STAR7

Sustainability Report 2022

Sustainability Report 2022

STAR7

STAR7 S.p.A.
Via Alessandria, 37/b - Valle San Bartolomeo
I-15122 Alessandria (AL) - Italy
VAT No. IT01255170050
Italian REA Index No. 208355

Contents

07 Letter to stakeholder

09 2022 Highlights
- STAR7's contribution to sustainable development - SDGs _ 11
- ESG performance _ 12
- Objectives _ 13

15 Methodological note

17 STAR7
- People of Content _ 19
- A global network _ 23
- Culture and values of STAR7 _ 26

29 Business model - Value chain and sustainable development
- Market Scenarios and Trends _ 31
- The role of STAR7 and its contribution to sustainable development _ 33
- STAR7's Integrale⁷ approach _ 36
- Employees and freelancers _ 44
- Suppliers _ 47
- Customers _ 48
- The role of stakeholders _ 49

51 Governance and Business Conduct
- Governance model and corporate bodies _ 53
- Sustainability governance _ 55
- The organisational structure and the delegation process _ 56
- Communication processes and conflicts of interest _ 59
- Responsible business conduct _ 60
- Management Systems and Certifications _ 62
- Environmental - Social - Economic Compliance _ 64
- External Initiatives and memberships _ 65

67 Material Topics
- Impacts and material topics _ 69
- Material Topics _ 72
- Material Topics - Objectives and Actions _ 75

79 Innovation, Research and Development and Cutting-edge Technologies
- The role of research and development _ 81
- Innovation: development of cutting-edge technologies _ 83

87 Creation and distribution of value
- Economic value generated and distributed _ 89

91 Ethics and Integrity
- Corruption prevention measures _ 93
- Respect for competition _ 94
- Tax transparency _ 95

97 Privacy, data and information
- Data Security and Privacy _ 99
- Protection of intellectual property _ 101

103 Quality and reliability of products and services
- Quality Policy _ 105
- Product health and safety _ 106
- Product conformity _ 107
- Selection, qualification and monitoring of suppliers _ 109

111 People
- Human Resources Management _ 113
- Employment and turnover _ 117
- Diversity and equal opportunity _ 120
- Maternity and paternity leave _ 122
- Training _ 124
- Occupational Health and Safety _ 126

129 Environmental Impacts
- Environmental policy and responsible use of resources _ 131
- Materials _ 132
- Waste _ 133
- Water _ 135
- Energy - Emissions and Climate Change _ 137

141 Gri Content Index

Letter to stakeholders

GRI 2-22

Lorenzo Mondo
Chairman and Chief Executive Officer STAR7

The release of STAR7's first Sustainability Report marks a significant milestone in our journey towards sustainability. This journey began several years ago and is now being formalised. We have come to realise how our way of operating in the market and supporting our professional community impacts our individual growth as human beings, as well as society and the environment.

Being sustainable involves recognising our company's role in the environmental and social ecosystem. It means acknowledging that the company's progress and achievements are a direct result of the dedication and contribution of our entire team, including our employees, customers, shareholders, and all individuals associated with our organisation.

To enhance STAR7's sustainability strategy, it is crucial to convert this awareness into actionable objectives that can improve the organisation's quality and level of service. Additionally, it is essential to continuously measure and analyse the impacts of these objectives.

We cannot ignore the context in which we find ourselves today: a world changing at a frenetic pace, the climate crisis, the demographic issue and migratory flows, the tail end of the pandemic, the energy crisis, the rapid rise in inflation and, last but not least, the dramatic consequences of the Russian-Ukrainian conflict. The current situation requires us to pursue our chosen path with greater determination and rethink our approach to living, working, and producing in order to ensure sustainable development in the long run. Ultimately, it is necessary to keep changing.

STAR7 has always been a company that can adapt and transform, thanks to an organisational system that supports it. This system is based on the following pillars:

People at the centre. An organisation that can meet people's higher-level needs and adapt them in line with company growth.

Customer at the centre. Customer satisfaction is the ultimate goal of STAR7's service lines.

Effective organisation. An organisational system that is capable of responding to today's challenges and can meet the strong need for internal integration and partnership with our customers.

Keeping these business objectives in mind, we have identified the Environmental, Social, and Governance goals that we aim to measure, enhance and accomplish in the upcoming years.

The pursuit of sustainability is a crucial driver of change that requires us to be attuned to current trends and work towards a brighter future.

2022 Highlights

STAR7's contribution to sustainable development - SDGs

STAR7 offers a range of services that cover all aspects of **product information**, from design to after-sales support. These services include engineering, **content creation and authoring, translation, printing**, and even **virtual product experiences**.

These services have a significant impact on society and the environment. In many cases, they play a crucial role in improving people's lives by promoting social and digital inclusion, education, and cultural integration. This includes making information more accessible. Additionally, STAR7's services help to reduce the environmental impact of the products and services offered by its customers. As a key part of the supply and value chain, they contribute to mitigating these impacts.

STAR7 used the United Nations 2030 Agenda and its **Sustainable Development Goals (SDGs)** as a reference and guide.

SDGs with prevalent impacts due to business model

SDGs with prevalent impacts due to internal activities

ESG performance

Economic	2022
Revenues	Euro 83,3 million
Economic value generated	Euro 84,8 million
Economic value distributed	Euro 72,6 million
Research & Development Investments - 2022	Euro 2,6 million

Governance & Policies	
Compliance Programme as per Legislative Decree 231/2001	
STAR7 S.p.A. Management Systems Quality UNI EN ISO 9001:2015 Environment UNI EN ISO 14001:2015	

Social - Quality and conformity of services	
Non-conformities - Reduction % 2022 vs 2020 (Global Content Service Line)	-51%
Data and Information Security - Privacy/data breaches (No.)	None

Social - Human Resources	
Number of employees as at 31 December 2022	859
Employment - increase in no. of employees 2020-2022 (%)	60%
Gender diversity - female gender share (% of total employees)	45%
Gender diversity - share of female gender in managerial positions (% of total)	29%
Cultural diversity and social inclusion - No. of nationalities/geographical origin of employees	14 nationalities
New generations/age diversity - share of employees under 30 years of age (% of total)	58%
Training - Average training hours 2022 per employee	16,0 hours
Health and Safety - Accident Frequency Index (number of accidents/hours worked x 1,000,000) (1 accident in 2022	0,003

Social - Freelancers	
Number of freelancers (translators - interpreters – DTP)	467
Cultural diversity and social inclusion - Number of employees by nationality/geographical origin (% of total)	74% UE 26% non UE

Environment	
Paper purchases - Percentage of FSC Chain of Custody Certified purchases	45,1%
Percentage of waste sent for recovery	Over 90%
Total direct energy consumption - GJ	16.770
Total direct (GHG Scope 1) and indirect (GHG Scope 2 location-based) emissions/t CO2e	1.016

ESG goals

Material topic		Sustainability plan objectives Description/Actions	Time span
E	**Environmental**		
1	Energy, emissions and climate change	Increase the proportion of energy derived from renewable sources and establish electricity supply agreements that come with a Guarantee of Origin. Map GHG Scope 3 emissions along the value chain.	2023-2025
2	Responsible use of natural resources	Improve the utilisation of materials and management of waste in accordance with circular economy principles. In this context: Identifying and implementing measures to eliminate or reduce paper waste is crucial for printing companies.	2023-2025
S	**Social**		
3	Human resources: talent attraction and retention	Group onboarding sessions (virtual and/or in-person) of new STAR7 resources. Maintain an active communication network with schools and universities in order to attract young talent.	2023-2024
4	Development, training and enhancement of human resources	Introduce new internal training process management tools. Implement a performance evaluation system that involves the majority of STAR7 employees. Create a mentorship programme - On-the-job training will play an active role for STAR7.	2023-2025
5	Equity, diversity and inclusion	Adopt a Group-wide Diversity, Equity and Inclusion Policy. Gender Gap analysis activities and subsequent evaluation of obtaining Gender Equality certification	2023-2025
6	Health and safety in the workplace	Maintain high safety standards and minimise accident rates. “Health and Safety in the Supply Chain” project.	2023-2024

Material topic		Sustainability plan objectives Description/Actions	Time span
7	Quality and reliability of products and services	Ensure that the products and services offered maintain and improve their high standards of quality and reliability. To improve customer satisfaction and reduce product non-conformities, we have appointed a dedicated internal person responsible for quality control and strengthened our quality control system. This will help us take necessary improvement actions and ensure that our products meet the required standards. Implementare controllo "Sample Picking" per un monitoraggio della qualità delle traduzioni mediante sistema di campionatura automatica e verifica da revisori qualificati.	2023-2024
8	Innovation, R&D for the development of new products and service	R&D activities, for the development of innovative solutions to improve service delivery and their ability to generate positive social and environmental impacts. "Next" is an internal competition aimed at generating innovative ideas and practical solutions related to services, technologies, and sustainability.	2023-2025
9	Protection of privacy, IT security and data protection	Protect sensitive customer and company data with effective security measures and in compliance with regulations and the Management System. Training activities aimed at all staff in order to raise awareness of IT security.	2023-2025
10	Sustainability in the supply chain	Adopt a Code of Conduct to be signed by suppliers (new and pre-existing).	2023-2024
11	Protection of intellectual property	Adopt STAR7 intellectual property protection policies. Monitoring and verification of possible intellectual property infringement offences Compliance Programme as per Legislative Decree 231/2001.	2023-2025
G	**Governance**		
12	Economic performance: generation and distribution of value	Actions aimed at developing and enhancing the competitive position strategy.	2023-2024
13	Transparency, ethics and integrity in the conduct of business	Establish an internal Risk and Sustainability Control Committee to manage the positive and negative impacts generated by STAR7.	2023-2025

Methodological note

GRI 1-3
GRI 2-1
GRI 2-2
GRI 2-3
GRI 2-4
GRI 3-1

STAR7 S.p.A. and its subsidiaries, collectively known as the STAR7 Group, have released their first Sustainability Report referring to the year 2022. This annual report aims to offer stakeholders a comprehensive overview of the STAR7 Group's significant impacts on the economy, environment, and people, including human rights. It also outlines how the company manages these impacts.

