> <p>The key players in the automotive sector are navigating one of the most dynamic markets, whose challenges are linked to new types of transport, emerging and cross-sector competitors, the spread of electric vehicles and the accompanying technological, logistical and bureaucratic implications, the demand for vehicle customisation and the digitalisation of processes and products.</p>



INDUSTRIES

STAR7 SERVICE OFFERING AND ROLE

Engineering & Machine Tools

Secure and relevant information accessibility

Human-machine interaction works if information models and management solutions can overcome physical distances, language barriers and cultural differences. Accessible, secure and relevant information paves the way for smart products that improve engineering processes with real-time processing, feedback and updates. From diagnostics to customised and interactive maintenance.

Fashion & Retail

Brand identity and product knowledge

STAR7 offers the industry, content that is curated, personalised and always aimed at conveying the exclusivity of an experience: text, images and videos must 'speak' to each user with the brand identity, at all stages of the relationship.

Finance

Data and information security

In Finance, STAR7's distinctive feature is based on customisation of the service, but the highly sensitive nature of the content imposes two indispensable principles for any information and technology architecture: on the one hand, security and data protection; on the other hand, quality of translations. AI closes the loop, ensuring compliance and the ability to optimise insights more quickly and accurately.

Food & Beverage

Content expertise and cultural context

STAR7 offers valuable support in the creation and integrated management of all types of content, from translated text to images and CGI animations, to ensure the best possible end consumer engagement. Our authoring and linguistic support takes the importance of specific terminology and cultural context into account, as well as simplifying content review in the target markets.

IT, Software & Technology

Innovation and AI

Technologies that assist in creating and localising each product are the key to ensuring a winning overall experience for the developer and the user. STAR7 combines artificial intelligence and translation memories in a proprietary system for the benefit of every actor involved: designers, developers, translators and end users.



INDUSTRIES

STAR7 SERVICE OFFERING AND ROLE

Life Sciences

**Research documentation**

In the life sciences field, documentation to support research is as essential as laboratory activities. Those working in the pharmaceutical and medical sectors face a major challenge: applying a scientific approach also to content and term bases in order to obtain the required approvals in the shortest possible time while respecting guarantee protocols. STAR7 has the best platforms and tools to manage sensitive information reliably and keep time to market as short as possible.

Media & Publishing

**Content communication**

On the one hand, thanks to its Global Content services, STAR7 meets the needs of content processing and translation for all types of media (such as localisation, adaptation, transcription, subtitling, voiceover and dubbing); on the other hand, with STAR7 Printing, it offers professional print-on-demand solutions for SMEs or key players in the publishing industry.

Public Utilities

**Data and information management - processes**

Industry players are complex organisations that need to produce and manage enormous amounts of data and information. Technology and human resources form the backbone of STAR7’s expertise in this sector, making us the best partner for content creation and localisation using proven workflows that simplify every process.

Sport & Sports Equipment

**Information and customer experience**

For the events and sports equipment sector, optimising performance and the customer experience is central. For this reason, content plays a fundamental role, because it must embody a perfect synthesis between the technical and the emotional. That is why STAR7 offers its expertise in technical and specialist authoring and translation, combined with an ability to create innovative digital content and unique product experiences, all as part of an overall optimisation of information generation, management and publication workflows to enhance the value of high-performance products throughout all phases of product life, from market launch to after-sales.



# The United Nations 2030 Agenda and the SDGs / Sustainable Development Goals

As a demonstration of STAR7's dedication to sustainable development through its business solutions, the company has adopted the United Nations 2030 Agenda and its **Sustainable Development Goals (SDGs)** as a point of reference and guidance. The SDGs serve as a roadmap for achieving sustainability objectives and should be viewed as opportunities to enhance business operations. It is important to read, interpret and implement them in order to achieve success.



SDGs with prevalent impacts due to business model



SDGs with prevalent impacts due to internal activities



For more information about STAR7's dedication to the SDGs in the short, medium and long term, please refer to the section titled "**Material topics - Goals and Actions**".



# Responsible business conduct

## Compliance Programme pursuant to Legislative Decree 231/2001

The parent company STAR7 S.p.A. has adopted the Compliance Programme pursuant to Legislative Decree 231/2001 (the '*Compliance Programme*') with the aim of ensuring compliance with current regulations and promoting principles of fairness, transparency and clarity in the management of all company activities. The adoption of this model marks a concrete commitment by the company towards responsible and ethical business conduct, ensuring an effective internal control system aimed at risk prevention.

The Compliance Programme consists of a General Section and a Special Section relating to the different types of offences relevant under the Decree that the Group may be at risk of committing in its business. The General Section, which contains the main principles of the Compliance Programme, the Supervisory Board and the system of training and dissemination of the compliance programme among the recipients.

The Special Section is divided into sections. The various sections are aimed at outlining the principles that must inspire the corporate protocols adopted (or that will be adopted in the future) by the Company. Specifically, each Special Section is divided into:

- a) description of the criminal offences;
- b) identification of sensitive processes in relation to the types of Offence;
- c) defines general principles of conduct;
- d) identification of operating principles.

The sanctions system is also described in the Special Section. The Code of Ethics forms an integral part of the Compliance Programme.

In accordance with the relevant legislation, a Supervisory Board (SB) has been established to oversee the functioning of operations and ensure compliance with the protocols outlined in the Programme. The SB is also responsible for ensuring that

these protocols are regularly updated. The Programme defines the information flows to and from the Supervisory Board. During the reporting period, the Compliance Programme was updated and is available on the [Corporate Governance | Compliance Programme website](#).

In order to guarantee the effectiveness of the Compliance Programme, STAR7 ensures wide dissemination of the Compliance Programme and adequate training for all the recipients concerned with regard to the application of the protocols as instruments for preventing the commission of the offences referred to in Legislative Decree 231/01 and subsequent amendments and additions.

It should be noted that, in addition to the parent company, the subsidiary STAR7 Printing has also adopted its own Compliance Programme.





# The Code of Ethics

The Code of Ethics outlines the commitments and moral responsibilities of individuals working within or interacting with the company. Its purpose is to maintain and strengthen the trust between the company and its stakeholders, including corporate bodies, employees, customers, suppliers, public bodies, and trade associations. Additionally, it serves to discourage unethical behaviour.

The Code of Ethics of the STAR7 Group outlines all the ethical principles that must be followed to ensure the smooth operation of its activities and proper management of relationships with various stakeholders. This is done to achieve the company's economic and social objectives. It is based on the principles of loyalty, the physical and moral integrity of persons, respect for the law, confidentiality, quality of service,

transparency of activities, protection of competition, and fairness in the event of conflicts of interest. In particular, the Group is committed to:

- placing integrity and honesty at the heart of its corporate conduct at all times, in its work and in its relationships with its various stakeholders;
- protecting its employees from discrimination on the grounds of race, language, nationality, religion, political beliefs, age and sexual orientation;
- valuing and taking up their staff's own ideas, encouraging people to take part in the Group's growth and development;

- making all recipients aware of this principle using the most suitable means of communication, and to take further monitoring measures so that any conduct that is not in line with the principle does not occur;
- constantly improving the features of their services and the way they provide them, so as to respond as best they can to the market's shifting demands;
- ensuring maximum transparency and correctness in the communication of information;
- safeguarding the value of fair competition;

honouring the principle of integrity and non-discrimination on the basis of race, gender, religion, political beliefs, language or age when carrying out their activities and in their relationships with their various stakeholders;

respecting ethical principles in the authoring, translation and printing of documents requested by clients.

The Code of Ethics is available on the [Corporate Governance | Code of Ethics](#) website.



# Whistleblowing

In the context of the Whistleblowing legislation, governed in Italy by Legislative Decree 24/2023, which transposes Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law and on the protection of persons who report breaches of national laws, STAR7 has fulfilled the new obligations in accordance with the timeframe indicated in the legislation. The STAR7 Group has adopted a whistleblowing policy (available on the [STAR7 | Whistleblowing Policy](#) website), and has set up a whistleblowing channel to allow whistleblowers to report relevant unlawful conduct under Legislative Decree 231/2001, offences within the scope of European Union or national acts relating to the sectors identified by Legislative Decree 24/2023 or violations of company procedures. The Group has therefore set up a dedicated platform, available

to internal and external stakeholders, for sending these reports (<https://whistleblowersoftware.com/secure/star7>), designed to guarantee the confidentiality of the whistleblower.

Reports are handled by the Chairman of the Supervisory Board, who carries out investigations in accordance with current legislation.

As of the date of publication of this document, no reports have been received through this channel.

# Legality rating

The Legality Rating, introduced by the Italian Competition and Market Authority (AGCM), promotes transparency and business ethics, recognising companies that operate in compliance with current regulations. The score, expressed in stars (from 1 to 3), assesses the level of compliance and attention to proper

business management.

In 2023, STAR7 S.p.A. achieved the maximum rating of 3 stars, attesting to its commitment to legality and responsible management, reinforcing its reliability to customers, investors and institutions.





# Management Systems and Certifications

The key objective of ensuring a high quality and reliability of the services offered, and the prospects for sustainable development, has led STAR7 S.p.A. to adopt a systematic approach to the management of its business, which is based, among other tools, on a number of management systems and certifications.

GRI Standard

2-24





<b>ISO 9001:2015 Quality Management Systems</b>	<div></div> <div>Provision of translation services and authoring of technical documentation, interpreting. Design and provision of technical training services (IAF 35, 37).</div>
<b>ISO 14001:2015 Environmental Man- agement Systems</b>	<div></div> <div>Design and implementation of multilingual technical and commercial communication services, using information technology systems and printing processes (IAF 35, 09).</div>
<b>ISO 17100:2015/ A1:2017 Translation services</b>	<div></div> <div><div>Translation Service Management System</div><div>Translation project management includes:</div><ul style="list-style-type: none"><li>• supervision of preparatory activities;</li><li>• assignment of translators to the project;</li><li>• assignment of reviewers and, if required, specialist reviewers;</li><li>• transmission of instructions to all parties involved in the project;</li><li>• activation and monitoring of translation consistency;</li><li>• monitoring and supervision of the process schedule;</li><li>• ensuring that contact is maintained with all parties involved in the process, including the customer;</li><li>• release authorisation.</li></ul></div>
<b>ISO 18587:2017 Post-editing</b>	<div></div> <div><div>Post-editing management system for machine translation output</div><div>Post-editing is performed for the purpose of checking the:</div><ul style="list-style-type: none"><li>• comprehensibility of the post-edited MT output;</li><li>• correspondence of source language content and target language content;</li><li>• compliance with the post-editing requirements and specifications defined by the TSP.</li></ul></div>



**ISO 27001**  
**Information security management system**

IT systems supporting the provision of infrastructure services and multilingual technical and commercial communication (translations and interpreting, and authoring of technical manuals).

**ISO 13485:2021**  
**Specific quality management system for medical devices**

Specific quality management system for medical devices. It ensures that companies in the industry comply with regulations, improve product safety and ensure traceability throughout the lifecycle, from design to distribution (provision of technical translation services for the medical sector).

**Chain of custody FSC-STD-40-004 V3.1**

Purchase of FSC MIX-certified paper and board for printing and sale of FSC MIX-certified printed material.

**PEFC Chain of Custody ST 2002-2020**

Purchasing paper that comes from sustainably managed forests, ensuring the traceability of wood throughout the production chain.



The matrix below details the certifications and management systems adopted by the various Group companies:

Management systems and certifications/Entity	UNI EN ISO 9001:2015	ISO 17100:2015	UNI ISO 14001:2015	ISO 18587:2017	ISO/IEC 27001:2013	FSC-STD-40-004 V3.1/ FSC-STD-50-001 V2.1	PEFC ST 2002:2020	PEFC ST 2001:2020	ISO 13485:2021
STAR7 S.p.A.	x	x	x	x	x	x	x		x
STAR7 Printing S.r.l.	x		x			x	x		
STAR Comunicação e Serviços LTDA	x					x			



# Environmental - Social - Economic Compliance

**Environment**

No environmental disputes occurred within the reporting period (2022-2024). At the time of writing, there are no environmental disputes that have given rise to significant penalties for non-compliance with environmental laws, rules, or regulations.

**Social and economic area**

No disputes or cases of violations of relevant social and economic laws and regulations arose during the reporting period (2022-2024). No significant penalties of this kind have been received between 2022 and 2024, and no significant legal actions have been reported in relation to this matter.





# External Initiatives and memberships

**STAR7** is a member of several industry and institutional associations, including **COM&TEC**, **Confindustria Alessandria**, **Confindustria Torino**, **Confindustria Modena**, **Unilingue**, **AIAD (Federazione Aziende Italiane per l'Aerospazio, la Difesa e la Sicurezza)**, **Manager Italia**, **Associazione Ferraristi**, **INPIÙ** and **QUAS**.

Membership of these organisations enables STAR7 to stay up-to-date on regulatory developments and market trends, as well as fostering dialogue with other industry players. However, participation in these organisations is predominantly of an institutional nature and, although STAR7 is a member, it does not play an active role in their management.





# Initiatives for the local area

In **2024**, STAR7 joined the initiative "**Noi con voi per fare di più**", promoted by the Alessandria Administration in collaboration with **Global Mobility System, a Benefit Company**. The project aims to make Alessandria a cardioprotected city, through the installation of an innovative **latest-generation defibrillator**, semi-automatic and equipped with voice guidance, designed to be easily used in emergency situations. In support of the initiative, **Global Mobility System** will organise training sessions in the area to spread knowledge and correct use of the device, helping to improve community safety.



In parallel, the project also supports **inclusive mobility**, in cooperation with **the Anteas volunteer association of Alessandria**. The initiative provides for the **free loan** of a vehicle equipped with a hydraulic platform, intended for the transport of elderly and disabled persons and those who have difficulty travelling to hospitals and health facilities.

In **2024**, STAR7 also started a cooperation with **COM&TEC and ITS Academy PU.MA.**, becoming a partner of the **first training course in Technical Communication Management**. The course, aimed at young graduates, is designed to develop specialised skills in the field of technical communication, training professionals to manage and optimise technical content for innovative and international companies. Thanks to the support of STAR7 and partner companies, students will have the opportunity to supplement classroom training with practical experience in the company, facilitating their entry into the world of work.





# Stakeholders: role and engagement

GRI Standard  
2-29

Stakeholders refer to people or groups who have a vested interest in a company, or who may be impacted positively or negatively by the company's actions. An interest, which can also be interpreted as participation, is something valuable to an individual or a group. Not all interests hold the same level of significance and therefore should not be given equal treatment. Ethical business conduct/management through policies and procedures that ensure integrity, regulatory compliance and tax transparency. The most significant effects that a company can have on individuals are those that have an adverse impact on their human rights.

Some stakeholders may not have a direct relationship with the company, such as workers in the company's supply chain, while others may be located at a distance, like STAR7 customers.

Stakeholder engagement is central to the Group. This approach is aimed at understanding the processes required to identify and assess actual and potential negative impacts that guide sustainability reporting.

STAR7 creates, develops and maintains relationships with its stakeholders over time with the aim of strengthening these ties and, as a result, improving its competitive position and ability to generate and distribute value in the long term. Dialogue and discussion with stakeholders (stakeholder engagement) is a structured activity aimed at understand-

ing their interests, expectations and needs, thus contributing to more effective and informed decision-making. This approach enables appropriate strategic planning and supports the achievement of business objectives.

The STAR7 Group bases its relations with its stakeholders on principles of honesty, fairness, loyalty and transparency. Stakeholders are identified taking into account the sector they belong to, the business model, the existing relationship system and the geographical presence of the company.

For STAR7, stakeholder engagement is an activity carried out systematically, integrated into its business model and independent of the sustainability reporting process alone. In this context, specific engagement initiatives are implemented to collect and analyse stakeholder expectations, ensuring that they are adequately considered in corporate decision-making processes.

The system of tools through which the STAR7 Group manages relations with its stakeholders is structured according to the different stakeholder categories.



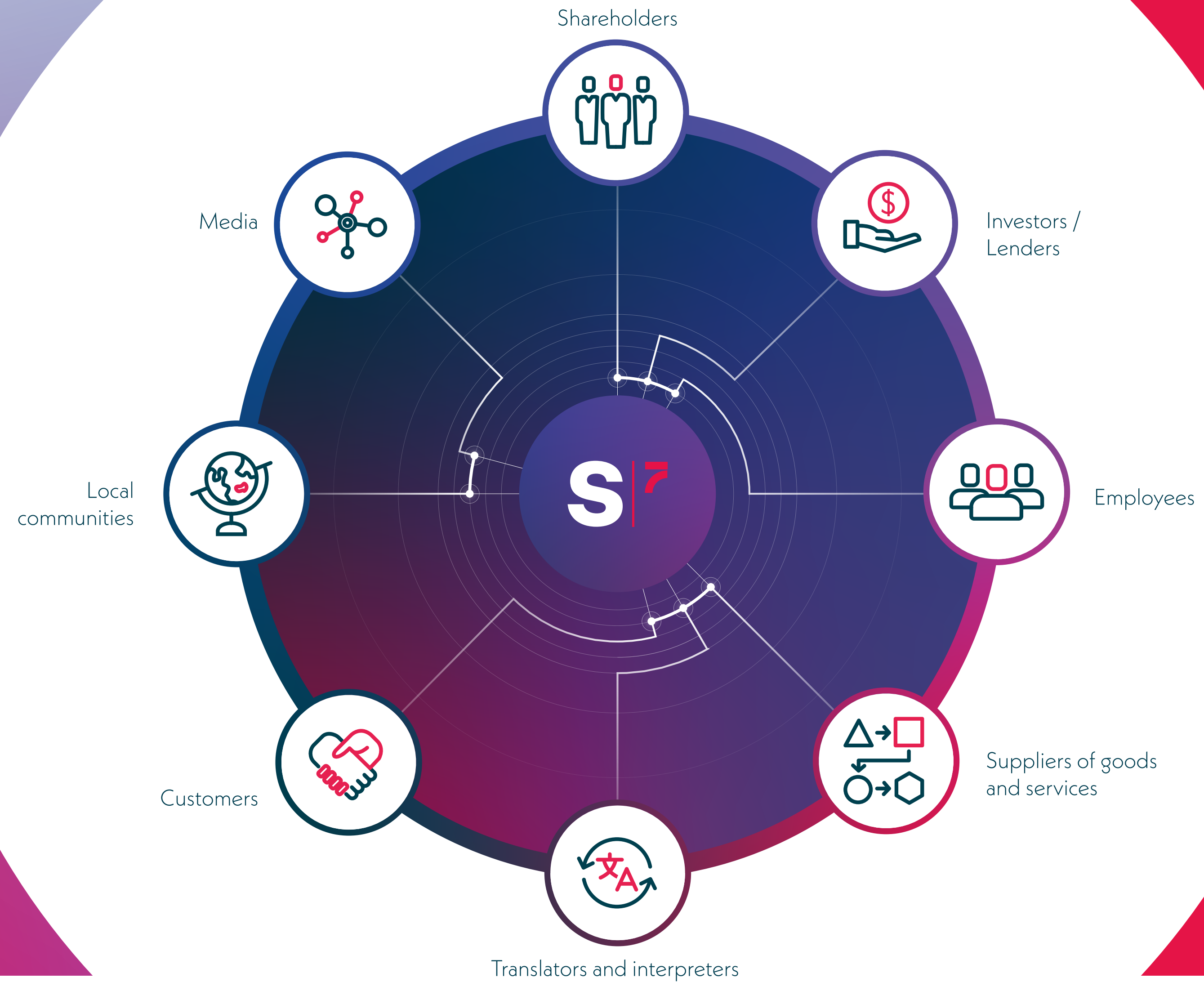
# Stakeholder relations and engagement

Below are the instruments that STAR7 uses to manage its relationships with stakeholders.

