

ETHICS POLICY

HUMAN RIGHTS, DIVERSITY, INCLUSION, GENDER EQUALITY AND SOCIAL
ENGAGEMENT



Management. Engineering. People.

Revision History

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ETHICS POLICY ON HUMAN RIGHTS, DIVERSITY, INCLUSION, GENDER EQUALITY AND SOCIAL ENGAGEMENT

1 INTRODUCTION

1.1 INTRODUCTION: PROGER'S ETHICAL COMMITMENT

Proger S.p.A., as well as all the companies controlled by it (hereinafter the “Proger Group”), in order to confirm its ethical and social commitment, are committed to guaranteeing, towards all their stakeholders, professional relationships based on the recognition, respect and defence of human rights by promoting and supporting socially responsible behaviour in carrying out their corporate activities.

As part of its ethical mission, through his Policy on Human Rights, Diversity, Inclusion, Gender Equality and Social Commitment (hereinafter also “Policy”), the Proger Group, renews its commitment to supporting, protecting and promoting:

- the human rights of workers,
- the values of diversity and inclusion
- the recognition and protection of the dignity, freedom and equality of human beings,
- equal opportunities and gender equality.
- zero tolerance against any sort of discrimination, corruption, forced or child labour
- respect and involvement of local communities
- environmental protection

This Policy is adopted by the Board of Directors of Proger S.p.A., in addition to and complementing the Code of Ethics, the Ethical Agreement and the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 of the Proger Group. This Ethics Policy is adopted in order to reiterate the commitment of all companies belonging to the Proger Group in adhering, promoting and supporting all the values and principles affirmed and outlined by the Universal Declaration of Human Rights of the United Nations, the fundamental Conventions of 'ILO - International Labour Organization - and the OECD Guidelines for Multinational Enterprises, in relation to the aforementioned topics.

The values and principles represented in this Policy constitute the cultural heritage of the Proger Group and are disseminated and implemented at all levels through the commitment to organizing specific awareness and training programs.

The Proger Group acts to ensure that these principles reach maximum diffusion even beyond its own corporate context. To this end, it also makes this Policy available to its external collaborators, partners and suppliers, and identifies the groups of subjects who risk being most impacted by the company's activity, promoting the commitment to respecting human rights and the implementation of projects aimed at supporting those who find themselves in particular situations of economic and social vulnerability.

The Proger Group also undertakes to actively collaborate with public and private authorities in the implementation of human rights programs, contributing to dedicated initiatives and networks at a local, national or international level.



1.2 THE REGULATORY FRAMEWORK OF REFERENCE

This Policy presupposes compliance with the regulatory provisions in force and with the voluntary codes to which Proger S.p.A., its branches and the companies controlled by it (hereinafter "Proger Group") adheres, as well as precise compliance with the regulations and company procedures.

1.2.1 External references: the national and international regulatory framework

The Proger Group is committed to applying and promoting the fundamental principles of the following conventions and declarations of international and European law:

- United Nations (UN) International Bill of Human Rights:
 - a) Universal Declaration of Human Rights, 1948;
 - b) International Covenant on Civil and Political Rights, 1976;
 - c) International Covenant on Economic, Social and Cultural Rights, 1976;
- European Convention on Human Rights, 1950;
- UN Convention on the Rights of the Child, 1989;
- Fundamental Conventions of the International Labour Organization (ILO);
- Declaration on Fundamental Principles and Rights at Work, 1998;
- European Parliament resolution of 10 March 2021 with recommendations to the Commission regarding due diligence and corporate liability.

Furthermore, promotes respect to the following standards and voluntary initiatives, in their most updated editions:

- United Nations (UN) Global Compact Principles, 1999;
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, 2011;
- ILO Tripartite Declaration of Principles on Multinational Enterprises and Social Policy, 1977;
- Guidelines (OECD) for Multinational Enterprises against slavery, 2020;
- WBCSD CEO Guide to Human Rights, 2020;
- International Standard Social Accountability 8000 (SA8000), 2014;
- Guidelines on the management system for gender equality - UNI/PdR 125:2022.

