



STAR7 GROUP HUMAN RIGHTS POLICY

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The STAR7 Group's Commitment to Respect for Human Rights

The STAR7 Group is committed to respecting, promoting and protecting the human rights of all individuals with whom it interacts, directly or indirectly, in the course of its business activities. The pursuit of economic results cannot disregard the protection of human rights, which is a founding element in pursuing sustainable development.

The STAR7 Group adopts a zero-tolerance approach towards any form of human rights violation, in the awareness that human rights are inalienable rights of every individual, regardless of nationality, gender, ethnicity, skin colour, religion, language or economic, cultural or other status. Every individual must have their human rights recognised, without any discrimination, and must be treated with fairness, dignity and respect.

The STAR7 Group is committed to not generating or contributing to negative impacts on human rights and to placing respect for human rights at the centre of its activities. It considers it essential to protect the individuals who, through their professionalism, add value to its services.

For this reason, the STAR7 Group has adopted this Human Rights Policy (hereinafter also referred to simply as the "Policy"), committing to combat every form of violation of the rights of the person, at any level and in every geographic area, and to promote a culture grounded in ethics and professional responsibility within its own organisation and along the value chain.

Respect for human rights is, for the STAR7 Group, a non-negotiable responsibility, regardless of the regulatory, social and cultural context in which it carries out its activities.

Section I - Recipients and Purpose of the Human Rights Policy

1.1. Recipients

The Human Rights 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 following are therefore recipients of the Policy (the "Recipients"):

- ✎ 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 maintain 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), in the context 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 companies of the STAR7 Group adopt the most appropriate measures to ensure its adequate dissemination to all Recipients, as described in Sections VII and VIII of this document.

Recipients undertake to observe and enforce 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. Accordingly, any violations may be sanctioned as indicated in Section VI of this document, in accordance with applicable legal and contractual provisions.

1.2. Purpose

The STAR7 Group's Human Rights Policy is intended to set out the principles on respect for human rights in which the Group itself believes and whose strictest observance it requires of all those with whom it interacts.

The Human Rights Policy is intended to strengthen the governance and internal control system existing at Group level, with a view to consolidating a responsible business conduct model aimed at promoting universally recognised human rights and ensuring that the Group is not involved, even indirectly, in human rights abuses. This Policy is consistent with the values and requirements set out in the STAR7 Group's Supplier Code of Conduct, although it has a broader scope in terms of Recipients.

Section II – References

2.1. Reference Regulations, Standards and Principles

This Policy has been drafted in accordance with the principal international standards with which the STAR7 Group identifies and to which it conforms its conduct.

Instruments issued by the United Nations (UN):

- ↪ Universal Declaration of Human Rights (1948);
- ↪ International Convention on the Elimination of All Forms of Racial Discrimination (1965);
- ↪ International Covenant on Civil and Political Rights (1966);
- ↪ International Covenant on Economic, Social and Cultural Rights (1966);
- ↪ 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 (1990);
- ↪ Ten Principles of the UN Global Compact (2000);
- ↪ Convention on the Rights of Persons with Disabilities (2006);
- ↪ Declaration on the Rights of Indigenous Peoples (2007);
- ↪ Guiding Principles on Business and Human Rights (2011);
- ↪ 2030 Agenda for Sustainable Development (2015).

Instruments issued by the International Labour Organization (ILO):

- ↪ Declaration on Fundamental Principles and Rights at Work (1998);
- ↪ Fundamental Conventions:
 - **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);
- ↪ Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (2022).

Guidelines of the Organisation for Economic Co-operation and Development (OECD):

- ↳ Guidelines for Multinational Enterprises (2023).

Other references:

- ↳ European Convention on Human Rights (1950);
- ↳ American Convention on Human Rights - Pact of San José (1969);
- ↳ Charter of Fundamental Rights of the European Union (2000);
- ↳ UK Modern Slavery Act (2015);
- ↳ EU Directive 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859, as amended and supplemented - CSDDD (2024).