Stakeholder	Engagement activities Projects - Initiatives - Reports
Shareholders	Shareholders’ Meeting – Board of Directors – Financial Statements
Investors - Lenders	Shareholders’ Meetings – Meetings and Regular Events - Financial Statements – IR Activities
Employees	Career fairs, social media platforms (LinkedIn, Facebook, Instagram) - Meetings - Internal and external training events - Company conventions – “Call for Ideas”
Suppliers of goods and services	Definition and sharing of production / service standards - Commercial meetings and visits / audits - Dedicated portals and platforms - Evaluation tools and questionnaires - Definition of qualification criteria and supplier selection - Website
Translators and interpreters	Online questionnaires to map and survey skills and tools subject to obsolescence
Customers	Sales meetings and visits - Industry events - Marketing activities - Publications and social media channels / content - Evaluation tools / questionnaires - Supply chain audit / verification - Website - Qualification and pre-qualification processes - Supplier portal accreditation - Meetings to define technical specifications / requirements / 7AI day
Local communities	Support and dialogue initiatives, relations and social responsibility (CSR) - Sponsorships and events - Institutional partnerships
Media	Press releases, social media, website, publications, events, interviews, and specialised insights.



# Stakeholder Map





5

# Material topics



# Impacts and material topics

## The GRI Standards perspective

This document has been prepared by adopting the GRI Standards as the reporting standard. As per the GRI Standards, impacts are the economic, environmental, and social effects that a company has or may have, including those on human rights, as a result of its activities, business, and trade relations. Impacts can take various forms, including actual or potential, negative or positive, short or long term, intentional or unintentional, reversible or irreversible. They can also reflect the organisation's contribution to sustainable development, whether positive or negative.

Impacts, according to their different nature (economic, environmental and social) are interrelated and indicate the company's contribution, negative or positive, to sustainable development. The most significant impacts, as identified according to the approach described in the following paragraphs, represent Material Topics.

The impacts of a company's activities and business relationships on the economy, the environment and people can also have positive and negative consequences on the company's operations or reputation and therefore, in many cases, these consequences are also financial or could become so in the medium and long term. Understanding these impacts is therefore necessary for a company in order to identify any significant risks and opportunities related to these impacts and which may influence the value of the company.

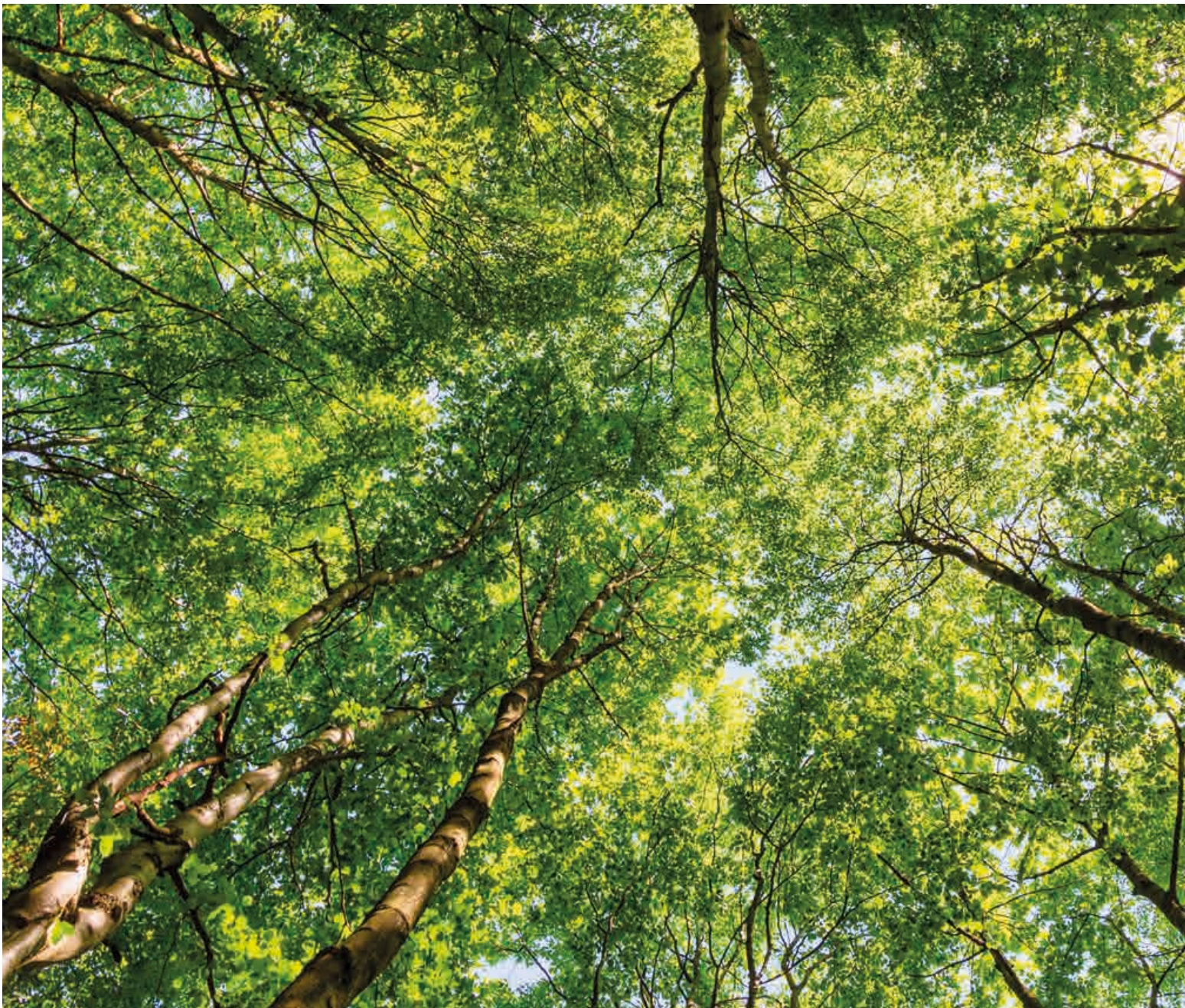
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can also reflect the organisation's contribution to sustainable development, whether positive or negative. The most significant impacts represent Material Topics.

The activities and business relationships of a company can have both positive and negative impacts on the economy, environment, and people. These impacts can also affect the company's operations, reputation, and financial standing in the medium and long term. As a result, they can impact the value of the company, its relationships with stakeholders, and its competitive position in the market.



# The process of identifying - evaluating and prioritising issues



The process of analysis identification, evaluation and subsequent prioritisation of material topics was developed as required by GRI Standard 3 Material Topic 2021. Specifically:

### Understanding the context of the organisation

The information regarding the background and framework of STAR7, the business model, business activities and relationships, as well as the sustainability context and stakeholder analysis, can be found in Chapters 2 and 4.

### Identification of actual and potential impacts

We identified actual and potential impacts on the economy, environment, and people, including human rights, by analysing various external and internal sources. We also considered the results of our dialogue and relationships with stakeholders.

### External Sources

World Economic Forum – Strategic Intelligence / Global Risk Report 2025

OECD Organisation for Economic Co-operation and Development - Due Diligence Guidance for Responsible Business Conduct/ OECD sectoral guidance on due diligence

International Labour Organisation (ILO), 2022. Transforming enterprises through diversity and inclusion.

United Nations Human Rights (UNHR), 2011. Guiding Principles on Business and Human Rights. Implementing the United Nations “Protect, Respect and Remedy” Framework

COSO | wbcsl - Enterprise Risk Management - Applying enterprise risk management to environmental, social and governance-related risks

Convention on Biological Diversity (2022), Kunming-Montreal Global Biodiversity Framework

SASB - Sustainability Accounting Standards - Materiality Finder

IFRS-S - International Financial Reporting Standards - Sustainability (Draft IFRS S1-S2)

Benchmarking STAR7's main peers and strategic partners: a) Material topics; b) Policies; c) Risk management

Sector studies and research



Internal Sources

- Compliance Programme pursuant to Legislative Decree 231/2001
- STAR7 Code of Ethics
- Management Systems
- Risk Assessment Document (DVR)
- Information Security Policy
- Environmental Policy
- Group management systems and certifications







**Evaluation of materiality and prioritisation of impacts**

The aim of assessing the materiality of identified impacts is to prioritise them. Prioritisation enables the company to identify the material topics to report on, and more importantly, to define commitments and actions needed to *address* the impacts in a more effective and relevant manner. The significance of the impact depends on the specific conditions of a company, the sector in which it operates, and its business model. The significance of an actual **negative impact** depends on the severity of the impact, while

that of a potential negative impact depends on the severity and likelihood of the impact.

Severity is defined by the GRI Standards on the basis of three dimensions:

- a) scale: how serious the impact is;
- b) scope: how widespread the impact is;
- c) irremediable nature.

The significance of an actual **positive impact** depends on the scale and scope of the impact, while the magnitude of a potential positive impact depends on both the scale and scope and the likelihood of the impact. In the case of positive impacts, the scale of an impact refers to the actual and/or potential benefits of the impact, while the scope refers to its actual or possible magnitude.

The process concluded with the prioritisation of identified and assessed impacts, taking into account their significance and a specifically defined threshold. The impacts considered most significant are included in the reporting within this document. After completing the process described and commented on below, we analysed and discussed the material topics. We then shared our findings with the Chairman and CEO of STAR7.



# The material topics

The following table summarises the activities that have been carried out. It highlights the material topics, the underlying impact areas (including descriptions and reasons for the relevance of the selected topics), the characteristics of the material topic, and the specific indicators (GRI Standards) used for reporting. The GRI Content Index, which is an integral part of this document, provides detailed information on these indicators.







# Environmental

Material topics	Impacts - Summary	Impacts - Characteristics	GRI Topic Standards
Energy, emissions and climate change	<div><div></div>Impacts related to greenhouse gas (GHG) emissions generated by STAR7's production activities. [Negative]</div>	Actual: emissions and energy consumption of the Group	GRI 302 Energy
		Direct: related only to direct activities	GRI 305 Emissions
		Short-, medium- and long-term (structural with respect to the business model)	
		Planned as it relates to business processes	
Responsible use of natural resources	<div><div></div>Impacts related to the use of resources (materials), efficient water management and waste generation in the Group's production processes. [Negative]</div>	Actual: Utilisation of resources for corporate activities	GRI 301 Materials
		Direct: related only to direct activities	GRI 303 Water and Effluents
		Short-term (structural with respect to the business model)	
		Planned as it relates to business processes	GRI 306 Waste



S

Social

Material topics	Impacts - Summary	Impacts - Characteristics	GRI Topic Standards
Human resources: talent attraction and retention	<div><div></div>Positive impacts on employment, level of knowledge and skills, and the ability to attract and retain talent. [Positive]</div>	<div>Actual: related to company procedures</div> <div>Direct: related only to direct activities</div> <div>Short-term (structural with respect to the business model)</div> <div>Expected as it relates to the business</div>	GRI 401 Employment
Development, training and enhancement of human resources	<div><div></div>Impacts related to the ability to provide all Group employees with support in their professional growth/development through training plans and skills development. [Positive]</div>	<div>Actual: competence-development training plans</div> <div>Direct: related only to direct activities</div> <div>Short-term (structural with respect to the business model)</div> <div>Expected as it relates to the business</div>	GRI 404 Training and education
Equity, diversity and inclusion	<div><div></div>Impacts related to the promotion of an inclusive work environment, valuing diversity, ensuring equal treatment and equal opportunities, excluding any form of discrimination. [Positive]</div>	<div>Actual: protection in the area of diversity and inclusion</div> <div>Direct: related only to direct activities</div> <div>Short-term (structural with respect to the business model)</div> <div>Expected as it relates to the business</div>	<div>GRI 405 Diversity and Equal Opportunity</div> <div>GRI 406 Non-discrimination</div>



S

Social

Material topics	Impacts - Summary	Impacts - Characteristics	GRI Topic Standards
Health and safety in the workplace	<div><div></div><div>Impacts on the health and safety of its employees during work activities due to the possibility of accidents occurring. [Negative]</div></div>	<div>Potential: accident monitoring and health and safety policies</div> <div>Direct: related only to direct activities</div> <div>Short-term (structural with respect to the business model)</div> <div>Both intended and unintended</div>	<div>GRI 403 Occupational health and safety</div>
Quality and reliability of products and services	<div><div></div><div>Our company has the capability to produce and provide top-notch products and services that meet and exceed customer expectations. We adhere to compliance standards and prioritize the health and safety of end users. [Negative]</div></div>	<div>Potential: continuous development of products and services</div> <div>Direct: related to direct activities only (structural with respect to the business model)</div> <div>Short-term (structural with respect to the business model)</div> <div>Expected as it relates to the business</div>	<div>GRI 416 Health and customer safety</div> <div>GRI 417 Marketing and labelling</div>
Innovation, R&D for the development of new products and services	<div><div></div><div>Investing in research, development, and innovation of products and services can drive economic development for the enterprise. [Positive]</div></div>	<div>Actual: related to the products and services offered</div> <div>Direct: related only to direct activities</div> <div>Medium- and long-term (structural with respect to the business model)</div> <div>Expected as it relates to the business</div>	<div>Topic covered by GRI 2 General Disclosures</div>



S

Social

Material topics	Impacts - Summary	Impacts - Characteristics	GRI Topic Standards
Protection of privacy, IT security and data protection	<div><div></div><div>Negative impact on data security and privacy protection due to exposure to cyber attacks and compromise of confidentiality of sensitive information. [Negative]</div></div>	<div>Potential: protection of company and customer data</div> <div>Direct: related to direct activities only (structural with respect to the business model)</div> <div>Short-term (structural with respect to the business model)</div> <div>Both intended and unintended</div>	<div>GRI 418 Customer privacy</div>
Sustainability in the supply chain	<div><div></div><div>Impacts relating to process of selecting and qualifying suppliers is based on social and environmental criteria and assessments (protection of human rights, ensuring the health and safety of workers, and proper environmental management). [Negative]</div></div>	<div>Actual: connected to suppliers</div> <div>Both direct and related to business relations</div> <div>Short-, medium- and long-term (structural with respect to the business model)</div> <div>Both intended and unintended</div>	<div>GRI 308 Supplier Environmental Assessment</div> <div>GRI 414 Supplier Social Assessment</div>
Protection of intellectual property	<div><div></div><div>Impacts related to the ability to protect intellectual property and technological innovation. [Positive]</div></div>	<div>Actual: intellectual property protection</div> <div>Direct: related only to direct activities</div> <div>Short-term</div> <div>Expected as it relates to the business</div>	<div>Topic covered by GRI 2 General Disclosures</div>





# Governance/Economic

Material topics	Impacts - Summary	Impacts - Characteristics	GRI Topic Standards
<b>Economic performance: generation and distribution of value</b>	<div><div></div><div>The ability to generate positive economic outcomes that ensure the company's economic sustainability and the equitable distribution of the value created among all stakeholders. [Positive]</div></div>	<div>Actual: creation of economic value generated and distributed</div> <div>Direct: related to direct activities only (structural with respect to the business model)</div> <div>Short-term (structural with respect to the business model)</div> <div>Expected as it relates to the business</div>	<div>GRI 201 Economic performance</div>
<b>Transparency, ethics and integrity in the conduct of business</b>	<div><div></div><div>Ethical business conduct/management through policies and procedures that ensure integrity, regulatory compliance and fiscal transparency. [Negative]</div></div>	<div>Potential: related to business activities</div> <div>Direct: related only to direct activities</div> <div>Short-term (structural with respect to the business model)</div> <div>Expected as it relates to the business</div>	<div>GRI 205 Anti-corruption</div> <div>GRI 206 Anti-competitive behaviour</div> <div>GRI 207 Tax</div>



The following are the priority impacts for STAR7, based on an assessment of its scale, scope, irretrievability, and impact on human rights. One of the most important topics is **people** (human resources): **attraction and retention**, followed **by quality and reliability of products and services and Innovation, R&D for the development of new products and services**, consistent with STAR7's business model and strategy.





# Changes since the previous reporting period

Compared to the material topics identified during the previous reporting period, no changes were reported. In the evaluation process carried out for the Sustainability Report 2024, which involved the participation and discussion of STAR7 management, the material topics of the previous Sustainability Report 2023 were confirmed.