Finally, the Proger Group complies with the regulations applicable in Italy and in the countries in which it operates or could operate, such as, but not limited to:

- Laws on equal opportunities between men and women;
- Italian Legislative Decree 231/2001 on the subject of administrative responsibility of entities;
- Anti-corruption laws;
- Laws relating to health and safety in the workplace;
- Laws regarding working hours;
- Environmental laws;
- Laws relating to privacy and protection of personal data.

1.2.2 Internal references

Proger Group has equipped itself with various internal regulatory tools, aimed at supporting companies in ensuring effective, efficient and transparent management of their activities, as well as respectful of the principles and values expressed by this Policy. Among the cited internal regulatory references, the following are particularly worth mentioning:

- Ethical code;
- Management System for Social Responsibility;
- Management System for Gender Equality;



- Management, Quality, Environment and Safety System and related Policy;
- Ethical Pact of the Proger Group;
- Organization, Management and Control Model pursuant to Italian Legislative Decree 231/2001 of Proger S.p.A. and the individual companies of the Proger Group;
- Organizational and privacy management model of the Proger Group;

Further internal regulatory documents relevant to the regulation of the operational activities carried out by the Company (for example, regarding Health, Safety and Environment, Supply Chain, Selection, hiring and management of Human Resources, Management of reports, Social Responsibility, Privacy).

1.3 THE PURPOSES AND FIELD OF APPLICATION

The Ethics Policy, approved in first draft by the Sustainability Committee on 16th December 2022, aims to define the fundamental principles, behavioural rules and responsibilities that the Proger Group recognizes, respects and assumes as a binding value and imperative, and with which all recipients of the Policy are required to comply.

This Policy applies to all Proger Group personnel and to all those who work for or on behalf of Proger Group companies, within the scope of the activities carried out and within the limits of their responsibilities. Furthermore, it also applies to the activities carried out by the Proger Group companies abroad, while considering the existing differences from a regulatory, social, economic and cultural point of view.

1.4 THE RECIPIENTS

The set of ethical principles, values and behavioural rules set out in this Policy must inspire the activity of all those who operate, internally or externally, in the sphere of action of the Proger Group (hereinafter the "Recipients").

In particular, by way of example, the following are Recipients of this Policy:

- the members of the Board of Directors, who are inspired by the principles of the Policy in setting the business objectives;
- the members of the Supervisory Body, who ensure respect and observance of the contents of the Policy in the exercise of their functions;
- the managers, who give substance to the values and principles contained in the Policy, taking on responsibilities both internally and externally;
- the internal committees on Sustainability, Risk Management and Remuneration Policies;
- employees, who, in compliance with current legislation, adapt their actions and behaviour to the principles, objectives and commitments set out in the Policy;
- collaborators, who, on an ongoing basis (consultants) align their conduct with the inspiring principles of the Policy;
- the suppliers and commercial partners of the Proger Group registered in the register or with an active contract.

1.4.1 The obligations of the recipients

All Recipients are responsible, each within their own sphere of competence, for compliance with this Policy. In particular, all actions, operations, negotiations and, in general, behaviour implemented by the Recipients in carrying out their work activities must be based on the principles and values expressed by this Policy, as well as be open to checks and controls according to current regulations and internal procedures. Furthermore, those with supervisory and coordination responsibilities are required to monitor compliance



with the Policy by their collaborators, as well as to adopt appropriate measures to prevent, identify and report potential violations.

All recipients are required to read, understand and fully observe this Policy, available on the company intranet, as well as on Proger's institutional website.

All Recipients are required to observe and, to the extent of their competence, to ensure compliance with the principles contained in the Policy: under no circumstances does the claim to act in the interests of the Proger Group companies justify the adoption of behaviour in contrast with those set out here and, in general, with applicable laws, regulations and disciplines.

2 PRINCIPLES

The fundamental principles regarding human rights, diversity, inclusion, gender equality and social commitment, identified below, are an expression of the values in which it believes and on which the corporate culture of the Proger Group is based. These values express the standard of behaviour required of all employees and collaborators of the Proger Group companies, as well as its suppliers and partners.

