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### 1. Introduction

Without prejudice to the contents of the Group's Code of Ethics, approved in its most recent version by the Board of Directors of SOL S.p.A. on September 14, 2017, this Policy explores the principles and values that have always characterized the SOL Group HR policies in depth. These shall continue to guide the management of interpersonal relations, selection, training and assessment of all SOL Group companies' employees, regardless of their job description, location in the organization and country of origin.

This Policy is addressed to all SOL Group employees, particularly supervisors and coordinators, and represents a shared foundation for the correct, responsible and fair management of HR resources.

### 2. The fundamental values underpinning SOL Group HR policies

The Group considers human capital its most important asset and main area of investment, not only for the ethical and profitable achievement of its objectives but also for the fulfillment of its social role in the growth of the individual, the community and the environment in which it operates.

For this reason, the Group has identified the core values for HR management, which shall serve as a guide in an ever-changing socioeconomic environment that constantly poses new challenges, with increased complexity, to face internationalization, globalization and the evolving needs of individuals.

## Principles and values underlying SOL Group HR policies

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### *Ethics and integrity*

SOL Group promotes and expects its employees to conduct themselves ethically and with integrity towards colleagues, customers, suppliers and all the stakeholders involved in achieving sustainable success.

Likewise, it guarantees, first and foremost to all employees at every level, fair treatment, professionalism and respect for the values of the individual, ensuring suitable working conditions that confirm compliance with the rules and personal values.

The Group rejects any unethical behavior towards others and promotes the dissemination of the principle of fairness and integrity from the earliest stages of selection and recruitment, considering these values to be fundamental in assessing candidates at the pre-employment stage.

SOL Group companies are constantly committed to operating in compliance with the national labor regulations from time to time applicable in each country in which it operates, as well as international directives and recommendations.

In particular, all Group companies are forbidden to employ minors or exploit child labor; the use of forced or compulsory labor or, in any case, the use of any form of labor under threat of punishment are also prohibited. The Group recognizes its employees' right to belong to trade unions and stipulate collective bargaining agreements within the framework of the individual category regulations. Industrial relations in the countries in which the Group operates are characterized by the utmost fairness and cooperation while respecting individual roles. The Group guarantees the right to fair working hours that do not exceed time schedules specified in the applicable labor contracts and agreements stipulated with labor unions or by law.

### *Dignity*

II Group promotes a corporate climate aimed at preventing the implementation, acceptance or tolerance of conducts detrimental to individual dignity.

Conversely, the Group promotes exchanges of opinions, a feedback-based culture where the management of unexpected events or mistakes does not result in intimidating repercussions, but rather in the daily construction of a transparent and assertive dialogue. Attitudes, conduct or language detrimental to the dignity of the individual are considered offenses and harassment and, as such, condemned by the Group. Harassment is any alleged verbal, physical, sexual or psychological violation of individual dignity, whether between peers or towards colleagues. For this reason, policies and whistleblowing channels, training and awareness campaigns are constantly provided and updated within the Group on issues related to respect for diversity, gender equality, physical abilities, sexual orientation, ethnicity and age.

## Principles and values underlying SOL Group HR policies

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### *Equal treatment and meritocracy*

Among the founding values of its growth, the Group supports the entrepreneurial spirit of the individual. Therefore, it consistently consolidates and updates the company policies that serve as guidance for accessing roles and responsibilities in the Company based on the principle of meritocracy and regardless of gender, age, physical abilities or other personal factors.

As a result, the Group provides ongoing training and information regarding biases that can prevent people from interacting with others in a fair and meritocratic manner. The Group also develops processes for assessing attitudes, skills, and performance, with a view to enhancing impartiality.

In this regard, the Group has drafted the first Manifesto on Diversity, Equity and Inclusion for all Group employees worldwide, emphasizing its commitment to pursuing the goal of inclusiveness in the HR processes deemed most sensitive and critical, such as Selection, Training and Performance Assessment.

For these purposes, the Group has established specific Boards and Committees to deal with the issues of gender equality, supervision of conduct inside the company and violations of the Code of Ethics. These Boards are responsible for supervising compliance with the principles of fairness, equality and dignity. They establish targets for improvement and allocate resources to manage reports, violations and ongoing training and information.

### *Health and Safety*

SOL Group companies are also committed to safeguarding employees' mental and physical wellbeing and safety.

All SOL Group employees must pay utmost attention to safety at work and the environment, and are committed to complying with legal and corporate directives regarding the protection of health, the environment and safety at work.