# The integration of dual materiality analysis (CSRD / ESRS)

The analysis and assessment of the material topics (relevant topics according to ESRS) for the purposes of the Sustainability Report 2024, as identified in the previous paragraphs, was carried out taking into account the CSRD and ESRS, which STAR7 is expected to adopt as of the financial year 2025, subject to the effects of possible revisions being defined at the date of this document. ESRS requires material topics to be identified and assessed according to an approach referred to as 'double materiality assessment', which assesses the impact relevance and financial relevance of the risks and opportunities (IRO Impact Risk Opportunities) of different environmental, social and governance issues.

- **Impact Materiality** - Significant actual or potential impacts on people and the environment directly related to an organisation's activities, products and services.
- **Financial Materiality** - sustainability risks and opportunities that may influence the value of the company (in terms of financial effects).

Impacts, risks and opportunities also include those that arise or may arise in the context of direct and indirect business relationships in the value chain (activities, sectors, geographic areas, operations, suppliers, customers, other relationships, where there is a likelihood of relevant IROs being generated/existing). For the purposes of the dual-materiality analysis, STAR7 considered where the impacts, risks and opportunities analysed are concentrated. In particular, for its upstream value chain, direct suppliers were considered, while for the downstream value chain, customers were taken into account.

STAR7 supplemented the materiality analysis by assessing the relevance of sustainability issues also from a financial perspective of the risks and opportunities underlying these issues as follows:

- a) analysis of the main types of risks identified and related to business model and processes;
- b) management review of the Quality Management System;
- c) Other risks/opportunities, both arising from its own operations and along the value chain, as resulting from a specific internal consultation activity involving the various corporate functions.

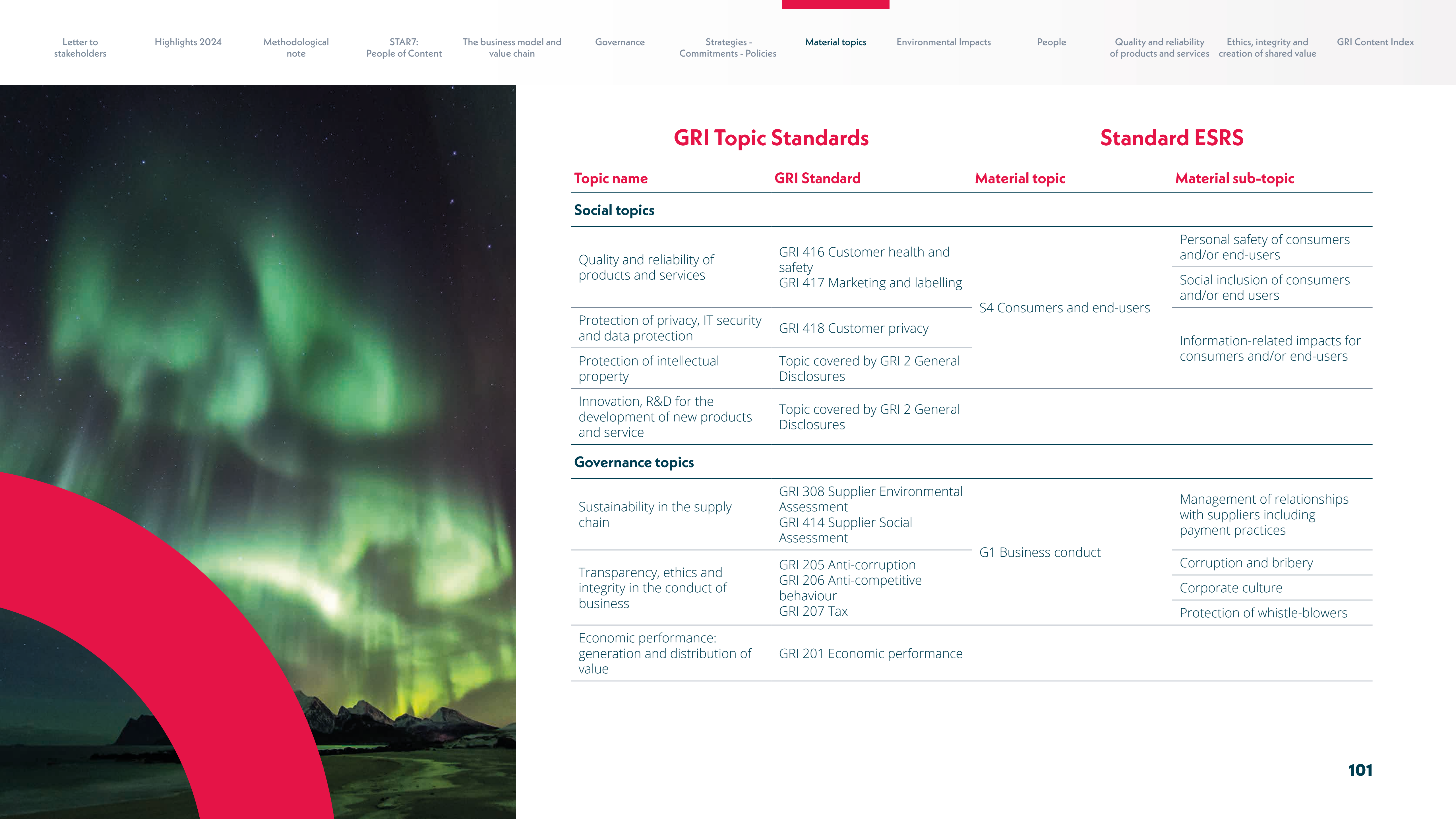


# Table linking GRI - ESRS material topics

For the sake of completeness, the following table provides evidence of the connection between the material topics reported in this document, identified and assessed according to the above-mentioned process, and the corresponding sustainability issues in the ESRS (ESRS 1 General Requirements, AR 16).

GRI Topic Standards		Standard ESRS	
Topic name	GRI Standard	Material topic	Material sub-topic
Environmental topics			
Energy, emissions and climate change	GRI 302 Energy	E1 Climate change	Energy
	GRI 305 Emissions		Climate change mitigation
Responsible use of natural resources	GRI 303 Water and Effluents	E3 Water and marine resources	Water
	GRI 301 Materials	E5 Resource use and circular economy	Resources inflows, including resource use
			Resource outflows related to products and services
	GRI 306 Waste		Waste
Social topics			
Human resources: talent attraction and retention	GRI 401 Employment	S1 Own workforce	Working conditions
Health and safety in the workplace	GRI 403 Occupational health and safety		
Development, training and enhancement of human resources	GRI 404 Training and education		Equal treatment and opportunities for all
Equity, diversity and inclusion	GRI 405 Diversity and Equal Opportunity GRI 406 Non-discrimination		
Sustainability in the supply chain	GRI 308 Supplier Environmental Assessment	S2 Workers in the value chain	Working conditions
	GRI 414 Supplier Social Assessment		Equal treatment and opportunities for all
			Other work-related rights





GRI Topic Standards

Standard ESRS

Topic name	GRI Standard	Material topic	Material sub-topic
Social topics			
Quality and reliability of products and services	GRI 416 Customer health and safety	S4 Consumers and end-users	Personal safety of consumers and/or end-users
	GRI 417 Marketing and labelling		Social inclusion of consumers and/or end users
Protection of privacy, IT security and data protection	GRI 418 Customer privacy		Information-related impacts for consumers and/or end-users
Protection of intellectual property	Topic covered by GRI 2 General Disclosures		
Innovation, R&D for the development of new products and service	Topic covered by GRI 2 General Disclosures		
Governance topics			
Sustainability in the supply chain	GRI 308 Supplier Environmental Assessment GRI 414 Supplier Social Assessment	G1 Business conduct	Management of relationships with suppliers including payment practices
Transparency, ethics and integrity in the conduct of business	GRI 205 Anti-corruption		Corruption and bribery
	GRI 206 Anti-competitive behaviour		Corporate culture
	GRI 207 Tax		Protection of whistle-blowers
Economic performance: generation and distribution of value	GRI 201 Economic performance		



# Material topics- Objectives and actions




The graphic below outlines STAR7’s commitments to the identified topics and demonstrates their correlation and coherence with the UN Agenda 2030 and the SDGs. The Agenda for Sustainable Development has identified 17 goals and 169 targets to achieve sustainable development. The objectives, actions, and their related impacts, as well as the processes and procedures used to monitor performance and the effectiveness of actions, are discussed in detail in the chapters of this document. The issues are addressed and reported on in these chapters. The outcomes of the objectives achieved and the progress of the activities are reported and discussed in more detail within the individual chapters on the respective material topics covered.







# Environmental

Sustainability plan objectives			SDGs Sustainable Development Goals		
Material topic	Description / Actions	Completed 2024	Time span	#	Target (Abstract)
Energy, emissions and climate change	<div><div></div><div>The goal is to increase the use of renewable energy sources and to secure electricity supply contracts with a Guarantee of Origin.</div></div>		2023-2025		7.2 Increase substantially the share of renewable energy in the global energy mix
	<div><div></div><div>Mapping GHG Scope 3 emissions along the value chain.</div></div>		2023-2026		13.2 Integrate climate change measures into national policies, strategies and planning
	<div><div></div><div>Evaluate the partial renewal of the STAR7 Printing fleet in order to achieve a significant reduction in energy consumption.</div></div>		2024-2026		
Responsible use of natural resources	<div><div></div><div>Improving material utilisation processes and waste management in line with circular economy models. In this context: identifying and implementing measures to eliminate or reduce paper waste is crucial for printing companies.</div></div>		2023-2025		12.2 Sustainable management and efficient use of natural resources



S

Social

Material topic	Description / Actions	Sustainability plan objectives		SDGs Sustainable Development Goals	
		Completed 2024	Time span	#	Target (Abstract)
Human resources: talent attraction and retention	Group onboarding sessions (virtual and/or in-person) of new STAR7 resources and evaluation of their effectiveness.	✓	2023-2025	8 DECENT WORK AND ECONOMIC GROWTH	8.5 Achieve full and productive employment and decent work, including for young people
	Maintain an active communication network with schools and universities in order to attract young talent.		Continuous		8.6 Reduce the proportion of youth not in employment
Development, training and enhancement of human resources	Introduction of new internal training process management tools.		2023-2026	4 QUALITY EDUCATION	4.4 Increase the number of youth and adults who have relevant skills, including technical and vocational skills.
	Implementation of a performance evaluation system that involves most of the STAR7 staff.		2023-2026		
	Creation and updating of an internal register of trainers – on-the-job training plays a key role in STAR7.		Continuous		



S

Social

Material topic	Sustainability plan objectives			SDGs Sustainable Development Goals	
	Description / Actions	Completed 2024	Time span	#	Target (Abstract)
Equity, diversity and inclusion	Adoption of a Group-wide Diversity, Equity and Inclusion Policy.		2023-2025	5 GENDER EQUALITY	5.1 End all forms of discrimination against women and girls.
	Gender Gap analysis activities and subsequent evaluation of obtaining Gender Equality certification		2023-2025		5.5 Ensure women’s full and effective participation and equal opportunities for leadership at all levels of decision-making.
				10 REDUCED INEQUALITIES	10.2 Promote universal social, economic and political inclusion.  10.3 Ensure equal opportunities.
Health and safety in the workplace	Maintain high safety standards and minimise accident rates.		Continuous	8 DECENT WORK AND ECONOMIC GROWTH	8.8 Protect labour rights and promote safe and secure working environments of all workers.
	STAR7 “Health and Safety in the Supply Chain” project.	✓	2023-2024		



S

Social

Material topic	Sustainability plan objectives			SDGs Sustainable Development Goals	
	Description / Actions	Completed 2024	Time span	#	Target (Abstract)
Quality and reliability of products and services	Ensure that the products and services offered maintain and improve their high standards of quality and reliability.		Continuous		8.2 Achieve higher levels of economic productivity through diversification, technological upgrading and innovation.
	To improve customer satisfaction and reduce product non-conformities, we have implemented a dedicated internal quality control resource and strengthened our quality control system.		Continuous		
	Implementation of 'Sample Picking' control for monitoring the quality of translations by means of an automatic sampling system and verification by qualified reviewers.		2023-2024		



S


Social

Material topic	Sustainability plan objectives			SDGs Sustainable Development Goals	
	Description / Actions	Completed 2024	Time span	#	Target (Abstract)
Innovation, R&D for the development of new products and service	<div></div> R&D activities, for the development of innovative solutions to improve service delivery and their ability to generate positive social and environmental impacts.		Continuous	<div>9INDUSTRY, INNOVATION AND INFRASTRUCTURE</div>	9.1 Develop quality, reliable, sustainable and resilient infrastructure to support economic development and the well-being of individuals.
	<div></div> “Next” is an internal competition aimed at generating innovative ideas and practical solutions related to services, technologies, and sustainability.	<div></div>	2023-2024		9.4 Upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes.
	<div></div> Project '7AI&Innovation' development activities related to innovative technologies with specific focus on generative artificial intelligence technologies related to the generation and management of multi-format, cross-functional, multi-purpose digital content.		2024-2026		



S

Social

Material topic	Sustainability plan objectives			SDGs Sustainable Development Goals	
	Description / Actions	Completed 2024	Time span	#	Target (Abstract)
Protection of privacy, IT security and data protection	Protect sensitive customer and company data with effective security measures and in compliance with regulations and the Management System.		Continuous		9.1 Develop quality, reliable, sustainable and resilient infrastructure to support economic development and the well-being of individuals.
	Training activities for all staff in order to raise awareness on cyber security and the adoption of an e-Learning platform to make employees aware of all cyber security issues.		2023-2025		
	Adoption of Data Loss Prevention (DLP) systems to automatically identify, monitor and protect sensitive data in the company.		2024-2026		



S

Social

Material topic	Sustainability plan objectives			SDGs Sustainable Development Goals	
	Description / Actions	Completed 2024	Time span	#	Target (Abstract)
Sustainability in the supply chain	<div>Adoption of a Code of Conduct to be signed by suppliers (new and not) and dissemination to suppliers.</div>		2023-2025	<div>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</div>	12.6 Encouraging companies to adopt sustainable practices
Protection of intellectual property	<div>Adopt STAR7 intellectual property protection policies.</div> <div>Monitoring and verification of possible intellectual property infringement offences Compliance Programme as per Legislative Decree 231/2001.</div>		2023-2025  Continuous	<div>16 PEACE, JUSTICE AND STRONG INSTITUTIONS</div>	16.10 Guarantee public access to information and safeguard fundamental freedoms, in compliance with national laws and international treaties.





# Governance

Sustainability plan objectives			SDGs Sustainable Development Goals		
Material topic	Description / Actions	Completed 2024	Time span	#	Target (Abstract)
Economic performance: generation and distribution of value	Actions related to the strategy of developing and strengthening the competitive position		Continuous		8.3 Promote policies that support productive activities, decent job creation, entrepreneurship, creativity, and innovation with a focus on development.
	Establish an internal Risk and Sustainability Control Committee to manage the positive and negative impacts generated by STAR7.		2023-2025		16.6 Develop effective, accountable and transparent institutions at all levels.
Transparency, ethics and integrity in the conduct of business	Implementation of a compensation policy and performance assessment for the Board of Directors.		2023-2025		



6

# Environmental Impacts

Energy - Emissions and Climate Change

Responsible use of natural resources





6

Environmental Impacts

Material topic	Objectives
Energy, emissions and climate change	<div></div> The goal is to increase the use of renewable energy sources and to secure electricity supply contracts with a Guarantee of Origin.
	<div></div> Mapping GHG Scope 3 emissions along the value chain.
	<div></div> Evaluate the partial renewal of the STAR7 Printing fleet in order to achieve a significant reduction in energy consumption.
Responsible use of natural resources	<div></div> Improving material utilisation processes and waste management in line with circular economy models. In this context: identifying and implementing measures to eliminate or reduce paper waste is crucial for printing companies.

SDGs

7 AFFORDABLE AND CLEAN ENERGY

13 CLIMATE ACTION

12 RESPONSIBLE CONSUMPTION AND PRODUCTION



# Energy - Emissions and Climate Change

In line with the strategic guidelines outlined in its Environmental Policy, STAR7 adopts a structured approach to managing impacts related to energy consumption and emissions. The company implements processes and solutions aimed at:

- **Optimise energy efficiency**, by continuously monitoring consumption and taking measures to reduce the environmental footprint of operations;
- **Promoting training and awareness** of staff and suppliers on environmental protection principles, ensuring alignment with the highest sustainability standards along the entire value chain.

Furthermore, the main Group companies adopt the environmental management system according to the international ISO 14001 standard, which ensures a structured management system to prevent, reduce and control negative environmental impacts.

This integrated approach allows STAR7 to improve its environmental performance, ensuring responsible management of resources and progressive reduction of environmental impact.

## Energy consumption

STAR7's energy consumption (which is represented in gigajoules (GJ)), in accordance with the GRI Standards) relates to electricity used for the activities carried out in the operational and commercial offices, fuels (diesel and petrol) power the fleet of company cars required for the Group's commercial and operational activities, and methane is used to heat company premises.

In 2024, total energy consumption increased by 10.6% compared to 2023. This increase is mainly attributable to the expansion of the Group's activities, the increased presence of personnel at the operating sites and the resulting increase in productivity and travel. In particular, at STAR Comunicação e

Serviços LTDA, there was an increase in electricity consumption, attributable to the purchase of new machines in the main hall, which contributed to an increase in production capacity.

The share of energy from renewable sources decreased slightly from 0.3% in 2023 to 0.2% in 2024. This decrease is mainly due to the increase in energy consumption related to the productivity growth of STAR Comunicação e Serviços LTDA, where there is no energy from renewable sources.

