

Rome, 04/10/2023

DE SANCTIS COSTRUZIONI S.p.A.
L'Amministratore Delegato
(Dott.ssa Francesca De Sanctis)



De Sanctis Costruzioni S.p.A. is a general construction Company specialized in both public and private projects, operating throughout Italy. Always mindful of ESG policies, it has implemented an Integrated Management System within its organizational structure in compliance with UNI EN ISO 9001:2015, UNI EN ISO 14001:2015, EMAS Regulation (EU) 2017/1505, UNI EN ISO 45001:2018, UNI ISO 39001:2016, SA 8000:2014, UNI ISO 37001:2016, UNI ISO 30415:2021, UNI/PdR 125:2022, UNI ISO 20400:2017 standards, in addition to the drafting of the Sustainability Report (SR) since 2021. Moreover, since 2015, it has implemented the Organizational and Management Model (Legislative Decree 231), all aimed at achieving the maximum satisfaction of all stakeholders.

The Company guarantees the execution of its production activities in accordance with contract specifications and technical standards, without neglecting quality and ethical aspects, the utmost respect for human and workers' rights, social responsibility, corruption prevention, environmental protection and the health and safety of its workers. Thus, it pursues a corporate *mission* focused on maximum sustainability, all confirmed in the Company's Industrial Plan.



INTEGRATED MANAGEMENT SYSTEM (IMS)

The Integrated Management System adopted by *De Sanctis Costruzioni S.p.A.* comprises integrated procedures and strategic guidelines to achieve continuous improvement in company performances and services offered, aiming to fully satisfy its stakeholders: customers, suppliers, local authorities where works are carried out, employees, accountable bodies (e.g. ARPA, INAIL, ISPRA, ISPREDIL, Trade Unions, etc.).

The adopted IMS includes the standards described below, as certified by third-party bodies that periodically carry out third-party audits to verify the correct implementation of the procedures required by each standard.

In particular, the Integrated Management System includes those standards characterized by a High-Level Structure (HLS) that combines various management systems (e.g. quality, environment, occupational health and safety, road traffic safety, anti-bribery, etc.) into a single, overall comprehensive, and harmonized management system.



The company's primary goal is to **respond to market demands and, where possible, to anticipate their needs**, both in terms of technical and professional skills and in terms of reliability, to ensure that the service provided is compliant and responsive to requirements, all while adhering to ESG principles.



To achieve those goals, the company's management declares its commitment to:

- Define, on an annual basis, specific and measurable goals for each critical business process regarding service quality and disseminate them to all involved parties through specific training investigations.
- Ensure the monitoring of defined goals through adequately formalized and documented periodic reviews.

**QUALITY (QMS)**

De Sanctis Costruzioni S.p.A. has been certified with **UNI EN ISO 9001** since 31/01/2001.



The main goal is to ensure customer satisfaction through periodic quality checks during construction on the materials used, in compliance with the Quality Control Plans (QCPs) outlined in specific company procedures, as well as on the supplied products and the work activities performed by subcontractors involved in the production phases of the construction site. Great attention is given to the quality control of executed work through suitable internal testing procedures in addition to those required by current laws.

In addition to these types of technical controls there are further checks on costs, waste reduction, increase in productivity, and effectiveness of internal processes to reduce any inefficiencies.



In this contest, the Company is committed to:

- Paying utmost attention to customer expectations.
- Promoting a process-based approach focused on risk analysis.
- Involving top management, the company team, and staff.
- Periodically monitoring performance by identifying suitable KPIs.
- Constantly checking the quality of materials, products used and ongoing works, ensuring compliance with legal values.
- Promoting and implementing continuous improvement of processes to enhance efficiency and productivity.
- Implementing and ensuring internal communication, especially of the achieved target and set goals.

**ENVIRONMENT (EMS)**

De Sanctis Costruzioni S.p.A. has been certified with **UNI EN ISO 14001** since 14/03/2013.



The main goal is to ensure that all activities, whether productive or non-productive, are carried out in accordance with environmental standard. The company is committed to pursuing goals and implementing policies that comply with legal requirements and consider significant environmental aspects.



