

POL-900

SUSTAINABILITY POLICY

POLICY

IDENTIFICATION

Category:	OG - Model 231 SI - Information Security PD - Data Protection	PC – Anti-Corruption AM - Environment SL - Occupational Health and Safety
Policy	POL-900 Sustainability Policy	
Version	00	Date: 24/10/2023

RESPONSIBILITIES

	Name	Position
Processed by:	Elena Cortese	Compliance Officer - Corporate Social Responsibility
Verified by:	Cristina Rossato	Chief Compliance Officer
Approved by:	Luca Donna	CFO and Managing Director BoD

CLASSIFICATION

Public

SUMMARY OF CHANGES

Ver.	Date	Description of Changes
00	24/10/2023	First issue

CONTENTS

1	INTRODUCTION	3
2	PURPOSE.....	3
3	SCOPE OF APPLICATION	3
4	GOALS AND COMMITMENTS.....	4
5	FUNDAMENTAL PRINCIPLES	5
5.1	PROTECTION OF HUMAN RIGHTS, QUALITY OF RELATIONSHIPS AND WORKING CONDITIONS	5
5.2	TRANSPARENCY AND ETHICS	6
5.3	COMMITMENT TO PROTECT THE ENVIRONMENT.....	6
5.4	ENGAGEMENT AND DISSEMINATION OF THE PRINCIPLES OF SUSTAINABLE DEVELOPMENT	7
5.5	SUPPORTING COMMUNITIES	8

1 INTRODUCTION

Lutech S.p.A. (hereinafter also referred to as "LUTECH" or the "Company") and the entire Lutech Group, a leader in the field of Information Technologies, base their growth strategy on the belief that elements such as ethics and integrity in the conduct of individuals, customer focus, recognizing the importance of individuals, innovation and profit are concepts which combine to create a synergistic, interdependent framework for economic, social and environmental Sustainability.

Lutech believes that correct, transparent and responsible conduct increases and protects brand identity and reputation over time, leading to sustainable business development aimed at creating and protecting the value chain for all stakeholders involved.

With this document, Lutech aims to define the guiding principles of its strategy for sustainable growth through the reduction of negative impact, both direct and indirect.

As a testament to its commitment to integrating ESG principles into its business model, Lutech has identified its Sustainability Pillars (hereinafter referred to as "Pillars") within this Policy (hereinafter referred to as the "Policy") with the intention of contributing towards the achievement of the Sustainable Development Goals (SDGs), as defined by the UN in the 2030 Agenda.

2 PURPOSE

The purpose of this Policy is to establish a corporate culture geared toward fairness and professionalism, to promote honesty, integrity and transparency, encourage sustainable development, foster dialogue related to business ethics and increase stakeholder responsibility.

3 SCOPE OF APPLICATION

This Policy applies to Lutech and all companies within the Lutech Group and is delivered to all internal and external stakeholders who request it; it is also available on the website <https://lutech.group/en> in the "Responsibility" section.

Key stakeholders, including employees, working associates, suppliers, shareholders, clients and trade unions as internal stakeholders and community and local areas, institutions and public administration, and trade associations as external stakeholders, are involved in the drafting and application of the Policy.

Continuous dialogue with stakeholders is a prerequisite for sustainability and the building-up of mutual value. Lutech considers all individuals who have legitimate interests, implicit or explicit, affected by its activities, to be stakeholders.

4 GOALS AND COMMITMENTS

The Sustainability Policy defines the principles and pillars that guide Lutech and the Group in contributing, through its business activities, to the creation of a sustainable development model, within which internal and external Stakeholders can work together to achieve common goals.

The document acts as a guide in understanding the main aspects on which the concept of "**Sustainability**" is based, with a view to improving and reducing the impact brought about by the business, taking into account the risks and opportunities that may affect its development and ability to innovate and generate lasting value over time.

