



STAR7 GROUP DIVERSITY, EQUITY AND INCLUSION POLICY

Table of Contents

Diversity, Equity and Inclusion: definitions.....	3
The STAR7 Group’s commitment to Diversity, Equity and Inclusion	3
Section I - Recipients and purpose of the DEI Policy.....	4
1.1. Recipients	4
1.2. Purpose	4
Section II – References	5
2.1. Regulations, standards and reference principles.....	5
Section III – Principles of Conduct.....	7
3.1. Non-discrimination and promotion of diversity	7
3.2. Individual responsibilities and commitments	8
Section IV - Application of DEI principles in business processes	9
4.1. Human resources management	9
4.2. Internal and external communication	10
4.3. Selection of suppliers and business partners	10
Section V - Reporting of violations.....	11
5.1. Tools available for reporting violations of the DEI Policy	11
Section VI - The sanctions system.....	11
6.1. Sanctions for company personnel.....	11
6.2. Sanctions for third parties	11
Section VII - Governance of the DEI Policy	12
7.1. Internal Policy Officer	12
7.2. Dissemination, communication and training.....	12
7.3. Monitoring and remedial actions	13
7.4. Reporting by the Parent Company	13
Section VIII – Adoption	13
8.1. Approval and subsequent amendments	13
Annex - Questions & Answers	14

Diversity, Equity and Inclusion: definitions

Diversity: the definition of diversity includes everything that makes individuals unique and unequalled, such as age, sex, sexual and affective orientation, gender identity or expression, race, skin colour, language, nationality, ethnicity, political and trade union opinions, religious beliefs, marital and family status, disability, level of education, professional experience, or any other personal characteristic or condition.

Equity: means ensuring fair and impartial treatment for each individual, recognising that people with different characteristics and conditions may need different measures and support to access the same opportunities.

Inclusion: means recognising, understanding and valuing diversity as a resource, and utilising it in a positive way to create a fair and welcoming environment.

The STAR7 Group's commitment to Diversity, Equity and Inclusion

Ensuring that all people can express their full potential every day and feel valued in the complete expression of their own characteristics is an essential factor for the STAR7 Group, which recognises in people and human capital a central role deserving of investment.

Diversity, Equity and Inclusion (hereinafter also referred to simply as "DEI") are values that help create an open and stimulating work environment, ensuring perspectives and points of view that foster innovative ideas and effective, virtuous behaviour. The STAR7 Group is aware that valuing each individual's diversity and ensuring fair and inclusive treatment have a positive impact on business management and are essential for sustainable development. An inclusive work environment, in which all people feel respected and able to express their full potential, contributes to the creation of a positive working climate, essential for staff well-being and satisfaction, for reducing stress, increasing engagement and motivation, and promoting an atmosphere of collaboration and cooperation.

The STAR7 Group embraces the principle of **"leave no one behind"** promoted by the United Nations 2030 Agenda for Sustainable Development. Promoting Diversity, Equity and Inclusion is, for the STAR7 Group, an ethical imperative, but also a key factor in increasing competitiveness, attracting talent and investors, and retaining and valuing people.

For this reason, the STAR7 Group has adopted this Diversity, Equity and Inclusion Policy (hereinafter also referred to simply as the "Policy" or "DEI Policy"), committing to ensuring that diversity is valued, included and treated fairly, at every level and in every geographical area, promoting a culture based on ethics, integrity and professional responsibility internally and throughout the value chain.

Section I - Recipients and purpose of the DEI Policy

1.1. Recipients

The DEI Policy applies to the companies of the STAR7 Group, meaning STAR7 S.p.A. (the "Parent Company") and its subsidiaries (the "Group" or the "STAR7 Group").

The Recipients of the Policy (the "Recipients") are therefore:

- ✎ the members of the corporate bodies of the Group companies;
- ✎ employees, without exception, and all those who work for the Group companies, regardless of the nature of the relationship, including temporary relationships, that binds them to such companies;
- ✎ third parties who have a business relationship with the Group companies, regardless of the legal nature of the relationship (e.g., suppliers of goods and services, including sub-suppliers, consultants and business partners), within the scope of the contractual or professional activities carried out.