STAR7 S.p.A. is a company that has been listed on the Euronext Growth Milan market since 23 December 2021. As a result, it is not subject to Legislative Decree No. 254 of 30 December 2016. This decree implements Directive 2014/95/EU and requires public interest entities, including companies listed on regulated markets, to prepare a Non-Financial Statement ("DNF") if they exceed certain quantitative thresholds. This document is therefore drafted on a voluntary basis and does not constitute a DNF.

The Sustainability Report provides details on environmental, social, economic, and governance topics to help readers gain a comprehensive understanding and evaluate the activities, performance, results, and impact of the STAR7 Group.

By reporting on the significant impacts of business activities and relationships on the economy, environment, and people (including human rights), a company can provide a clearer understanding of its overall performance and value. This is because these impacts can have financial implications over time.

The Sustainability Report for 2022 has been created following the methodologies and principles outlined in the GRI Sustainability Reporting Standards. These standards have been defined by the Global Reporting Initiative (GRI Standards), and the report has been prepared in accordance with the reporting option that aligns with these standards. The Sustainability Report includes various chapters that report on specific GRI Standards or aspects of their content. Additionally, the GRI Content Index, which is an essential part of this document, provides a summary of these Standards.

To ensure sustainability reporting adhered to the latest standards, the GRI published updated guidelines in 2021. These changes included updates to the drafting process, general disclosure requirements, and the process for identifying and assessing material topics: GRI 1 Foundation; GRI 2 General Disclosures; GRI 3 Material topics. The GRI 1 Foundation 2021 outlines the fundamental principles of sustainability reporting: accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness and verifiability.

The GRI Standards and performance indicators chosen and reported are representative of the sustainability issues (material topics) that have been analysed and are consistent with STAR7's business and related impacts. The process of analysis, identification, evaluation and prioritisation of material issues, as described in Chapter 4/Impacts and Material Topics, was conducted as required by the GRI Standards, taking into account the reporting option adopted.

The Sustainability Report follows the reporting standards (GRI Standards) and is structured in the following way:

Chapters 1-3	General Disclosures (GRI 2)
Chapter 4	Material topics: process and topic list (GRI 3)
Chapters 5-11	Performance analysis of material topics (GRI 200 - GRI 300 - GRI 400)
GRI Content Index	List of GRI indicators reported (GRI 1)

The qualitative and quantitative data and information in this report covers the performance of STAR7 S.p.A. and its subsidiaries, which are consolidated on a line-by-line basis according to the Group's consolidated financial statements as of 31 December 2022. This reporting covers the entire period from 1 January 2022 to 31 December 2022. The environmental data regarding waste does not encompass the subsidiary STAR Comunicacao e Servicos LTDA, as they are currently unavailable and, in any case, not relevant to the objective of this document.

To allow for the assessment of STAR7's performance and the comparison of data over time, we have included comparative data for the two preceding years. This document makes reference to the potential use of estimates for certain quantitative information throughout its various paragraphs. These comments are intended to provide context for the presented data.

It is important to note that the STAR7 Sustainability Report, which has been created voluntarily, does not contain the information that is mandated by Article 8 of the EU Regulation 2020/852 on the European Union's Taxonomy of Sustainable Activities. This is because STAR7 is not obligated to publish such reports.

The document was drafted by the heads of the different functions of STAR7 S.p.A., the parent company, and its subsidiaries.

The STAR7 Board of Directors approved the Sustainability Report on 16/06/2023, and it did not undergo a limited audit by an independent auditor.

The Sustainability Report can be found on the STAR7 corporate website at star-7.com/ESG. More information on this can be obtained by writing to the following e-mail address: esg@star-7.com.

STAR7 S.p.A. has informed the Global Reporting Initiative (GRI) that it is utilising the GRI Standards and has provided a Statement of Use.

STAR7

People of Content

GRI 2-1
GRI 2-6

For over two decades, STAR7 has been providing services that cater to every aspect of **product information**, from design to after-sales. Our services include **creating and authoring technical content, translation, printing**, and **virtual experience**.

Global content
Advanced language services

Engineering
Product and process engineering

Product knowledge
Technical product expertise

Experience
VR, AR, 3D and computer graphics

Printing
Printing, packaging and kitting services

Over time, the company has pursued a strategy of expansion and integration through mergers and acquisitions, as well as diversifying its areas of expertise. This has involved developing new business lines to provide customers with the best possible solutions, setting the Group apart as a distinctive partner in the market.

STAR7 is focused on expanding its **presence** in key markets and delivering **high-quality** services. Our approach involves integrating services and creating value throughout the product information life cycle, which also offers cost reduction opportunities for customers.

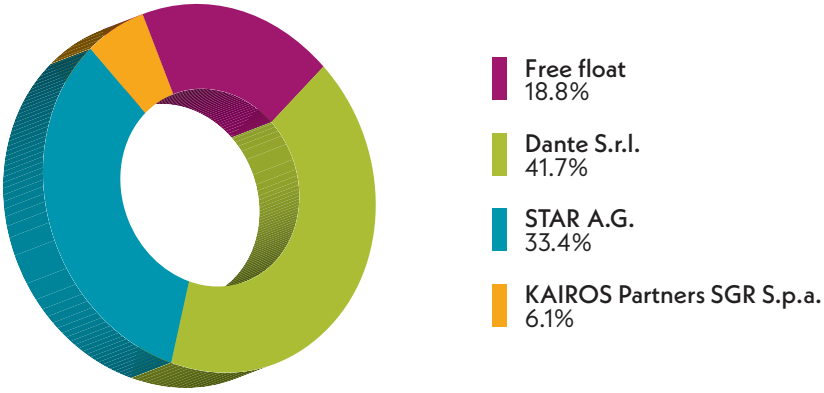
STAR7 in brief

As of 2021, STAR7 S.p.A. is listed on the Euronext Growth Milan, a multilateral trading system that is organised and managed by Borsa Italia. The company has its registered office in Alessandria (AL), Italy.

The Group's consolidated revenue for the financial year 2022 was € 84.8 million. As of 31 December 2022, the company had a total of 881 employees. Out of these, 489 were based in Italy and 392 were working at foreign subsidiaries.

Shareholding structure

On 31 December 2022, the parent company STAR7 S.p.A. had a share capital of € 599,340.00. This was made up of 7,649,752 ordinary shares and 1,350,000 PAS Special Shares. The largest shareholder, Dante S.r.l., owns 41.7% of the company.



Group History

STAR7 was established in 2000 by Lorenzo Mondo, who is currently the Chairman and CEO. The Swiss company STAR AG, owned by Josef Zibung, was also involved in the founding of the company. During its initial phase, the company focused on being a Language Service Provider (LSP) that offered translation and localisation services.

In 2006, STAR7 began diversifying its business model by integrating translation services with technical and commercial authoring services.

In 2010, the company founded STAR7 Printing S.r.l. (formerly known as STAR log S.r.l.), which offers logistics, printing, distribution, and digital archiving services to its clients.

In 2013, it acquired a controlling interest in the Brazilian company STAR Comunicação e Serviços Ltda, which operates in the printing & logistics sector.

In 2014, the Issuer created STAR7 Engineering S.r.l., a subsidiary that offers Process and Product Engineering services, as well as augmented and immersive reality solutions. This subsidiary is wholly-owned by the Issuer.

2000
STAR Italia was founded
Italian subsidiary of the STAR Group for professional translations

2006
Authoring
Technical authoring service added alongside translation (now known as Product Knowledge)

2010
STAR Log opens its doors
Digital print centre established

2013
STAR comes to Brazil
STAR COM is born

2014
STAR7 Engineering is founded

2015
STAR becomes STAR S.p.A.

2016
STAR U.S.A. established
STAR Austria established

2017
AD Studio Acquisition
Company specialising in technical authoring, A&D sector

2018
Foundation of STAR Albania

2019
STAR enters Argentina
STAR acquires Techworld
U.S. company specialising in language services

2020
STAR becomes STAR7
STAR7 acquires The Geo Group
U.S. company specialising in language services

2021
STAR7 acquires LocalEyes
Irish company specialising in language services for the Tech sector
STAR7 is listed on the EGM

2022
Acquisition of Vertere s.r.l.
Company specialising in language services

2023
Lease of CAAR and STI business units

On 7 July 2015, STAR S.p.A. became a joint-stock company after acquiring a majority stake in Call Comunicação e Serviços Ltda., a Brazilian company located in Belo Horizonte.