The principles of this Policy, being based on internationally recognised standards, are presumed to be consistent with the local laws on the protection of human rights in force in the countries in which the STAR7 Group operates.

Where local laws are stricter than the principles set out in this document, Recipients must comply with local laws. Conversely, the STAR7 Group is aware that, in some countries, local laws 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 local level.

As recalled by the OECD, "Respect for human rights is a universal standard of conduct that enterprises are required to observe regardless of States' ability and/or willingness to fulfil their own obligations in this regard, and does not diminish such obligations".

Section III - Principles of Conduct

The STAR7 Group requires all Recipients to conform their conduct to 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 location of the activities carried out by the Group companies.

3.1. Prohibition of Forced and Child Labour

The STAR7 Group does not tolerate the use of forced, compulsory or slave labour, meaning any work or service exacted from a person under threat of punishment or for which said person has not offered themselves voluntarily. It condemns human trafficking and, more generally, any form of exploitation of workers, including the confiscation of money or identity documents in order to retain them against their will, thereby restricting their freedom of movement. This commitment requires even greater attention for certain more vulnerable categories, such as migrants and/or refugees. The STAR7 Group condemns the employment of persons below the minimum age established by the laws in force in the country in which the work is performed and, in any event, does not expose minors to hazardous work or working hours that conflict with applicable legal requirements.

3.2. Prohibition of Irregular Labour

Personnel must be employed on the basis of regular employment contracts, in compliance with any applicable collective bargaining agreements and all relevant regulations. Contracts must be drafted in a clear and comprehensible manner. Everyone must be recognised the freedom to withdraw from an employment contract, within the timeframes and in the manner established by the applicable regulations, without suffering retaliation or punishment.

3.3. Fair Remuneration

The STAR7 Group is committed to guaranteeing the right to fair and decent remuneration, in line with market conditions, in compliance at least with legal minimums, sufficient to cover the essential needs of individuals, and that takes into account the role and responsibilities assigned, as well as the professional skills of each person, with a view to impartiality, equal opportunities, meritocracy and maximum objectivity, avoiding any form of discrimination. The STAR7 Group ensures that there are no unjustified differences in remuneration between workers with the same professional characteristics and seniority of service and promotes equal pay between men and women, also recognising the importance of paying salaries or fees within the terms and timeframes contractually defined. In order to promote measures supporting parenthood, the STAR7 Group protects maternity rights and provides financial benefits in compliance with the applicable regulations regarding the duration and compensation of parental leave.

3.4. Decent Working Hours

The STAR7 Group is committed to organising the work of its people in such a way as to avoid excessive workloads and to ensure a proper balance between private and working life (the so-called "work-life balance"), in compliance with local regulations regarding maximum working hours, holidays, leave and rest periods. Overtime work must be authorised by the relevant line manager, must not be imposed but voluntary, and must be paid in accordance with the applicable regulations. Where individuals need to care for family members, they must be granted the leave, time off and contractual protections provided for under the applicable regulations.

3.5. Freedom of Association and Collective Bargaining

Personnel must be recognised and guaranteed the right to associate, organise and/or join any trade union organisation recognised by law, as well as the right to participate in collective bargaining without suffering retaliation or threats of any kind. In this context, workers' union representatives must be protected in such a way as to ensure the conditions for carrying out their respective union activities, and the value of collective bargaining as the preferred instrument for defining workers' contractual conditions must be recognised.

3.6. Non-Discrimination and Equal Opportunities

No form of discrimination based on age, sex, sexual orientation, gender identity or expression, race, colour, language, nationality, ethnicity, political and trade union opinions, religious beliefs, marital and family status, disability, or based on any other personal characteristic or condition, is tolerated. The STAR7 Group also ensures that, in every aspect of the employment relationship, personnel receive treatment appropriate to their ability to meet the requirements of their role, avoiding any form of discrimination. All workers, in full compliance with the applicable regulations, must be guaranteed the same opportunities, ensuring that everyone can enjoy fair treatment, based exclusively on criteria of merit and competence.