All Recipients, without exception, are required to be familiar with the contents of the Policy. To this end, the STAR7 Group companies adopt the most appropriate measures to ensure its adequate dissemination to all Recipients, as described in Sections VII and VIII of this document.

The Recipients undertake to observe and ensure observance of the principles contained herein, within the scope of their respective functions and responsibilities, in the awareness that compliance with the Policy constitutes an essential part of the quality of their work and professional performance. Therefore, any violations may be sanctioned as indicated in Section VI of this document, in accordance with applicable law and contractual regulations.

1.2. Purpose

The STAR7 Group's DEI Policy aims to define the values and commitments adopted by the Group regarding Diversity, Equity and Inclusion issues, the strictest observance of which is required from all those with whom it interacts.

The DEI Policy aims to promote diversity in all its forms, combat discrimination and ensure fair treatment for all personnel, with the ultimate goal of creating an inclusive working environment in which different ideas and perspectives are valued and encouraged in order to stimulate innovation and creativity.

The DEI Policy aims to strengthen the existing governance and internal control system at Group level, with a view to consolidating a model of responsible management of business activities aimed at promoting the values of Diversity, Equity and Inclusion. This Policy is in continuity with the Group's Human Rights Policy, developing, elaborating on, and translating the principles of non-discrimination and equal opportunity into specific commitments regarding Diversity, Equity and Inclusion.

Section II – References

2.1. Regulations, standards and reference principles

This Policy has been drafted in accordance with the main international standards with which the STAR7 Group identifies and to which it conforms its conduct, and in particular:

- ↪ Universal Declaration of Human Rights of the United Nations (UN) (1948);
- ↪ Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO) (1998);
- ↪ Fundamental Conventions of the International Labour Organization (ILO):
 - **C29** - Forced Labour Convention (1930);
 - **C87** - Freedom of Association and Protection of the Right to Organise Convention (1948);
 - **C98** - Right to Organise and Collective Bargaining Convention (1949);
 - **C100** - Equal Remuneration Convention (1951);
 - **C105** - Abolition of Forced Labour Convention (1957);
 - **C111** - Discrimination (Employment and Occupation) Convention (1958);
 - **C138** - Minimum Age Convention (1973);
 - **C155** - Occupational Safety and Health Convention (1981);
 - **C182** - Worst Forms of Child Labour Convention (1999);
 - **C187** - Promotional Framework for Occupational Safety and Health Convention (2006);
 - in addition to Convention **C190** on the elimination of violence and harassment in the world of work (2019);
- ↪ Conventions of the United Nations (UN), including:
 - International Convention on the Elimination of All Forms of Racial Discrimination (1965);
 - Convention on the Elimination of All Forms of Discrimination against Women (1979);
 - Convention on the Rights of the Child (1989);
 - International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (1990);
 - Convention on the Rights of Persons with Disabilities (2006);
- ↪ UN Global Compact Principles (2000);
- ↪ Women's Empowerment Principles promoted by the UN Global Compact and UN Women (2010);
- ↪ 2030 Agenda for Sustainable Development (2015);
- ↪ United Nations (UN) Guiding Principles on Business and Human Rights (2011) and the related Gender Dimensions (2019);
- ↪ Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the International Labour Organization (ILO) (2022).

Other references:

- ✓ Charter of Fundamental Rights of the European Union (2000);
- ✓ EU Directive 2023/970 of the European Parliament and of the Council of 10 May 2023 to strengthen the application of the principle of equal pay for equal work or work of equal value between men and women through pay transparency and enforcement mechanisms.

This Policy, being based on internationally recognised standards, applies in compliance with the local regulations in force in the countries in which the Group operates. Where local regulations are more stringent than the principles contained in this document, Recipients must comply with local regulations. Conversely, the STAR7 Group is aware that, in certain countries, local regulations may be less restrictive than the provisions of this Policy. In such cases, Recipients are required to comply with the principles of the Policy, even if this entails prohibiting conduct that would otherwise be permitted at the local level.