The Group considers the prevention and elimination of all situations that may generate risks inside and outside the company a professional and ethical obligation, as established in the "SOL Group Companies Policy on Safety and Environment". All the department heads are responsible for implementing the necessary processes to ensure that the provisions of the aforementioned policy are consistently applied at all levels. The same commitment must also be required of suppliers of goods and services.

### *Goals and responsibilities*

All SOL Group employees, regardless of their position or type of contract, are responsible for achieving the goals assigned to them. Therefore, within the limits of their powers and duties, they must be in a position to make decisions and work autonomously, building on a strong trust relationship with the Company. The SOL Group is committed to developing the competencies and skills of its employees to enable them to express their full potential, commitment and creativity in pursuing the goals assigned in line with the needs of the organization. All employees agree to receive suggestions, directions and coordination from their hierarchical-functional structure of reference, recognizing that

such suggestions, directions and coordination are based on and conducted for the purpose of stimulating their motivation and the improvement of the Group as a whole.

This culture is aimed at generating responsibility, safety and security, awareness and commitment in all the people belonging to the SOL Group, translating into competence, creativity, capacity for innovation and creating a positive climate, characterized by strong and vital personal and professional relations.

### **3. Internal HR management processes**

#### *3.1 Recruitment and selection*

The selection process pursues annual targets for the induction of new profiles. The process is validated by Top Management and HR in line with the strategic business objectives and the long-term sustainability of the Group's growth.

The search and selection processes take into account both the needs for physiological growth of the workforce - including temporary staff replacements and succession plans for managerial positions - and regulate the correct selection flows, both from outside the Company and/or internally, through voluntary submission of applications by Group employees. The Group encourages the voluntary application of candidates who meet the requirements and have the competencies required for a given vacant position.

The selection process is described in a dedicated policy in order to ensure fair and impartial processes, both in terms of representation of diversity and fair treatment of new resources.

In searching and selecting resources, HR is responsible for ensuring compliance with the fundamental principles contained in the Group's Code of Ethics.

The ultimate goal is to select and hire people who, in addition to the necessary skills, knowledge and potential, also can cooperate with others, create constructive relationships and pursue their goals with honesty, commitment, transparency, intelligence, flexibility and team spirit.

The HR function ensures no discrimination in terms of skills and characteristics required for any specific job and supervises that the Department directly involved in the selection of candidates applies the procedure consistently.

#### *3.2 Training and development*

Continuous technological development and innovation call for constant updating of skills and knowledge. Intellectual curiosity, learning and ongoing training in the broadest sense are an integral part of the SOL Group's culture. Concurrently with employee onboarding, every new hire joining the SOL Group receives basic training in safety, quality, privacy, pharmacovigilance, Diversity, Equity and Inclusion. Also, the new entry's supervisor is responsible for developing a targeted training program involving all related functions in line with the activity to be performed.

The professional development of resources includes mainly on-the-job technical training.

The HR function is responsible for collecting training needs in order to identify *ad hoc* programs for individual resources.

Upon completion of each training course, the HR function is responsible for assessing the efficacy of the training, with a view to making further improvements.

We can improve our professionalism only if we recognize the inner spark driving our curiosity and fortifying the determination to face new challenges and learn more, in order to be ready to cope with new and ever-evolving situations.

We believe that each individual is responsible for his/her own professional development. The Company is committed to supporting its employees in the most suitable way, favoring the expression of their potential and determination in order to develop new skills and competencies.

Supervisors are responsible for providing employee training and professional development, including moments of exchange of feedback. This is intended to reciprocally highlight strong points and areas for improvement, with attention and respect.

### *3.3 Internal communication, free flow of information and confidentiality*

Communication addressed to Group employees must be simple, credible and appropriate. Communicating does not only mean providing information but also, and sometimes even more, listening. Therefore, it is both a right and a duty to foster a respectful and proper dialogue with everyone, at every level.

Top management promotes the free flow of information, useful for pursuing professional goals, learning about business contexts and feeling part of the company's strategic objectives. The Group's short, medium and long-term goals are shared in a transparent and understandable manner to encourage the active participation and virtuous initiative of the individuals within not only their relevant area but in the general interest of the entire organization. Employees are invited to participate in the proposition of improvement initiatives in the areas of sustainability, economic growth, company welfare and social responsibility, and Top Management is committed to examining and concretely assessing the emerging needs and ambitions of its employees in these areas.

Lack of transparency and omitting information to employees that would be useful in the pursuit of their goals or strengthening their sense of belonging to the Group are considered serious failures on the part of Top Management and an obstacle to the growth of the individual and team spirit. Strategic business goals, economic results, corporate welfare, formal communication channels, trade union agreements, and safety, health, and labor-management regulations are regarded as information to be disclosed within the organization and useful to encouraging the participation and inclusion of the individual.

