

Diversity, Equity & Inclusion Policy

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ART. 1. Purpose and Scope

Diversity, Equity and Inclusion ("**DEI**") are strategic values for the future sustainable growth of SAATI S.p.A. and all companies controlled by it (collectively "**SAATI**" or "**SAATI Group**"), as they allow for the creation of an inclusive culture rooted in community which encourages collaboration, creativity and openness, where people feel respected, valued and free to fully express their potential.

For this purpose, the present Policy (the "**Policy**") aims to promote Diversity, Equity and Inclusion in all Human Resources management activities carried out within SAATI Group.

1.1. Principles and Standards

The Policy is inspired by international and national norms and agreements which promote the principles of non-discrimination, equal opportunities and fair treatment at work, as well as social justice in the workplace, particularly the ILO Convention n°111 on Discrimination in Employment and Occupation (1958), the United Nations (UN) Universal Declaration of Human Rights (1948), the UN Convention on the Rights of Persons with Disabilities (2006) and the Women's Empowerment Principles (WEPs) developed by UN Women and the UN Global Compact as part of the 2030 Agenda for Sustainable Development.

While upholding the principles of this Policy at a global level, SAATI endeavors to adapt its Human Resources management practices to local and national contexts, customs and legal frameworks, recognizing that diversity takes on different forms across the Countries where SAATI Group operates and that inclusion requires awareness of local challenges and opportunities.

Thus, in instances where applicable local laws and regulations impose requirements more stringent than those outlined herein, those laws and regulations shall apply and prevail over the provisions of this Policy.

1.2. Objectives of the Policy

The objectives of the Policy are:

- a. to ensure respect for human rights and protect the dignity of individuals, in line with the commitments set out in SAATI's Policies and Code of Conduct;
- b. to prevent all forms of discrimination in the HR management process;
- c. to contribute to the achievement of SAATI Group's Sustainability objectives;
- d. to promote equal opportunities and fair treatment of all SAATI staff and candidates;
- e. to create an inclusive HR management process which embraces the diversity of individuals;

- f. to ensure transparency and fairness throughout the HR management process and provide clear and open communication with staff and candidates;
- g. to adopt consistent and fair assessment methods;
- h. to evaluate the compliance of SAATI's HR management practices with this Policy.

ART. 2. Definitions

For the purposes of this Policy:

Human resource management practices ("HR practices") include all stages of a person's career path at SAATI: recruitment and selection, onboarding, training, career and development, involvement and participation in company initiatives and decision-making, rewards and offboarding.

Diversity refers to the wide range of individual differences and unique attributes among people, including but not limited to race, ethnicity, gender, age, sexual orientation, disability, religious beliefs, socio-economic status and cultural background. Embracing diversity means recognizing the value of differences among people.

Equity refers to ensuring fair treatment and impartiality by addressing systemic barriers and upholding equal opportunities for all people at SAATI, regardless of their backgrounds or individual differences.

Inclusion refers to creating an environment where all individuals are able to participate, regardless of their differences. Inclusive HR practices value people's unique qualities and ensure that none of them are excluded from the HR process based on grounds unrelated to job requirements.

Direct discrimination refers to any provision, criterion, practice, act, order, agreement or behavior which has a prejudicial effect on an individual or group of individuals on the basis of sex, gender, age, ethnic or national origin, phenotype, religion, ideology or other personal beliefs, political or trade union affiliation, sexual orientation, marital status, psycho-physical conditions, pregnancy status, maternity or paternity status, other personal or social conditions or any other status protected by international or national law.

Indirect discrimination occurs when a seemingly neutral provision, criterion, practice, act, order, agreement or behavior puts or is likely to put certain individuals at a particular disadvantage compared to others on the basis of the aforementioned grounds.

Different treatment on the basis of characteristics that constitute essential requirements for the work performance does not constitute discrimination, provided that the objective pursued is legitimate and the means employed to achieving it are proportionate to the aim and reasonable.