2.1 PROTECTION OF WORKERS' HUMAN RIGHTS

2.1.1 Rejection of forced or compulsory labour and child labour

Forced or compulsory labour

The Proger Group does not tolerate any form of forced or compulsory labour, and is committed to promoting the effective elimination of all forms of worker exploitation, including any form of abuse, coercion or psychological and physical violence, towards both its own employees and workers employed along the supply chain, and strongly condemns human trafficking and exploitation in all its forms.

The Proger Group rejects and prohibits the use of forced or compulsory labour (as defined by ILO Convention 29 and 105), and in particular:

- You are absolutely never asked to leave cash deposits upon hiring;
- You are absolutely never asked to leave identity documents at the time of hiring (except for the declarations and/certifications necessary to initiate communications relating to the hiring);
- No employee or collaborator operates under the threat of penalties.

Child and child labour

The Proger Group rejects the use of child and child labour and undertakes not to use personnel younger than the minimum age established by the ILO Convention 138 and below the minimum age established by the Italian legislation in force or rather by the legislation in force in the country execution of activities.

Furthermore, the Proger Group prohibits any form of child labour and protects minors by not tolerating any type of work that could harm their health, safety or morals, in compliance with the provisions of ILO Conventions 182 and ILO recommendation 146.

The Proger Group is committed to promoting training and dissemination among its customers/suppliers of the importance of combating the use of the labour of children and/or young workers. Furthermore, it undertakes to evaluate or monitor its suppliers and, if necessary, implement the necessary corrective actions.

2.1.2 Rejection of discrimination and respect for diversity, gender equality, inclusion and disability



The Proger Group, in compliance with ILO Conventions 100, 111, 159, is committed to preventing any form of discrimination, in hiring, remuneration, access to training, promotion, dismissal or retirement, based on race, sex, age, social class, origin, religion, disability, sexual orientation, public opinion, trade union membership.

The Proger Group respects the fundamental rights of all people, protecting their moral integrity and guaranteeing equal opportunities. In both internal and external relations, behaviour that have a discriminatory content based on political and trade union opinions, religion, gender, ethnicity, nationality, age, sexual orientation, state of health, family responsibilities and in general on any characteristic of the human person are not permitted.

The Proger Group considers diversity an opportunity, a resource on a cultural, human and professional level, an added value that is generated through dialogue and the comparison of opinions, ideas and experiences and is committed to encouraging a corporate culture based on respect and valorisation of diversity in all its dimensions, and providing an inclusive culture.

In pursuing its commitment to enhancing and protecting diversity, inclusion and gender equality, the Proger group is committed to promoting concrete measures and objectives as much as possible on aspects such as:

- Selection and hiring (recruitment)
- Career management
- Pay equity
- Parenting, care
- Work-life balance
- Prevention of abuse and harassment

In particular, Proger has defined the principles, objectives and its own guidelines, which it undertakes to follow, with regard to issues relating to gender equality, the valorisation of diversity and female empowerment.

The Proger group also undertakes not to interfere in any way with the exercise of the personal right to follow principles or practices or to satisfy needs related to race, class, national origin, religion, disability, sex, sexual orientation, trade union membership or political affiliation, ensuring that these freedoms of one do not go against the needs of the other.

The Proger group carefully considers the problem of the inclusion of disabled people in its structures, and in line with the rules for the right to work of disabled people, supports and promotes the principle of "targeted placement", i.e. the employment of disabled people in jobs compatible with one's health conditions and working abilities, in order to achieve a profitable placement that meets the needs of the individual on the one hand and the production/organizational needs of the company on the other.

Particular attention is then paid to the development of policies aimed at promoting the well-being of employees and the conciliation between private and professional life, as well as compliance with the legislation protecting protected categories.

2.1.3 Commitment against harassment and mobbing practices in the workplace

The Proger Group firmly rejects and does not tolerate any type of harassment, whether verbal, physical, sexual and psychological, direct, indirect or explicit and through any means and is committed to ensuring a correct and professional working environment for all its workers, whatever the type of relationship established and the role they play.



The Proger Group rejects and condemns harassment in all its forms, and considers it even more serious when it is used, implicitly or explicitly, to exert pressure in the case of hiring a worker, or in the case of decisions that concern his/her professional future, or when they have the purpose or effect of unreasonably interfering with the employee's professional performance or creating an intimidating, hostile, humiliating or offensive work environment.