In 2016, it continued its process of expansion and affirmation in the international market by setting up the American company STAR USA LLC, based in San Francisco(California, USA) and the Austrian company STAR Austria GmbH, based in Linz (Austria).

In 2017, the company acquired AD Studio S.r.l., which specialises in technical authoring activities. It then went on to sign a business unit lease agreement for System Data Service S.r.l., which focuses on technical authoring activities in the Aerospace and Defence sector.

In 2018, our growth and development strategy is set to continue with the acquisition of Grafica e Editoria Colibri Ltda, a Brazilian company based in Belo Horizonte, and the establishment of a new company in Argentina called STARCOM Argentina SAS, which will be headquartered in Cordoba. Later that year, it purchased all the shares of RESS.r.l., a company based in Alessandria that specialises in technical authoring activities.

In 2019, the company successfully acquired 100% of Techworld Language Services Inc, a US-based company located in Troy, Detroit, Michigan. This acquisition allowed the company to expand its international presence and establish a new company in Albania, known as STAR Albania SHPK, which is based in Tirana.

In 2021, the company made two significant acquisitions - The Geo Group, an American language services provider, and the Irish LocalEyes Group, also specialising in language services.

Towards the end of the year, the company completed its transition to the regulated market in Euronext Growth Milan.

In 2022, STAR7 continued to expand by acquiring Vertere S.r.l., a company that specialises in language services. On 31 December 2022, the company signed a lease agreement for a business branch with the CAAR group. This move has greatly enhanced its engineering services in Italy and Brazil.

STAR7's robust expansion continues, with a presence in over 30 countries and 10 offices in Italy, 19 offices worldwide, over 1000 employees and more than 700 freelancers. We have established important partnerships with leading industrial companies and are now publishing our first Sustainability Report.

A global network

GRI 2-6

STAR7 has established a **global network** with several offices around the world, including 10 in Italy and 19 in Austria, the USA, France, Spain, Germany, Denmark, Ireland, Finland, Sweden, the Netherlands, Albania, Brazil, and Argentina.

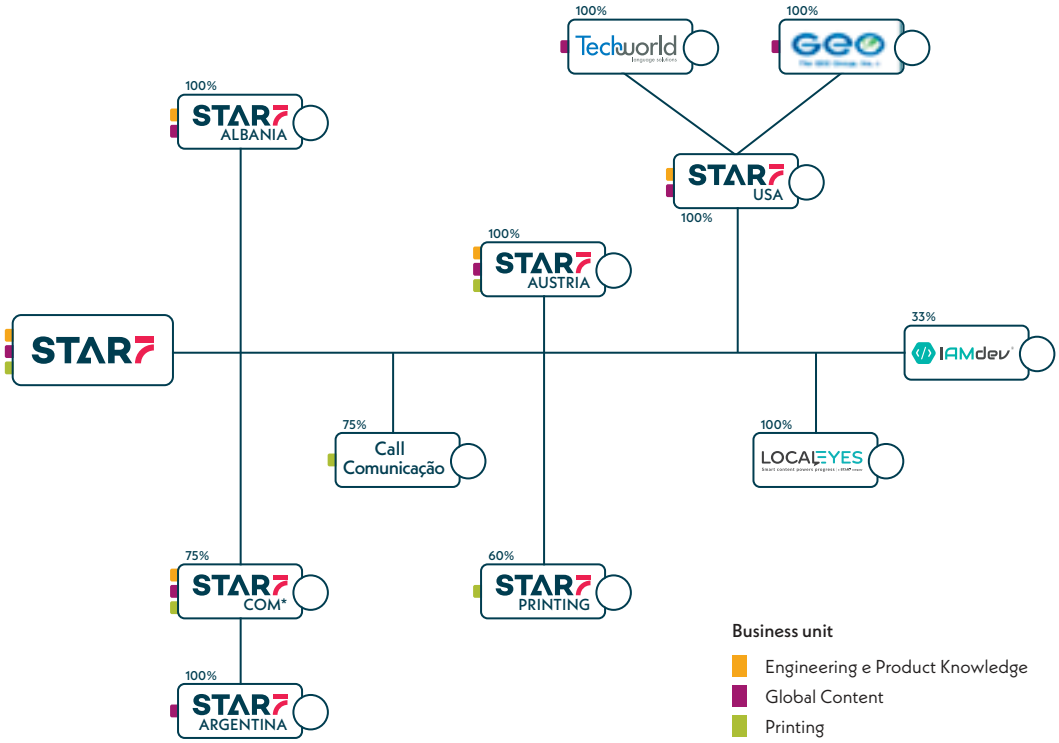
As of 31 December 2022, the Group had two production units for digital printing services of technical and commercial documentation, in addition to its offices in the various countries.

Company	Registered office	Country
STAR7 Printing S.r.l.	Asti	Italy
STAR Comunicação e Serviços Ltda	Belo Horizonte	Brazil

As of 31 December 2022, the STAR7 Group comprised 17 companies, including the parent company, located across three different continents: Europe, North America, and South America. For a comprehensive list of companies under STAR7, please refer to the Consolidated Financial Statements as of 31 December 2022.

The companies within the group have **specific areas of expertise and operate within various sectors**. Through this diversification, it is possible to offer high value-added services to its customers in the areas of printing, logistics, process engineering, VR, AR, IR, technical authoring and translation.

Group Structure & IPO Perimeter



Revenues by geographical area

Revenues by geographical area (Euro)	2020	2021	2022
Italy	33,967,445	42,335,080	47,054,679
Europe	3,101,050	3,573,573	3,178,075
Non UE	6,392.,133	13,083,773	33,018,424
Total	**43,460,628**	**58,992,426**	**83,251,178**

Target markets and services

STAR7 has been able to pursue its growth path by strategically acquiring and implementing operations aimed at further strengthening its expertise and capabilities in specific sectors.

Services are currently offered in the following areas:

- Aereospace & Defence
- Agriculture & Construction Equipment
- Air conditioning & Household appliances
- Automotive & Transportation
- Engineering & Machine Tools
- Fashion & Retail
- Finance
- Food & Beverage
- IT, Sotware & Teconology
- Life Sciences
- Media & Publishing
- Public Utilities
- Sport & Sports Equipment

Culture and values of STAR7

Corporate culture consists of shared values, and the two cornerstones on which an organisation is founded. The driving force behind business activity is its ***vision*** - the long-term ambition and direction that an individual company wants to take. Its ***mission***, on the other hand, is the purpose for which it operates. This is understood as an operational version of the vision, which is translated into the strategies implemented to achieve the objectives.

VISION

STAR7 aims to be the first choice for your product content, thanks to our high-quality services that span the entire information life cycle and our philosophy of delivering maximum efficiency and added value every step of the way.

MISSION

STAR7's services cover our clients' entire technical and commercial information life cycle.

It adopts a modular and integrated approach, combining know-how, network ubiquity and innovative STAR Group technologies.

The outcome is a comprehensive selection of services that can be tailored to your specific needs, including content creation, localisation, printing, logistics, and multimedia.

The values of STAR7

STAR7 is built by **people**, **working with and for other people**. The values underlying the corporate culture, which inspire them, condition their activities, their modus operandi and their choices every day. The Group is driven by seven shared values that inspire constant improvement.

1. Relationship

We're centred on the customer | It's thanks to our customers that we grow in expertise, capacity and ambition. That's why we devote our constant efforts and enthusiasm to seeking the best possible result, for a relationship that's built to last, on trust.

2. Responsibility

Other people's opportunities and problems are ours too | We believe that the work and conduct of each one of us can make a difference, at our company and with our customers. And we do all we can to act accordingly.

3. Listening

To give valuable answers, we first listen | Our work is based on relationships between people, customers and colleagues And we believe that only by listening to people with respect and sensitivity can we appreciate problems and identify solutions.

4. Integration

We believe in the strength of the whole | We've built our identity, our future, our growth and the growth of our customers on the integration of expertise, perspectives, talents and solutions.

5. Transparency

Conscious and direct, about potential and limitations | We believe in sincerity and fair-dealing as the fast-track to constructive, expeditious communication able to encourage the free exchange of ideas and get results.

6. Evolution

We never stand still | We grow, learn and change continuously to develop together with our clients and their projects in a fast-moving market

7. Creativity

Envisioning tomorrow is the driving force that guides us | We strive every day to conceive what no one ever has before and put our creativity to work together with technology to offer simple, new solutions that are truly fit for purpose.

Business model
Value chain and sustainable development

Market Scenarios and Trends

STAR7's target market is situated in a scenario defined by various mega-trends, where innovation and digitisation are of utmost importance.

Artificial Intelligence (AI)

Microsoft's substantial investment in OpenAI brought generative artificial intelligence to everyone's attention through the ChatGPT phenomenon. It is widely acknowledged that this will mark a global technological step change, surpassing even the advent of the World Wide Web. This will impact every industrial sector, giving rise to ethical, privacy, and employment concerns that must be effectively managed and regulated.