This Policy was inspired and drafted on the basis of the following principles:

- ❑ **Propensity for change:** it is the intention of both Lutech and the Group as a whole to actively contribute to the achievement of sustainable business growth, reducing impact on the various players involved along the entire value chain: suppliers, employees, clients, community. Lutech is therefore committed to defining and periodically updating a long-term strategy that aims to generate value in the present without compromising the ability to create value in the future.
- ❑ **Stakeholder Engagement:** Lutech's commitment to raising awareness among internal and external Stakeholders about the importance of responsible conduct when managing social, environmental and governance issues.
- ❑ **Communication and transparency (accountability):** willingness to convey, with adequate emphasis, the importance Lutech attaches to the various dimensions of Sustainability, undertaking, among other things, to
 - report on its performance in connection with social, environmental and governance issues critical to Stakeholders and to the Company itself;
 - guarantee that all internal and external stakeholders are familiar with its policies;
 - maintain management systems certified by external bodies to guarantee its performance.

5 FUNDAMENTAL PRINCIPLES

Lutech intends to take an increasingly sustainable and socially responsible approach to defining its business activities. Lutech's commitments can be traced to specific priority guidelines, represented by the following pillars, on which the Sustainability Policy is structured.

5.1 Protection of human rights, quality of relationships and working conditions

Principle

Commitment to the recognition and respect of human rights, seen as essential to the principle of legality, and the concepts of social justice and equity. Recognizing the importance of human resources by ensuring a safe and inclusive work environment. Strong commitment to the development of skills and expertise, ensuring that recruitment, training and professional development of resources are based on fairness and merit, counteracting all forms of discrimination.

Application

Lutech is committed to carrying out its activities with full respect for human and workers' rights, as recognized by the conventions and declarations operating nationally and internationally. It condemns all forms of child labor, forced labor, and discrimination based on age, racial and ethnic origin, nationality, political and trade union views, religious beliefs, sexual orientation, gender identity and any other non-work-related personal characteristics.

Lutech's success is based on the strategic capabilities and technical-professional skills of its working associates, the effectiveness of the services offered and the ability to put projects into operation, using an 'end to end' approach.

Lutech also gives its employees the opportunity to develop their skills by providing effective training, career paths based on the merit of resources and an objective performance evaluation system.

Lutech protects its employees by ensuring a work environment that aims at achieving inclusiveness, discouraging incidents of discrimination, exploitative actions, mobbing and/or harassment. Likewise, in full compliance with current data protection legislation (see also *PSQ-600 Organization, Roles and Responsibilities - SGPDP*), Lutech informs every employee about the nature of data processing, to ensure adequate confidentiality.

LUTECH is committed to ensuring the healthiness and safety of the various work environments (see also *MSL-POL Occupational Health and Safety Management System Policy*) in which its employees provide professional services, not only through scrupulous management of physical locations and offices, but also through increasing attention to identifying the best services and tools to support its resources in remote working situations.

5.2 *Transparency and ethics*

Principle

Commitment to conducting business activities in accordance with the highest ethical standards, developing and using a form of governance that actively encourages transparent, responsible and fair conduct with all stakeholders, including market stakeholders (and competitors), not tolerating forms of bribery and corruption, and operating in compliance with relevant national, international laws and applicable regulations.

Application

Lutech is committed to conducting its business activities in accordance with high ethical standards, rejecting all forms of bribery and corruption and operating in compliance with the relevant national and international laws and regulations applicable (see *PSQ-500 Anti-Bribery Policy* and *MOG-000A Organization, Management and Control Model pursuant to Italian Legislative Decree 231/01 - General Part*). With this in mind, Lutech has adopted its own Code of Ethics (see *MOG-001 Code of Ethics*), which defines the ethical principles to which Lutech Stakeholders must adhere and provides the tools for combating and preventing bribery and corruption. The document is published on the company website to ensure that it is adequately disseminated.

Lutech has introduced a useful whistleblowing channel (see *PSQ-501-EN Whistleblowing Policy*) to report cases of bribery and corruption, discrimination or related irregularities, for which the Supervisory Board is responsible. Finally, Lutech is committed to obtaining and maintaining certifications that attest to the regularity and transparency of its processes, involving all relevant units and those responsible for the relevant processes when they are put into operation.

Lutech also works in the interest of the common good so that the consequences - direct and indirect - of its activities are socially responsible and aspire to social, as well as environmental and economic, Sustainability, which is accounted for annually in the Sustainability Report.