A person with a disability refers to any person who has a physical, sensory, intellectual, or mental condition that is usually permanent or lasts for a long time and substantially limits one or more major life activities. This definition aligns with local laws and regulations on disability rights and accommodations in the respective Countries where SAATI Group operates.

People from **underrepresented groups** refers to people who come from historically disadvantaged backgrounds or minority groups.

ART. 3. Responsible Individuals

SAATI HR department personnel and managers responsible for collaborators (collectively "**Responsible Personnel**") are required to:

- a. adhere to the principles outlined in this Policy;
- b. promote and maintain HR practices aligned with such principles and prevent behaviors that could undermine them.

In particular, HR personnel is responsible for:

- a. ensuring awareness of and adherence to the Policy and its procedures, and for conducting appropriate monitoring actions to assess its effectiveness;
- b. providing the relevant functions with the key performance indicators ("**KPIs**") outlined in this Policy;
- c. providing specific support and training to all managers involved and awareness programs for all employees.

ART. 4. Suppliers operating permanently at SAATI facilities

For the purpose of the Policy, the term refers to companies that provide services such as: canteen, cleaning, reception, maintenance and transportation, using their own personnel who work daily within SAATI facilities.

ART. 5. External Recruiters and Staffing Agencies

For the purposes of the Policy, an "**External Recruiter**" is an individual or professional organization is an individual or a professional organization entrusted with the management of part of the recruitment process through a contractual agreement with SAATI. This includes

the management of recruiting activities such as sourcing and screening candidates, conducting interviews and assessing.

SAATI ensures that External Recruiters and Staffing Agencies adhere to the Policy that External Recruiters adhere to the Policy and any update hereto through their signature of the “External Recruiter Compliance Statement” (as attached under Annex n°1 hereto), which formalizes their observance of the Policy’s principles in all interactions with candidate.

ART. 6. Recruitment and Selection Process

6.1. Job posting phase

6.1.1. Sourcing of candidates

To promote fairness in accessing job opportunities, SAATI partners with External Recruiters to source a diverse pool of candidates.

Each subsidiary within SAATI Group implements an internal referral program that aims to broaden the pool of potential candidates, in line with the principles set forth in this Policy. These programs establish the procedures, eligibility criteria and, in case of successful referral, the reward for employees who refer potential candidates whose profile aligns with the job requirements and the company's needs.

6.1.2. Advertising, Job Descriptions and Skills Specification

SAATI Group ensures that:

- a. job descriptions focus exclusively on the job-related skills, qualifications and experience necessary for the position;
- b. the language used in the job description and job title is inclusive and doesn’t inadvertently use terminology that may exclude candidates from underrepresented groups.

Job advertisements, whether posted on SAATI’s career page or other platforms, include a disclaimer affirming SAATI’s DEI commitments. The disclaimer is adjusted to meet legal requirements of each Country where SAATI Group operates while remaining consistent with the Policy’s framework.

6.1.3. Website and Career page Accessibility

SAATI ensures that the application process is, to the greatest extent possible, inclusive and accessible to all candidates, including those with disabilities. This extends to addressing various types of disabilities that may affect web accessibility including auditory, cognitive, neurological, physical, speech and visual impairments.

For this purpose, the SAATI's Website and Career page are designed to align to the greatest extent possible with accessibility standards such as the Web Content Accessibility Guidelines ("WCAG"), allowing candidates to use assistive technologies and leverage a range of accessibility features.

6.2. Job selection phase

6.2.1. Awareness Programs for Recruitment Personnel

SAATI ensures that Recruitment Personnel undergo awareness programs designed to equip them with the knowledge and resources necessary to identify and prevent unconscious biases during candidate evaluations, to address systemic barriers, to prevent discriminatory decision-making and to promote a fair and inclusive hiring process.

The percentage of Recruitment Personnel involved in the awareness program is a KPI monitored by H.R. personnel at both local and global levels.

