



ALMAVIVA GROUP
POLICY ON HUMAN RIGHTS,
DIVERSITY, GENDER
EQUALITY, SLAVERY, AND
HUMAN TRAFFICKING

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**POLICY ON HUMAN RIGHTS, DIVERSITY, GENDER EQUALITY,
SLAVERY, AND HUMAN TRAFFICKING**

ALMAVIVA GROUP

TABLE OF CONTENTS

1. INTRODUCTION	3
2. OUR COMMITMENT	3
3. OUR PRINCIPLES	3
3.1. Diversity, Inclusion, and Respect for all People	3
3.2. Combatting Gender Discrimination	4
3.3. Freedom of Expression and Association	4
3.4. Remuneration and Working Conditions	4
3.5. AHarassment-Free Work Environment Free	5
3.6. Combating Child Labor, Forced Labor, and Human Trafficking	5
3.7. The Right to Education, Culture, and Skills	5
3.8. Data Protection	5
3.9. Ethics of AI Solutions	6
4. ADDITIONAL INFORMATION	6

1. INTRODUCTION

Almaviva Group accompanies the growth of the country's system, supporting enterprises in the new challenges they must face in order to remain competitive in the digital age and innovating its own business model, organization, corporate culture, and information and communications technology.

As a technology company, we are dedicated to contributing to sustainable development through inclusive technologies that respect human dignity and have a positive impact on all the stakeholders within our ecosystem.

2. OUR COMMITMENT

We are aware of the important role we play in the industrial sector and market in which we operate and, therefore, commit to taking responsibility for safeguarding the personal dignity, individual freedom, and well-being of the people with whom we work and collaborate.

Almaviva Group's Human Rights Policy is based on universally recognized principles of international law, specifically:

- The United Nations (UN) International Bill of Human Rights;
 - ✓ - Universal Declaration of Human Rights
 - ✓ - International Covenant on Civil and Political Rights
 - ✓ - International Covenant on Economic, Social, and Cultural Rights
- The United Nations Conventions on Women's Rights, the Elimination of All Forms of Racial Discrimination, the Rights of the Child, and the Rights of Persons with Disabilities
- The 2030 Agenda for Sustainable Development, adopted on September 25, 2015 by the United Nations General Assembly, and its 17 Sustainable Development Goals
- The Core Conventions of the International Labor Organization (ILO) and the Declaration of Fundamental Principles and Rights at Work
- ILO Conventions on the Rights of Ethnic Minorities
- European Convention on Human Rights
- The 10 Fundamental Principles of the United Nations Global Compact, of which Almaviva Group is a member
- The Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- National Action Plan (PAN) on "Enterprise and Human Rights" adopted by the Italian Government

The Policy is fully consistent and implemented in accordance with the provisions of the Code of Ethics and other corporate policies that safeguard people's fundamental rights, health and safety, transparency, and sustainable development.

3. OUR PRINCIPLES

3.1. Diversity, Inclusion, and Respect for all People

We are committed to respecting, including, and celebrating the unique qualities of every individual. We offer equal opportunities and fair treatment, regardless of social, cultural, ethnic or national origins, religious beliefs, political or sexual orientation, gender identity, nationality, ethnicity, social class, trade union affiliation, marital status, disability, age, or any other personal, cultural, or professional characteristic of the individual.

Almaviva Group embraces the belief that people are the primary drivers of change and the differentiating element in an increasingly competitive market. For this reason, we strive to ensure that the value of each individual and their unique characteristics is recognized, creating favorable conditions in which everyone is able to express their unique qualities and realize

In accordance with the guidelines set forth by the ISO30415 standard, we commit to fostering and promoting a culture of solidarity that respects equal opportunities within every role and every area of operation, without distinction, inspired by the principles of diversity, equity, and inclusion, to ensure that everyone is able to express their unique qualities, realize their full potential, and demonstrate their value.

We ensure that all internal and external communication is based on the principles of diversity and inclusion, respecting all of the stakeholders involved.

3.2. Combatting Gender Discrimination

We promote a work environment that supports gender equality at every level and overcomes all stereotypes.

We embrace the principles of the UNI/PdR 125:2022 international standard, which defines a management system aimed at promoting a policy of inclusion and gender equality in the workplace. We guarantee fairness and equal opportunity for access to the same roles and the same compensation for all employees, regardless of gender, promoting knowledge and professionalism.

We support the empowerment of under-represented genders and gender balance in positions of leadership.

We promote gender diversity in education, supporting schools in the process of adapting their curricula to meet the changing demands of enterprise, including the integration of women in traditionally male-dominated fields. We create opportunities for young female graduates and recent graduates in STEM disciplines who are looking for work to connect directly with HR managers and recruiters.