STAR7 is committed to embracing the latest megatrend and has launched its in-house Next programme. This initiative is designed to identify the next generation of product information management services. The main topic of discussion is the effect that generative AI will have on the Product Knowledge (PK) and Global Content (GC) Service Lines. Specifically, this technology will aid in the automatic creation of content and improve machine translation engines. AI translation software that uses machine learning has the ability to correct itself and enhance the quality of its translations. Many translation software programs that use artificial intelligence can translate multiple documents into different languages at the same time, providing customers with a cost-effective solution. AI will thus be able to facilitate the translator's work. A hybrid approach is already taking shape: The process involves using neural translation technology, which is then enhanced through post-editing that combines the power of artificial intelligence with human expertise.

The Next programme has clear R&D objectives, but it also seeks to evaluate how AI affects sustainability strategy and encourage fresh initiatives in this field.

Virtual reality (VR) e Augmented reality (AR)

The AR/VR market is seeing growing demand for **head-mounted displays (HMDs) in gaming and entertainment**, as well as the adoption of **augmented and virtual reality for marketing strategies, and the increasing demand for AR/VR in retail, e-commerce, education and training**[1].

[1] Market Research Future report available at the link: https://www.marketresearchfuture.com/reports/augmented-reality-virtual-reality-market-6884).

STAR7's extensive expertise in the realm of Experience has enabled the company to establish a strong competitive position in the market, which will prove advantageous as virtual and augmented reality continue to gain popularity.

Industry 4.0

The term Industry 4.0 refers to the trend in today's **industrial automation** to introduce certain **new production technologies** to improve working conditions, create new business models, increase plant productivity and improve product quality.

The adoption of Industry 4.0 models offers numerous advantages, including increased efficiency and productivity, the creation of new revenue streams, and more customer-focused operations. **Original Equipment Manufacturers (OEMs)** primarily use **IoT technology**[2] to develop innovative business models. Additionally, these models enable companies to reduce their time-to-market and become more flexible. The affirmation of Industry 4.0 models has brought direct benefits to STAR7's business through the **progressive affirmation of IoT technologies, as well as the significant need for updates to be made to technical documentation through different channels** (paper/digital) and in different languages (in particular, the implementation of these technologies allows SMEs to produce a high-quality result at reduced costs and with high flexibility).

E-Commerce

The e-commerce sector has experienced a major penetration rate increase from USD 4.3 billion in 2020 to USD 6.4 billion in 2024 (CAGR 11% per year)[3]. STAR7 is benefiting from the increasing demand for interactive solutions that can showcase products to customers in multiple languages.

Digital Printing

The global size of the digital printing market will grow to USD 17.5 billion by 2026 (CAGR 2021-2026 12.1%), due to increased demand in textiles, packaging, e-commerce, home furnishings and vehicle wrapping, with particular opportunities coming from emerging economies such as China and India, where rapid industrialisation is also driven by demand for digital printing services. STAR7 is in a prime position to take advantage of the current growth trend due to the adaptability of its digital printing solutions[4].

[2] Based on IoTNOW analysis in the report "IoT, IIoT, connected industry and Industry 4.0 come together to create a new model for business" available at www.iot-now.com/2018/10/12/89230-iot-iiot-connected-industry-industry-4-0-come-together-create-new-model-business.

[3] Report "Retail e-commerce sales Worldwide from 2014 to 2024".

The role of STAR7 and its contribution to sustainable development

The social and environmental impacts of product information

STAR7 offers a range of services that cover all aspects of **product information**, from design to after-sales support. These services include engineering, **content creation and authoring, translation, printing**, and even virtual product experiences.

These services are closely linked to the mega-trends and market scenarios described in the previous paragraphs. They have an important social and environmental impact, contributing in several cases to the improvement of people's lives. As a key part of the supply and value chain, they favour processes of social and digital inclusion, education, and cultural integration, including accessibility to information. Additionally, they help mitigate environmental impacts linked to the products and services offered by STAR7's clients.

The following table/infographic summarises the role of STAR7 in the various markets it operates in:

	Industries	STAR7 service offering and role
	Areospace & Defence	**Legality and safety standards** STAR7 offers a mix of services designed and optimised to support, in strict compliance with **rigorous industry standards**, all life cycle phases of a complex system, from design to production, through to engineering and integrated logistics support.
	Agriculture & Construction Equipment	**Sustainable agricultural practices - precision farming** The 4.0 precision agriculture market is constantly evolving and demands cutting-edge machinery and digital technology to address not only production challenges, but also social and environmental concerns. Smart connectivity installed in the latest generation of machines enables the **exchange of information with databases which monitor quality, product traceability, field treatments** and maintenance of agricultural vehicles, with the aim of reducing operating costs and lowering environmental impact.
	Air conditioning & Household appliances	**Product use & customer experience** STAR7 provides its expertise and technologies to ensure **smooth and automated processes**. In addition, support for **product usability** using innovative user instructions management, paired with new outputs and channels for sharing content, contribute to **improving the customer experience in all target markets**. The offer is rounded out by printing and logistics services to deliver technical documentation to production plants.
	Automotive & Transportation	**Sustainable mobility** The key players in the automotive sector are navigating one of the most dynamic markets, whose challenges are linked to **new types of transport**, emerging and cross-sector competitors, the spread of electric vehicles and the accompanying technological, logistical and bureaucratic implications, the demand for vehicle customisation and the digitalisation of processes and products.

Industries	STAR7 service offering and role
Engineering & Machine Tools	**Secure and relevant information accessibility** Human-machine interaction works if **information models and management solutions** can overcome physical distances, **language barriers and cultural differences. Accessible, secure and relevant information** paves the way for smart products that improve engineering processes with real-time processing, feedback and updates. From diagnostics to customised and interactive maintenance.
Fashion & Retail	**Brand identity and product knowledge** STAR7 provides the industry with curated and personalised content that always aims to convey the exclusivity of an experience: **text, images and videos** must speak to each user with the brand identity, throughout all sta-ges of the relationship.
Finance	**Data and information security** In Finance, STAR7's distinctive trait is its personalised service, but the highly sensitive nature of financial content requires that two essential principles be followed for any information and technology architecture **security and data protection, and translation quality.** AI closes the loop, ensuring compliance and the ability to opti-mise insights more quickly and accurately.
Food & Beverage	**Content expertise and cultural context** STAR7 offers valuable support **in the creation and integrated management of all types of content**, from tran-slated text to images and CGI animations, to ensure the best possible end consumer engagement. Our autho-ring and linguistic support takes the importance of **specific terminology and cultural context** into account, as well as simplifying content review in the target markets.
IT, Software & Technology	**Innovation and AI** **Technologies that assist in creating and localising each product** are the key to ensuring a winning overall ex-perience for the developer and the user. STAR7 combines **artificial intelligence and translation memories** in a proprietary system, to the benefit of all those involved, including designers, developers, translators and end users.
Life Sciences	**Research documentation** In the life sciences field, **documentation to support research** is as essential as laboratory activities. Those ope-rating in the pharmaceutical and medical sectors face a crucial challenge: to apply a **scientific approach also to content and termbases** in order to obtain the required approvals in the shortest possible time, all while re-specting the guarantee protocols. STAR7 has the best platforms and tools to manage sensitive information re- liably and **keep time to market as short as possible**.
Media & Publishing	**Content documentation** On the one hand, thanks to the Global Content services, STAR7 satisfies the **processing and translation needs** of content for any type of media (such as localization, adaptation, transcription, subtitling, voiceover and dubbing); on the other, with STAR7 Printing, it offers **professional on-demand printing solutions** for SMEs or key players operating in the publishing sector.
Public Utilities	**Data and information management - processes** Industry players are complex organisations that need to produce and manage enormous amounts of data and information. Technology and human resources form the backbone of STAR7's expertise in this sector, making us the **best partner for content creation and localisation** using proven workflows that simplify every process.
Sport & Sports Equipment	**Information and customer experience** For the events and sports equipment sector, **optimising performance and the customer experience** is central. For this reason, content plays a fundamental role, because it must embody a perfect synthesis between the technical and the emotional. That is why STAR7 offers its expertise in **technical and specialist authoring and translation**, combined with an ability to create innovative digital content and unique product experiences, all as part of an overall optimisation of **information generation, management and publication** workflows to en-hance the value of high-performance products throughout all phases of product life, from market launch to after-sales.

The United Nations 2030 Agenda and the SDGs/Goals for Sustainable Development

As a demonstration of STAR7's dedication to sustainable development through its business solutions, the company has adopted the United Nations 2030 Agenda and its **Sustainable Development Goals** (SDGs) as a point of reference and guidance. The SDGs serve as a roadmap for achieving sustainability objectives and should be viewed as opportunities to enhance business operations. It is important to read, interpret and implement them in order to achieve success.

To delve deeper into STAR7's dedication to the SDGs in the near, medium, and distant future, please refer to the section titled "Material Topics - Goals and Actions".