In particular, the Company is committed to:

- Evaluating environmental risks arising from activities and mitigating their effects through effective actions targeting the root causes.
- Continuously seeking innovative technologies and operational methods to improve environmental performance and pollution prevention, rationalize the



- use of hazardous or polluting materials and substances, and reduce the risk of accidents and the consumption of natural and energy resources.
- Ensuring compliance with current legislation, prescriptions and applicable agreements related to environmental protection and pollution prevention.
 - Increasing purchases of “green products” and engaging with suppliers committed to environmental protection.
 - Operating by minimizing waste production and managing waste in accordance with legislation, prioritizing recovery, reuse, and recycling where possible.
 - Planning and implementing the modernization of owned vehicles and equipment by replacing the most obsolete and polluting ones with technologically innovative and environmentally friendly alternatives conducive to worker health and safety.
 - Optimizing the consumption of natural and energy resources, reducing waste from construction activities and endeavoring to recover/reuse waste wherever possible.
 - Ensuring maximum collaboration with authorities in efforts to protect public health.
 - Collaborating with relevant entities, joint bodies, employers’ association (e.g. by signing specific agreements) to oversee compliance with environmental regulations, promoting the common social goal of proper project implementation while respecting the environment and worker safety.
 - Ensuring compliance with environmental and safety legislation, including international obligations regarding climate change and sustainable development such as the reduction of CO₂ emissions and protection of biodiversity.
 - Protecting natural habitats by examining and monitoring any change that may disrupts the environment during work activities.
 - Adopting necessary measures to prevent or reduce negative impacts on biodiversity and restoring ecosystems to promote the principle of “no net loss” to biodiversity.
 - Maintaining constant communication with local communities in the areas where the organization operates, promoting interaction, engagement, and information sharing.
 - Contributing to the pursuit of combating climate change and achieving Sustainable Development Goals promoted by the United Nations.
 - Safeguarding water resources by monitoring work activities with the aim of reducing and minimizing consumption.
 - Raising awareness among staff about responsible water and energy resources usage and negative effects of improper consumption management.

The **Annex 4 - STOP WORK Policy**, which is an integral part of the Company Policy, promotes and consolidates the culture of environmental protection. The policy encourages timely intervention by each worker to timely act to stop any activity that could cause damage to the environment defined as compromising the quality of its components (air, soil, water), consumption of natural resources, flora, fauna, etc., without fearing consequences.

To ensure the commitments made, the company periodically monitors performance indicators (KPIs) to achieve continuous improvement on all significant environmental impacts, such as atmospheric emissions, noise, use of low environmental impact products, waste, and maintains a responsible approach to the sensitive issue of climate change, paying particular attention to natural resources consumption and energy efficiency.

For this purpose, since 2018, the company has voluntarily adhered to the **EMAS Regulation**, renewed annually, which indicates the company's compliance with the provisions of Regulation (EU) 1221/2009, as integrated by Regulation (EU) 2017/1505 and Regulation (EU) 2018/2026. This compliance is certified by the data reported in the **Environmental Declaration**, an annual document that reports all improvements of the organization's environmental efficiency, the environmental performance achieved during the three-year reference period and the future goals to share with its stakeholders, fixed into the three-year environmental program.

Furthermore, since 2018 *De Sanctis Costruzioni S.p.A.* has voluntarily joined the international ESG rating platform, **ECOVADIS**, related to the eco-sustainability of its supply chain, increasing scores over the years.

Since 2021, it publishes the **Sustainability Report** annually; since 2022, it voluntarily adheres to the world's largest corporate sustainability initiative of the **United Nations Global Compact (UNGC)** and since 2023 it has purchased carbon credits on the voluntary market to offset of CO₂ emissions in the atmosphere.



HEALTH AND SAFETY (HSMS)

De Sanctis Costruzioni S.p.A. has been certified with **UNI EN ISO 45001** since 14/03/2013 (ex OHSAS 18001).



Its main goal is to ensure that work environments, both at office location and construction sites, are healthy and safe, thereby preventing work-related injuries and illnesses while proactively improving performance related to Occupational Health and Safety (OHS).

With this policy, the company is committed to pursuing target and implementing policies that comply with continuously updated legal requirements.