Section III – Principles of Conduct

3.1. Non-discrimination and promotion of diversity

The STAR7 Group has identified the issues most exposed to the risk of non-inclusion, aware that this is not an exhaustive list, as diversity is complex and encompasses any characteristic of the person. To ensure concrete safeguards that consider the individual as a whole, the STAR7 Group adopts an intersectional approach, aware that different diversity factors may overlap and amplify barriers or discrimination. The STAR7 Group requires all Recipients to align their conduct with the principles described below and undertakes not to establish or continue relationships with anyone who demonstrates an unwillingness to share their content and spirit. These principles have been formulated taking into account the business context and the geographical location of the activities carried out by the Group companies.

Gender: gender equality and balance must be promoted, countering any form of discrimination, disparity or stereotype, ensuring the utmost respect for each individual's uniqueness. Barriers related to biological sex, gender identity or its expression must be prevented and removed, as far as possible, ensuring equal opportunities and full respect for the individual.

Sexual and emotional orientation: full respect for the sexual and emotional orientation of every individual must be ensured, promoting a culture of welcome and firmly rejecting any form of prejudice, harassment or disparity, so that everyone can freely live out their own orientation and feelings.

Parenthood: subject to organisational requirements and in accordance with applicable legislation and collective agreements, flexible working arrangements are promoted to support parenting and family care responsibilities. Parenting and personal choices must not result in unlawful discrimination or unfair treatment in the workplace.

Disability: work environments must be accessible to all people, including persons with disabilities, promoting the removal of physical and digital barriers and, where necessary, the adoption of reasonable accommodations and suitable workstations, so as to enable everyone to fully express their potential.

Health status: the protections provided for persons with vulnerable health conditions or who need to care for family members in such condition are guaranteed, in compliance with applicable laws and collective agreements. Absences for illness, treatment or caregiver leave must not result in unlawful discrimination or penalisation, promoting, where possible, organisational solutions compatible with the mental and physical well-being of the individual.

Age: equal access to, development within, and retention in the workplace must be guaranteed regardless of age, and the exchange of knowledge and experience among personnel of different ages must be promoted, valuing the transfer of skills from one generation to another.

Nationality, ethnicity and geographical origin: no one shall be discriminated against because of their nationality, ethnicity or geographical origin. A work environment free of barriers, including linguistic barriers, and prejudice must be ensured, countering any form of racism, xenophobia or cultural stereotyping in order to guarantee everyone full inclusion and a sense of belonging.

Religious orientation: a work environment must be promoted in which every belief is welcomed with respect, preventing any form of intolerance and fostering inclusion, including through the awareness of different forms of worship and, where provided for by applicable law or collective agreements, the possibility of taking leave or time off for religious holidays.

Personal opinions, political and trade union orientation: no one may be discriminated against for their personal or political opinions or for union membership. Any form of discrimination, favouritism or penalisation related to personal opinions, membership of political parties or trade unions, and the exercise of representation rights is prohibited.

Socioeconomic status: socioeconomic status must not represent an obstacle to access to employment, growth and professional development. Equity must be promoted by offering everyone the same opportunities, valuing talent regardless of one's economic or social status.

Professional role: any form of discrimination based on qualification or role is prohibited, ensuring equal dignity, respect and protection for every employee. A fair work environment must be guaranteed in which contractual level and professional classification depend exclusively on skills, merit and responsibility.

Marital or family status: everyone must be considered free in their personal choices and private life. Marital status, whether married, cohabiting, or family situation, must not influence job or career opportunities in any way.

3.2. Individual responsibilities and commitments

The full realisation of an inclusive work environment depends on the active contribution of each individual. Therefore, the STAR7 Group requires all Recipients to translate the principles of Diversity, Equity and Inclusion into practical actions, through the:

- 🔸 **Promotion of mutual respect:** adopting, on a daily basis, conduct based on the utmost fairness, equity and respect for the dignity of every individual;
- 🔸 **Use of inclusive language:** using respectful language in every communication, whether verbal or written, avoiding stereotyped, discriminatory or potentially offensive expressions;
- 🔸 **Removal of prejudices:** committing to recognising and acting on one's own biases in relationships with others, helping to establish a working environment that promotes dialogue, collaboration, and the participation of others in generating ideas and solutions;
- 🔸 **Duty to report:** actively contributing to safeguarding the work environment by promptly reporting, through the appropriate channels, any conduct that does not comply with the principles of this Policy.