The Proger Group is committed to ensuring that hidden forms of mobbing do not occur by monitoring the corporate climate regarding the issues covered and condemns any omission (failure to act) in preventing or reporting any episode of harassment or mobbing.

2.1.4 Freedom of association and collective bargaining

The Proger Group, in compliance with ILO conventions 87 and 98 and the relevant CCNL (if applicable), supports freedom of association and the effective recognition of the right to collective bargaining in Italy and, where present, also abroad, sharing with the representatives of workers a system of relationships based on constant and constructive discussion.

2.1.5 Health and Safety at work

The Proger Group is committed to guaranteeing high standards of health and safety protection at work, promoting the consolidation of a culture of safety through the adoption of responsible behaviour and awareness of operational risks by all employees and collaborators, also through specific information, training and awareness-raising activities.

In compliance with respect for the person and in compliance with the legal precepts binding from time to time, the Proger Group ensures the creation and management of environments and workplaces suitable from the point of view of workers' health and safety.

The Proger group provides:

- the fulfilment of all obligations established by mandatory legislation regarding the health and safety of workers
- to develop specific procedures to manage prevention activities and to guarantee the fulfilment of all legal and ethical obligations envisaged.

Furthermore, it undertakes to offer its workers specific training, integrating and spreading a culture of safety so that they themselves contribute to safeguarding their own safety and that of others by respecting the rules and standards required and promptly reporting any dangerous situation to their own safety and of third parties.

2.1.6 Adequate working conditions

The Proger Group undertakes to request work services in compliance with the legal provisions in force, and with national collective bargaining, where applicable, in terms of hours and days worked, as well as to guarantee adequate rest, the right to free time and fair remuneration for all employees.

Working hours

The Proger Group respects the right of workers to rest and free time, and undertakes to respect the applicable local legislation, and the provisions of the relevant CCNL (if applicable), where present and adopted.

Overtime activity is never forced and is always used responsibly, constantly monitoring its scope, frequency, hours worked by individual resources and overall.



Remuneration

The Proger Group guarantees the recognition of a salary that complies with current legislation, ensuring that it is sufficient to ensure a dignified standard of living.

In accordance with the provisions of ILO Convention 100, in its remuneration policies, the Proger group takes into consideration the principle of fair compensation for work and equal pay between women and men for work of equal value, based on objective evaluation. The minimum remuneration of Proger employees cannot be lower than that established by the collective agreements, where applicable, and by the relevant legislative and regulatory treatments in force, in line with the provisions of the ILO Conventions. The apprentices employed in the company are all regularly hired in accordance with the applicable legal provisions. For the regulation of apprenticeships, in Italy, reference is made to the relevant legal provisions. (Legislative Decree 167/11).

Proger is committed to ensuring fairness and opportunities for access to the same remuneration for everyone regardless of gender.

2.1.7 Business Management System

Proger S.p.A. draws up its Sustainability Report every year with reference to its Italian offices and its main foreign branches.

Proger S.p.A. has for years implemented and already certified an integrated management system for quality, environment and safety, compliant with the requirements of the ISO 9001:2015, ISO14001:2015 and ISO 45001:2018 standards, for its main Italian and abroad offices.

Furthermore, with reference to Proger Italia, the certification of the management system for Social Responsibility was achieved in compliance with the requirements of the SA 8000 standard (September 2023) and of the management system for Gender Equality in accordance with the requirements of UNI/PdR 125 :2022 (January 2024) as well as the ESG verification certificate in compliance with UNI ISO/TS 17033:2020 and UNI/PdR 102:2021 (February 2024).

2.2 COMMUNITY AND SOCIETY

2.2.1 Respect and involvement of local communities

The Proger Group is committed to respecting the rights of local communities and contributing to their realization, promoting local development.

As part of its activities, the Proger Group is committed to contributing to the development and well-being of the community in which it operates, ensuring respect for the needs of the territory, with the aim of interpreting its needs also in terms of attention to employment levels, and investing in the research and development of efficient and advanced technologies that allow services to be provided according to the highest standards of sustainability from an environmental and energy point of view.