Specifically, the Company is committed to:

- Respect the primary goal that the responsibility for managing workers safety and health concerns the entire organization, from the employer to every individual worker, each according to their roles and competencies.
- Ensure compliance with legislation, applicable agreements on worker health and safety and any other requirement related to worker health and safety.
- Consider the health and safety of its employees and the related outcomes as integral parts of company management.



- Continuously improving the injury rate and the performance related to the health and safety of its workers through constant prevention efforts and providing necessary human and instrumental resources.
- Ensuring prevention of work-related injuries and illnesses for its workers.
- Ensuring awareness and training workers to perform their duties safely and to assume empower them to take responsibility for safety and health.
- Ensuring the involvement and consultation of workers, including through their safety representatives, and all those working on behalf of the organization.
- Defining and disseminating specific health and safety goals and implementation programs consistent with this Policy and making them measurable where possible.

In particular, to promote and consolidate the culture of occupational health and safety, the specific **Annex 4 - STOP WORK Policy**, which is an integral part of the Company Policy, is dedicated to this topic. It requires that each worker promptly acts and stops any activity that may endanger their own or of others' health and safety, without fearing retaliations.



ROAD TRAFFIC SAFETY (RTS)

De Sanctis Costruzioni S.p.A., in its field of activity engages in the design, construction and maintenance of roads, highways, bridges, viaducts and tunnels.



Therefore, since 02/06/2020 the Company has been certified with **UNI ISO 39001** with the primary goal of managing road safety to reduce the risk of serious or fatal accidents related to road traffic, by controlling and managing everything under its influence and control.

With this policy, the company is committed to pursuing goals and implement policies such as prevention, control and monitoring of risks and continuous improvement of road safety performances.

Specifically, the company is committed to:

- Ensuring a company management always compliant with the requirements of the RTS (Road Traffic Safety) standard.
- Ensuring compliance with current legislation and applicable agreements regarding road safety for road users and company workers.
- Ensuring that the set goals are compatible with the organization's strategy.
- Ensuring the availability of adequate resources for RTS management system and providing suitable vehicles and equipment.
- Establishing the long-term RTS goal of eliminating deaths or serious injuries in road traffic accidents.
- Setting intermediate RTS targets to be achieved in the short to medium term.
- Working in partnership and collaboration with stakeholders to contribute to a safe road traffic system and achieve established goals.





- Directing and promoting people's contribution to the effectiveness of the RTS management system.
- Operating with the aim of preventing or reducing road accidents, both those related to construction activities and those due to public traffic.
- Raising awareness among drivers (both company employees and suppliers/subcontractors) to adopt all useful measures to prevent accidents/injuries and work-related health and safety issues while performing their duties.
- Monitoring the trends of accidents/incidents and near missed both in the workplaces and during commutes or travels in orders to analyze the causes and define corrective actions to communicate to the staff.
- Planning and organizing trips according to the specific needs with the aim of reducing the CO₂ emissions.
- Raising awareness among stakeholders regarding road safety, encouraging their involvement and reporting of potential hazards.
- Using last generation vehicles and keeping them in excellent functional condition, both in terms of efficiency and safety, to ensure the safety workers during travels.



CORPORATE SOCIAL RESPONSIBILITY (CSR)

Since 16/05/2018, *De Sanctis Costruzioni S.p.A.* has been certified with **SA 8000** (Social Accountability System) and follows this standard model of corporate management that promotes the corporate social responsibility, respect for human rights, workers' rights, protection against child labor exploitation, occupational health and safety and sustainability.



With this policy, the company has committed to its employees to improve working conditions, implement fair remuneration, and protect human rights. It is a reference that, by its nature, involves the entire company and requires attention and participation from top management, employees, suppliers, subcontractors, and clients.



In particular, the Company is committed to:

- Ensuring that the company's management consistently complies with national and international laws, ILO conventions and internal provisions.
- Improving the quality of work consistently with the concept of sustainable development.
- Establishing a communication and dialogue system with all stakeholders of the company that allows easy access to information about the services offered, the correctness, and moral quality of its offer, and ensures the respect of ethical principles.
- Condemning all illegal conduct and those that may damage the dignity or physical and/or moral integrity.
- Not using child, forced or compulsory labour.