Every Function Manager of the STAR7 Group companies has the task of leading by example in implementing the principles of Diversity, Equity and Inclusion, committing to actively disseminating them both within their own area of responsibility and externally.

Section IV - Application of DEI principles in business processes

The STAR7 Group recognises that the principles of Diversity, Equity and Inclusion are not merely a statement of intent, but must translate into practical conduct, becoming integrated across all business processes. For this reason, all Group companies are required to comply with the following provisions, undertaking not to establish or continue relationships with third parties who demonstrate an unwillingness to share their content and spirit.

4.1. Human resources management

Selection: the requirements for access to a job position and the language used in job postings must not be discriminatory or exclusionary. Information requested from candidates during interviews must be strictly related to the characteristics of the role being sought. Selection practices based on merit and fairness must be adopted, evaluating candidates objectively.

Training: mentoring programmes and training in general must be accessible to all personnel on an equal basis, valuing merit and skills without any kind of distinction.

Performance evaluation: the criteria for evaluating personnel must be objective, fair and free from bias or stereotypes. Each employee must be guaranteed an evaluation based on their skills and professional contribution, free from discrimination related to personal characteristics.

Professional development: career development paths must be accessible to every employee and must be based on fair, objective and measurable criteria that take into account each individual's skills and abilities.

Succession plans: succession plans for key roles must ensure a balanced representation of diverse talent, valuing a multiplicity of perspectives and skills. As far as possible, corporate bodies must be composed in a way that guarantees diversified representation within them.

Remuneration: both at the time of hiring and subsequent promotion, remuneration must be determined on the basis of transparent and objective criteria, monitoring and eliminating unjustified pay disparities arising from discrimination based on personal characteristics. Remuneration must be based on each person's skills, experience and responsibilities. Particular attention must be paid to equal pay between men and women for work of equal value.

Digital accessibility: corporate IT systems must be designed and implemented according to accessibility criteria, so as to ensure that people with disabilities are also able to fully participate in work activities.

4.2. Internal and external communication

The values of Diversity, Equity and Inclusion must be reflected in every form of communication, both internal and external, promoting an authentic narrative that values plurality.

Inclusive language: the language used, both in relationships among colleagues and in relationships with external parties, must be as inclusive, accessible and free from stereotypes as possible, recognising, respecting and valuing each person's identity.

Respect for identity: discriminatory expressions related to gender, ethnicity, age, sexual orientation, disability, or any other personal or professional characteristic must be avoided.

Gender equity: a conscious use of language must be promoted that overcomes cultural defaults, ensuring a symmetrical, equal and respectful representation of all genders in every document, email or official communication.

Universal accessibility: digital or physical content, including social media channels, websites, internal documentation and promotional or informational materials, must be designed and set up to be fully accessible also to people with visual, hearing, motor or cognitive disabilities, eliminating any informational barrier.

4.3. Selection of suppliers and business partners

Relationships with third parties who share the principles and values of this Policy must be promoted, in the belief that an inclusive and non-discriminatory approach must extend along the entire value chain. Consistent with the provisions of the Supplier Code of Conduct, the STAR7 Group does not establish relationships with parties who engage in forms of discrimination against their own personnel.

Checks on third-party reliability: before entering into a business relationship with suppliers and business partners, their reliability from a DEI perspective must be assessed, for example through the acquisition of public data relating to indicators of adverse conduct, such as convictions or ongoing proceedings for discrimination or defamation, including through generic internet searches or with the support of specialised tools (Cerved or Cribis reports). These checks are the responsibility of the personnel dedicated to procurement at the STAR7 Group companies, in coordination with the Head of Human Resources. The outcomes of the checks must be recorded, and it is not permitted to enter into a business relationship with parties who do not successfully pass such checks. The checks must be carried out where the following materiality parameters are present: strategic, continuous or high-value services with counterparties that are little-known, small in size, or start-ups. In the case of continuous or otherwise long-term relationships, the checks must be repeated on a periodic basis (at least annually) to ensure ongoing monitoring of the requirements demanded of the counterparty.