6.2.2. Interviews, Evaluations and Feedback

- Interviews

To minimize subjectivity and allow for diverse perspective when evaluating a candidate's suitability for a position, at least two evaluators are involved in the entire selection process. An evaluator is either an employee of SAATI or an External Recruiter tasked with conducting interviews and evaluating candidates' qualifications and suitability for a specific position.

- Standardized Evaluation Methods

SAATI employs standardized assessment methods to ensure consistent and fair evaluation of candidates, such as:

- a. structured interview with topics and leading-questions for conducting panel interviews;
- b. clear and consistent criteria of evaluation based on job-related qualifications, skills and experiences. These criteria are clearly communicated to Recruitment Personnel and External Recruiters.
- c. for certain positions, objective tests (aptitude assessments, behavioral traits assessment, personality questionnaires);
- d. post-interview debriefing sessions involving the recruiting manager and H.R. personnel to collaboratively evaluate the candidate's suitability for the position and assess the effectiveness of the interview techniques used.

These assessment methods are relevant for both in-person and remote interviews whenever applicable.

- Communication with Candidates and Feedback

SAATI provides clear guidelines and maintains open and transparent communication with candidates throughout the hiring process, by implementing measures such as:

- a. providing a 'Candidate Journey Map' to candidates at the beginning of the selection process, offering information about the steps and timeline involved;
- b. notifying candidates about the outcome of their application once a decision is made;
- c. providing candidates with feedback upon request, offering insights into their application and interview performance;
- d. requesting candidates' feedback on their recruiting experience through a questionnaire provided at the conclusion of the process, to evaluate and continually improve hiring practices.

6.2.3. Accessibility and Reasonable Accommodation

SAATI ensures that all candidates, including those with disabilities, can fully participate in the recruitment process. SAATI provides reasonable accommodation, understood as necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, in accordance with national law and practice.

Candidates who require a reasonable accommodation for any part of the recruitment process can make such request when applying on SAATI's website or other platform, or alternatively contact the H.R. team at the location where the application is submitted.

6.3. Diversity of Candidates and New Hires

SAATI Group assesses the effectiveness of the Policy and ensures the continuous improvement of its hiring practices through the yearly monitoring, as a KPI, of the representation of candidates and new hires from underrepresented groups.

H.R. personnel is responsible for the yearly monitoring of this KPI at both local and global levels. Those results and progress are shared annually with stakeholders in the SAATI's Sustainability Report.

SAATI assesses this KPI in compliance with all relevant applicable laws, including labor laws and data protection laws, in the Countries where it operates.

This assessment is directly related to SAATI's commitment to promoting women in leadership positions (see Art. 7 "Gender Equality").

ART. 7. HR processes

- **Leadership Model – ProSperous Community:** Every person at SAATI is expected to follow the skills and behaviors outlined in the Leadership Model, including:
 - Understand and appreciate different perspectives and individual identities;
 - To view diversity as a resource and opportunity rather than a problem;
 - To engage in effective dialogue and interaction with individuals of different thoughts and cultures in a multicultural context.
- **Inclusive work environment:** SAATI is committed to creating an environment where everyone has equal access to opportunities, resources and support, and is able to express themselves and contribute fully. SAATI is committed to protecting certain categories of workers who may be more at risk of discrimination (for example: women, students, juvenile workers, people with disabilities). SAATI shall provide reasonable accommodations, understood as necessary and appropriate modifications and adjustments that do not impose a disproportionate or excessive burden, where necessary in a particular case, in accordance with national law and practice.
- **Onboarding:** The onboarding process is based on the transmission of SAATizenship values. All new hires participate in an onboarding program that provides essential information and materials for successful integration as well as training on the various business processes. In HQ, the Ambassadors contribute to the inclusion of all new hires during moments of socializing, exchange of information and active listening.
- **Access to development initiatives:** SAATI promotes professional development by offering opportunities for job rotation, international experiences and involvement in projects in the Group's subsidiaries, personalized training courses and self-learning. Access to those opportunities is based on merit, contribution and talent recognition.
- **Performance appraisal system and feedback process:** Everyone has the opportunity to have a feedback interview and performance review with their manager, addressing both performance and career growth. SAATI also promotes career growth beyond the initial area of expertise, viewing each person as a valuable resource for the entire organization.
- **Gender pay equity:** SAATI annually monitors the Gender Pay Gap and implements corrective actions in order to ensure pay equity.
- **Gender equality:** SAATI aims to increase the percentage of women in middle management to 40% and in senior management to 25% by 2030. In HQ, a specific mentoring and coaching initiative is in place for the development of female talent and potential.
- **Work-life balance and well-being:** SAATI is committed to improving work-life balance through the adoption of a work approach that considers personal needs, client demands, team requirements, organizational needs, and the nature of activities.
SAATI's commitment to well-being focuses on improving the physical, mental and social well-being of employees, preventing risks, protecting against adverse factors and creating a working environment suited to the physiological and psychological capabilities of each