Conversely, personal and sensitive information (biographical, economic, health-related, etc.) of employees or subjects and institutions protected by confidentiality agreements can in no way be disclosed within the organization, subject to data processing regulations, which each employee is obliged to observe when processing such information.

Employees are required to consider company information strictly confidential vis-à-vis the market, suppliers, their acquaintances and any other subject outside the company. Any violation in this regard is considered an act of irresponsibility, and in no way acceptable.

### *3.4 Performance assessment*

In order to support employee development and ensure that everyone has an opportunity to demonstrate their potential within the organization, the Heads of the Departments, Business Units, Services or work groups establish targets for their employees in a clear and transparent manner, in line with their level of responsibility, the skills required for their role and the targets assigned.

The HR function promotes an annual performance assessment that takes into account both the achievement of the targets by employees and their conduct and participation within teams at all levels.

In particular, the HR function is responsible for the distribution of the guidelines to the Head of the Business Units, middle managers and top managers, in order to promote a feedback-based culture between employees and supervisors in line with impartial and objective criteria, regardless of gender difference, physical abilities, sexual orientation or age, and guided solely by the skills required for the role, the achievement of agreed objectives and adherence to the Group's code of conduct.

### *3.5 Inclusiveness and gender parity*

The SOL Group, thanks also to its successful international expansion over the years, has developed the sensitivity and tools needed to manage diversity, cultural differences and talent identification in multiple areas, sectors and countries.

The Group believes in the importance of talent retention policies and tools that take into account people's changing and emerging needs, with a view to both integrating diversity in work groups and facilitating the person in the different stages of their professional and personal lives.

To this end, the Group promotes policies related to:

- work-life balance, taking into consideration flexible working hours and the possibility of requesting and accessing part-time schedules in a fair and individually negotiable manner and, when possible, also revocable. Private life is as important as professional life, and the Group recognizes the importance of ensuring a fair and harmonious balance between the two. For this reason and to the extent possible, as well as in line with each individual's privacy, SOL Group Companies carefully evaluate every single situation through the HR function, with the utmost attention;
- parenting support in the form of access to flexibility tools for parents and caregivers in the delicate stages of caring for their children or loved ones, with policies designed to promote not only support for the mother (in the case of parenting) but also integration with social policies regarding leaves for fathers;
- access to work for categories of disadvantaged workers and individuals with disabilities, not only in compliance with the legal obligations, but also reflecting the commitment of all company employees to actively include them in the work teams, protecting not only their fragility but also and

above all their talents, while recognizing their specific individual skills and promoting their growth without any form of discrimination;

- analysis of employees' reasons for leaving, especially with a view to monitoring turnover by gender, through confidential and discretionary exit interviews conducted by the HR function. This is intended to exclude any unspoken form of discrimination, psychological pressure or work-life balance difficulties, and detect and manage possible violations, and improve the Group's policies through attentive listening to the employee even upon leaving the company;
- the promotion of gender parity in all its forms: equal opportunities for training and promotion and equal pay for equal roles and degree of coverage.

#### **4. Alcohol and drug abuse**

Each individual Sol Group employee – regardless of the role and type of contract – must personally contribute to maintaining a work environment that respects the decorum, sensitivity and freedom of other individuals.

Therefore, the use of alcohol, drugs or similar substances is considered a voluntary violation of one's obligations. This conduct may be subject to disciplinary measures in compliance with the applicable contractual regulations. The relevant supervisor is responsible for verifying the proper application of these principles.

#### **5. The Anti-Corruption Code**

SOL Group's priority is conducting business with loyalty, fairness, honesty and integrity, in full compliance with the currently applicable laws, regulations, Italian and international best practices and principles already contained in the Group's Code of Ethics.

The SOL Group has implemented an Anti-Corruption Code to be complied with by all Group companies' employees and all external parties (suppliers, consultants, professionals, business partners, self-employed or parasubordinate workers, etc.) collaborating with the Group Companies.

The adoption of the Anti-Corruption Code, its dissemination and the relevant training enabled the Group to develop an additional tool aimed at preventing corruption in line with the "zero tolerance" principle while ensuring compliance with all applicable anti-corruption regulations. This reflects the principle that every true success is based on an equally profound sense of ethics.

**Principles and values underlying  
SOL Group HR policies**

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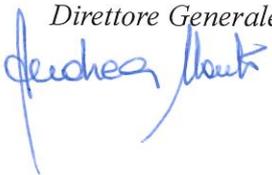
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