In particular, the experience gained in serving local communities and the awareness that its activities involve a high level of territorial, social and environmental interaction have allowed the Proger group to consolidate a relationship with communities based on listening and continuous dialogue and on the active involvement of its stakeholders, a source of valuable information and ideas to understand the needs of the territories and respond to them effectively, anticipating any critical issues.

The variety of categories of stakeholders involved in the group's initiatives encourages the sharing of different experiences and points of view, in order to improve the services offered to the communities and the quality of life of the territories in which the Proger Group is present.



2.2.2 Environmental Protection

The Proger Group promotes and adopts an environmental management model aimed at continuous improvement, implementing eco-compatible solutions aimed at minimizing the risks associated with global warming, pollution and resource depletion and encouraging sustainable development initiatives.

As part of its activities, the Proger Group, attentive to the consequences of its choices on the environment and the territory, is committed to contributing to the creation of a local, national, global and environmentally sustainable economy, capable of reducing the impact environmental through elements of innovation, progress and circularity.

The Proger Group is also committed to promoting the dissemination of environmental education among its employees and collaborators and in the territories in which it operates.

2.2.3 Fight against corruption

The Proger Group recognizes corruption as one of the factors undermining institutions and democracy, ethical values and justice, the well-being and development of societies and therefore rejects it in all its direct and indirect forms. It prohibits and fights all forms of corruption without any exception, both in relations with private entities and in relations with the Public Administration, which must be characterized by maximum transparency and correctness. Promotes and disseminates, inside and outside the Proger Group, the principles and rules to be followed to prevent and combat corrupt conduct of any kind, direct and indirect, active and passive, including in the form of incitement, as provided by the applicable anti-corruption legislation as stated in its Code of Ethics.

2.2.4 Privacy and confidentiality

The Proger Group respects the right to confidentiality and privacy of its stakeholders, committing itself to the correct use of the personal data and information provided to it.

In particular, it undertakes to process personal data and information in compliance with fundamental rights and freedoms, as well as the dignity of the interested parties, with particular reference to confidentiality, personal identity and the protection of personal data.

The Proger Group guarantees that personal data is processed lawfully and in accordance with the provisions of current regulations, ensuring, in particular, the relevance of data processing with the declared and pursued purposes.

2.2.5 Security activities

The Proger Group is committed to managing security activities in compliance with current legislation and international standards regarding human rights.

Policies and preventive measures are envisaged and adopted for the purposes of protecting personnel with respect to the information they manage and their use in company assets exposed to a security risk.

2.2.6 Digital inclusion and access to innovation

The Proger Group promotes digital, social and geographical inclusion and supports the diffusion of new smart and digital technologies.

It promotes innovation, in the engineering field and also in its internal management processes, developed in a participatory manner with its partners and suppliers, universities, research centers, associations and start-ups, in order to continuously develop new services that are useful and functional to improving the quality of life of people and communities.



3 RISK ASSESSMENT AND MANAGEMENT

The Proger Group constantly evaluates and monitors its real and potential impacts on Human Rights, Diversity, Inclusion, Gender Equality and Social Commitment.

It is committed to improving the effectiveness of its risk prevention action, as well as to guarantee effective management and mitigation of any negative impacts that it has contributed to causing in the performance of its activities.

The risk management model adopted includes, among others, the types of risk relating to health and safety at work, human resources management, the supply chain, compliance, current legislation, governance and the environment.

Human rights (Diversity, Inclusion, and Gender Equality) are also the subject of specific evaluation as part of the materiality analysis represented in the Sustainability Report of Proger S.p.A., drawn up on the basis of the "GRI Sustainability Reporting Standards".

The Proger Group is committed to spreading, at all levels, an internal culture characterized by awareness of the existence of potential risks of violation of human rights, as well as the importance of respecting the relevant prevention measures contained in company policies and procedures.

4 IMPLEMENTATION AND MONITORING

It is primarily the responsibility of the Board of Directors and the managers of the companies belonging to the Proger Group to give substance to the principles and contents of this Policy and to represent, with their own behaviour, an example for their collaborators, both internal and external to the Group, in order to ensure the diffusion of ethical culture, based on respect and protection of human rights, diversity, inclusion, and gender equality, promoted by Proger.