SDGs with prevalent impacts due to business model STAR7 Services

SDGs with prevalent impacts due to internal activities

STAR7's Integrale[7] approach

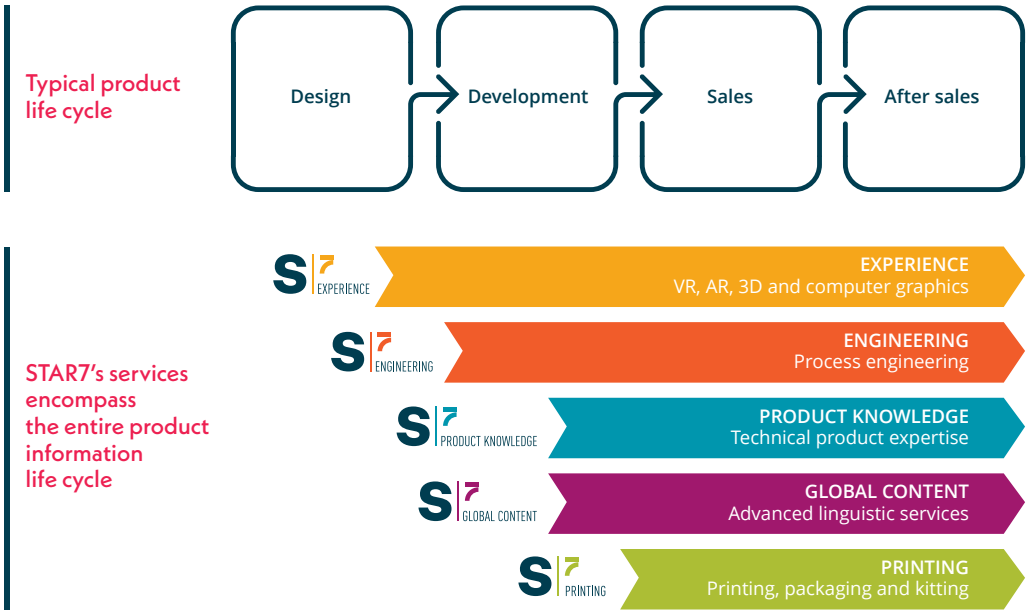
GRI 2-6

STAR7 provides a distinctive system for creating and overseeing product information using a groundbreaking business model that encompasses the entire value chain. STAR7 provides support to companies throughout the entire product life cycle with its Integrale[7] approach.

The STAR7 Group can leverage its model by offering verticality and specificity across complementary areas of expertise, presenting itself to clients as a single partner thanks to significant potential cross-selling between different business lines. Integrale[7] is how STAR7 defines its philosophy, calling and DNA: the decision to approach the whole as more than the sum of its parts, moving beyond the concept of an information supply chain.

Service Line

STAR7 operates through **five primary Service Lines**, each with distinct services and stages in the value chain. These Service Lines are interconnected, despite their unique characteristics.



STAR7 | Experience | The STAR7 Experience team has the expertise to configure a product prior to its commercial launch or promote its features in a marketing campaign before it goes into production. They begin with their technical and engineering knowledge to ensure a successful outcome. The services of the Experience division have been developed by the Group in response to an ever-increasing market demand to access and convey information in a digitised way.

By using cutting-edge video and 3D graphics technology (like CGI systems, visual effects and virtual reality software), STAR7 develops a wide range of solutions with innovative content and many potential new applications, from the most technical realms, to virtual training, to the worlds of communication and marketing.

STAR7 Experience designs and creates cutting-edge digital experiences by applying technology to the realm of imagination. Starting with the design of some product components, virtual training paths are developed in immersive environments where product behaviour can also be tested, without the need for prototyping.

Scope	Service	Activities
Virtual reality	Virtual product configuration	Photorealistic-quality product customisation service before commercial launch.
	Augmented reality	Mixed reality service to correlate 3D technical information with the physical product.
	Immersive reality	Immersive design service for rapid prototyping that allows users to implement and test the features and functionality of a product in the stages before production
Creativity	CGI, VFX e 3D art	Technologies for creating photorealistic videos and footage that can keep costs down and convey a sense of the product even before production.
	Graphic Design	Creative 2D product communication. From looking for innovative moods and layouts, to proposing high-quality graphic designs.
	Video & animation	CGI video production for all sectors of industry and commerce

STAR7 | Engineering | STAR7 Engineering has honed its process engineering activities by providing support to its customers during the industrialisation phase of their products.

Over ten years' experience, particularly in the automotive sector, has enabled the development of a consultancy approach that understands the needs of designers and engineers in the sector, as well as to create new applications that exploit the great potential of virtual and immersive reality to support companies in the study of the product in the pre-production phases, with a consequent reduction in costs and times linked – in particular – to the prototyping phase.

The engineering approach involves forming stable teams that can seamlessly integrate into the customer's production chain. This is achieved by creating small professional communities that possess specific skills and receive continuous training and updates. As a result, these teams become valuable partners in their projects.

Scope	Service	Activities
Design	Product engineering	From the product feasibility study to the CAD of components for making it. Engineering for complex industrial projects.
	Process engineering	Feasibility analysis for the development, assembly and industrialisation of a product. Support service to the various areas of the business – engineering, quality, production – to enhance and optimise production lines by integrating the concepts of lean manufacturing.

STAR7 Engineering thus carries out excellent engineering that helps strengthen the leadership of its partners worldwide.

STAR7 | Product Knowledge | The Product Knowledge division provides a range of services to help create, manage and share technical and commercial information using both traditional and advanced methods.

Starting from instruction and maintenance manuals, through the various support services of aftersales, training, help desk, e-learning and integrated logistic support (ILS) up to the more complex consulting activities of advanced project management, STAR7 Product Knowledge follows all phases of defining, writing and managing technical product documentation in a specific, innovative way.

The authoring approach is based on the skills of the team and cutting-edge technology capable of transforming product technical information into a strategic asset for industrial efficiency, technological implementation, commercial development and support over the operational life of the product.

Scope	Service	Activities
Product information	Technical information	Technical authoring service for the instructions and documentation needed to guarantee effective product maintenance over the entire life cycle, such as information on use, maintenance, repair and troubleshooting.
	Product definition	Collection and verification of all the information needed to define a product in order to include it in the information flow, forecast and quantify costs, and establish the logistics of its life cycle.
	Spare parts catalogue	Spare parts catalogue authoring and design service, starting from the product definition and proceeding to the identification of spare parts and creation of technical illustrations.
	Wiring diagrams	Creation and management of static or interactive wiring diagrams optimised for diagnostic and repair processes.
	Labour time	Measurement, analysis and publication of the labour times needed to diagnose, maintain or repair products.
	NATO Codificationsystem	Procedure for assigning NATO code to all parts that make up military products.
	IT Custom solution	Customisation service for multilingual portals for interactive and dynamic consultation of technical information by end customers or the assistance network. Customisable consultation of information from any data source.

Scope	Service	Activities
	Smart diagnostic	Advanced remote diagnosis service for identifying and resolving faults that integrates big data and probabilistic data structure.
After-Sales Support	Customer care	Multilingual and multichannel support service – e-mail, telephone, messaging – for managing relations with end customers delivered by product experts.
	Technical help desk	Multilingual support service for assistance networks for the diagnosis, repair or maintenance of products.
Digital solutions for after-sales	Virtual reality	Thanks to the latest VR technologies, the After Sales Digital Twin software develops an innovative service for creating and managing aftersales documentation. In a completely virtual workshop, a specialist can gain a precise, accurate experience of each operation thanks to the "digital twin" of the product they have to analyse.
	Artificial intelligence	Facilitates and accelerates the work of diagnosis and repair, offering users the information they need on demand and according to their level of experience. Thanks to the artificial intelligence of PRISMA, complex support processes can be facilitated and accelerated.
	Mixed reality	Digital Wiring 7 (DW7) technology offers an innovative virtual assistance service for diagnosis, superimposing the components and virtual wiring on the physical product and allowing immediate access to the corresponding data, drastically reducing diagnosis and repair times.
Training	Training & e-learning	Training services with a structure of teaching units compliant with SCORM and/or AICC standards, starting from the content produced for the technical documentation and to be reproduced on any LMS (Learning Management System) or e-learning platform. Classroom delivery of technical and sales training.
	Virtual training	Virtual training service with an immersive experience in a 3D environment without the need for the physical product.
Technical consulting	Serviceability Analysis	Virtual and physical analysis and simulation of repair and maintenance procedures to assess the degree of product serviceability.
	Technical staffing	High-level consultancy service offered for project management, design or complex analysis activities.
	Integrated Logistic Support	Integrated logistic support (ILS) service, or the complete organisation of product operation management, in terms of reliability, testability, safety and maintainability.
Certifications	CE Certification	Authoring service for the technical documentation required for the operation of machinery according to CE specifications. The technical file is created by analysing specific standards and includes calculation reports, control circuit diagrams, plans, and laboratory tests.

STAR7 | Global Content | The Global Content division is Italy's top Language Service Provider and holds significant global importance.

Our translation service is seamlessly integrated with our customers' IT systems through our in-house developed online platform, MySTAR. This platform allows for direct transmission of translation requests, real-time interaction between our company and the customer, and automatic continuation of validation, changes or modifications to the text at any time. This optimises processes and saves time for all parties involved.