GRI Standard
3-3
302-1
302-3
305-1
305-2
305-4



Energy consumed <sup>1</sup> - GJ	2022	2023	2024
Electricity			
Purchased electricity	6,053	6,591	8,470
Electricity produced by photovoltaic system	59	54	42
Less: energy sold to the grid produced by photovoltaic system	0.2	0.4	0.1
Total	6,112	6,645	8,512
Of which from renewable sources	59	54	42
Vehicle Fuel			
Diesel	5,144	6,852	6,413
Petrol	4,253	5,175	5,740
LPG	-	-	10
Total	9,397	12,027	12,163
Methane/heating	824	1,106	1,196
Total energy consumption - GJ	16,333	19,778	21,871
Proportion of renewable energy	0.4%	0.3%	0.2%

<sup>1</sup> The reporting boundary for 2024 includes STAR7 Spa, STAR7 Printing; STAR Comunicação e Serviços LTDA; LocalEyes Ltd, LocalEyes Tirana, STAR7 USA LCC, CAAR do Brasil, the data of the other companies are not significant compared to the Group's total consumption.

**Source**  
Electricity: [Conversion factors of ENEA - Energy Efficiency Unit](#)  
Fuels: [Greenhouse gas reporting: conversion factors 2024 - GOV.UK](#)  
Methane: [EU ETS - Italy: News](#)



# Energy intensity

The table presented below displays the energy intensity measurement indicator, which is calculated based on the **number of hours worked by the Group**. In 2024, there is an increase in energy intensity of 0.7%, mainly due to an increase in energy consumed due to an increase in production.

Energy intensity	2022	2023	2024
Energy consumption	16,333	19,778	21,871
Hours worked <sup>2</sup>	1,545,008	2,275,614	2,498,278
Intensity ratio	10.57	8.69	8.75

<sup>2</sup> Hours worked by ABACAAR, LocalEyes Helsinki and ABACAAR were estimated.

# Emissions

The emission figure is measured in tonnes of carbon dioxide equivalent (t CO2e) and includes both direct emissions (GHG Scope 1 - Greenhouse Gas) and indirect emissions from the consumption of electricity purchased from the grid (GHG Scope 2).

The STAR7 Group has not signed any power purchase agreements that ensure a particular combination of primary energy sources for generating electricity. Similarly, there are no supply contracts with Guarantee of Origin (GO), an electronic certification that verifies the

renewable origin of the energy sources used to produce purchased electricity. As a result, we calculated the indirect emissions from electricity consumption (GHG - Scope 2) using the location-based approach. The Location-based method involves calculating emissions from electricity consumption by using national average emission factors for the countries where the electricity is bought.

Emissions GHG/CO <sub>1</sub> - Scope 2 + Scope 2 t CO2	2022 <sup>3</sup>	2023 <sup>3</sup>	2024
Total GHG emissions Scope 1	696	883	892
Total GHG emissions Scope 2 Location based	337	349	378
Total	1,033	1,231	1,270

<sup>3</sup> The total GHG Scope 2 Location-based and total emissions for 2022 and 2023 have been changed from what was reported in the Sustainability Report 2023 following an update of the emission factors.



The increase in energy consumption due to the expansion of the Group's size and business volume determined the trend in emissions over the three-year period. The company's fleet vehicles (petrol and diesel) are the primary source of CO2 and direct emissions (GHG Scope 1). These emissions increased compared to the previous year due to the full resumption of post-pandemic activities.

The maintenance work conducted in 2024 did not uncover any leaks. As a result, it was assumed that there were no emissions from refrigerant gas leaks in air conditioning systems.

CO <sub>2</sub> emissions - Scope 1 t CO <sub>2</sub> e	2022	2023	2024
Vehicle Fuel			
Diesel	366	484	453
Petrol	283	336	371
LPG	-	-	1
Methane	46	63	68
F Gas	-	-	-
Total - Scope 1 emissions	696	883	892

GHG emissions/CO <sub>2</sub> - Scope 2 Location based t CO <sub>2</sub>	2022 <sup>4</sup>	2023 <sup>4</sup>	2024
Purchased electricity	337	349	378

<sup>4</sup> The total GHG Scope 2 Location-based emissions for 2022 and 2023 have been changed from those reported in the Sustainability Report 2023 following an update of the emission factors.

# Emissions intensity

In 2024, there is a decrease in the emission intensity index due to an increase in the number of hours worked as emission factors change.

Emission intensity - Location based	2022 <sup>5</sup>	2023 <sup>5</sup>	2024
Scope 1 + Scope 2 emissions	1,033	1,231	1,370
Hours worked <sup>6</sup>	1,545,008	2,275,614	2,498,278
Intensity ratio	0.67	0.54	0.51

<sup>5</sup> The total GHG Scope 2 Location-based for 2022 and 2023 have been changed from what was reported in the Sustainability Report 2023 following an update of the emission factors.  
<sup>6</sup> Hours worked by ABACAAR, LocalEyes Helsinki and ABACAAR were estimated.

In future reporting periods, STAR7 will strive to define the scope of its **Scope 3** emissions, i.e. those generated by activities not directly controlled by the company but present in its value chain.

To this end, the criteria and **15 emission categories** identified by the **GHG Protocol**, the main reference standard for measuring and managing greenhouse gas emissions throughout an organisation's value chain, will be adopted.

**Source**  
Fuels: [Greenhouse gas reporting: conversion factors 2024 - GOV.UK](#)  
Methane: [EU ETS - Italy: News](#)  
Italy / Albania: [ISPRA - Ministry of Environment Report 404/2024I](#)  
Ireland: [ISPRA - Ministry of Environment Report 366/2022](#)  
Brazil: [carbonfootprint.com - International Electricity Factors](#)  
United States: [US Env Protection Agency \(EPA\) eGrid - January 2024](#)



# Responsible use of natural resources

STAR7 firmly believes that in order to establish a competitive position and enhance economic and financial performance, it is crucial to attain and uphold a position of excellence. This involves not only delivering high-quality services and products, but also ensuring that they are provided in full compliance with legal regulations, environmental sustainability principles, and compatibility with the surrounding area.

STAR7's environmental policy is founded on a commitment to responsible resource management, which is guided by the following principles:

- Prevent environmental pollution at every opportunity;
- Comply with statutory and mandatory environmental regulatory requirements that apply to its services/products, processes, means of production and company facilities;
- Evaluate the significance of its own environmental aspects and impacts and incorporate the results into daily practice and business development;
- Control the implementation of its processes and monitor the development of environmental performance in order to identify possible areas for improvement;

The company has implemented an Environmental Management System that meets international regulatory standards. This system is designed to help the organisation manage and control its environmental aspects and impacts, and to guide it towards continuous improvement of its environmental performance.

- Pursue objectives to improve environmental performance, including: selecting relevant suppliers and ascertaining their compliance with STAR7 environmental principles, establishing relationships aimed at improving their environmental performance; improving the management and differentiation of produced waste; optimising energy consumption; training and raising awareness of environmental protection principles among company staff, suppliers and all stakeholders whose actions have an influence on the company's environmental aspects.

GRI Standard
3-3
301-1
303-1
303-2
303-3
306-1
306-2
306-3
306-4
306-5



# Materials

STAR7 has two production units for the digital printing of technical and commercial documentation, STAR7 Printing S.R.L. and STAR Comunicação e Serviços LTDA respectively.

The table below shows the main materials used by the companies for printing activities. Paper is the main material used, with a total consumption of 1,444 tonnes in 2024, **76% of which is FSC-certified (Forest Stewardship Council)**, ensuring that paper

comes from responsibly and sustainably managed forests. The figure for FSC-certified paper is lower than last year. This decrease is mainly attributable to the overall increase in production at STAR Comunicação e Serviços LTDA, in line with what was observed for energy consumption. Furthermore, the overall reduction in the paper figure is due to an average decrease in the number of pages produced for all customers. Furthermore, various materials

are utilised, including glue, water-based ink, toner, plastic covers, and packaging materials.

Between 2022 and 2024 there was an overall increase in the use of packaging materials, reflecting a growth in production and logistical needs.



Materials		2022			2023			2024		
	Unit	Non-renewables	Renewables	Total	Non-renewables	Renewables	Total	Non-renewables	Renewables	Total
Paper	tons	-	1,235.1	1,235.1	-	1,526.0	1,526.0	-	1,444.0	1,444.0
Ink	tons	5.3	-	5.3	6.1	-	6.1	6.9	-	6.9
Glue	tons	2.4	-	2.4	2.8	-	2.8	2.3	-	2.3
Toner	tons	5.7	-	5.7	3.7	-	3.7	3.2	-	3.2
Plastic for covers*	tons	-	-	-	2.2	-	2.2	2.3	-	2.3
Packaging materials										
	Unit	Non-renewables	Renewables	Total	Non-renewables	Renewables	Total	Non-renewables	Renewables	Total
Plastic packaging	tons	139.4	-	139.4	157.4	-	157.4	171.3	-	171.3
Cardboard packaging	tons	-	4.0	4.0	-	7.0	7.0	-	8.1	8.1
Plastic containers	units	6,203.0	-	6,203.0	6,978.4	-	6,978.4	7,232.0	-	7,232.0
Wooden pallets	units	-	400.0	400.0	-	642.0	642.0	-	696.0	696.0

\* The raw material figures for 2023 have changed compared to the Sustainability Report 2023 because plastic for covers was added as a result of an improved data collection process.



# Waste

As indicated previously, STAR7’s environmental policy includes a commitment to responsible management of environmental aspects and impacts, including improving the management and sorting of waste produced. Waste generated by STAR7 refers to those companies with activities that produce industrial waste, related to printing activities. The waste produced along the STAR7 value chain concerns paper and cardboard in particular.

The waste quantities reported for 2024 refer to the parent company STAR7 S.p.A., STAR7 Printing S.r.l. and STAR Comunicação e Serviços LTDA. As of 2024, STAR7 S.p.A. started reporting on the waste resulting from the opening of a new location in Bolzano, operating in the Engineering sector,

Toolshop area. STAR7 Printing S.r.l., engaged in production activities, generates industrial waste related to printing processes. Finally, STAR Comunicação e Serviços LTDA, a production unit located in Brazil, mainly produces waste that can be classified as washing liquids and aqueous organic effluents.

The classification of waste (recovery/disposal) is based on the technical documentation completed during collection (waste forms) and takes into account information from environmental managers.

In 2024, there will be a 4.3% increase in the total amount of waste generated, attributable to the increase in production. 96% of waste is sent for recovery. The share of hazardous waste

in the total remains marginal at 3.6%. STAR7 confirms an ongoing commitment to waste reduction and recycling, promoting sustainable solutions to minimise environmental impact and improve production process efficiency.

The Group's largest waste product is paper and cardboard in relation to STAR7 Printing's activities. Over the three-year period 2022-2024, STAR7's production of paper and cardboard waste remained more or less stable, ranging from 207.82 tonnes in 2022 to 208.38 tonnes in 2024. The management of this type of waste proved to be efficient, with 100% going to recovery in all three years.



Waste by category (t)	2022*			2023*			2024		
Hazardous waste	Recovery	Disposal	Total	Recovery	Disposal	Total	Recovery	Disposal	Total
Washing liquids and aqueous organic effluents	-	1.0	1.0	-	4.0	4.0	-	8.1	8.1
Total	-	1.0	1.0	-	4.0	4.0	-	8.1	8.1
Non-hazardous waste	Recovery	Disposal	Total	Recovery	Disposal	Total	Recovery	Disposal	Total
Paper and cardboard	207.8	-	207.8	208.2	-	208.2	208.4	-	208.4
Aqueous liquid wastes containing ink	-	0.7	0.7	-	0.9	0.9	-	1.6	1.6
Out-of-print toners	0.7	-	0.7	0.6	-	0.6	0.4	-	0.4
Waste adhesives and sealants	-	0.2	0.2	-	0.8	0.8	-	0.3	0.3
Plastic packaging	3.0	-	3.0	3.7	-	3.7	2.3	-	2.3
Wood Packaging	-	-	-	-	-	-	-	-	-
Mixed Material Packaging	3.5	-	3.5	0.5	-	0.5	-	-	-
Equipment no longer in use	0.3	-	0.3	-	-	-	0.1	-	0.1
Iron and steel	-	-	-	-	-	-	7.03	-	7.03
Total	215.3	0.9	216.1	212.9	1.7	214.6	218.2	1.8	220.0
Total waste generated	215.3	1.9	217.1	212.9	5.7	218.6	218.2	9.9	228.1
Waste destined for recovery (%)	99%			97%			96%		

\*Data for waste in 2022 and 2023 have changed compared to the Sustainability Report 2023 as data from STAR Comunicação e Serviços LTDA were also included following an improvement in the data collection process.



The following tables illustrate the trend in waste management by STAR7 over the three-year period 2022-2024, distinguishing between waste for recovery and waste for disposal. In particular, 95.6% was destined for recycling in 2024.

Waste/Recovery (t)	2022	2023	2024
Non-hazardous waste			
Recycling	215.0	212.9	218.0
Other recovery operations	0.3	-	0.1
Total	215.3	212.9	218.2
Waste - Disposal (t)			
Hazardous waste			
Incineration	1.0	4.0	8.1
Non-hazardous waste			
Landfill	0.2	0.8	0.3
Other disposal operations	0.7	0.9	1.6
Total	1.9	5.7	9.9



# Water

## Water management policies

With respect to the characteristics of internal production processes, mainly printing, water withdrawals do not represent a particularly significant figure for the STAR7 Group. The withdrawal sources

are largely those of public aqueducts. Effluents, resulting from predominantly sanitary use, and the relevant minimum quality standards set and criteria for their determination comply

with the relevant limits set by Legislative Decree 152/2006 for Italian locations, and in accordance with local regulations for foreign companies.

## Management of water discharge-related impacts

Effluents include all water discharges, used water and unused water released as surface water, groundwater, seawater or water supplied to third parties no longer used by the organisation in the reporting period. Water discharges, resulting from predominantly sanitary use, take place in accordance with the directives established by Legislative Decree 152/2006 for Italian STAR7 companies. As far as

foreign subsidiaries are concerned, effluent management practices are adopted in line with current local laws and regulations.

As per the GRI Standards, water withdrawal data is presented in Mega Litres, where 1 Mega Litre is equivalent to 1,000 cubic metres. It should be noted that the **figures shown refer to the parent company and STAR7 Printing S.R.L., STAR Comunicação e**

**Serviços LTDA, STAR7 USA LLC and CAAR do Brasil.** Data could not be collected for the remaining subsidiaries. Therefore, the samples only pertain to sanitary uses in occupied offices and should not be deemed significant.



Water withdrawals (megalitres) <sup>1</sup>	2022	2023	2024 <sup>2</sup>
Third-party water resources (aqueduct)			
Freshwater (≤1,000 mg/L Total Dissolved Solids)	2.4	2.4	2.8
Other water types (>1,000 mg/L Total Dissolved Solids)	-	-	-
Water withdrawals – Surface water			
Freshwater (≤1,000 mg/L Total Dissolved Solids)	-	0.1	0.1
Other water types (>1,000 mg/L Total Dissolved Solids)	-	-	-
Water withdrawals – Groundwater			
Freshwater (≤1,000 mg/L Total Dissolved Solids)	-	0.1	0.1
Other water types (>1,000 mg/L Total Dissolved Solids)	-	-	-
Total			
Freshwater (≤1,000 mg/L Total Dissolved Solids)	2.4	2.6	3.0
Other water types (>1,000 mg/L Total Dissolved Solids)	-	-	-
Total	2.4	2.6	3.0

<sup>1</sup> The reporting boundary includes STAR7 Spa, STAR7 Printing; STAR Comunicação; STAR7 USA LLC and CAAR do Brasil - the most significant companies for water withdrawals/restricted to office sanitary uses.

<sup>2</sup> Due to the change of location, the 2024 figures of STAR7 USA LLC were estimated as a percentage of the total building area.

**Water stress** - Water stress refers to the ability or inability to meet the demand for water, both human and for ecosystems as a whole, i.e. the ratio of total water withdrawal to the available renewable supply from surface and groundwater sources. Water withdrawals include domestic, industrial, irrigation, livestock and non-consumption uses. Higher values indicate greater competition between users. As a tool for assessing water stress areas, reference was made to the Aqueduct Water Risk Atlas [Aqueduct | World Resources Institute \(wri.org\)](#) of the World Resources Institute.

The companies are located in areas that are not characterised by particularly significant water stress problems, and STAR7’s uses do not have a significant impact on the availability of water for the area in question.



# 7 People



Human Resources Management

Employment and turnover

Diversity and equal opportunity

Development, training and enhancement  
of human resources

Occupational Health and Safety





SDGs



7

People

Material topic	Objectives
Human resources: talent attraction and retention	↪ Group onboarding sessions (virtual and/or in-person) of new STAR7 resources and evaluation of their effectiveness.
	↪ Maintain an active communication network with schools and universities in order to attract young talent.
Development, training and enhancement of human resources	↪ Introduction of new internal training process management tools.
	↪ Implementation of a performance evaluation system that involves most of the STAR7 staff.
	↪ STAR7 actively involves on-the-job training in the creation of an internal register of trainers.
Equity, diversity and inclusion	↪ Adoption of a Group-wide Diversity, Equity and Inclusion Policy.
	↪ Gender Gap analysis activities and subsequent evaluation of obtaining Gender Equality certification
Health and safety in the workplace	↪ Maintain high safety standards and minimise accident rates.



# Human Resources Management

STAR7 recognises the value of people as a central element of corporate success and a strategic lever for the Group's growth. Therefore, it invests in the development of human resources, considering it an essential factor for the achievement of corporate and economic objectives

All staff are employed under regular employment contracts. The employment relationship is governed by the collective bargaining regulations of the sector, as well as social security, tax, and insurance regulations.

87.9% of the employees of the parent company STAR7 S.p.A. are covered by the CCNL Commerce and 12.1% by the CCNL Metalmeccanici. Regarding the STAR7 Group as a whole and in compliance with relevant local labour laws, 85% of employees are subject to collective bargaining agreements.

The information regarding human resources management policies pertains specifically to the parent company, STAR7 S.p.A.

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# Attraction and retention

STAR7 Group companies adhere to the Code of Ethics and the law when selecting personnel. The criteria used are based on fulfilling the professional, psycho-aptitude, and behavioural requirements for the desired profile at STAR7.