3.7. Prevention of Harassment

The STAR7 Group protects its personnel, preventing them from being subjected to unlawful pressure or undue abuse of power. Acts of offense, violence or physical, sexual, verbal or psychological harassment, and any discriminatory attitude or behaviour harmful to a person, their beliefs or their preferences, are prohibited. Working relationships must not involve harassment or conduct amounting to mobbing, whether for work-related or personal reasons, regardless of the level of responsibility or role held. Relationships with colleagues must therefore be based on correctness, courtesy, mutual respect and tolerance. No one may abuse their position to demand services unrelated to the performance of normal work activities, nor may they demand personal favours or activities from their subordinates that conflict with the principles of this Policy or, more generally, with the applicable regulations.

3.8. Occupational Health and Safety

The STAR7 Group promotes a culture of health and safety in the workplace, fostering risk prevention and awareness together with responsible conduct on the part of personnel, in order to preserve the physical and mental well-being of all workers. The promotion and protection of occupational health and safety are essential values for the STAR7 Group, which is committed to ensuring safe working environments compliant with applicable regulations and to providing adequate training and information on the subject. Everyone is called upon to contribute personally to maintaining a safe working environment and to adopt responsible conduct to protect their own safety and that of anyone accessing the STAR7 Group's workplaces.

3.9. Protection of Minorities and Indigenous Peoples

The STAR7 Group recognises and respects the rights of minorities and indigenous peoples in the countries in which it is present or from which it sources, with particular reference to their cultures, local customs, lifestyles, institutions, ties to their ancestral lands and development models, ensuring that each individual can exercise their civil and political rights, as well as their economic, social and cultural rights.

3.10. Respect for Local Communities

The STAR7 Group is aware that its activities may have direct and indirect impacts on local communities in the countries in which it operates, and is committed to exercising a positive influence on them, preventing any harm. Socially responsible conduct that is respectful of local communities is required, acting with integrity and good faith and establishing relationships based on mutual trust. The STAR7 Group is committed to an open dialogue with local communities to ensure that their legitimate expectations are taken into account whenever the Group's decisions may affect their rights.

3.11. Protection of Personal Data

The STAR7 Group ensures the protection of the personal data of all those with whom it interacts in the course of its activities, in accordance with applicable regulations. Personal data must be protected, avoiding improper use, and must be processed lawfully, fairly, for specified, explicit and legitimate purposes and within the limits established by the applicable regulations. In particular, only the data necessary for the purposes for which it was collected must be processed, and such data must be retained for a period of time not exceeding that necessary for the purposes of the processing.

3.12. Training and Professional Development

The STAR7 Group regards training and professional development as a key lever for achieving its business objectives and, therefore, offers training and internal growth opportunities, fostering each individual's professional development. The STAR7 Group promotes staff training without any discrimination and under conditions of equal treatment.

3.13. Respect for the Environment

The STAR7 Group recognises that the protection of human rights and environmental sustainability are inseparable dimensions of responsible corporate conduct. It is committed to conducting its activities while mitigating its environmental footprint, including through the provision of services that minimise environmental impacts, responsible sourcing of materials, and the adoption of sustainable business practices along the entire value chain. The fight against climate change and the protection of natural resources are essential requirements for safeguarding the enjoyment of human rights, such as the right to health and to a good quality of life for present and future generations.

3.14. Anti-Corruption

Corruption, in all its forms, represents a direct threat to human rights, as it diverts resources from security and fosters dynamics of exploitation, particularly to the detriment of the most vulnerable workers. For this reason, the STAR7 Group adopts a zero-tolerance policy towards any corrupt practice, as set out in the Anti-Corruption Policy, to which reference is made, in the belief that ensuring the integrity of the business and the lawfulness of its processes is a fundamental prerequisite for preventing abuses and ensuring fair, safe working conditions that are respectful of human rights.

