CORPORATE GOVERNANCE

Integrated Group Policy

April 2026

Sirti Group is protagonist in the design, realization and management of Telecommunication network, energy installations and networks, cyber security systems, networking, ICT services and technological systems. The context where the Companies of the Group work requires strong technological innovation, realization process capacities and pompt respose to emergencies. The Group considers the prevention and protection of workers' health and safety, including road traffic safety, environmental protection, the continuity of the Group's processes, quality, information security, data processing, energy efficiency, social accountability principles, sustainability issues (ESG), gender equity, diversity, inclusion and anti-corruption and discrimination fight, which are primary values at the basis of the Integrated Management System adopted and implemented by the Group's companies.

Each Sirti Group Company, aware of the importance of these topics, promotes a Policy that is a guide and point of reference and commits all its resources in accordance with the following principles:

- *Guarantee the full satisfaction of the customers and stakeholders needs and expectations and the quality standards performances with the involvement of all hierarchical Company levels;*
- *Continuous improvement of the internal process efficiency and efficacy;*
- *Guarantee the operational continuity of all processes, raising awareness at every level, based on the identified crisis scenarios;*
- *Strengthen the competitive advantage of its offer by developing of innovative technologies and service solutions;*
- *Continuous renewal of the platforms, the solutions and IT services;*
- *Implement efficacy security measurement in order to protect the privacy, maintain integrity and guarantee the information availability;*
- *Promote the employees participation to the identifications and preventions risk process and opportunities identification;*
- *Assess in advance the impacts of its activity and maintain the health and safety best conditions for all employees and environmental protection, including the pollution prevention;*
- *Preserve the environment through a preventive environmental impact assessment when starting new projects and activities;*
- *Promote the participation of all employees in safe driving of a road vehicle, safeguarding the safety of workers and road users;*
- *Guarantee the respect of the regulatory, legislative, contractual and corporate/consortium requirements, defined in internal policies;*
- *Involve all hierarchical Company levels in the spread and correct application of quality, health and safety of workers, road safety, environment, information security, IT services, anti-corruption, energy efficiency regulations, business continuity, social accountability standards, gender equality and D&I;*
- *Promote the culture, incentivize the participation of everybody and ensure the fulfillment of the social accountability requirements, base of Human Rights:*
  - *no use or support of child labor;*
  - *no use or support for forced or compulsory labor through coercion or physical threats;*
  - *provide a safe and healthy workplace; prevent potential occupational accidents and occupational diseases;*
  - *respect the right of workers to form and join trade unions and bargain collectively;*
  - *no discrimination based on race, national or social origin, caste, birth, religion, disability, gender, sexual orientation, union membership, political opinions and age;*
  - *no use or support disciplinary practices, such as corporal punishment, physical or mental coercion, verbal abuse;*
  - *respect the ordinary and overtime working hours required by laws and national and local agreements;*

  - *respect right of personnel to living wage, respecting the national collective labor contract and the company supplementary one.*
- *Promote the culture, incentivize the participation of everybody and ensure the fulfillment of the gender equality and diversity and inclusion:*
  - *Provide decent work;*
  - *Provide impartial and respectful treatment of the individual;*
  - *Create and maintain an inclusive workplace, safeguarding diversity;*
  - *Prevent any form of contempt or marginalization of diversity;*
  - *Maintain a procurement system free from bias and/or discrimination;*
  - *promote hiring, recruitment, learning and development, compensation, advancement, mobility and termination processes by incorporating all forms of diversity and fostering inclusion;*
  - *Influence and collaborate with stakeholders in the adoption of inclusive behaviors and practices;*
- *Ensure the integration of aspects relating to Sustainable Development into the Group's decision-making process, defining an appropriate Strategy.*

Under these principles, each Sirti Group Company commits to:

- *Ensure the comply with local, national and community laws, regulations, standards and mandatory provisions and with other requirements to which Sirti Group subscrives;*
- *Ensure the respect of ethical principles of Accountability, Transparency, Loyalty and Commitment to all levels;*
- *Analyze the work contexts in accordance with the internal and Interested Parties requirements and expectations;*
- *Ensure attention to: quality, safety, including road traffic safety, environment, information security, ICT services, anti-corruption, energy efficiency, business continuity, social responsibility, gender equality and D&I, through targeted training, effective ongoing communication and practical involvement of staff through, for example, where applicable, exercises, emergency simulations, etc.;*
- *Adopt organizational processes and models that take into account any crisis scenarios that may impact their activities, in order to guarantee the business continuity of all processes;*
- *Adopt organizational processes and models that are also useful for the purpose of traceability of the related responsibilities;*
- *Promote professional excellence and personal responsibility, supporting team building and a Lean & Fast approach;*
- *Ensure the application of the principles of gender equality and D&I in the management of human resources;*
- *Enhance diversity and support female empowerment;*
- *Enhance and develop competence and knowledge;*
- *Adopt means, procedures and working methods in order to prevent accidental events to preserve the health and safety of workers and the environmental protection;*
- *Guarantee resources and means in order to implementation, management and continuous improvement of the Integrated Management System;*
- *Ensure regular maintenance of their own vehicles and operating machines, promoting preventive checks, in order to guarantee maximum reliability;*
- *Define objectives and improvement programs, providing tools for auditing and continuous measurement of the Integrated Management System;*
- *Evaluate the suitability, wholeness and effectiveness of the Integrated Management System and the improvement objectives achievement in the Management Reviews context;*
- *Constantly train and inform the Management and all workers in order to:*

- *have the best conditions to accomplish their assigned duties in safety and in environmental respect;*
- *become aware to quality, health and safety at work, environment, anti-corruption, energy-efficiency, social accountability, D&I, sustainability and information security problematics;*
- *spread the ITIL model in the IT service management activities;*

- *Fully respect contractual SLA (Service Legal Agreement);*
- *Guarantee workers consultation, trade unions and the Workers' Representatives about health and safety programs and results and about human rights;*
- *Promote continuous innovation of solutions and services, proposed and provided;*
- *Use an inclusive procurement system that, furthermore, supports purchasing of energy-efficient and low environmental impact products and services;*
- *Support design activities that consider improving energy performance and minimizing environmental impacts;*
- *Ensure a supply chain that respects the principles of anti-corruption, social accountability and D&I;*
- *Pursue objectives and implement actions aimed at achieving the following Sustainability (ESG) issues:*
  - *Human capital development:*
  - *Attention to the quality of life of our people;*
  - *Protection of the environment, energy efficiency, fight against climate change;*
  - *Inclusion and protection of diversity by promoting equal opportunities without practicing any kind of discrimination;*
  - *Closeness to the community;*
- *Report to the Interested Parties;*
- *Propagate, both internally and externally, the importance of effective management for Sustainability and the principles of D&I for the organization;*
- *Manage Social Responsibility and Sustainable Development issues, going beyond mere legislative compliance.*

The Management reviews the Policy annually, the objectives level achievement and the Policy understanding by the organization. The Management implements and promotes improvement activities in order to satisfy the Customers' requirements and achieve the objectives of Company/Consortium.

The commitment to continuous improvement is integral part of responsibilities for all of us.

The present Policy is available to the Interested Parties, with the procedures defined by each interested company.

This document is valid for each Italian Company belonging to the Sirti Group, where applicable for the management systems and for the activities carried out by the organization.

Sesto San Giovanni, 24th April 2026

signed by CEO of the Parent Company Sirti SpA