One of the strategic objectives, as well as a target for some Service Lines, is to ensure a high saturation of resources, while offering opportunities for growth through involvement in new projects, customers and areas of competence. This approach fosters the **development of cross-cutting knowledge**, which is essential for a career path geared towards **enhancing technical skills, autonomy and responsibility**.

STAR7 recognises the value of young talent and actively participates in university Career Days in several Italian cities. In 2024, the company took part in four events at some of Italy's leading universities. With a view to continuous resource development, resumes of young people and recent graduates interested in joining the team are carefully evaluated.

To foster direct contact with students close to graduation, STAR7 maintains an ongoing dialogue with universities and colleges in the areas of Turin, Lugo, La Spezia, Bolzano and Modena, thus strengthening the link between academic training and the world of work.





Search, selection and placement

The recruitment process and plan of the STAR7 Group begins with budgeting, followed by an initial phase of internal discussion to determine business needs. The HR department first analyses the internal database to determine if the organisation’s needs can be met by rotating employees’ job roles. If the required figure cannot be found internally, we activate the selection process through external means such as publishing advertisements on various channels and engaging external headhunting companies.

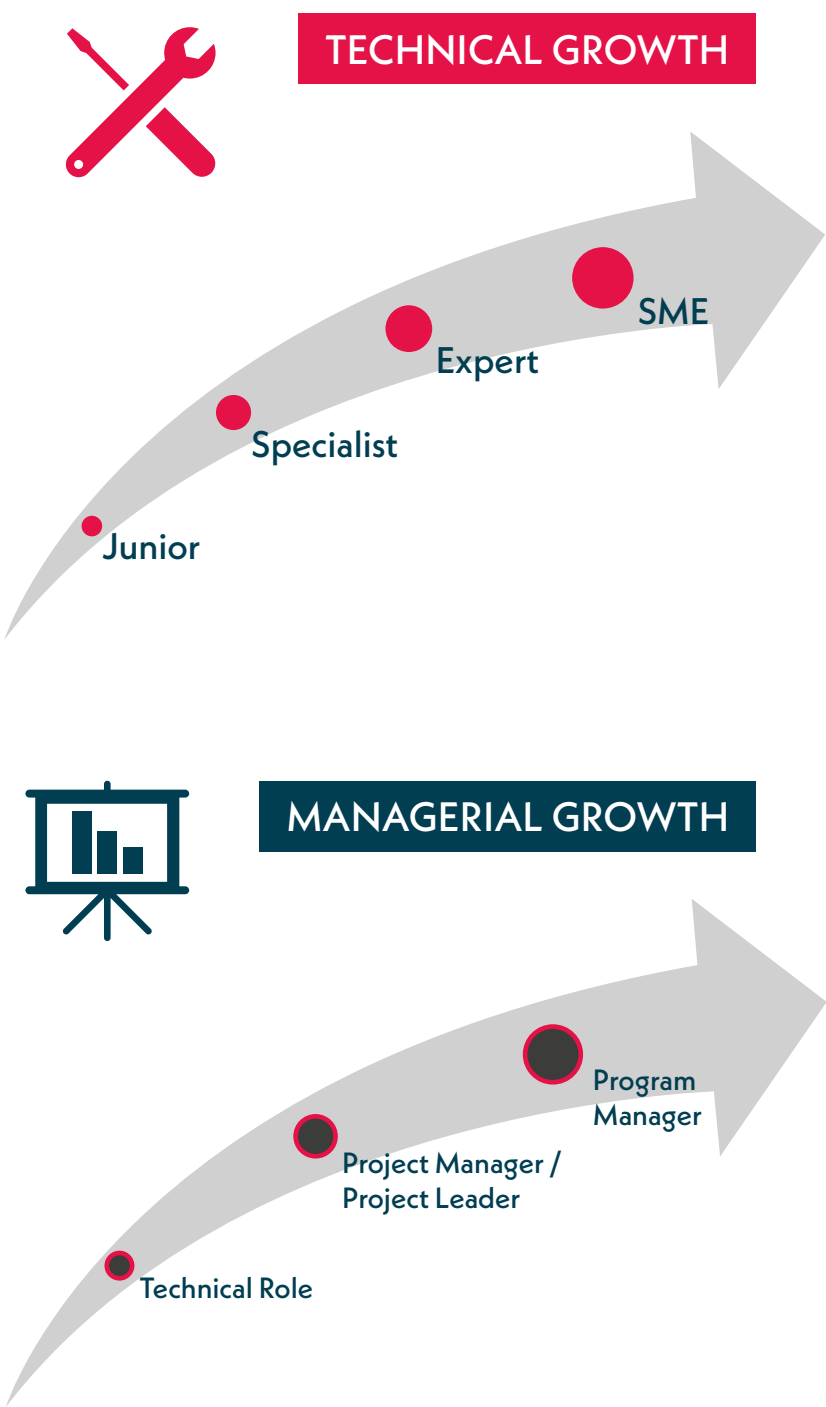
The process of onboarding new resources includes:

- During the initial meeting with the site’s HR representative, the Welcome Kit will be presented to the employee. This kit contains informative materials and company-branded items. Afterwards, the device will be delivered along with an introduction and explanation of the portals and systems utilised.
- During the second direct alignment meeting with the head of function, you will receive an overview of the organisation, a tour of the premises, and an introduction to new team colleagues. Additionally, you will be introduced to the tools related to the tasks you will be performing.

Onboarding sessions are personally managed by each function manager and last on average 2 hours. They are conducted by the Human Resources department and involve all newly recruited employees in the period. The main topics covered are the company overview (vision, mission, business areas); company organisation (culture, organisational structure and main roles) and the use of portals and requests.

Opportunities for growth and performance evaluation

Know how to see and recognise value. STAR7 is committed to enhancing the potential and contribution of people, enabling them to express themselves to the full. The different professional skills required by the five Service Lines, together with the choice of respecting and enhancing the aptitude and predisposition of each one, translate concretely into the possibility of growing in two directions: the first, focused on the verticality of skills and, therefore, on specialisation, the second linked to management and managerial growth.



STAR7 maintains a **system of general and specific target allocation** for its employees (**MBO: Management by objectives**) to which specific economic incentives are attached. The extent to which these objectives are met is regularly assessed through meetings with HR.

Since 2025, STAR7 has made a number of changes to its internal organisation aimed at continuously improving the efficiency of processes and clarity in the definition of roles and responsibilities. The evolution of STAR7’s organisation includes the abolition of hierarchical-functional double reporting in operations functions, in favour of solely hierarchical management of resources in project teams and the creation of the figures of Project Manager, Project Leader and Program Manager. These roles are common to all Service Lines and Clusters, with an unambiguous definition of responsibilities, activities and competences.

To promote the integration of skills and the potential for internal career progression, STAR7 places a strong emphasis on job rotation schemes. These are further supported by the implementation of internal job postings, which allow employees to proactively apply for vacant positions within the company.



# Corporate welfare systems and tools

In February 2023, a corporate welfare plan was introduced: after a pilot project born in 2019, which already provided for conventions and discounts for employees, the offer was improved and enhanced with the introduction of a structured platform and an annual budget available to each STAR7 S.p.A. employee for various types of expenditure: from the reimbursement of costs already incurred (e.g. public transport, education and training, mortgages, elderly care), to the purchase of goods and services through welfare tickets or vouchers, without the need for a cash advance (e.g. for sports, travel, wellness, culture and leisure and fuel vouchers), to payments to social security funds or health insurance funds. Furthermore, starting from March 2023, STAR7 S.p.A. has decided to offer a Supplementary Health Plan to all its employees who have completed their probationary period and have an open-ended contract. This plan will also cover their families. This cover is an additional benefit to the existing coverage provided by the CCNL. It reimburses medical expenses that are not included in the basic insurance package. All these initiatives have also been confirmed for the years 2024 and 2025.

With the aim of facilitating the work of translators and making it more efficient, the Group has been providing freelancers who request it with personal computers to carry out their tasks until the end of the contract.

## Flexible working agreement

The parent company, STAR7 S.p.A., has made two agreements with its employees to work flexibly. These agreements are in accordance with Articles 18 et seq. of Law 81/2017, in force until 30/06/2025. The first covers the majority of the company population, and provides for a maximum of 3 days a week for agile working; the second provides for up to a maximum of 5 days a week and is designed for specific and special needs (employees working for customers; health reasons; Law 104; pregnancy/breastfeeding, etc.). Agreement on the scheduling of agile working days must be made in advance with the line manager, typically on a weekly basis. On agile working days, the service can be provided without a designated workstation. STAR7 S.p.A. provides its employees with a personal computer (PC) that comes equipped with the necessary software to enable them to perform their job.

STAR7 S.p.A. is committed to ensuring the health and safety of workers who engage in agile work. This is achieved through the provision of comprehensive information on both general and specific risks associated with the particular mode of work, use of equipment, correct workstation, and optimal ways of carrying out activities with reference to personal protection.





# Employment and turnover

The turnover of staff indicates the gradual growth of the STAR7 Group's operations. In 2024, there was a **positive overall turnover of 13.3%**. In addition, 50.9% of new recruitments in 2024 involved resources under the age of 30, a figure that confirms STAR7's focus on young people.

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New recruits and turnover			2022			2023			2024		
Recruitment			Women	Men	Total	Women	Men	Total	Women	Men	Total
Up to 29 years			83	104	187	89	166	255	93	173	266
30 to 50 years			56	69	125	64	172	236	77	127	204
Over 50 years			3	9	12	15	39	54	11	42	53
Total			142	182	324	168	377	545	181	342	523
Terminations			Women	Men	Total	Women	Men	Total	Women	Men	Total
Up to 29 years			48	56	104	42	90	132	48	89	137
30 to 50 years			45	49	94	52	87	139	88	104	192
Over 50 years			6	7	13	4	17	21	7	18	25
Total			99	112	211	98	194	292	143	211	354



New recruits and turnover			2022			2023			2024		
Reason for termination											
	Women	Men	Total		Women	Men	Total		Women	Men	Total
Voluntary terminations	77	87	164		68	102	170		91	128	219
Retirement	-	-	-		1	1	2		-	-	-
Dismissal	14	20	34		10	26	36		18	49	67
Other (e.g. end of fixed-term contracts)	8	5	13		19	65	84		34	34	68
Total	99	112	211		98	194	292		143	211	354
Turnover											
	Women	Men	Total		Women	Men	Total		Women	Men	Total
Positive turnover - recruitment	41.4%	45.2%	43.4%		43.5%	79.7%	63.4%		36.9%	43.9%	41.2%
Negative turnover - terminations	28.9%	27.8%	28.3%		25.4%	41.0%	34.0%		29.2%	27.1%	27.9%
Overall turnover	12.5%	17.4%	15.1%		18.1%	38.7%	29.5%		7.8%	16.8%	13.3%



# Appointments and terminations by geographical area

(Figures reported only for the financial years 2023 and 2024 to calculate the turnover for these periods).

Recruitment	Italy		Europe		USA		South America		Total	
	2023	2024	2023	2024	2023	2024	2023	2024	2023	2024
Up to 29 years	107	52	70	50	8	4	70	160	255	266
30 to 50 years	129	35	36	36	14	7	57	126	236	204
Over 50 years	39	15	-	-	8	4	7	34	54	53
Total	275	102	106	86	30	15	134	320	545	523

%	Italy		Europe		USA		South America		Total	
	2023	2024	2023	2024	2023	2024	2023	2024	2023	2024
Up to 29 years	12.5%	4.1%	8.1%	3.9%	0.9%	0.3%	8.1%	12.6%	29.7%	21.0%
30 to 50 years	15.0%	2.8%	4.2%	2.8%	1.6%	0.6%	6.6%	9.9%	27.5%	16.1%
Over 50 years	4.5%	1.2%	-%	0.0%	0.9%	0.3%	0.8%	2.7%	6.3%	4.2%
Total	32.0%	8.0%	12.3%	6.8%	3.5%	1.2%	15.6%	25.2%	63.4%	41.2%



Terminations

	Italy		Europe		USA		South America		Total	
	2023	2024	2023	2024	2023	2024	2023	2024	2023	2024
Up to 29 years	46	33	42	30	3	4	41	70	132	137
30 to 50 years	66	68	43	43	6	4	24	77	139	192
Over 50 years	15	16	-	1	5	1	1	7	21	25
Total	127	117	85	74	14	9	66	154	292	354

%

	Italy		Europe		USA		South America		Total	
	2023	2024	2023	2024	2023	2024	2023	2024	2023	2024
Up to 29 years	5.4%	2.6%	4.9%	2.4%	0.3%	0.3%	4.8%	5.5%	15.4%	10.8%
30 to 50 years	7.7%	5.4%	5.0%	3.4%	0.7%	0.3%	2.8%	6.1%	16.2%	15.1%
Over 50 years	1.7%	1.3%	-%	0.1%	0.6%	0.1%	0.1%	0.6%	2.3%	1.4%
Total	14.8%	9.2%	9.9%	5.8%	1.6%	0.7%	7.7%	12.1%	34.0%	27.9%



Turnover

	Italy		Europe		USA		South America		Total	
	2023	2024	2023	2024	2023	2024	2023	2024	2023	2024
Up to 29 years	61	19	28	20	5	0	29	90	123	129
30 to 50 years	63	(33)	(7)	(7)	8	3	33	49	97	12
Over 50 years	24	(1)	-	(1)	3	3	6	27	33	28
Total	148	(15)	21	12	16	6	68	166	253	169

%

	Italy		Europe		USA		South America		Total	
	2023	2024	2023	2024	2023	2024	2023	2024	2023	2024
Up to 29 years	7.1%	1.5%	3.3%	1.6%	0.6%	0.0%	3.4%	7.1%	14.3%	10.2%
30 to 50 years	7.3%	(2.6%)	(0.8%)	(0.6%)	0.9%	0.2%	3.8%	3.9%	11.3%	0.9%
Over 50 years	2.8%	(0.1%)	-%	(0.1%)	0.3%	0.2%	0.7%	2.1%	3.8%	2.2%
Total	17.2%	(1.2%)	2.4%	0.9%	1.9%	0.5%	7.9%	13.1%	29.5%	13.3%



# Diversity and equal opportunity

The STAR7 Group is distinguished by its strong international presence and a team of over 1,400 employees from more than 14 nationalities. This multicultural aspect is a unique asset for the company, fostering creativity, the development of intercultural and cross-disciplinary skills, and the creation of new business prospects in domestic markets.

As previously mentioned, **women** make up **36.7% of the total 1,438 employees** as of 31 December 2024. According to this figure, 31.8% of all women in Italy and abroad hold management positions. In the white-collar and middle management roles (which are similar categories), 38.0% of the total workforce is made up of women.

In terms of age demographics, it is worth noting that a **significant proportion of employees in this sector are under the age of 30**. As of 31 December 2024, this group accounted for **34.0%** of the workforce, indicating a growing and relatively youthful segment.

Regarding the reporting periods, it is important to note that there were no instances of discrimination in the management of human resources relations, nor were there any reported incidents of human rights violations. STAR7 is dedicated to promoting equal opportunities in both the workplace and the professional growth of its staff.

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Employee diversity

2022

2023

2024

Employees per category/by gender

	Women	Men	Total	Women	Men	Total	Women	Men	Total
Executives	2	5	7	7	15	22	7	15	22
Office workers - Middle Managers	333	359	692	426	633	1,059	446	727	1,173
Manual workers	51	109	160	57	131	188	75	168	243
Total	386	473	859	490	779	1,269	528	910	1,438

Employees per category/by gender %

	Women	Men	Total	Women	Men	Total	Women	Men	Total
Executives	0.2%	0.6%	0.8%	0.6%	1.2%	1.7%	0.5%	1.0%	1.5%
Office workers - Middle Managers	38.8%	41.8%	80.6%	33.6%	49.9%	83.5%	31.0%	50.6%	81.6%
Manual workers	5.9%	12.7%	18.6%	4.5%	10.3%	14.8%	5.2%	11.7%	16.9%
Total	44.9%	55.1%	100.0%	38.6%	61.4%	100.0%	36.7%	63.3%	100.0%

Employees per age group/by gender

	Women	Men	Total	Women	Men	Total	Women	Men	Total
Up to 29 years	136	180	316	155	238	393	180	309	489
30 to 50 years	229	246	475	284	445	729	291	475	766
Over 50 years	21	47	68	51	96	147	57	126	183
Total	386	473	859	490	779	1,269	528	910	1,438



Employee diversity

2022

2023

2024

Employees per age group/by gender %

	Women	Men	Total	Women	Men	Total	Women	Men	Total
Up to 29 years	15.8%	21.0%	36.8%	12.2%	18.8%	31.0%	12.5%	21.5%	34.0%
30 to 50 years	26.7%	28.6%	55.3%	22.4%	35.1%	57.4%	20.2%	33.0%	53.3%
Over 50 years	2.4%	5.5%	7.9%	4.0%	7.6%	11.6%	4.0%	8.8%	12.7%
Total	44.9%	55.1%	100.0%	38.6%	61.4%	100.0%	36.7%	63.3%	100.0%

Employees by category/age group

	Up to 29 years	30 to 50 years	Over 50 years	Total	Up to 29 years	30 to 50 years	Over 50 years	Total	Up to 29 years	30 to 50 years	Over 50 years	Total
Executives	-	4	3	7	-	8	14	22	-	12	10	22
Office workers - Middle Managers	274	373	45	692	344	614	101	1,059	416	630	127	1,173
Manual workers	42	98	20	160	49	107	32	188	73	124	46	243
Total	316	475	68	859	393	729	147	1,269	489	766	183	1,438

Category/age group %

	Up to 29 years	30 to 50 years	Over 50 years	Total	Up to 29 years	30 to 50 years	Over 50 years	Total	Up to 29 years	30 to 50 years	Over 50 years	Total
Executives	-%	0.5%	0.3%	0.8%	-%	0.6%	1.1%	1.7%	0.0%	0.8%	0.7%	1.5%
Office workers - Middle Managers	31.9%	43.4%	5.2%	80.6%	27.1%	48.4%	8.0%	83.5%	28.9%	43.8%	8.8%	81.6%
Manual workers	4.9%	11.4%	2.3%	18.6%	3.9%	8.4%	2.5%	14.8%	5.1%	8.6%	3.2%	16.9%
Total	36.8%	55.3%	7.9%	100.0%	31.0%	57.4%	11.6%	100.0%	34.0%	53.3%	12.7%	100.0%



# Maternity and paternity leave

STAR7 ensures that all employees have equal opportunities for parental leave, for the birth of a child, in compliance with local regulations. The table below shows the figures for employees who took maternity/paternity leave and the rates of return to work and retention.