worker. Our commitment aligns with Goal 3 of the United Nations Sustainable Development Goals, focused on Health and Well-being until 2023, aiming to "Ensure healthy lives and promote well-being for all at all ages".

ART. 8. Training and awareness initiatives

This Policy is communicated to all employees and new hires and remains accessible on the company's intranet and website. Periodic reviews are conducted to assess the continued relevance of the objectives, particularly in response to significant internal and external changes that may impact the Policy.

Awareness initiatives and communication tools are implemented to ensure knowledge of and compliance with the Policy, as well as support its objectives.

It is the responsibility of the parent company's Management Team to promote appropriate monitoring actions to assess the effectiveness of initiatives in preventing and countering conduct contrary to the principles of the Policy.

ART. 9. Reporting violations of the Policy

SAATI Group encourages anyone to report in good faith, even anonymously, any act or omission by anyone at SAATI, in relations with it or on its behalf, which constitutes or may constitute a violation of the principles set forth in this Policy.

SAATI's Code of Conduct, published at www.saati.com, sets out the procedure for submitting reports, how they are managed and how confidentiality and nonretaliation are guaranteed, in compliance with applicable norms, including those regarding privacy.

In particular, anyone who wishes to report a violation of this Policy such as instances of discrimination against a job candidate or SAATI personnel, without prejudice to the possibility of recourse to the competent authorities, may send an anonymous or non-anonymous report through the platform available at the following link: <https://saati.integrityline.com>.

SAATI Group undertakes to promptly and impartially investigate and manage any report of a violation of this Policy, and to adopt all necessary corrective measures depending on the severity of the case, in line with the applicable legal, regulatory, contractual and disciplinary systems.

Date and Version:	Reviewed by:	Revisions made:
11/02/2025	Maria Chiara Barabino, Global HR Director	Publication of the Policy

Place and Date: Appiano Gentile, February 11th 2025

Issued by: Global HR Director

Signature: 

Annex:

- Annex n°1: " External Recruiter Compliance Statement Template"



External Recruiter Compliance Statement

The undersigned, in its capacity as External Recruiter as defined in the Diversity, Equity and Inclusion in Recruitment Policy adopted by SAATI Group (the “**Policy**”), hereby represents to have received, read and understood the Policy and undertakes to promote and implement, while assisting SAATI Group in its recruitment process, fair, inclusive and non-discriminatory hiring practices in line with the Policy's values and objectives.

It is understood and agreed that the breach of the principles and objectives of the Policy by the undersigned would represent a material breach of contract and entitle SAATI Group to the immediate termination of the contractual relationship for breach, as well as to any additional remedies available at law or, where applicable, in equity.

Signatures:

External Recruiter's Name:

Place and Date:

Signature: _____

SAATI Group Representative:

Place and Date:

Signature: _____