- Respecting freedom of association and the right to collective bargaining.
- Counteracting all forms of discrimination and unequal treatment (in recruitment, remuneration, access to training, career promotion, etc.), based on race, ethnicity, religion, disability, sex, sexual orientation, union membership, political affiliation.
- Ensuring the protection of maternity and paternity, as well as underprivileged people.
- Creating an inclusive work environment that guarantees respect, integrity, personal development, and equal opportunities, not only for current employees, but also for potential ones.
- Increasing employee' awareness of diversity and equal opportunities within the company.
- Respecting regulations and laws regarding equal opportunities, also legal frameworks of the foreign countries in which it operates, if applicable, and best practices identified.
- Encouraging suppliers to respect for human dignity as non-discrimination and diversity protection.

In order to ensure the proper implementation of the Social Responsibility System, the company management has formed the Social Performance Team (SPTeam), as provided by the SA8000 standard, ensuring a balanced presence of worker representatives and company management. It is responsibility of the SPTeam organize meetings, at least every six months, to review the application of the SA8000 standard, monitor the KPIs, collaborate with other areas of the Organization to examine, define, analyze and/or resolve any possible non-conformities to the standard, ensure the effective implementation of policies and procedures for the timely implementation of corrective and preventive actions, allocating adequate resources.

Furthermore, every year the company draws up the **Social Balance Sheet**, an extra-accounting periodic report made available to stakeholders (workers, associates, citizens, Public Administrations, etc.), published on the company's website, providing information about the activities carried out and the social results achieved in the reporting period.

Another strategic tool of Social Responsibility, aimed at improving organizational structure and establishing relationship of trust with customers and stakeholders, is the protection of personal data that means confidentiality of one's identity and information regarding private life, political and religious orientations, health, ethnicity, sexual orientation. That is aimed by adopting technical and organizational measures compliant with the Regulation (EU) 2016/679 - GDPR and other provisions issued by the Italian Data Protection Authority. For this purpose, a specific policy, **Annex 9 - Information Security Policy**, has been drawn up and it is as integral part of the Company Policy.

Furthermore, *De Sanctis Costruzioni S.p.A.* has deemed it appropriate to draw up specific policies in order to:

- ✓ Promote the protection Of Human Rights (see **Annex 1 – Human Rights Protection Policy**), where are specified all the channels for reporting any wrongdoing.

- ✓ Promote inclusion and diversity by contrasting any form of discrimination already at the time of recruitment (see **Annex 3 – Recruitment, Hiring and Personnel Integration Policy**).
- ✓ Attain a continuous optimization and reconciliation between the company's production needs and the personal needs of its employees, positively impacting the work-life balance (see **Annex 10 – Flexibility Working Hours Policy** e **Annex 11 – Part-Time Policy**).
- ✓ Renew the organizational and work management models, in line with ongoing global developments, by adopting remote work arrangements through smart working practices (see **Annex 12 – Smart Working Policy**).

**ANTY- BRIBERY (ABMS)**

De Sanctis Costruzioni S.p.A. has been certified with **UNI ISO 37001** since 24/01/2022.



Its primary goal is to prevent, detect, and manage situations of corruption (active or passive) by the Organization, its employees, and business partners, promoting a series of measures and controls and providing supportive guidance for their implementation.

In particular, it commits to:

- Ensuring compliance with current legislation on the prevention and combating of corruption, involving employees and collaborators at every level.
- Absolutely prohibiting behaviors that may constitute corruption or attempted corruption, including:
 - Offering, promising, giving, paying, authorizing someone to give or pay, directly or indirectly, material benefits, economic advantages, or other utilities to a Public Official or a private individual (Active Corruption).
 - Accepting or authorizing someone to accept, directly or indirectly, economic advantages or other utilities, requests, or solicitations for economic advantages or other utilities from a Public Official or a private individual (Passive Corruption).
 - Inducing a Public Official or a private individual to perform, improperly, any public function or any activity related to a business or rewarding them for having performed it.
 - Influencing an official act (or omission) by a Public Official or any decision in violation of a duty of office.
 - Obtaining or securing an improper advantage in relation to business activities.
 - In any case, violating applicable laws.
- Identifying, within the activities carried out by *De Sanctis Costruzioni S.p.A.*, the areas at potential risk of corruption, and implementing actions suitable to reduce/minimize such risks.