Scope	Service	Activities
Linguistic services	Translation	We offer translation services for all types of content, including manuals, websites, press releases, and e-commerce, into any language in the world.
	Software localization	Translation of labels, messages, online help and screenshotting. For any software application and operating system: Windows, MacOS, Unix, Linux, Android and iOS.
		Integrated management of content, menus, dialog boxes, error messages and all information for the user.
	Copywriting & transcreation	Creation of editorial and communication content in all languages with creative adaptation of the translated texts.
	Machine translation & post-editing	Machine translation, both statistical and neural. Use of any type of commercial and/or proprietary engine.
		Integrated translation workflow management.
	Interpreting	Interpreting services for events, meetings, conferences and courses in all fields and languages.
		Real- and semi-real-time transcriptions for general meetings, boards of directors, committees and meetings.
Consultancy	Terminology management	Management of technical terminology, extraction of terminology databases from any type of source and creation of integrated solutions.
		Creation of terminology workflows, with additions and comments via web.
		In-house terminologist for consulting services at the client's premises, for the management of terminology within complex organisations.
	Translation memory setup	Retrieving existing translations, subsequent transformation into a database compatible with any CAT tool and quality check (TM Cleaning).
Multimedia	Dubbing, voice-over and subtitling	Dubbing, voice-over and subtitling
		Dubbing, subtitling and voice-over services for all types of multimedia content.
		Comprehensive project management: from translation to time code creation, recording and editing with a wide selection of voice talent.

STAR7 | Printing | STAR7 Printing is a cutting-edge digital printing centre that creates and delivers top-quality professional printing materials across various sectors. They achieve this through their flexible and customisable solutions, ensuring the highest level of technical quality.

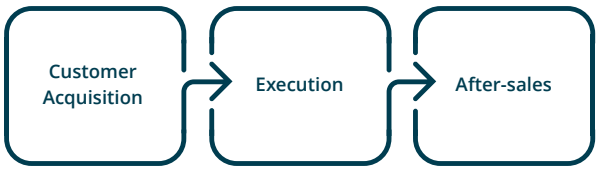
Our services are designed to eliminate any unnecessary steps in the production process, following the just-in-time approach. This means we produce exactly what is needed, when it is needed, and optimise batches to reduce excess stock and waste. Our efficient use of Kanban systems and SMI allows us to achieve Print On Demand, eliminating the need for excess inventory and reducing obsolescence.

From paper to digital, the company provides document dematerialisation services to optimise space and archive management, increasing the efficiency and productivity of our customers.

Scope	Services	Activities
Printing	Digital Printing	Digital printing services in both black and white and colour, using inkjet technologies that provide ultra HD definition (using MX iQuarius ink), delivered on sheets or web-fed for any print run and type of customisation.
	Offset printing	Traditional printing solutions for large runs with any kind of finish.
Logistics	Logistica personalizzata e kitting	Distribution chain management services - from receipt to quality control, storage to distribution, guaranteeing a single intermediary to get better results, meeting time frames and optimising costs.
	Warehousing	Customised warehouse and shipping solutions with tracking, proof of delivery and detailed reporting of final balances.
		Integrated consignment stock, supplier management inventory (SMI) and Kanban solutions.
Dematerialisation	Paperless solutions	Dematerialisation, document digitisation, and digital archiving.
	Physical	Digitised storage of documentation assets in advanced facilities and with operational systems ensuring high standards of flexible and personalised security.
	Data loading & burning	Personalised data loading service, duplication and burning onto magnetic media, mass storage.

Production and delivery of products and services

The STAR7 Group places great emphasis on collaboration with its customers, involving them right from the outset in the development of its products and services. This forms the core of its business model:



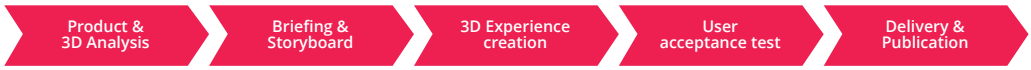
Customer Acquisition | The commercial growth of the organisation is driven by a team responsible for acquiring new customers through sales activities. This team is situated in the Group's strategic locations both in Italy and overseas. STAR7 creates business opportunities by taking part in conferences, meetings, and industry events. To support active prospecting, which includes lead generation and cold calling, digital marketing campaigns are also utilised with targets for conversion, reputation, and awareness. Thanks to the use of CRM software, STAR7 can easily monitor customer relations and create cross-selling activities between its various Service Lines.

Execution | The second stage of the value chain is divided into sub-processes that vary depending on the specific division:

Engineering | The process begins with the group's team of engineers conducting a preliminary analysis of the project to determine its feasibility. During this phase, a virtual simulation of the project is created using 3D technologies. Customers are provided with support during the product development process by creating digital prototypes. This enables them to identify any significant issues and implement solutions. This is then followed by defining the assembly sequences, which are aimed at launching the product and creating the necessary technical documentation to support it. Finally, there is a quality control and approval process for the production that is carried out for the customer's satisfaction.

Product Knowledge | The first step involves reviewing the technical specifications and mathematical designs of the products provided by customers. To develop an in-depth understanding of products, we gather information through interactions with engineers, frequent visits, and surveys. Our team of technicians and engineers are experts in various strategic areas, and are dedicated to supporting our customers in the creation of technical documentation using specialised software. A team is dedicated to the creation and development of training courses by supporting the organisation of training courses.

After-sales services are typically offered on-site at the customer's location through the technical help desk, customer service, and spare parts information support. STAR7 has the capability to monitor all engineering changes and potentially initiate new activities, thanks to our in-house developed technology known as the Engineering Change Monitoring System.



Experience | The initial stage of the process involves a thorough analysis of the product. A team of engineers will scrutinise the mathematical properties of the product. To create the storyboard for the virtual or augmented experience, the team begins by assessing the customer's requirements. The Company's service line leader then coordinates a team of internal developers for the programming and development of the VR/AR/3D virtual experience, and then works with individual STAR7 managers on the testing phase, in which end consumers are involved to gather opinions and potential anomalies. Finally, the product is finalised by the team.

Global Content | Firstly, the documents that need to be translated are carefully reviewed. This analysis helps to determine the amount of time and cost required to complete the translation task. The company employs a vast network of certified and specialised translators to carry out their translation services. In most cases, STAR7 acts as project manager, coordinating the management of customers' translation requests, which are carried out by the network of selected translators. STAR manages the translation activities performed by translators, ensuring that the service is provided with speed and precision. Finally, there is a stage where we check that the translation meets the formal requirements of the client and deliver it in the agreed format.

Printing | Firstly, STAR7 analyses the assignment in order to assess its organisational profiles. The team, in coordination with the production managers, manages the production processes of orders in compliance with the agreed deadlines by selecting the machinery to be used for implementation. The service is provided by the two production units at Asti and Belo Horizonte, using digital and offset technology in a wide variety of formats and media. STAR7 also takes care of finishing the printed material (e.g. binding, stapling or punching) and, in the case of a kitting request, of assembly. After completing the necessary preparations, STAR7 verifies the characteristics, quality, production, and packaging of the product. They then handle the logistics involved in delivering the product.

After Sales | In the phase following the provision of its services, STAR7 carries out an analysis of the service provided and the level of satisfaction of its customers, evaluating the correspondence with the agreed quality standards. In particular, the Company has implemented special systems of business review and performance analysis in order to ensure proper management of customer relations, including in the post-sales phase. In this respect, a person has been appointed who is responsible for each division to monitor performance and a person responsible for quality control with a customer care support function to assess customer satisfaction. In addition, STAR7 organises periodic meetings with customers in order to understand any critical issues arising in the post-sale phase, also providing them with technical assistance or proposing new solutions.

Through these stages, STAR7 is not only able to build customer loyalty by becoming an integrated partner of its customers, but also to improve the quality of its services, which are constantly updated and optimised with respect to specific customer feedback.

Employees and freelancers

GRI 2-7
GRI 2-8

Between 2020 and 2022, the STAR7 Group experienced substantial growth, including acquisitions, resulting in a significant rise in the total number of employees. As of 31 December 2022, the group had **859 employees, with 472 based in Italy**.

Ninety-five percent of workers are employed on permanent, full-time contracts (96%). The **proportion of female workers** on the same date was **45%**.

At the time of publishing this document, STAR7 has not yet established an internal communication protocol for employees who do not identify as male or female. It is worth noting that a procedure is currently being considered to formalise this process. This will support employees and ensure their complete freedom in terms of gender recognition and identity. As of the date, however, no communications have been received from employees declaring that they do not identify themselves in these genders or that they have expressed the wish not to communicate the gender in which they identify themselves, regardless of their personal data and biological sex.