Section IV - Human Rights Due Diligence

4.1. Human Rights in Relations with Third Parties

The STAR7 Group does not establish or continue relationships with parties that fail to demonstrate respect for human rights and that, in general, do not meet the requirements set out in this Policy. For this reason, before entering into a business relationship with customers, suppliers and business partners, it is necessary to verify their ethical and reputational reliability and their regulatory compliance with respect to human rights. In detail:

- ↪ **ethical and reputational reliability**, to be verified by obtaining public data concerning adverse indicators, such as convictions, protests or ongoing proceedings, including through generic internet searches or with the support of specialised tools (Cerved or Cribis reports), from which involvement in human rights violations can be excluded;
- ↪ **regulatory compliance**, to be verified through the acquisition of documentary evidence that, depending on the legislation applicable in the country concerned, demonstrates compliance with the requirements regarding occupational safety, the conformity of employment contracts and the use of regular workers holding valid residence permits. The verification also extends to compliance with the limits on working hours and the regulatory provisions on weekly rest, work on holidays and at night, as well as the correct fulfilment of remuneration, social security, welfare and tax obligations relating to personnel management.

These checks are the responsibility, depending on the type of counterparty, of the personnel dedicated to procurement or sales at the STAR7 Group companies, with the support of the Finance and Legal functions. The outcomes of the checks must be adequately documented.

It is not permitted to enter into a business relationship with a party that does not pass the "Human Rights Due Diligence" process and, where necessary, the third party must be required to implement corrective actions, with the STAR7 Group subsequently monitoring their implementation.

Due Diligence must be carried out where the following materiality criteria are present: strategic, ongoing or significant-value services provided by counterparties that are little known, small in size or start-ups.

In the case of ongoing or otherwise long-lasting relationships, the Due Diligence must be repeated on a periodic basis (at least annually) to ensure ongoing monitoring of the requirements demanded of the counterparty.

Contracts with third parties must include specific clauses whereby such parties undertake to comply not only with this Policy, but with all local or international regulations or conventions on human rights, including within their own supply chain (subcontracts included).

Section V - Reporting of Violations

5.1. Tools Available for Reporting Violations of the Human Rights 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 employment or in the course of work or professional activities, whether current or past, carried out for the STAR7 Group. Reports must be submitted using the channels available at the page <https://whistleblowersoftware.com/secure/star7>.

Reports may also be submitted anonymously, provided that they describe in detail the facts and persons that are the subject of the report. 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 in all cases. 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 their report.

Section VI - The Sanctions System

6.1. Sanctions for Company Personnel

Compliance with the provisions of the Human Rights Policy must be regarded as an essential part of the contractual obligations of STAR7 Group employees. Any violation of the provisions of the Policy may constitute a breach of employment obligations or a disciplinary offense, in accordance with applicable labour law, with all consequences provided by law, including with respect to the continuation of the employment relationship and the resulting compensation for damages.

6.2. Sanctions for Third Parties

Compliance with the Human Rights Policy forms an essential part of the contractual obligations assumed by all those who maintain business relationships with the companies of the STAR7 Group. Accordingly, violation of the provisions of this Policy may constitute a breach of contract, with all consequences provided by law with respect to termination of the contract. The STAR7 Group's 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 remains unaffected.

Section VII – Governance of the Human Rights Policy

7.1. Internal Policy Officer

Each STAR7 Group company must identify, within its own organisation, a Policy Officer for the Human Rights Policy, whose task is to:

- 🔸 oversee the activities for disseminating and communicating the Policy to all Recipients, in accordance with the procedures adopted by the Group (see paragraph 7.2 below);
- 🔸 promote the provision of periodic training sessions for company personnel;
- 🔸 monitor compliance with the Policy, reporting at least annually to the Parent Company (see paragraph 7.3 below);
- 🔸 propose any updates to the Policy, for example, in the event of: changes 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;
- 🔸 respond to any requests for clarification regarding the application of the Policy.

As far as possible, given the organisational structure of each Group company, the Policy Officer identified must have the requisite autonomy, independence and impartiality, ensuring that they are not involved in processes that are sensitive from a human rights protection standpoint (for example, human resources management or procurement management).