In 2024, a total of 53 employees took maternity or paternity leave, with 34 being women and 19 being men. At the conclusion of their leave period, the majority of employees who had taken leave returned to work.

Maternity/paternity leave	2022			2023			2024		
Employees per category/by gender	Women	Men	Total	Women	Men	Total	Women	Men	Total
Number of employees entitled to maternity/paternity leave, by gender	386	473	859	489	780	1,269	528	910	1,438
Number of employees who took maternity/paternity leave	26	13	39	41	15	56	34	19	53
Days	1,740	84	1,824	2,335	113	2,448	3,809	118	3,927
Number of employees returning to work after maternity/paternity leave	21	13	34	35	15	50	29	19	48
The number of employees who returned to work and remained employed by the organisation for 12 months after their return	19	10	29	23	13	36	35	14	49
Return rate	81%	100%	87%	85%	100%	89%	85%	100%	91%
Retention rate	100%	100%	100%	100%	100%	100%	100%	93%	98%



# Remuneration

STAR7 is committed to fair and transparent remuneration for all employees, promoting gender equality and ensuring that remuneration is commensurate with the responsibilities and skills required for each role. Below are the annual total remuneration rates for 2024, together with the gender pay gap analysis, with reference to the parent company STAR7 S.p.A.

### Gender pay gap

The gender pay gap for the parent company STAR7 S.p.A. is determined by comparing the average gross hourly remuneration of men and women, expressed as a percentage of the average male remuneration, including all employees present at the end of the year. Gross remuneration is calculated by adding up the total remuneration paid in 2024, including basic salary and additional components, such as bonuses, benefits, overtime and other ancillary remuneration. The total amount was then divided by the total hours worked in order to obtain a fair and representative comparison of wage differences.

 **Gender pay gap (%)  
2024**

**11%**  
**Gender pay  
gap**

The figure shows that, on average, men's hourly wages are 11% higher than those of women. This difference can be attributed to various factors, including seniority, the tasks performed and the responsibilities assigned to certain categories of workers. However, it is important to consider that this gap may vary over time, as elements such as bonuses and productivity awards influence annual salaries and may reduce or widen the difference between men and women, depending on how they are awarded and achieved.

### Annual total remuneration ratio

In 2024, for the parent company STAR7 S.p.A., the ratio of the annual total remuneration of the highest paid person to the median annual total remuneration of all other employees was 11.0.





# Access to Digital

Accessibility refers to the capacity of information systems to offer services and provide information that can be utilised by everyone, including those who require assistive technologies or special configurations due to disabilities, without any form of discrimination. According to the World Health Organization's World Disability Report, the global population of disabled individuals has increased to 1.3 billion, which accounts for 15% of the world's population. In Italy, there are 3.1 million individuals with disabilities, which accounts for 5.2% of the country's entire population.

The UN Convention on the Rights of Persons with Disabilities recognises access to information and communication technologies as a fundamental human right. Directive 2019/882, also known as the European Accessibility Act (EEA), is the latest legal framework for digital accessibility. It aims to harmonise accessibility requirements for products and services across Europe. The aim of this provision is to universalise the WCAG, which are the web accessibility guidelines of the World Wide Web Consortium (W3C).

The reference standard for digital accessibility in Italy is the "Stanca Law" aims to facilitate access to IT tools for disabled individuals. According to this law, a computer service or website can be defined as 'accessible' when the ways of accessing the information it contains are, for the user, easily accessible; efficiency of use is ensured by the separation of content, presentation and mode of operation of the interfaces, as well as by the possibility of obtaining the same information through different sensory modalities, regardless of the device used for access.

STAR7's role in this challenge for digital inclusion is to offer services in the area of Accessibility, providing state-of-the-art technology, providing high value-added consulting, offering innovative solutions and providing training programmes. The main solutions implemented are:

🔴 **Accessibility Audit** – STAR7 offers audit services that detect issues by indicating their degree of conformity, level of importance, and location. We provide suggestions for resolution and explain how each type of error impacts accessibility in accordance with the international guidelines set by the W3C consortium.

🔴 **Accessibility Widget** – An AI-based solution that provides users with an additional interface to customise their browsing experience on the website. This feature makes the site more suitable for their specific needs. Visitors to the site will have dozens of customisation features at their disposal, including: changing the colour contrast, enlarging the size of texts, using screen-reading tools, and making further changes that will make it easier and more effective to enjoy the site content.

🔴 **Accessibility Statement** - An Accessibility Statement is a written document that declares compliance with web accessibility standards. STAR7 provides support for compiling documents in compliance with current regulations. This includes incorporating information on actions taken and planned to enhance the accessibility of digital services offered.





# Development, training and enhancement of human resources

STAR7 is committed to supporting the growth and development of its employees and freelancers, which includes providing various training opportunities. The Group believes that training and keeping up-to-date are essential requirements for the personal and professional development of its employees. **The HR department is accountable for identifying training requirements and creating a training plan.** This is done by gathering requests from different service lines and approving the budget. In order to respond effectively to the demand for specific skills, before resorting to external courses, the HR function verifies whether such skills can be acquired through on-the-job training or in-house courses, overseen by colleagues with specific technical expertise.

At STAR7, our people are continuously trained and updated through ongoing investment. This enables us to form teams where everyone can develop their talents and utilise the necessary skills to tackle and solve problems in a creative and innovative manner.

In 2024, an average of **19.2 hours per employee** were provided at Group level, a slight decrease compared to 2023, a year in which numerous investments in training were completed.

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Average hours of training per employee	2022			2023			2024		
Average training hours	Women	Men	Total	Women	Men	Total	Women	Men	Total
Executives	-	-	-	7.1	4.0	5.0	6.9	1.7	3.4
Office workers - Middle Managers	11.9	21.6	16.9	23.8	38.4	32.6	17.1	17.8	17.5
Manual workers	19.8	18.0	18.6	22.0	36.6	32.2	20.7	32.4	28.8
Total	12.9	20.5	17.1	23.4	37.5	32.0	17.5	20.2	19.2

In particular, for the parent company STAR7, training courses were provided in various areas in order to meet the objectives and needs of employees. The training courses provided covered topics such as occupational health and safety, hard and soft skill development, as well as foreign language learning. A 'welcome kit' was also provided for new employees, for which 99 hours of training were provided. Particular emphasis was placed on training in people management, effective communication and time management.

With the aim of assessing the quality of the training activities carried out, each participant is asked to fill in a satisfaction questionnaire on various aspects such as the degree of satisfaction, the completeness of the topics, the usefulness of the knowledge acquired and other aspects. This tool is useful and effective for the HR function, which by processing the information received can identify areas of improvement for future initiatives.



# Training courses Post-Editing

The Global Content Service Line from 2023 has developed a course dedicated to training professionals in post-editing. The programme uses artificial intelligence technologies for automated video generation and is delivered through an e-learning platform, ensuring easy and flexible access for users. The course content is entirely developed by STAR7, which provides its expertise in content creation and in-depth knowledge of the localisation industry. The training course aims to achieve three main objectives:

- **Talent attraction** and their introduction to STAR7 and the post-editing world. The course will be shared with universities and graduate schools in Italy, as well as other international markets where STAR7 operates.
- **Creating a community of STAR7 Post-Editors** is essential for implementing effective retention, communication, and brand awareness policies among global localisation resources.
- **Skill Building:** in line with Forbes’ “reskilling revolution”, our course provides STAR7’s in-house and supplier translators with the chance to enhance their professional capabilities by acquiring new skills that align with market trends. This will make both our translators and our company more competitive.

# Internal training projects

In 2024, STAR7 launched the 'Formamministrazione' project, an initiative dedicated to refresher and administrative training for staff. Through a monthly newsletter, employees will receive useful information on key aspects of administrative management, such as reading pay slips, calculating holidays and leave, managing overtime, using company systems and the opportunities offered by the welfare plan. The initiative aims to improve awareness and understanding of company procedures, fostering more effective and transparent management of daily activities. In addition, employees can suggest topics of interest to be explored, thus helping to make the project more in line with their needs.





# Occupational Health and Safety

STAR7 is dedicated to promoting a safety culture among all its employees. This involves encouraging responsible behaviour and implementing internal procedures and measures to prevent workplace accidents and protect workers.

To guarantee working conditions that uphold individual dignity and provide a safe and healthy work environment, STAR7 S.p.A., the parent company, has established

procedures for managing and monitoring the workplace. This includes ensuring compliance with safety and environmental regulations, as well as promoting employee well-being. Management defines appropriate control and maintenance plans for premises, installations, and equipment that affect the working environment. These plans are implemented to ensure effective management of the working environment.

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# Occupational health and safety management

## Hazard identification, risk assessment and accident investigation

In compliance with applicable local occupational safety regulations, STAR7 ensures that all workplaces are adequately signposted by means of clear signage that complies with safety standards. The signs provide essential information on evacuation and rescue routes, on the location of fire-fighting equipment and medication boxes or packages, as well as on potential hazards and prohibitions within the work areas. To ensure a safe and mindful working environment, all employees receive mandatory training, consisting of a general and specific part according to their role and tasks, as set out in the Risk Assessment Document (DVR). The company constantly monitors the updating of safety skills, ensuring that each worker is adequately informed about the specific risks of his or her work context and the preventive measures to be taken.

## Occupational health service

All STAR7 locations have a nominated company doctor. All employees benefit from a health surveillance plan and periodic examinations to determine their suitability for the job, conducted by a competent doctor.

## Worker participation and consultation and communication on occupational health and safety

At each STAR7 S.p.A. site, specific Health and Safety Managers (RLS) have been designated, essential reference figures for the implementation, monitoring and continuous improvement of the company's occupational safety policies. Their role plays a strategic role in ensuring compliance with applicable regulations and promoting a working environment that conforms to the highest standards of worker health and safety protection. In order to perform their duties effectively, RLS are required to attend specialised training courses, designed to provide them with adequate preparation on the main aspects of risk prevention, emergency management, the appropriate use of personal protective equipment (PPE) and the operational procedures to be adopted in critical situations. This training is subject to periodic updates in line with changing regulations and business needs.

In addition, Health and Safety Managers are actively involved in all stages of updating the Risk Assessment Document (DVR), ensuring that the prevention measures adopted are always consistent with the real operational needs of the organisation. Their contribution is also crucial in the context of the annual safety meeting, where the results of monitoring activities are analysed, any critical issues are discussed and continuous improvement strategies for the protection of workers' health and safety are defined.

## Training of workers on occupational health and safety

STAR7 S.p.A. relies on external training providers for both general and task-specific training, as defined in the Risk Assessment Document (DVR). The Human Resources department keeps current training calendars that offer and track employee training opportunities.

## Workers' health promotion

Every STAR S.p.A. employee has access to the *inPIÙ* Supplementary Health Plan, a service for preventive screening services and discounts on medical services.

## Process and equipment management

The activities carried out by STAR7 S.p.A. focus mainly on office tasks, which include the management and processing of technical documentation, project planning and interaction with customers and partners. At the same time, technical inspections and surveys are carried out directly at the customer's premises, operations that require specific expertise and special attention to work safety aspects. To ensure the protection of the health and safety of personnel involved in activities involving exposure to potential risks, the company takes appropriate preventive measures. In particular, the personal protective equipment (PPE) required for the various tasks requiring its use is provided at the time of employment. Each employee receives the appropriate PPE according to the type of activity to be performed and attests its receipt by signing an appropriate delivery letter. This process ensures not only compliance with current occupational safety regulations, but also full awareness and empowerment of personnel regarding the importance of the correct use of such devices.



# Accidents

During the three-year period under review, only a small number of STAR7 employees were affected by work-related accidents. In 2024, as in previous years, there were no fatal or serious accidents.

It should be noted that the current procedure for managing data on accidents at work does not provide for the systematic collection of data on “other workers”, i.e. workers who are not employees but whose work and/or workplace is controlled by the company. These cases may relate in particular to translators

and interpreters, whom STAR7 uses for translation work. It should be noted, however, that during 2024, as in previous years, no reports were made by these employees concerning incidents that occurred during their work for STAR7.

Work-related injuries	Unit	2022	2023	2024
Accidents at work	No.			
Deaths		-	-	-
Serious accidents		-	-	-
Other accidents		1	1	2
Total registered accidents		1	1	2
Travel accidents		1	1	-
Total hours worked <sup>1</sup>	h	1,545,008	2,275,614 <sup>1</sup>	2,498,278
Days of absence due to accidents	No.	5	1	26
Accident ratios				
Accident Frequency Index (No. of accidents/hours worked x 1,000,000)				
Deaths		-	-	-
Serious accidents		-	-	-
Other accidents		0.6	0.4	0.8
Accident Severity Index (accident absence days/hours worked x 1,000)		0.0032	0.0004	0.0104

<sup>1</sup> Hours worked by ABACAAR, LocalEyes Helsinki and ABACAAR were estimated.



8

# Quality and reliability of products and services

Quality Policy

Product health and safety

Sustainability in the supply chain

Protection of privacy, IT security and data protection

Protection of intellectual property



8

Quality and reliability of products and services



SDGs



Material topic	Objectives
Quality and reliability of products and services	<ul style="list-style-type: none"><li>Ensure that the products and services offered maintain and improve their high standards of quality and reliability.</li><li>To improve customer satisfaction and reduce product non-conformities, we have implemented a dedicated internal quality control resource and strengthened our quality control system.</li></ul>
Sustainability in the supply chain	<ul style="list-style-type: none"><li>Adoption and dissemination of a Code of Conduct to be signed by suppliers (new and pre-existing).</li></ul>
Protection of privacy, IT security and data protection	<ul style="list-style-type: none"><li>Protect sensitive customer and company data with effective security measures and in compliance with regulations and the Management System.</li><li>Training activities for all staff in order to raise awareness on cyber security and the adoption of an e-Learning platform to make employees aware of all cyber security issues.</li><li>Adoption of Data Loss Prevention (DLP) systems to automatically identify, monitor and protect sensitive data in the company.</li></ul>
Protection of intellectual property	<ul style="list-style-type: none"><li>Adopt STAR7 intellectual property protection policies.</li><li>Monitoring and verification of possible intellectual property infringement offences Compliance Programme as per Legislative Decree 231/2001.</li></ul>



# Quality policy

STAR7 aims to be the first choice for your product content, thanks to our high-quality services that span the entire information life cycle and our philosophy of delivering maximum efficiency and added value every step of the way. Delivered through a modular, integrated approach that blends expertise, geographical reach and innovative STAR Group technologies, our approach means we can offer a wide range of completely customisable services, from content creation to localisation, printing, logistics and multimedia.

At STAR7, we consider the quality and reliability of our products and services to be crucial for our daily operations and growth. Therefore, we adhere to the following principles:

- understanding and meeting the expectations of our clients and stakeholders
- complying with legal and voluntary standards applicable to our products and services
- continuously improving our processes in pursuit of maximum effectiveness and efficiency.

GRI Standard  
3-3



# Product health and safety

At STAR7, our top priority is to ensure the health and safety of our end-users. We are committed to providing the highest quality goods and services to guarantee customer satisfaction. Accurate and dependable product information is crucial for ensuring safe product usage, which in turn has a positive impact on people's health and safety. This also contributes to greater customer satisfaction, both directly and indirectly.

Using a non-conforming translation or technical authoring can have negative impacts not only on the quality of the product, but also on its functionality. This can have repercussions on the health and safety of the user, the client's image, and the reputation of STAR7.

Thanks to collaboration between technology and human expertise, STAR7 provides top-notch services that deliver precise and dependable translations to the end user. By ensuring a better user experience, the company can limit its liability in case of complaints arising from product misuse.

To ensure the safety of our solutions, STAR7 S.p.A. adheres to regulatory guidelines, customer compliance requirements, and our quality system by monitoring and evaluating the impact of all products and services offered.

During the reporting period of 2023, as well as in the preceding years of 2023 and 2022, there were no notable instances of non-compliance with standards, regulations, or voluntary codes related to the health and safety impacts of our products and services.

In addition, STAR7 constantly ensures that marketing communications for its products and services follow the principles of ethics and integrity. In the reporting period there were no significant incidents of non-compliance with standards, regulations or voluntary codes concerning the health and safety impacts of products and services.

GRI Standard
416-2
417-2
417-3



# Conformity of products and services

## Non-conformity management process

STAR7 has adopted an internal procedure with the aim of ensuring appropriate management of non-conformities (detected or potential) that have a possible impact on product/service quality, customer satisfaction, the environment and the effectiveness of the management system and the consequent implementation of corrective, corrective or preventive actions.

Non-conformities that can typically be encountered are distinguished by type, including those related to complaints (reports by the customer, or by a competent third party, deemed “justified”), accidents (breakdowns/ failures of plant, machinery and equipment) product/ service (deviations from pre-established requirements), organisational (such as delivery delays), operational (attributable to a failure to comply with an internal provision), supply (attributable to products/services supplied) and system (referring to deviations from system requirements).

It is the responsibility of anyone who comes across a possible non-conformity to take action to reduce any negative impact and try to resolve the issue. They should also inform their manager in a timely and appropriate manner, taking into account the level of importance and urgency.

The Department Head must evaluate the reported situation’s scope and importance and determine whether there is a non-conformity. If something is considered significant, it will be recorded in the relevant register and a thorough analysis of the causes will be conducted.