- Identifying, reviewing, and achieving the corruption prevention goals.
- Planning and implementing its own policies and actions so that it is not in any way involved in situations or attempts of corrupt nature and not risk involvement in situations of illicit nature with public or private subjects.
- Encouraging the reporting of suspected cases of corruption in good faith, or on the basis of a reasonable and confidential belief, ensuring not to proceed with disciplinary/sanctioning measures nor to retaliate in any way.
- Preventing or reducing the undesired effects related to the corruption prevention policy and goals.
- Promoting an ethical culture to avoid:
 - Violations of confidentiality.
 - Conflicts of interest.
 - Corrupt events.

The company has appointed the "Compliance Function for Corruption Prevention" that is in an organizational position with the adequate level of independence and the necessary authority to carry out the following tasks:

- Supervise the design and implementation of the Corruption Prevention Management System by *De Sanctis Costruzioni S.p.A.*
- Provide advice and guidance to employees regarding the Corruption Prevention Management System and corruption-related issues.
- Ensure that the Corruption Prevention Management System complies with the requirements of UNI ISO 37001 standard.
- Report on the performance of the Corruption Prevention Management System to the President of BoD/CEO and other functions.
- Receive reports of violations or alleged violations, or suspicions in good faith, or based on reasonable belief, without fear of retaliation, at the dedicated email address whistleblowing@gruppodesanctis.com, and proceed with investigations.

The application of disciplinary measures is foreseen for any violation of this Corporate Policy in the forms, manners, and times provided by the sanctioning/disciplinary system adopted by the Company.

Furthermore, the discipline of anti-corruption is addressed in the "**Management and Control Organization Model and Code of Ethics (ex. Legislative Decree 231/01)**" adopted by the Organization, which includes adequate procedures and specific policies aimed at preventing and responding to any incidents of active and passive corruption, direct or indirect.

In order to **strengthen the safety and legality conditions** of its activities, *De Sanctis Costruzioni S.p.A.*, in addition to constantly monitoring and controlling compliance with this policy, has implemented suitable reporting procedures (see **Annex 7 - Whistleblowing Policy**) within its Integrated Management System so that individuals involved, duly informed about the existence of the aforementioned procedures, promptly report any observed illicit conduct.

Furthermore, an Internal Control Committee has been established, and the Protocols of Legality and adherence to Whitelists are strictly applied.

The operating directives apply to all employees, managers, directors, outsourcers, and third-party individuals appointed as representatives of *De Sanctis Costruzioni S.p.A.*, such as intermediaries, consultants.

De Sanctis Costruzioni S.p.A. verifies that all parties with whom it conducts business have similar policies and/or procedures or Management Systems aimed at preventing the corruption.

Within the framework of the Corruption Prevention Management System, *De Sanctis Costruzioni S.p.A.* has drafted specific documents, attached as integral part to the Corporate Policy, with the aim of:

- Providing the anti-corruption program designed to educate and provide all stakeholders (internal and external) with the necessary tools to identify and prevent corruption and to implement zero tolerance towards all forms of corruption (see **Annex 5 - Anti-Corruption Code/Policy**).
- Promoting proper and ethical behaviour and facilitating the prevention and detection of fraud; applied to any irregularity or suspected irregularity involving stakeholders (internal and external) in a working relationship with *De Sanctis Costruzioni S.p.A.* (see **Annex 6 - Anti-Fraud Policy**).
- Providing all stakeholders (internal and external) with channels to report any commission, omission, inappropriate, illegal behaviour, or behaviour that constitutes a violation of the Supplier Code of Conduct, the Anti-Corruption Code/Policy, the Human Rights Information Handbook, the Anti-Corruption Guidelines, the Organization, Management and Control Model ex Legislative Decree 231/01 (MOGC 231), the procedures of the Integrated Management System, and any other compliance policy adopted by the company (see **Annex 7 - Whistleblowing Policy**).



DIVERSITY AND INCLUSION (D&I)

De Sanctis Costruzioni S.p.A., as part of its human resources management, has been certified with **UNI ISO 30415** since 07/10/2022.



Its primary goal is to create and maintain an inclusive work environment for all employees, regardless of their diversities, by defining actions to achieve predefined target and opportunities, and identifying and evaluating related risks to prevent or limit them.