859
employees

of which

472
in Italy

Employees			2020			2021			2022
	Women	Men	Total	Women	Men	Totale	Women	Men	Total
Total number of employees at the end of the period/by gender	238	299	537	343	403	746	386	473	859

Geographical area			2020			2021			2022
	Women	Men	Total	Women	Men	Totale	Women	Men	Total
Italy	175	221	396	192	242	434	200	272	472
Europe	17	20	37	90	67	157	124	89	213
USA	23	9	32	26	11	37	24	7	31
Sud America	23	49	72	35	83	118	38	105	143
Total	238	299	537	343	403	746	386	473	859

Contract/Gender	2020			2021			2022		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Open-ended	212	277	489	305	362	667	367	448	815
Fixed-term	26	22	48	38	41	79	19	25	44
Total	238	299	537	343	403	746	386	473	859

Total number of permanent employees by gender/geographical area	2020			2021			2022		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Italy	151	199	350	156	202	358	182	254	436
Europe	17	20	37	88	66	154	123	85	208
USA	23	9	32	26	11	37	24	7	31
South America	21	49	70	35	83	118	38	102	140
Total	212	277	489	305	362	667	367	448	815

Total number of fixed-term employees by gender/geographical area	2020			2021			2022		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Italy	24	22	46	36	40	76	18	18	36
Europe	-	-	-	2	1	3	1	4	5
USA	-	-		-	-	-	-	-	-
South America	2	-	2	-	-	-	-	3	3
Total	26	22	48	38	41	79	19	25	44

Form of employment/gender	2020			2021			2022		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Full-time employment	218	293	511	315	395	710	359	463	822
Part-time employment	20	6	26	28	8	36	27	10	37
Total	238	299	537	343	403	746	386	473	859

Total number of full-time employees by gender/geographical area	2020			2021			2022		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Italy	158	215	373	175	235	410	184	266	450
Europe	16	20	36	81	66	147	115	88	203
USA	23	9	32	24	11	35	22	7	29
South America	21	49	70	35	83	118	38	102	140
Total	218	293	511	315	395	710	359	463	822

Total number of full-time employees by gender/geographical area	2020			2021			2022		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Italy	17	6	23	17	7	24	16	6	22
Europe	1	-	1	9	1	10	9	1	10
USA	-	-	-	2	-	2	2	-	2
South America	2	-	2	-	-	-	-	3	3
Total	20	6	26	28	8	36	27	10	37

Other workers

The "other workers" category refers to individuals who are not employed by the STAR7 Group but are utilised to perform specific tasks. For 2022, there were a total of **818 non-employee workers**, including 2 temporary workers, 7 interns, 489 translators, 81 interpreters, and 25 DTP (desktop publishing) specialists. The remaining 214 workers represent other types of collaboration used by the Group, such as instructors, project manager contractors, and free-lancers.

Suppliers

GRI 2-6

STAR7 used more than 700 suppliers in 2022 (53.9% of the Group's total procurement costs for products and services).

Process area	Activity/type of supplier
Production	Translation and interpreting services
	Authoring services
	Print services
	Purchase of printing materials
Production service	Purchase of products, machines, equipment
	Software and IT services that affect the storage and accessibility of data and information
	Logistics services
	Professionals and consultants
Company management	Office equipment
	Consumables
	Maintenance services
	Spare and replacement parts for maintenance
	Consulting services

The most significant supplier categories are **freelancers, including translators, interpreters and DPTs, i.e. those involved in translation activities**, but also suppliers for the purchase of production material – such as paper, ink, toner, glue – used in printing activities.

The table below shows the expenditure for supplies 2022, broken down by geographical area of origin of the suppliers:

Geographical area of suppliers	%
Italy	57.6%
Europe	35.2%
Asia-Pacific and Middle East	3.5%
North America	2.6%
Africa	0.6%
South America	0.5%
Grand total	**100.0%**

Customers

GRI 2-6

The STAR7 Group's **corporate reputation** is one of the main strategic factors in its success and in the expansion of its business. In order to maintain sustainable economic growth, the Group's companies are committed to investing in customer relations.

Over time, STAR7 has developed enduring relationships with key players in various sectors, both in Italy and internationally. To date, it has more than 900 customers in more than 20 different business sectors.

Customer business relationships are typically managed through multi-year contracts or framework agreements. In 2022, **over 60% of the top 20 customers of the company have been working with STAR7 for more than five years**.

Clients typically access STAR7's services through a single service offer, which then gradually and naturally extends to other services manner over time. The STAR7 business model is designed to offer capabilities and services that are carefully targeted across the entire product value chain, using its Integrale[7] approach. In 2022, the number of full-service contracts (64%) exceeded that of single service contracts (36%).

The role of stakeholders

GRI 2-29

Stakeholders refer to people or groups who have a vested interest in a company, or who may be impacted positively or negatively by the company's actions. An interest, which can also be interpreted as participation, is something valuable to an individual or a group. Not all interests hold the same level of significance and therefore should not be given equal treatment. Ethical business conduct/management through policies and procedures that ensure integrity, regulatory compliance and tax transparency. The most significant effects that a company can have on individuals are those that have an adverse impact on their human rights.

Some stakeholders may not have a direct relationship with the company, such as workers in the company's supply chain, while others may be located at a distance, like STAR7 customers.

Companies aim to build and maintain relationships with their stakeholders using various tools and systems. This helps to strengthen relationships and ultimately improve their competitive position, enabling them to generate and distribute value over time. Stakeholder engagement is a crucial activity that involves interacting and communicating with stakeholders to comprehend their interests, expectations, and requirements. This helps to facilitate a more efficient and informed decision-making process, which can lead to effective strategic planning and the attainment of business goals.

We identified stakeholders by considering STAR7's sector, business model, existing relationships, and geographical presence. When identifying material STAR7 issues, we took into account the interests of stakeholders who may be negatively impacted by the organisation's actions.

Stakeholder relations and engagement

Below are the instruments that STAR7 uses to manage its relationships with stakeholders.

Stakeholder	Engagement activities / Projects - Initiatives - Relations
Shareholders	Shareholders' Meeting – Board of Directors – Financial Statements
Investors - Financiers	Shareholders' Meetings – Meetings and Regular Events - Financial Statements – IR Activities
Employees	Career fairs, social media platforms (LinkedIn, Facebook, Instagram), meetings, training events, and company conventions
Suppliers of goods and services	Definition and sharing of production/service standards - Commercial meetings and visits/audits - Dedicated portals and platforms - Evaluation tools and questionnaires - Definition of qualification criteria and supplier selection - Website
Translators and interpreters	Online questionnaires to map and survey skills and tools subject to obsolescence
Customers	Sales meetings and visits - Industry events - Marketing activities - Publications and social media channels/content - Evaluation tools/questionnaires - Supply chain audit/verification - Website - Qualification and pre-qualification processes - Supplier portal accreditation - Meetings to define technical specifications/requirements
Local communities	Support and dialogue initiatives, corporate social responsibility (CSR) – Sponsorships and events – Institutional partnerships
Medium	Press releases, social media, website, publications, events, interviews, and specialised insights

Governance and Business Conduct

Governance model and corporate bodies

GRI 2-9
GRI 2-10
GRI 2-11
GRI 405-1

STAR7 S.p.A. follows a traditional organisational model for its corporate governance structure, which includes the following corporate bodies:

- The Shareholders' Meeting
- The Board of Directors
- The Board of Statutory Auditors

The Board of Directors and the Board of Statutory Auditors will remain in their positions until the financial statements as of 31 December 2023 are approved. The responsibility for conducting the legal audit of the financial statements as of 31.12.2023 has been assigned to BDO Italia S.p.A. and their approval is required.

Board of Directors	Position
Lorenzo Mondo	Chairman and Chief Executive Officer
Josef Zibung	Director
Andrea Farina	Director
Roberto Manzoni	Director
Isabella Mondo	Director
Paolo Rebaudengo	Independent director
Maria Luisa Vada	Director

As stated in STAR7 S.p.A.'s articles of association, all directors are appointed on the basis of an assessment of eligibility, professionalism and honourableness requirements, hold **office for a period not exceeding three financial years and may be re-elected. Their term of office expires on the date of the meeting called to approve the financial statements for the last year of their term of office, except for the causes of termination and revocation provided for by law and by the Articles of Association**.

The Board of Directors is appointed by the Shareholders' Meeting on the basis of lists submitted by shareholders, provided that they hold - individually or jointly - a number of shares **equal to at least 5% of the subscribed share capital at the time the list is submitted**.

Please refer to the website Board of Directors | STAR7 for the relevant profiles and information on other important positions held and commitments undertaken by each member.

The Board of Directors is vested with the broadest powers of ordinary and extraordinary administration of the company, as well as of disposition of the company's assets, and therefore, with the exception of the powers and with the authorisations that the law and the Articles of Association expressly reserve for the shareholders' meeting. It can appoint the Chairman, one or more Vice Chairmen, one or more Chief Executive Officers and delegate to them their powers (except for those which are mandatory for them by law), including those related to the issue and revocation – according to the law – of special powers of attorney for specific deeds or categories of deeds, also to non-Company persons; the office of Chief Executive Officer can coincide with other offices within the Board of Directors.

The Board of Directors may also appoint a permanent Secretary, who need not be a Director; the Secretary remains in office (unless revoked or resigned) until the expiry of the term of office of the Board of Directors which appointed them.

Directors remain in office for a period not exceeding three financial years and may be re-elected; their term of office expires on the date of the meeting called to approve the financial statements for the last year of their term of office, except for the causes of termination and revocation provided for by law and by the Articles of Association.

The Board of Directors may delegate its powers, within the limits of the law, to an Executive Committee, made up of Directors, determining its composition and powers. The Chairman, Vice-Chairmen and Chief Executive Officers are entitled to sit on the Executive Committee. The Standing Statutory Auditors must attend its meetings. For the operation of the Executive Committee, the same rules apply as for the Board of Directors.