7.2. Dissemination, Communication and Training

The STAR7 Group is committed to ensuring that the contents of the Human Rights Policy are brought to the attention of all Recipients, given that the adoption of 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's 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, concerning the commitment to comply with the provisions of the Human Rights Policy and the possibility of termination of the relationship in the event of a breach of that commitment.

Each Group company 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 Human Rights Policy to acknowledge and accept it.

7.3. Monitoring and Remedial Actions

Each company of the STAR7 Group ensures that its internal control system is consistent with the requirements set out in this Policy, in the areas identified as having the greatest impact on the protection of human rights, both in internal relations and with business counterparties. The corporate procedures of the STAR7 Group companies must ensure adequate measures to prevent the risk of (i) causing or contributing to causing actual or potential negative impacts on human rights and, consequently, of (ii) incurring sanctions, financial losses or reputational damage.

The internal Policy Officer of each STAR7 Group company periodically verifies compliance with the principles contained in this Policy, through sample audits of the main risk areas, and reports to STAR7 S.p.A., at least annually, on the results of the audits conducted, on the related actions taken or to be taken, as well as on the number of reports of violations received during the reference period.

The STAR7 Group is committed to providing every possible remedy for any negative impacts on human rights that it has directly caused or contributed to causing. In the case of negative impacts generated by the parties with which it interacts, the STAR7 Group undertakes to exercise, to the extent possible, its influence over them so that they remedy any negative impacts directly linked to their activities. Where it is not possible to adopt mitigation measures, the discontinuation of the activities or business relationships that gave rise to such negative impacts must be provided for.

7.4. Reporting by the Parent Company

STAR7 S.p.A., as the Parent Company, annually reports the Group's results and performance in the area of human rights within its 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 is intended to ensure a better understanding and assessment of the activities carried out by the Group, including from a social and human rights protection standpoint, 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 Human Rights 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 human rights?

Human rights are the inalienable rights of every person, recognised to each individual regardless of nationality, gender, ethnicity, skin colour, religion, language or economic, cultural or other status. Every individual must have their human rights recognised, without any discrimination, and must be treated with fairness, dignity and respect. For example, the notion of human rights includes: civil and political rights, the right to health, the right to work and to an adequate standard of living.

2. I work with a foreign supplier based in a country with weaker human rights protections than those set out in the Policy. How should I behave?

It is necessary to comply with the principles of this Policy, even if this entails prohibiting conduct that would otherwise be permitted at local level.

3. What if the supplier is based in a country where stricter regulations than this Policy are in force?

In this case, it is necessary to comply with the regulatory provisions in force in the relevant country.

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

Yes, if the service is strategic, ongoing or of significant value, a Human Rights Due Diligence check must be carried out as indicated in paragraph 4.1 of the Policy, assessing the third party's ethical and reputational reliability as well as its compliance with applicable human rights regulations.

The outcome of the checks must be documented and, in the case of ongoing relationships, the Human Rights Due Diligence check must be repeated at least once a year.

5. I am asked to work overtime on a continuous basis, well beyond regular working hours. How should I behave?

Given that overtime work must be authorised by one's supervisor, voluntary and paid in accordance with local regulations and the applicable collective bargaining agreement, the Group is committed to avoiding excessive workloads and to complying with limits on working hours, rest periods and leave.

If working hours systematically become excessive or imposed, this is a situation that must be reported through the available channels.

6. Can I join a trade union or take part in collective bargaining without suffering any consequences at work?

Yes. Joining, organising and taking part in collective bargaining is a recognised and protected right, and cannot give rise to retaliation or threats.

7. Our activities risk having repercussions on the local community or on local minorities. Is this our concern?

Yes. The Group is committed to preventing negative impacts on local communities and to respecting the rights of minorities and indigenous peoples in the countries in which it operates or from which it sources.

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

If a situation appears to be at risk and you are unsure how to handle it, stop and contact the internal Policy Officer for the Human Rights 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 the page <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 myself?

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