GRI Standard

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417-2

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Once the causes of non-conformity have been identified, appropriate corrective action is taken. This may provide an opportunity to take preventive action, which can be represented in the following steps:





# Complaints and non-conformities in service delivery processes

Non-conformities related to service delivery processes are handled internally within the relevant processes. The methods for dealing with non-conformities are organised and managed differently for each process.

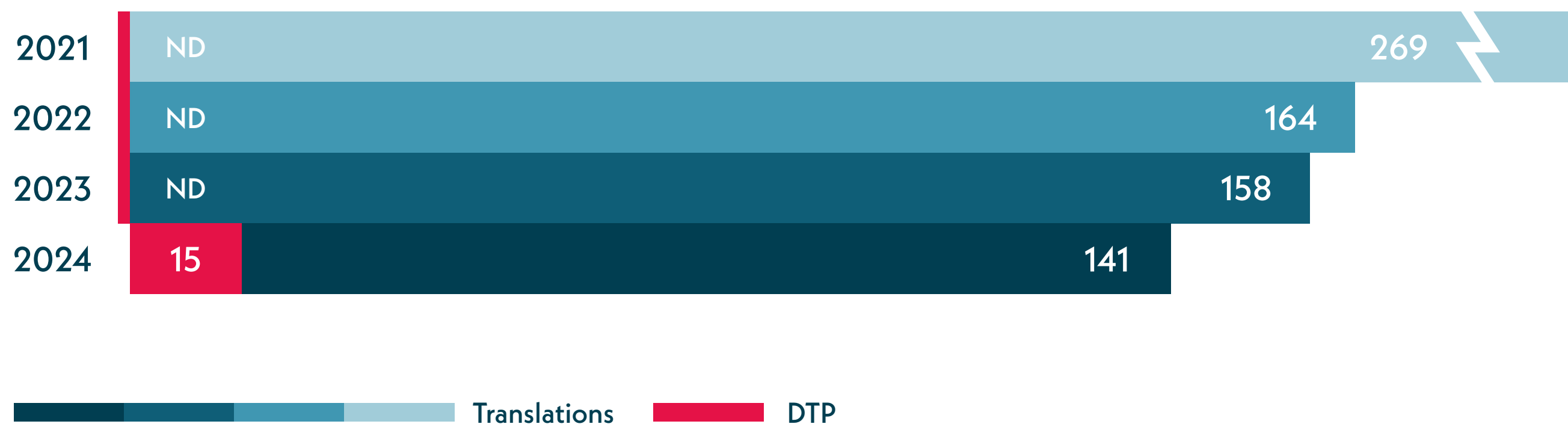
In 2024, the Global Content Service Line saw a decrease of 10.7% in detected non-conformities related to translation, compared to 2023.

In addition to translation-related nonconformities, 15 nonconformities related to DTP (desktop publishing) were also received in 2024.

STAR7 aspires to apply machine translation to the majority of its projects. In order to prevent errors due to this type of service, the Group has implemented a procedure for managing non-conformities due to machine translation.

Project Managers receive complaints from Vendors and forward them to Quality Control which proceeds to identify the most significant non-conformity reports which are analysed in order to improve their service. Reports may or may not contain a request for compensation. Following analysis of the non-conformity, the Project Manager advises the Vendor whether there is a compensation fee for reporting it.

## NON-CONFORMITIES PER YEAR



In line with the objectives of the sustainability plan, as of May 2023, the Global Content Service Line implemented a new way of monitoring translation quality by defining a scorecard that takes customer-specific service levels into account. The new scorecard (S7 Adequacy-Fluency Scorecard) makes it possible to expand the 'sample picking' process and to monitor translation quality more flexibly. This process became structural in 2024. To date, over 640 evaluations have been carried out using the new scorecard to assess: new suppliers, complex projects and service models related to AI (Artificial Intelligence) and MT (Machine Translation).



# Sustainability in the supply chain

## Selection, qualification and monitoring of suppliers

STAR7’s Code of Ethics states that the selection process for new suppliers is based on evaluation criteria of reliability, timely delivery and integrity. When it comes to selecting a new supplier, Group companies strive to use impartial criteria so it can give everyone the same opportunities and make sure procedures are transparent and fair. The STAR7 Group also undertakes only to enter supply contracts with parties whose conduct is considered to be in line with the Code’s rules and values.

When it comes to managing relationships with suppliers, whether they are based in the UK or abroad, the personnel at STAR7 Group always strive to maintain an open and fair dialogue. They make sure that correct and transparent information is communicated effectively to ensure a smooth flow of communication.

STAR7 drew up a new Code of Conduct for suppliers in 2024 and is committed to disseminating it during 2025, further consolidating its commitment to promoting business relationships based on transparency, reliability and consistency with its ethical and value-based principles.

The parent company, STAR7 S.p.A., has implemented a Management System that includes **criteria for evaluating, selecting, monitoring, and reassessing external suppliers**, based on their ability to provide products and services that meet the required standards. The aim of this process is to verify that suppliers possess the necessary characteristics and capabilities to meet the expected quality standards for the product or service.

The evaluation is conducted covering all aspects deemed significant, such as the quality of the products and services provided and their compliance with mandatory regulatory requirements; the reliability of the processes and equipment used; the experience gained and the professional competence offered.





The Procurement Service documents the outcome of the supplier screening activity and any necessary corrective actions. This information is then shared with the resources involved in the procurement process to aid in the allocation of supplies. The Procurement Service regularly updates the evaluation results based on evidence discovered during the supply process.

At this initial stage of monitoring, there was no formal procedure in place to provide evidence of supplier performance in relation to environmental and social impacts. Additionally, there was no process to map significant negative impacts along the supply chain.

As indicated above, STAR7 makes use of freelancers such as translators and interpreters to deliver its products and services. In order to promote and reinforce the quality of work, confidentiality, ethics and integrity, confidentiality of information provisions, and professional behaviour of its employees, it has adopted a Code of Conduct applicable to all contractors, where guidelines and rules of engagement are defined.

For interpreters and freelance translators, STAR7 has adopted a specific recruitment procedure given the specific nature of the expertise required in localisation and interpreting. Candidate interviews are conducted by the Talent Acquisition team and Senior Vendor Managers. The objective is to establish a varied resource chain and a team of subject matter experts to guarantee proficiency that aligns with the needs of STAR7 customers.

Candidates are selected based on specific requirements, including a degree in languages or other relevant qualifications, at least one previous experience in the required field, and being a native speaker of the target language. The proficiency of a language resource is evaluated through one or more tests that are specifically designed to assess their skills in the desired field. This test file is only sent to candidates who have signed STAR7's general non-disclosure agreement (NDA). This is done to ensure confidentiality is maintained throughout the process, starting from the initial stages. If the candidate is being considered for a permanent position within the in-house team, either as an employee or on-site contractor, they will be required to undergo multiple tests and participate in 2-4 interviews with different individuals.



STAR7’s senior auditors conduct evaluations that consider the potential of resources based on the client’s requirements, including style and tone of voice. The selection process for freelance resources involves the following steps:

- 1. **Screening and selection of CVs** to identify the most suitable candidates.
- 2. **Signing the NDA (Non-Disclosure Agreement)** to ensure confidentiality of information.
- 3. **Initial assessment test (Test 1)** to check competences.
- 4. **Additional test (if required):** if highly specialised teams are required, candidates who pass the first test may be subject to an additional test.
- 5. **Evaluation of tests and feedback** from reviewers.
- 6. **Sharing feedback with the freelancer** to compare results.
- 7. **Final result (pass/fail).**
- 8. **In the event of a pass**, the candidate proceeds with:
  - Signature of any specific NDAs,
  - Definition of contractual terms,

- Signature of the SLA,
- Completion of the supplier form and data entry in the STAR7 Group system.
- 9. **Onboarding by LRM/Production**, with the integration of the resource into the company's operational processes.

The language service provider (LSP) selection process includes the following steps:

- 1. **Screening and selection of the LSP** to identify the most suitable suppliers.
- 2. **First contact by e-mail** to initiate initial communication.
- 3. **Signing the NDA (Non-Disclosure Agreement)** to ensure confidentiality.
- 4. **Completion of a written questionnaire**, useful for gathering key information, including:
  - Type of company, years of activity, number of employees,
  - Team composition (in-house translators, proofreaders, DTP specialists, PM, etc.),

- Main customers and areas of expertise
- CAT tools used and server security.
- 5. **Screening call** to explore operational and organisational aspects.
- 6. **Briefing and Test 1**, to be carried out with at least two translators. The LSP must be prepared to provide the CVs of the professionals who participated in the test in the event of a positive outcome.
- 7. **Evaluation of results** by the STAR7 team.
- 8. **In the event of a pass**, the supplier proceeds with:
  - Signature of any specific NDAs,
  - Definition of contractual terms,
  - Signature of the SLA,
  - Completion of the supplier form and data entry in the STAR7 Group system.
- 9. **Onboarding by LRM/Production**, with operational integration into the corporate workflow.

If the test is passed and an agreement on fees is reached, the supplier sends the SLA (Service Level Agreement) and the datasheet to the successful applicant, who sends these signed documents back by e-mail. The Vendor Manager stores the CV, test, fee agreement, auditor’s feedback sheet, signed NDA, signed SLA, and completed vendor form in their internal database, following ISO standards and for future reference. The Language Resource Manager and/or Project Manager can now follow the new resource and provide any technical training.





# Protection of privacy, IT security and data protection

Ensuring corporate IT security management is a crucial matter for STAR7 to safeguard both customer data and the company's interests.

As per the Code of Ethics, the STAR7 Group guarantees the safeguarding of personal data and information during its business operations by preventing any improper or unlawful use.

All recipients should keep sensitive data on Group companies completely confidential, including outside of work and after their working relationship has ended, so as to protect information on the companies' technical skills, assets, finances, legal and administrative workings.

In accordance with GDPR legislation, a "personal data breach" refers to the accidental or unlawful access, destruction, loss, modification, or unauthorised disclosure of personal data stored or transmitted on electronic networks by the Company due to a breach of its security system. Under the GDPR, if there is a breach of personal data, the data controller must inform the relevant supervisory authority (in Italy, this is the Garante per la protezione dei dati personali) within 72 hours of becoming aware of the breach. However, if the breach is unlikely to

pose a risk to the rights and freedoms of individuals, notification is not required.

Where a personal data breach is likely to present a high risk for the rights and freedoms of natural persons, the controller shall also communicate the breach to the data subject unless (a) the controller has implemented appropriate technical and organisational protection measures (e.g. encryption); (b) the controller has taken appropriate measures to prevent the occurrence of a high risk for the rights and freedoms of data subjects; or (c) such communication would require disproportionate efforts. In such a scenario, a public notice or a similar measure is implemented to inform the concerned individuals with equal effectiveness.

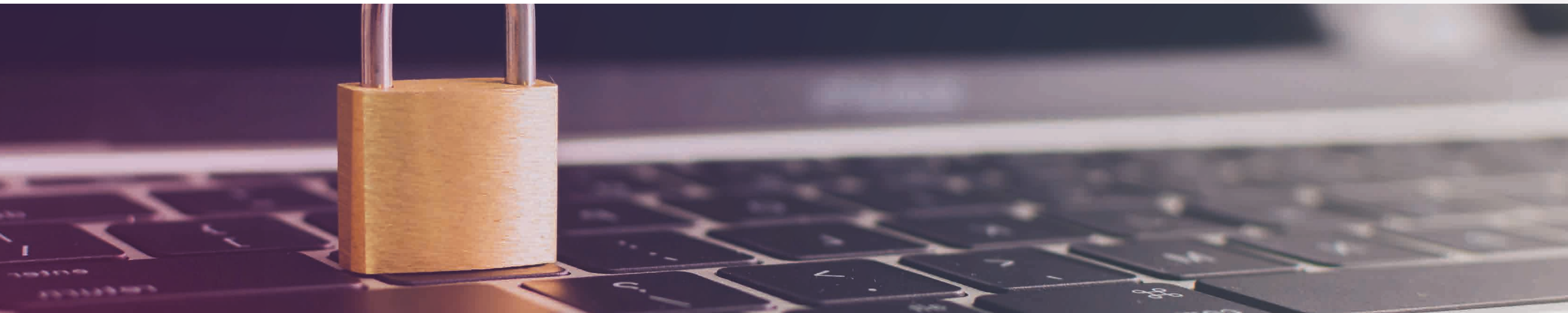
**To foster a culture of information security and data protection, STAR7 has implemented the ISO 27001:2017 standard.**

GRI Standard

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For the areas described, STAR7 implements good practices to protect the organisation's information assets from internal or external, intentional or unintentional information security threats; aligning information security management with the organisation's strategic risk management framework; setting information security objectives and establishing direction and principles for action; establishing criteria for risk assessment and risk acceptance; complying with applicable information security requirements, including the requirements set out in ISO/IEC 27001:2013; reviewing the effectiveness of the ISMS at regular intervals and continuously improving the ISMS.

The information security management system's objectives align with the organisation's business, strategy, and activity plans. Management and the ISMS manager regularly review and monitor these objectives to ensure they are fulfilled and achieved.

The objectives are described as follows:

- 🔴 **Minimising damage caused by potential security incidents**
- 🔴 **Ensuring continuous business operations with minimal interruptions**
- 🔴 **Ensuring the integrity of all information managed by the company**
- 🔴 **Handling all relevant information with appropriate confidentiality**
- 🔴 **Imparting information security training to all employees, including new recruits**

In 2024, as in the preceding reporting periods of 2022 and 2023, there were no incidents of data loss (data breaches) and no substantiated complaints regarding breaches of customer privacy or loss of customer data.

During 2024, multi-factor authentication (2FA/MFA) was adopted, with the aim of further strengthening the security of access to corporate systems, increasing data protection and mitigating potential cyber risks, in line with the security and compliance standards adopted by STAR7.



# Protection of intellectual property



Alongside the Civil Code, the Industrial Property Code and the Copyright Law are the primary legal sources in Italy concerning industrial and intellectual property. These laws are particularly pertinent to the activities of STAR7.

The Group manages intellectual property, including registered and protected trademarks, which are a major corporate asset, protecting these assets from possible infringement or misuse by both international competitors and local operators.

Confidential materials provided by the Customer may concern:

- a) the information, documentation and data provided by the customer;
- b) know-how, intellectual property and customer personal data;
- c) information and documents prepared by STAR7 for the customer;
- d) printed documents to be delivered to the customer.

If this documentation is used in business processes, the product will still belong to the customer. Nonetheless, the company bears legal responsibility for appropriately storing and utilising the material as defined in the contract.



9

# Ethics, integrity and creation of shared value

Corruption prevention measures

Respect for competition

Tax transparency

Economic performance: generation and  
distribution of value





9

Ethics, integrity and creation of shared value

Material topic	Objectives
<b>Economic performance: generation and distribution of value</b>	<div><div></div>Actions aimed at developing and enhancing the competitive position strategy.</div>
<b>Transparency, ethics and integrity in the conduct of business</b>	<div><div></div>Establish an internal Risk and Sustainability Control Committee to manage the positive and negative impacts generated by STAR7.</div> <div><div></div>Implementation of a compensation policy and performance assessment for the Board of Directors.</div>

SDGs





# Corruption prevention measures



GRI Standard

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205-3

STAR7 has implemented tools and policies to mitigate potential corruption risks. The system includes in particular: Compliance Programme pursuant to Legislative Decree 231/2001 (Compliance Programme) and Code of Ethics. In addition, STAR7's Whistleblowing Policy provides the opportunity for employees, partners, suppliers and stakeholders in general (such as employees, former employees, freelancers, consultants, customers, suppliers, job applicants, shareholders and anyone with a legitimate interest in the STAR7 Group's business activities) to report incidents of corruption through the Whistleblowing reporting channel.

To learn about STAR7's management approach for combating corruption, please refer to **Chapter 4, "Strategies - Commitments - Policies - Responsible business conduct"**.

No instances of active or passive bribery involving directors or employees of STAR7 (parent company and subsidiaries) were identified during the reporting periods, as well as in previous reporting periods, including those that required reporting.



# Respect for competition

Throughout the reporting period, STAR7 did not experience any incidents or legal proceedings related to violations of free competition, monopolistic practices, or antitrust laws in 2024 or previous years.

GRI Standard

3-3

206-1





# Tax transparency

## Approach to taxation

STAR7 adheres to the tax regulations in the different jurisdictions where it operates. Despite having an international profile and corporate structures in numerous countries, STAR7 has not yet developed or implemented a dedicated tax strategy. At STAR7, we are committed to upholding the values of honesty and fairness in our management practices. This includes adhering to all tax laws and regulations in the countries where our Group operates. We strive to maintain compliance with taxation policies in a responsible manner. Under no circumstances does the STAR7 Group pursue or realise its interest in violation of tax laws.

STAR7 aims to meet its tax obligations, both formal and substantive, in a timely, complete, and accurate manner. This is to reduce the tax risks that may arise from the application of tax laws and regulations in all the countries where the Group operates. This includes addressing any uncertainties in the interpretation of tax matters.

## Tax governance, control and risk management

STAR7 has little exposure to tax risk. When deciding how to tax a specific transaction or activity, the approach taken is to use sensible,

well-supported, and logically reasoned tax decisions and interpretations. Considering the vastness and intricacy of the Group's operations, there is a possibility of encountering risks related to the interpretation of complicated tax regulations. The Group identifies and analyses risks internally, with the assistance of qualified tax advisors. This process takes into consideration the countries in which the Group operates.

## Relationship with tax authorities (stakeholders)

STAR7 is committed to complying with all relevant legal provisions and upholding the principles of transparency, honesty, and fairness when dealing with tax authorities in the countries where it operates. The STAR7 Group does not exert any improper influence on the decisions of tax authorities in the countries where it operates, even through third parties. On the contrary, our aim is to maintain open and constructive relationships with all relevant tax authorities. We strive to resolve any disputes in a collaborative spirit, which may include the use of litigation-defining instruments. When there is uncertainty regarding the tax treatment of certain issues, STAR7 recommends using tools to determine the position of the relevant tax authorities beforehand.