4.1 MONITORING YOUR BUSINESS RELATIONSHIPS

The Proger Group adopts selection policies for its suppliers, collaborators and commercial partners based on fair, transparent and compliant processes with applicable laws, and works to ensure responsible management of the value chain, based on the respect and promotion of human rights and of the guiding principles of this Policy.

4.1.1 Rules of conduct towards suppliers and external collaborators

In order to minimize the risks of violation of the principles expressed in this Policy, in its supply chain, the suppliers and external collaborators of the Proger Group must meet certain minimum requirements and are subjected to assessments, for example, aimed at verifying compliance with the legislation on labour matters, including what concerns child labour and the health and safety conditions of workers.

Furthermore, the Proger Group requires its suppliers and external collaborators to adhere to the Ethical Pact, which provides for the obligation to respect the inspiring principles of the Code of Ethics and this Policy, the other rules of conduct adopted and communicated, as well as the assumption of specific measures in the event of violation of the same, including the possible termination of the contractual relationship.

To this end, the structures responsible for the company functions undertake to monitor compliance with this Policy in the execution of the activities envisaged in the contracts by suppliers, in particular with regard to child labour and the health and safety of workers.



The Proger Group brings the contents of this Policy to the attention of suppliers and external collaborators by making it available on the Proger institutional website.

4.1.2 Rules of conduct towards business partners

The Proger Group develops partnership relationships with counterparties of consolidated reputation and experience, setting up these relationships in compliance with current legislation and the guiding principles of this Policy.

The commercial partners of the Proger Group must adhere to the entire contractual documentation submitted by the Companies, including the obligation to respect the aforementioned principles and the other rules of conduct adopted and communicated for this purpose, which provide for the taking of specific measures in case of violation, including the possible termination of the contractual relationship.

4.2 REPORTING SYSTEM AND PRINCIPLE OF NON-RETARIATION

All stakeholders can report, even anonymously, through the various reporting channels adopted, any violation or suspected violation of this Policy.

Reports can be sent verbally, as well as by ordinary mail and e-mail, to the contact addresses published on the Proger institutional website.

In the event of any reports, the absolute confidentiality of the identity of the person reporting in good faith is guaranteed, ensuring him or her against any form of retaliation, discrimination or penalization during and after the inspection activity.

Failure by an employee to report a known or presumed illicit action of which he or she has become aware has the possible consequence of the application of disciplinary sanctions.

4.3 SANCTIONING SYSTEM

The Proger Group undertakes to use every reasonable effort to prevent any conduct that violates this Policy and to interrupt and sanction any conduct contrary to it carried out by any employee, partner or third party who generally operates for the Proger Group.

Violation of the principles expressed in this Policy by the aforementioned subjects damages the relationship of trust established with the company and may lead to disciplinary and compensation actions.

In such cases the Proger Group undertakes to take appropriate measures in order to adopt the most appropriate measures required by law.

With reference to Recipients other than employees (suppliers, commercial partners, consultants and anyone who has established a collaborative relationship with the Company), the Proger Group provides, in the relevant contracts, the right to terminate the contractual relationship in the event of harmful behaviour and actions of the principles and values contained in the Policy.

This remains without prejudice to the prohibition of discrimination and retaliation against the person reporting in good faith.

5 COMMUNICATION AND TRAINING

The Proger Group undertakes to promote and guarantee adequate knowledge of the Policy by disseminating it to interested parties through specific and adequate communication activities, through the appropriate tools to reach the entire company population, such as for example publication on the company



intranet for employees and on the Company's institutional website for consultants, agents, suppliers and commercial partners.

Furthermore, in order to ensure the correct understanding of this Policy for all its recipients and guarantee continuous awareness of the values and principles contained therein, the Proger Group undertakes to guarantee an adequate training program.

6 REVIEW AND UPDATE

The Proger Group's commitment to human rights, diversity, inclusion, gender equality and social commitment, is regularly updated in order to include any internal change within the Proger Group companies, as well as the external context, enhancing the progress of standards and practices regarding ethical and social responsibility.

The updating and any revision of this Policy will be carried out by and under the responsibility of the Sustainability Committee of Proger S.p.A., with the support of the functions involved from time to time, based on the indications and guidelines provided by the Board of Directors of Proger S.p.A.