Other DEI assessment parameters: preference must be given to those parties who provide documentary evidence of inclusive policies (for example, by requesting the completion of specific questionnaires designed to assess the third party's commitments regarding Diversity, Equity and Inclusion, or by requesting any certifications or policies applied). Where appropriate, depending on the strategic importance of the third party, the STAR7 Group undertakes to exercise its influence over the counterparty, promoting and encouraging the adoption of more inclusive practices.

Formalisation of contracts: contracts with third parties must include specific clauses whereby such parties undertake to comply with the principles of this Policy, including within their own supply chain (subcontracts included).

Section V - Reporting of violations

5.1. Tools available for reporting violations of the DEI Policy

Recipients are required to report any violation or suspected violation of the provisions of this Policy, based on precise and consistent evidence, of which they have become aware in the course of their work, or of ongoing or past work or professional activities carried out for the STAR7 Group. Reports must be sent using the channels available at <https://whistleblowersoftware.com/secure/star7>.

Reports may also be submitted anonymously, provided that they describe in detail the facts and persons subject to the report. In any case, the confidentiality of the whistleblower, of the persons involved or otherwise mentioned in the report, of its content and of the related documentation is guaranteed. Confidentiality is also guaranteed during the subsequent handling of the report. The STAR7 Group ensures that whistleblowers will not suffer any retaliation as a result of the report.

Section VI - The sanctions system

6.1. Sanctions for company personnel

Compliance with the provisions of the DEI Policy must be considered an essential part of the contractual obligations of STAR7 Group employees. Any violation of the provisions of the Policy may constitute a breach of the obligations of the employment relationship or a disciplinary offence, in accordance with applicable labour law, with all legal consequences, including with regard to the continuation of the employment relationship and the resulting compensation for damages.

6.2. Sanctions for third parties

Compliance with the DEI Policy forms an essential part of the contractual obligations undertaken by all those who have business relationships with the STAR7 Group companies. Therefore, violation of the provisions of this Policy may constitute a breach of contract, with all legal consequences with regard to termination of the contract. The STAR7 Group reserves the right to seek compensation for damages arising from the violation of the provisions and rules of conduct set out in this Policy by the aforementioned third parties.

Section VII - Governance of the DEI Policy

7.1. Internal Policy Officer

Each STAR7 Group company must identify, within its own organisation, a Policy Officer for the DEI Policy, tasked with:

- ↪ overseeing the dissemination and communication of the Policy to all Recipients, in accordance with the methods adopted by the Group (see paragraph 7.2 below);
- ↪ promoting the provision of periodic training and awareness sessions for company personnel;
- ↪ monitoring compliance with the Policy, reporting at least annually to the Parent Company (see paragraph 7.3 below);
- ↪ proposing any updates to the Policy, for example, in the event of: developments in the regulatory framework and reference standards; changes in the business and identification of new risk areas; identification of possible areas for improvement found as a result of periodic verification and monitoring activities;
- ↪ responding to any requests for clarification regarding the application of the Policy.

Where possible, given the organisational structure of each Group company, the Policy Officer for the DEI Policy is identified as the Head of Human Resources, who will perform this role in close collaboration and coordination with those responsible for communication activities and procurement.

7.2. Dissemination, communication and training

The STAR7 Group is committed to ensuring that the contents of the DEI Policy are brought to the attention of all Recipients, given that adopting conduct contrary to the principles set out therein may be subject to sanctions.

To this end, dissemination of this Policy to third parties is ensured through:

- ↪ publication on the STAR7 Group website and, where available, on the websites of the individual Group companies;
- ↪ the inclusion of specific clauses, to be shared when formalising relationships with such third parties, regarding the commitment to comply with the provisions of the DEI Policy and the possibility of termination of the relationship in the event of a breach of such commitment.

Each Group company is likewise undertakes to guarantee to all company personnel (current employees and every new hire):

- ↪ adequate training and awareness-raising on the contents of this Policy;
- ↪ its distribution through the means deemed most appropriate (for example, by posting on company notice boards or publishing on the intranet), following notice of where it can be consulted.

Company personnel are required to sign the DEI Policy to acknowledge and accept it.

7.3. Monitoring and remedial actions

Each STAR7 Group company ensures that its internal control system is consistent with the requirements contained in the DEI Policy.