GRI Standard

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207-2

207-3



# Economic performance: generation and distribution of value

The determination of the Value Generated and Distributed is based on the Consolidated Income Statement of the Group. This representation provides evidence of the economic value directly generated by STAR7 that is distributed to internal and external stakeholders. Please refer to the Consolidated Financial Statements of STAR7 S.p.A. for further details on the company's performance, including economic, financial, and asset performance.

The term “Value generated” refers to STAR7’s revenues from an accounting standpoint. This includes revenues, other operating revenues, net of credit losses and tax benefits. On the other hand, “Economic value distributed” encompasses costs that have been reclassified according to stakeholder category. In addition, the amount of dividends is also added to the costs shown in the consolidated income statement, if they were distributed to shareholders (which was not the case for STAR7).

Economic value retained refers to the difference between the Economic Value Generated and Distributed, which takes into account the depreciation of tangible and intangible assets, provisions, bad debts, and deferred taxes.

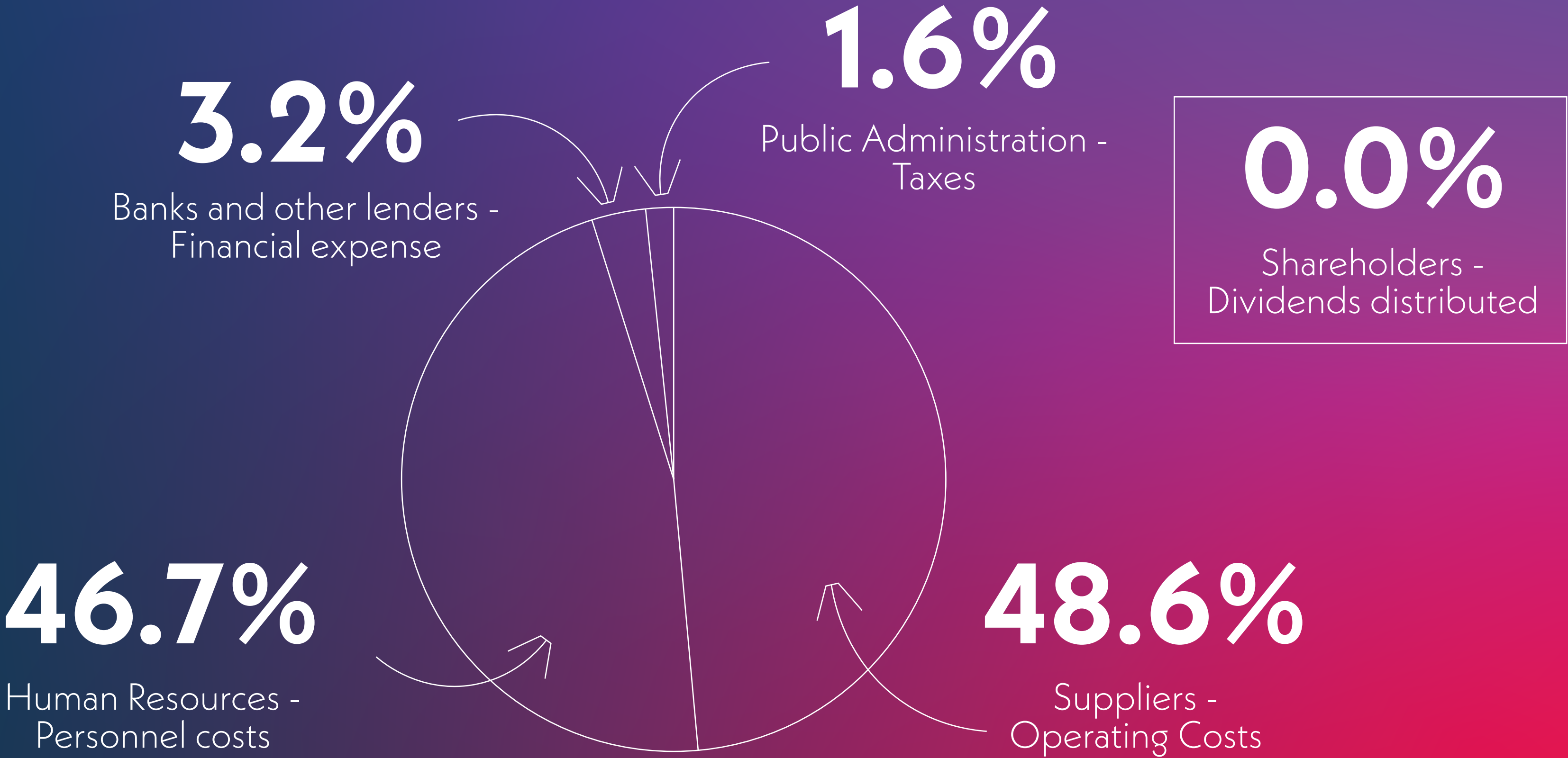
GRI Standard  
3-3  
201-1

Economic Value (euros)	2022	2023	2024
<b>Economic value generated</b>	<b>84,766,735</b>	<b>105,337,061</b>	<b>120,905,206</b>
<b>Suppliers - Operating Costs</b>	39,136,706	46,216,411	52,042,781
<b>Human Resources - Personnel costs</b>	29,156,658	43,236,653	49,963,849
<b>Banks and other lenders - Financial expense</b>	2,300,042	3,027,097	3,376,563
<b>Public Administration - Taxes</b>	1,984,537	1,447,921	1,695,888
<b>Shareholders - Dividends distributed</b>	-	-	-
<b>Economic value distributed</b>	<b>72,577,942</b>	<b>93,928,081</b>	<b>107,079,081</b>
<b>Economic value retained</b>	<b>12,188,793</b>	<b>11,408,980</b>	<b>13,826,125</b>



# Economic value distributed

In 2024, 48.6% of the total value distributed was allocated to suppliers. The majority of this amount was attributed to the supplier category comprising of translators and interpreters. This figure confirms the significant role played by these stakeholders in STAR7's value creation chain. 46.7% of the generated value was distributed to employees. Over the course of three years, the resolutions passed by STAR7 shareholders did not include any provisions for distributing dividends to shareholders.





# GRI Content Index



# GRI Standards – General disclosures

### Statement of use

The Sustainability Report of STAR7 S.p.A. for the financial year 2023 [01 January - 31 December 2024] was prepared with reference to GRI Standards.

### GRI 1 adopted

GRI 1 Foundation 2021

GRI Sustainability Reporting Standard	References Chapter/Paragraph	Correspondence with ESRS
GRI 2 - General Disclosures - version 2021		
The organisation and its reporting practices		
2-1 Organisational details	Methodological note 1 STAR7: People of Content / Profile and identity	N/A
2-2 Entities included in the organisation’s sustainability reporting	Methodological note	ESRS 1 / 5.1 ESRS 2 / BP-1 5 (a), (b) i
2-3 Reporting period, frequency and contact point	Methodological note	ESRS 1 73
2-4 Restatements of information	Methodological note	ESRS 2 / BP-2 13, 14 (a) - (b)



Activities and workers

2-6	Activities, value chain and other business relationships	1 STAR7: People of Content / Profile and identity 1 STAR7: People of Content / A global network 2 Business model and value chain / market scenarios and trends 2 The business model and value chain / Integrale <sup>7</sup> : an integrated approach 2 The business model and value chain / The business model: Production and delivery of products and services 2 The business model and value chain / Suppliers 2 The business model and value chain / Customers	ESRS 2 / SBM-1 40 (a) i, (a) ii, (b), (c); 42(c)
2-7	Employees	2 The business model and value chain / The people and employees of STAR7	ESRS 2 / SBM-1 40 (a) iii; ESRS S1 / S1-6 50 (a), (b), (d), (e); 51; 52
2-8	Non-employees	2 The business model and value chain / The people and employees of STAR7	ESRS S1 / S1-7 55; 56

Governance

2-9	Governance structure and composition	3 Governance / Governance model and corporate bodies	ESRS 2 / GOV-1 21 (a), (d), 22 (a), 23
2-10	Nomination and selection of the highest governance body	3 Governance / Governance model and corporate bodies	N/A
2-11	Chair of the highest governance body	3 Governance / Governance model and corporate bodies	N/A
2-12	Role of the highest governance body in overseeing the management of impacts	3 Governance / Sustainability governance	ESRS 2 / GOV-1 22 (c); GOV-2 26 (a), (b); SBM-2 45 (d) G1 5 (a)
2-13	Delegation of responsibility for managing impacts	3 Governance / Sustainability governance	ESRS 2 / GOV-1 22 (c) i, (c) ii; GOV-2 26 (a) ESRS G1 / G1-3 18 (c)
2-15	Conflicts of interest	3 Governance / Sustainability governance	N/A
2-16	Communication of critical concerns	3 Governance / Sustainability governance	ESRS 2 / GOV-2 26 (a); G1 / G1-3 18 (c)



Strategy, policies and practices

2-22	Statement on sustainable development strategy	Letter to stakeholders	ESRS 2 SBM-1 40 (g)
2-23	Policy commitments	4 Strategies - Commitments - Policies / Responsible business conduct	ESRS S1 / S1-1 19; AR 14; ESRS S2 / S2-1 16, 17; AR 11, 16; ESRS S4 / S4-1 15 - 17, AR 13; ESRS G1 / G1-1 7
2-24	Embedding policy commitments	4 Strategies - Commitments - Policies / Management Systems and Certifications	ESRS 2 / GOV-2 26 (b)
2-26	Mechanisms for seeking advice and raising concerns	4 Strategies - Commitments - Policies / Responsible business conduct	ESRS G1/ G1-1 10 (a), G1-3 18(a)
2-27	Compliance with laws and regulations	4 Strategies - Commitments - Policies / Environmental - Social - Economic Compliance	ESRS S1 / S1-17 103 (a)
2-28	Membership associations	4 Strategies - Commitments - Policies / External initiatives and memberships	N/A

Stakeholder engagement

2-29	Approach to stakeholder engagement	4 Strategies - Commitments - Policies / Stakeholders: role and engagement	ESRS 2 / SMB-2 45 (a) i - (a) iv; ESRS S1 / S1-1 20 (b)
2-30	Collective bargaining agreements	7 People / Human Resources Management	ESRS S1 / S1-8 60 (a)



# GRI 3 - Material Topics - version 2021

3-1	Process to determine material topics	Methodological note 5 Material Topics / Impacts and material topics	IRO-1 53 (a); (b) ii - (b) iv
3-2	List of material topics	5 Material Topics / The material topics	ESRS 2 / SBM-3 / 48 (a);
3-3	Management of material topics	2 The business model and value chain / Innovation, research and development and cutting-edge technologies 5 Material Topics / Material Topics - Objectives and Actions 6 Environmental Impacts / Energy - Emissions and Climate Change 6 Environmental impacts / Responsible use of natural resources 7 People / Human Resources Management 7 People / Employment and turnover 7 People / Diversity and equal opportunities 7 People / Development, training and enhancement of human resources 7 People / Occupational Health and Safety 8 Quality and reliability of products and services / Quality policy 8 Quality and reliability of products and services / Sustainability in the supply chain 8 Quality and reliability of products and services / Privacy, IT security and data protection 8 Quality and reliability of products and services / Intellectual property protection 9 Ethics, integrity and creation of shared value / Corruption prevention measures 9 Ethics, integrity and creation of shared value / Respect for competition 9 Ethics, integrity and creation of shared value / Tax transparency 9 Ethics, integrity and creation of shared value / Economic performance: generation and distribution of value	ESRS 2 SBM-3 48 (c) i - (c) iv; ESRS 2 BP-2 17 (b) - (e); ESRS S1 / S1-5 47 (b)



# GRI Standards - Material Topics/Specific Indicators disclosure

Please note that, unless stated otherwise, the GRI Standards published in 2016 have been used. In 2018, the GRI 301 Water and Discharges standard was used to report on water withdrawals, while the GRI 403 Occupational Health and Safety Standards were used to report on occupational health and safety. In 2020, the GRI 306 Waste standard was adopted and published for waste reporting purposes. GRI 207 Tax (2019) was applied in the reporting of tax issues.

GRI Sustainability Reporting Standard	References Chapter/Paragraph	Correspondence with ESRS Indicators
GRI 200 - Economic Issues		
201 Economic Performance		
201-1 Direct economic value generated and distributed	9 Ethics, integrity and creation of shared value / Economic performance: generation and distribution of value	N/A
205 Anti-corruption		
205-3 Confirmed incidents of corruption and actions taken	9 Ethics, integrity and creation of shared value / Corruption prevention measures	ESRS G1 / G1-4 25 (a)
206 Anti-competitive behaviour		
206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	9 Ethics, integrity and creation of shared value / Respect for competition	N/A



207 Taxes - 2019

207-1	Approach to taxation	9 Ethics, integrity and creation of shared value / Tax transparency	N/A
207-2	Tax governance, control and risk management	9 Ethics, integrity and creation of shared value / Tax transparency	N/A
207-3	Stakeholder engagement and management of concerns related to tax	9 Ethics, integrity and creation of shared value / Tax transparency	N/A

GRI 300 - Environmental Issues

301 Materials

301-1	Materials used by weight or volume	6 Environmental impacts / Responsible use of natural resources	ESRS E5-4 31 (a), (b)
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302 Energy

302-1	Energy consumed within the organisation	6 Environmental Impacts / Energy - Emissions and Climate Change	ESRS E1 / E1-5 37 (a), (c)
302-3	Energy intensity	6 Environmental Impacts / Energy - Emissions and Climate Change	ESRS E1 / E1-5 40

303 Water and effluents - 2018

303-1	Interactions with water as a shared resource	6 Environmental impacts / Responsible use of natural resources	ESRS 2 SBM-3 48 (c) i and (c) iv; MDR-T 80 (f); ESRS E3 8 (a), (b); AR 15 (a); E3-2 17; AR 20; E3-3 24; 25
303-2	Management of water discharge-related impacts	6 Environmental impacts / Responsible use of natural resources	N/A
303-3	Water withdrawal	6 Environmental impacts / Responsible use of natural resources	ESRS E3 / E3-4 AR 32



305 Emissions

305-1	Direct (Scope 1) GHG emissions	6 Environmental Impacts / Energy - Emissions and Climate Change	ESRS E1 / E1-6 44 (a); 48 (a); AR 39 (a)-(d)
305-2	Energy indirect (Scope 2) GHG emissions	6 Environmental Impacts / Energy - Emissions and Climate Change	E1-6 44 (b); 49 (a); AR 39 (a)-(d); AR 45 (a), (c), (d), (f)
305-4	GHG emissions intensity	6 Environmental Impacts / Energy - Emissions and Climate Change	ESRS E1 / E1-6 53; AR 39 (c)

306 Waste

306-1	Waste generation and significant waste-related impacts	6 Environmental impacts / Responsible use of natural resources	ESRS 2 SBM-3 48 (a), (c) ii, iv; ESRS E5 AR 7 (f)
306-2	Management of significant waste-related impacts	6 Environmental impacts / Responsible use of natural resources	ESRS E5 / E5-2 19, 20 (e), (f); E5-5 40, AR 33 (c)
306-3	Waste generated	6 Environmental impacts / Responsible use of natural resources	ESRS E5 / E5-5 37 (a), 38, 40
306-4	Waste diverted from disposal	6 Environmental impacts / Responsible use of natural resources	ESRS E5 / E5-5 37 (b), 38, 40
306-5	Waste directed to disposal	6 Environmental impacts / Responsible use of natural resources	ESRS E5 / E5-5 37 (c), 38, 40

308 Supplier environmental assessment

308-1	New suppliers that were screened using environmental criteria	8 Quality and reliability of products and services / Sustainability in the supply chain	ESRS G1 / G1-2 15 (b)
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# GRI 400 - Social Issues

## 401 Employment

401-1	New recruits and turnover	7 People / Employment and turnover	ESRS S1 / S1-6 50 (c)
401-3	Parental leave	7 People / Diversity and equal opportunities	ESRS S1 / S1-15 93

## 403 Occupational health and safety - 2018

403-1	Occupational health and safety management system	7 People / Occupational Health and Safety	ESRS S1 / S1-1 23
403-2	Hazard identification, risk assessment and accident investigation	7 People / Occupational Health and Safety	ESRS S1 / S1-3 32 (b), 33
403-3	Occupational health services	7 People / Occupational Health and Safety	N/A
403-4	Worker participation and consultation and communication on occupational health and safety	7 People / Occupational Health and Safety	N/A
403-5	Training of workers on occupational health and safety	7 People / Occupational Health and Safety	N/A
403-6	Workers' health promotion	7 People / Occupational Health and Safety	N/A
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	7 People / Occupational Health and Safety	N/A
403-9	Work-related injuries	7 People / Occupational Health and Safety	ESRS S1 / S1-4 38 (a); S1-14 88 (b),(c); AR 82



404 Training and education

404-1	Average hours of training per year per employee	7 People / Development, training and enhancement of human resources	ESRS S1 / S1-13 83 (a)
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405 Diversity and equal opportunity

405-1	Diversity of governance bodies and employees	3 Governance / Governance model and corporate bodies 7 People / Diversity and equal opportunities	ESRS 2 / GOV-1 21 (d); S1-9 66 (a), (b)
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406 Non-discrimination

406-1	Incidents of discrimination and corrective actions taken	7 People / Diversity and equal opportunities	ESRS S1 / S1-17 103 (a), AR 103
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414 Supplier social assessment

414-1	New suppliers that were screened using social criteria	8 Quality and reliability of products and services / Sustainability in the supply chain	ESRS G1 / G1-2 15 (b)
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416 Customer health and safety

416-2	Incidents of non-compliance concerning health and safety impacts of products and services	8 Quality and reliability of products and services / Product health and safety	ESRS S4 / S4-4 35
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417 Marketing and labelling

417-2	Incidents of non-compliance concerning product and service information and labelling	8 Quality and reliability of products and services / Product health and safety	N/A
417-3	Incidents of non-compliance concerning marketing communications	8 Quality and reliability of products and services / Product health and safety	N/A

418 Customer privacy

418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	8 Quality and reliability of products and services / Privacy, IT security and data protection	N/A
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**STAR7**