5.3 *Commitment to protect the environment.*

Principle

Integration of the aspects of protection, awareness, promotion and regeneration of the environment and natural ecosystems as part of the group's business processes, with a view to managing the use of resources more effectively, promoting the reduction of direct and indirect environmental impact, fostering sustainable sourcing policies for products and services.

Application

Lutech is sensitive to the issue of reducing environmental impact and responsible management of natural resources and is committed to directing its decisions in such a way that the compatibility of business activities with respect for the environment is guaranteed.

	<i>Policy</i> Sustainability Policy	<i>Document code</i> POL-900	<i>Version</i> 00
---	---	--	-----------------------------

Aware of the environmental impact generated by its business activities, Lutech intends to play an active role in increasing awareness of the need for responsible conduct and managing the risks and challenges that may arise in the short and long term from an environmental perspective (see *MAM-POL Environmental Management System Policy*).

In concrete terms, Lutech is committed to opting for sustainable forms of procurement of resources and services, choosing suppliers who are also selected on the basis of their performance in the areas of Environmental and Social Sustainability, as well as cost-effectiveness and efficiency.

It also undertakes, as part of an approach based on continuous improvement, to monitor and keep up-to-date with CO₂ emissions through external assurance. Monitoring will clarify areas for efficiency gains and, where it is no longer possible to reduce the environmental impact of business processes, offset CO₂ emissions. In this area, the company will assess the processes and impact related to the mobility of its professional associates and the use of renewable energy sources to power its business activities.

Finally, Lutech is committed to improving the sustainability performance of all its offices and data centers by encouraging a progressive reduction in the use of plastic, the choice to work remotely, training in the responsible use of resources and the use of renewable energy, wherever possible.

5.4 Engagement and dissemination of the principles of Sustainable Development

Principle

Willingness to promote the principles of Sustainable Development as called for in the Sustainable Development Goals of the United Nations 2030 Agenda, with particular reference to Goals 16 and 17. Creation of Sustainable Development ecosystems that benefit territories and communities by streamlining the process of achieving lower environmental and social impact in a systemic, coordinated and calculable way.

Application

Lutech understands that in order to achieve stable, long-term changes, conditions must be created that allow for replicability of interventions to maximize their impact. In this, a very important role is played by processes designed to create thematic networks with other companies, in order to share best practices, projects, campaigns. Equally, participation in specialized networks and forums, in which the topic of Environmental Sustainability is analyzed, updated and promoted, is another way in which Lutech testifies to its commitment, entering into discussion with players from similar or different sectors. Finally, participation in events where environmental sustainability is thematized, with a focus on the role of Artificial Intelligence and digital tools in the environmental debate, are opportunities for learning and exchange that involve territories, communities and generally stakeholders to whom Lutech wishes to make its commitment explicit.

5.5 Supporting communities

Principle

Supporting the community through financial support and active participation in charitable initiatives, awareness campaigns, pro bono research activities and corporate volunteering to foster the emergence and development of worthy initiatives within the communities, offline and online, in which Lutech operates.

Lutech also highlights the importance of gauging the impact of these pathways, in order to be able to chart continuous improvement paths based on past ESG performance.

Application

In order to guarantee the responsible management of its business, Lutech wishes to contribute towards the recognition of the community with which it comes into contact on a daily basis, at the same time maintaining the balance between the areas of Social, Environmental and Economic impact.

Among the activities that demonstrate its commitment to the society in which it operates, Lutech promotes initiatives and actions to support different associations and organizations forming part of the civil community. In particular, the company supports the pro bono activities of such entities through philanthropic donations, whether sponsorships or monetary donations or gifts in kind, aimed at supporting scientific research, education or emergency situations in need of rapid-deployment humanitarian aid. In addition, Lutech views corporate volunteering as a resource for restoring value to the communities in which it operates and values mechanisms for donating labor hours to satisfy demand in its territories and communities. Finally, joining or indirectly supporting nationally or internationally recognized civil causes is another way of creating value for offline and online communities whose principles are recognized and shared by Lutech.