The internal Policy Officer for the DEI Policy of each STAR7 Group company periodically verifies compliance with the principles contained in this Policy through sample audits of at-risk business processes (human resources management, communication activities, and selection of suppliers/business partners).

The internal Policy Officer for the DEI Policy reports to STAR7 S.p.A. at least annually on the results of the verifications carried out, on the related actions taken or to be taken, as well as on the number of reports of violations received during the reference period. For the purposes of periodic reporting, questionnaires may be used and sent to personnel (including anonymously), with the aim of assessing the level of awareness and identifying any needs of individuals with respect to DEI issues, so as to be able to guide future actions.

The STAR7 Group undertakes to adopt remedial measures with respect to any non-inclusive practices that it has directly caused or contributed to (for example, strengthening training initiatives, updating company procedures, or applying disciplinary measures).

7.4. Reporting by the Parent Company

STAR7 S.p.A., as the Parent Company, annually communicates the Group's results and performance in relation to Diversity, Equity and Inclusion within the Sustainability Report. This Report is prepared on a voluntary basis in accordance with the methodologies and principles set out in the GRI Sustainability Reporting Standards, defined by the Global Reporting Initiative, and aims to ensure a better understanding and assessment of the activities carried out by the Group, including from a social perspective, in terms of trends, results and impacts produced. The Sustainability Report is published on the institutional website of STAR7 S.p.A. at <https://www.star-7.com/esg/bilancio-di-sostenibilita>.

Section VIII – Adoption

8.1. Approval and subsequent amendments

The DEI Policy has been approved by the Board of Directors of STAR7 S.p.A., and any subsequent amendment and/or update will likewise be approved by it and promptly disseminated through the most appropriate means.

Each Group company is required to ratify this Policy, and any subsequent amendment, by resolution of its own governing bodies.

Annex - Questions & Answers

1. What is meant by Diversity?

Diversity is everything that makes a person unique, such as age, sex, sexual and affective orientation, gender identity or expression, race, skin colour, language, nationality, ethnicity, political and trade union opinions, religious beliefs, marital and family status, disability, level of education, professional experience, or any other personal characteristic or condition.

2. What does it mean to ensure Equity and Inclusion?

It means ensuring fair and impartial treatment for each individual, recognising that people with different characteristics and conditions may need different measures and support to access the same opportunities, creating an environment that values and welcomes diversity.

3. Discriminatory conduct is prohibited. But what does discrimination consist of?

Any conduct, action or practice that results in unjustly unfavourable treatment of a person or group of people, based on their actual or presumed membership of a particular social or professional category.

4. Which business processes are most exposed to Diversity, Equity and Inclusion issues?

Human resources management, internal and external communication activities, and the selection of suppliers/business partners.

5. Am I required to adopt inclusive language?

Yes, the Policy requires this in every communication, internal and external. It is not a matter of style, but of respect for people's dignity.

6. Can I request time off for religious holidays?

The Policy promotes an environment in which every belief is welcomed with respect, including through awareness of different forms of worship and the possibility of leave for religious holidays, within the limits and in accordance with the procedures established by applicable law and collective agreements.

7. I am about to enter into a relationship with a little-known or small counterparty. Do I need to carry out checks?

Yes, if the service is strategic, continuous or of significant value, the third party's reliability from a DEI perspective must be verified, as indicated in paragraph 4.3 of the Policy. The outcome of the verification must be recorded and, in the case of continuous relationships, it must be repeated at least once a year.

8. I have a doubt about the application of the Policy. Who can I contact?

If a situation appears to be at risk and you are unsure how to handle it, you can contact the internal Policy Officer for the DEI Policy.

9. I suspect a violation, but I am not certain of it. What should I do?

Report violations, even suspected ones, provided they are based on concrete and consistent evidence, through the channels available at <https://whistleblowersoftware.com/secure/star7>. The report may also be anonymous, provided it is detailed. The confidentiality of the whistleblower is guaranteed, and they will not suffer any retaliation as a result of the report.

10. I become aware of a possible case of violation of the Policy. Do I need to verify it or gather evidence personally?

No. The Recipients' task is to report, not investigate. Whatever is known must be reported promptly through the channels available at <https://whistleblowersoftware.com/secure/star7>, leaving the assessment and further investigation to the competent functions.