The commitment undertaken by the Organization to promote **diversity, inclusion, and equal opportunities** at all stages of the employment relationship, from the selection process to role assignments, from performance evaluations to career advancements, from compensation treatment to the end of employment, is specifically described in

the **Annex 2 - Diversity and Inclusion Policy**, which is an integral part of the Corporate Policy.



GENDER EQUALITY (GEMS)

De Sanctis Costruzioni S.p.A., as part of its human resources management, has obtained the **UNI/PdR 125** certification on 07/06/2023.



Starting from the principle of gender equality throughout all employees' professional journeys, the company aims to increase female representation within the work environment. It also aims to ensure equal opportunities for career advancement and economic treatment through policies and recruitment plans intended to promote and value *diversity and meritocracy*.



The commitment made by the Organization to promote the adoption of policies for gender equality and female empowerment at the corporate level, and thus to improve women's access to the job market, leadership roles, and work-life balance, is described in detail in the **Annex 13 - Gender Equality Policy**, which is an integral part of the Corporate Policy.



SUSTAINABLE DEVELOPMENT

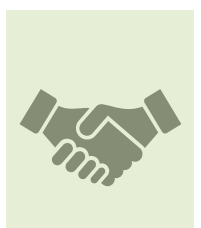
Consistently with the values that it promotes every day, *De Sanctis Costruzioni S.p.A.* is strongly committed to contributing to the achievement of the **Sustainable Development Goals (SDGs)** defined in the United Nations' Agenda 2030.



These goals include:

- Ensuring health and well-being for all.
- Achieving gender equality and the empowerment of all.
- Promoting inclusive and sustainable economic growth, full and productive employment, and decent work for all.
- Making cities and communities inclusive, resilient, and sustainable.
- Taking action to combat climate change at all levels.
- Protecting, restoring, and promoting sustainable use of terrestrial ecosystems.

Based on SDGs, *De Sanctis Costruzioni S.p.A.* has established 8 goals to pursue and commits to achieving them through specific actions divided into 4 macro areas of sustainable development:



Social Commitment

*“Operating with **Integrity**, ensuring the **Safety and Well-being** of our Stakeholders, and promoting the inclusion of the Communities benefiting from our works, contributing to the creation of a fair and participatory society, without compromising the ability of future generations to meet their own needs.”*

Economic Commitment

*“Generating value in the areas where we operate, thanks to the **Quality** and **Innovation** of our works, contributing to the creation of opportunities and local economic growth”.*

Environmental Commitment

*“Reducing the environmental impacts of our works while preserving the richness of the **local ecosystem** and actively engaging in the global commitment to mitigate **Climate Change**”.*

Ethic Commitment

*“Fighting all forms of **organized crime** and significantly reducing **corruption** and **illegality**, ensuring equal opportunities in access to justice, and, at the same time, guaranteeing respect for **Human Rights** to all workers involved in production processes”.*

To contribute to "Sustainable Development", these commitments are officially undertaken by the Organization in specific corporate policies and through the acquisition of the following certifications: for the environment (ISO 14001), for Social Responsibility (SA8000), for anti-corruption (ISO 37001), for Quality (ISO 9001), and for sustainable procurement (ISO 20400).

Regarding **Sustainable Procurement**, *De Sanctis Costruzioni S.p.A.* has obtained the **UNI ISO 20400** certification on 28/07/2023, with the goal of promoting the production and consumption of goods, service performances, and construction works that, throughout their lifecycle, meet high economic, ecological, and social requirements.

The Organization's commitment is to promote the Sustainability principles with its Suppliers/Subcontractors, identifying and managing environmental, social, and economic impacts within the supply chain and committing to purchasing sustainable, ethical, and responsible materials, goods, and services. This commitment is described in detail in the specific document **Annex 8 - Sustainable Procurement Policy**, which is an integral part of the Corporate Policy.

As previously mentioned, since 2021 *De Sanctis Costruzioni S.p.A.* has been annually publishing its **Sustainability Report** on the company website. The report is prepared by accounting for a selection of the "GRI Sustainability Reporting Standards" (GRI - Referenced Claim) published by the Global Reporting Initiative (GRI) in 2016 and its updates in 2021. Through this report, the company communicates to all stakeholders its commitments and results within the four pillars of sustainability described earlier.