3.3. Freedom of Expression and Association

We guarantee that freedom of association, the right to strike, and the right to collective bargaining are acknowledged and safeguarded.

We are committed to promoting a respect for everyone's right to freedom of expression and to engage in open dialogue. We encourage our employees to freely express their opinions without any fear of retaliation. We encourage diversity, equity, and inclusion to ensure that all internal and external communication is based on these principles and is, therefore, respectful of all stakeholders involved.

3.4. Remuneration and Working Conditions

The Group guarantees fair and dignified working conditions to all employees. Specifically, in compliance with national legislation and collective bargaining agreements, we ensure remuneration that guarantees a decent standard of living for employees and their families.

We also ensure that overtime is paid in accordance with national laws, collective bargaining agreements, or industry standards.

Finally, we guarantee that each employee can perform their job in suitable, healthy, and hygienic work conditions.

In accordance with the Health and Safety Policy, we are committed to protecting the health and safety of workers through the adoption of measures that ensure their physical integrity and prevent any risks that may compromise it.

3.5. Harassment-Free Work Environment

We are committed to maintaining a harassment-free work environment and condemn any form of violence, threat, or intimidation as well as any sexual, psychological, physical, or verbal abuse targeting an individual's personal and/or cultural differences, including any attitude, behavior, or situation that may constitute harassment.

We ensure a protected work environment in which every employee is free to report cases of human rights violations, with full freedom, complete anonymity, and no fear of retaliation. Specifically, we have implemented:

- a whistleblowing process for collecting and managing reports which ensures the confidentiality of the whistleblower and the content of the reports, as well as legal protection
- the SA8000 reporting system, through which any employee can file anonymous reports related to Social Responsibility and Safety in the workplace, with the assurance of prompt intervention by the Group to resolve the issue.

We take all necessary steps to promptly address any reported cases of harassment and train our employees to work together to maintain a respectful atmosphere, free from incidents of physical or psychological violence.

3.6. Combating Child Labor, Forced Labor, and Human Trafficking

We reject all forms of exploitative labor, including forced or slave labor, child labor, and human trafficking.

We respect the labor laws in all countries where we are present as Almoviva Group.

We are dedicated to respecting and promoting universal human rights throughout the value chain, making sure that we are not, even indirectly, complicit in human rights abuses. In our Supplier Code of Conduct, we are explicitly committed to ensuring that the principles upheld and implemented by the Almoviva Group regarding human rights, diversity and inclusion, and gender equality are recognized and adopted throughout the supply chain.

Specifically, we ensure that, in conducting their activities, our suppliers and their collaborators strictly abide by the principles of human rights recognized by national and international legislation and implemented by the Group.

We ensure that our employees maintain a healthy work-life balance by setting reasonable working hours and acknowledging the right to disconnect. We promote agile and flexible work to give our employees the freedom to choose how to balance work and personal life.

3.7. The Right to Education, Culture, and Skills

We leverage our employees' strengths and cultivate a work environment that attracts and nurtures talent through training opportunities, skill management tools, performance evaluation mechanisms, and professional recognitions that celebrate each person's unique qualities.

3.8. Data Protection

We commit to applying the highest standards in the processing of personal data. We guarantee the confidentiality of the personal data of any stakeholder with whom we work, respecting fundamental rights and freedoms, as well as the dignity of all individuals involved.

We provide our employees with regular training on privacy and information security.

3.9. Ethics of AI Solutions

We prioritize human rights in our approach to conceiving, designing, and developing AI solutions.

We are aware of the risks associated with the development of advanced technologies in terms of protecting human rights, security, equality, privacy, and freedom of expression. For this reason, we are committed to developing secure services to ensure the confidentiality, integrity, and availability of information and safeguard it from possible attacks or unauthorized use.

4. ADDITIONAL INFORMATION

Almaviva Group's Policy on Human Rights, Diversity, Gender Equality, Slavery, and Human Trafficking is supplemented by other corporate policies and principles, including:

- Group Policy
- Code of Ethics
- Supplier Code of Conduct
- Health and Safety Policy
- Organizational Model "231"
- Information Security Policy
- Whistleblowing Procedure
- Principles of the SA8000 standard on Corporate Responsibility
- Principles of the ISO45001 standard on Occupational Safety
- Principles of the PdR 125 standard on Gender Equality
- Principles of the ISO30415 guidelines on Diversity and Inclusion

Details regarding Almaviva Group's commitment to these issues are available on Almaviva website in the *Corporate Governance* section and in the published *Sustainability Reports*.