Furthermore, within the framework of Sustainable Development, it is worth highlighting that since 2018 *De Sanctis Costruzioni S.p.A.* has voluntarily joined the international ESG rating

platform **ECOVADIS**. ECOVADIS annually provides a "score" based on the analysis of objective data provided by the Organization on the four fundamental sustainability themes: environment, protection of workers and human rights, ethics, and sustainable procurement. Over the years, the company has achieved increasing scores, reflecting its progressive improvements.

Finally, in 2022, *De Sanctis Costruzioni S.p.A.* decided to sign the **United Nations Global Compact (UNGC)**, a voluntary strategic initiative aimed at companies worldwide that intend to adhere to a set of 10 principles promoting sustainability values in the long term. These principles encompass political actions, corporate practices, social and civil behaviours that are responsible and consider future generations.

The Management of *De Sanctis Costruzioni S.p.A.*, considering that compliance with and the success of this Company Policy and its Annexes guarantee continuity and growth, **achievable only with the complete and maximum commitment of all**, assures that it will provide to:

- Illustrate and disseminate the Company Policy and its Annexes to all employees and those working on behalf of the Organization, and to display it in the main premises.
- Make the Company Policy available to stakeholders and anyone who requests it, also publishing it on the company website.
- Review the Company Policy annually based on the results derived from monitoring the Integrated Management System and the Internal Control procedure, as well as the management system itself. The policy review, which does not necessarily entail a revision of it, may also occur as a result of events or situations that make it necessary.

To ensure the proper implementation of the Social Responsibility System, the Company Management has established the Social Performance Team, as required by the SA8000 standard, ensuring a balanced presence of both workers and management representatives. The SA8000 information includes references to the Certification Body.

Below are the references of SAI that developed the SA8000 standard in 1997, of SAAS that is the Accreditation Body for Certification Bodies regarding the standard and of RINA the Certification Body for *De Sanctis Costruzioni S.p.A.*:

SAI - Social Accountability International, 9 East 37th Street, 10th Floor, New York, NY 10016 – USA - Phone: +1(212) 684-414 - Fax: +(212) 684-1515 - Email: info@sa-intl.org

SAAS – Social Accountability Accreditation Services, 15 West 44th Street, 6th Floor New York, NY 10036 – USA – Phone: +1(212) 391-2106 - fax: +1(212) 684-1515 – Email: saas@saasaccreditation.org

Rina Services (Certification Body), Via Cesare Pavese, 305 – 00144 Rome - ITALY
Phone: +39 06 5422 8651 - Email: sa8000@rina.org

All reports can be sent to the following dedicated email address:

sa8000@gruppodesanctis.com

For anonymous reports it's possible to use the specific link provided on the company website, under the "Chi Siamo" (About Us) section, labelled "**Segnalazioni SA8000**".

Lastly, concerning anti-corruption measures, *De Sanctis Costruzioni S.p.A.* consistently monitors and enforces compliance with this policy. It requires all involved parties, who are adequately informed about the procedures, to promptly report any breaches, suspected breaches, or suspicions in good faith, or based on reasonable belief, without fear of retaliation. Reports should be directed to the anti-bribery compliance function to the following email address: whistleblowing@gruppodesanctis.com; this function possesses the independence and authority within the organization to enforce the current policy.

In particular, for various areas, *De Sanctis Costruzioni S.p.A.* drafts specific policies that are attachments of the Company Policy and integral part, listed below:

- Annex 1 – Human Rights Protection Policy.
- Annex 2 – Diversity & Inclusion Policy.
- Annex 3 – Recruitment, Hiring and Personnel integration Policy.
- Annex 4 – Stop Working Policy.
- Annex 5 – Anti-Corruption Code/Policy.
- Annex 6 – Anti-Fraud Policy.
- Annex 7 – Whistleblowing Policy.
- Annex 8 – Sustainable Procurement Policy.
- Annex 9 – Information Security Policy.
- Annex 10 – Flexibility Working Hours Policy.
- Annex 11 – Part Time Policy.
- Annex 12 – Smart Working Policy.
- Annex 13 – Gender Equality Policy.