Board of Directors - Diversity (gender - age groups)		
Women	Men	Total
2 (28.6%)	5 (71.4%)	7 (100.0%)
Under 30	Between 30 and 50 - 2 (28.6%)	Over 50 - 5 (71.4%)

Compensation policy and performance assessment for the Board of Directors

As stated in STAR7's Articles of Association, the Ordinary Shareholders' Meeting determines the total remuneration due to the Board of Directors and its allocation.

Board of Statutory Auditors

The Shareholders' Meeting appoints three full members and two alternate members to the Board of Statutory Auditors.

Board of Statutory Auditors	Position
Fabio Maria Venegoni	Chairman of the Board of Statutory Auditors
Vincenzo Gambaruto	Standing auditor
Alberto Bodiglio	Standing auditor
Stefano Cernuschi	Alternate auditor
Cristiano Lenti	Alternate auditor

Sustainability governance

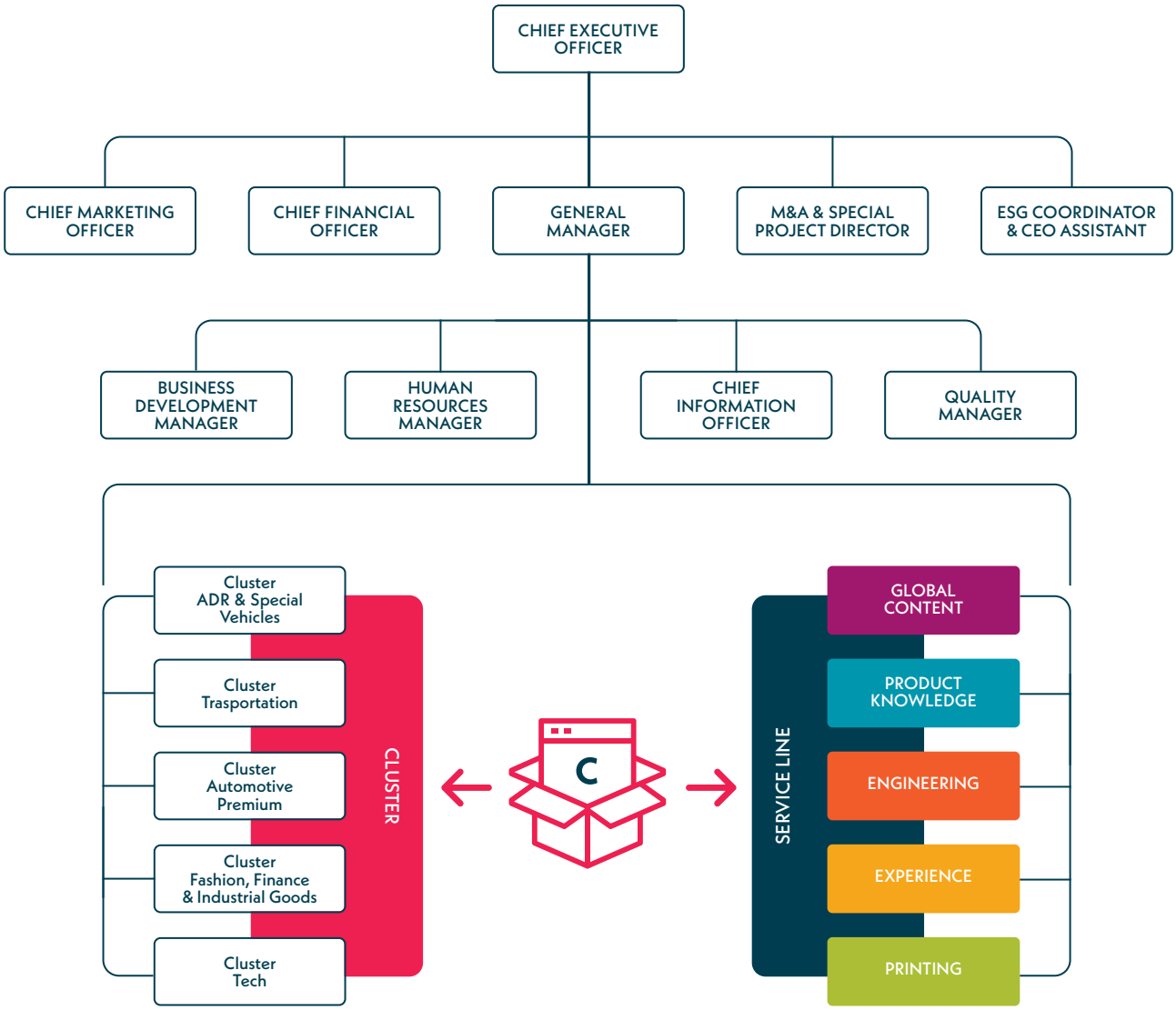
GRI 2-12

The Board of Directors approves the Sustainability Report. The STAR7 Board of Directors is committed to ensuring that its knowledge, stakeholder engagement for impact management and oversight of the sustainability reporting process is up-to-date, and in particular that potential or actual negative economic, environmental and social impacts are identified and managed.

The organisational structure and the delegation process

GRI 2-13

Below is the organisational structure of the parent company STAR7 S.p.A.



In order to make the business process even more productive, in 2021 STAR7 adopted a new organisational system, whereby **each individual division (Service Line) is led by a Service Line Leader (SLL)** with responsibility for managing resources and the quality and efficiency of the services provided, who liaises with the Client Partner (CP), who is responsible for managing and satisfying the clients of the cluster assigned to him, with the aim of guaranteeing a quality service in compliance with the times and costs established for the order.

The system of operational governance is called Équipe: it comprises the CEO, GM, Client Partner, Service Line Leader, and key staff functions such as ESG, HR, ICT, Marketing, and Sales. The primary responsibility of the Management Team is to execute the business strategies established by the CEO in collaboration with the Board of Directors. Monthly meetings are organised with the aim of sharing economic and financial reporting, analysing opportunities and critical issues and monitoring the progress of the STAR7 Group's main strategic projects in Italy and abroad. To enhance the effectiveness of implementing operational strategies in foreign markets, a dedicated meeting called the Waypoint meeting is organised exclusively for the Country Managers of the regions where STAR7 operates.

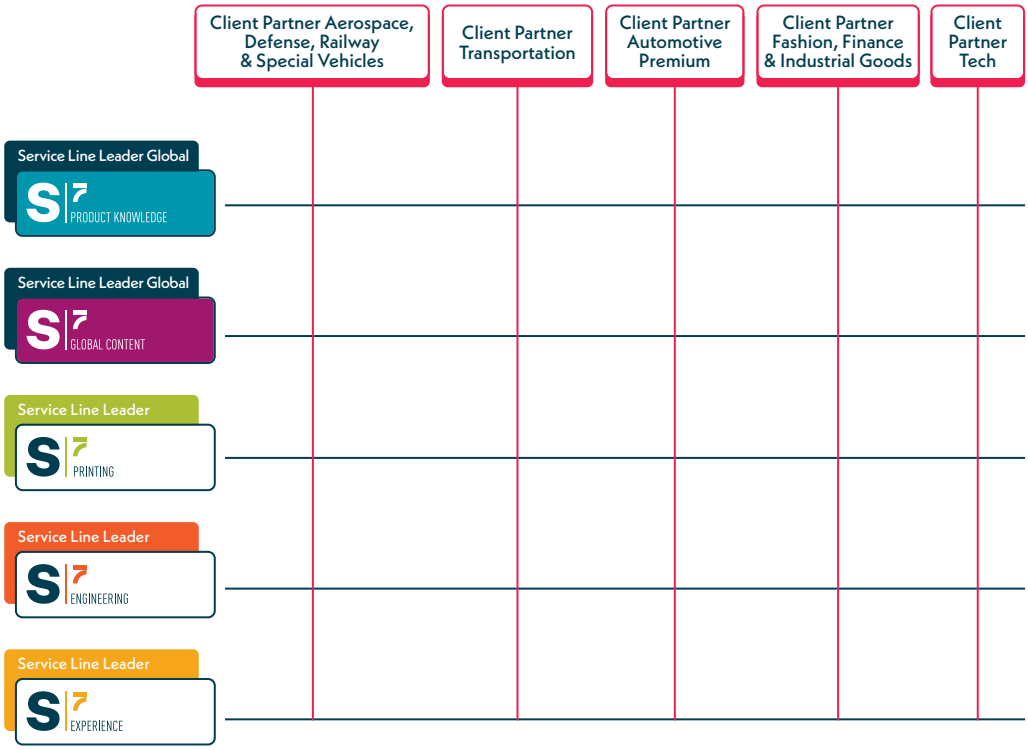
The management team has assigned CP and SLL with the responsibility of managing the organisation's impact on the economy and people. The Service Lines in STAR7 are responsible for personnel development and management, with support from the HR function. They are responsible for overseeing the development of career paths and managing key issues related to safety and well-being in the workplace. Additionally, they identify training needs and create corresponding training programs. Furthermore, the Service Lines are responsible for managing the supply chain. The SLLs, with the assistance of the Purchasing function, are responsible for evaluating and choosing STAR7's supply chain based on STAR7's principles and criteria for supplier selection. The Service Line is responsible for providing services and managing all associated environmental impacts.

Clusters are responsible for both customer satisfaction and the profitability of the activities provided to them, as well as for business development and growth. Their task, in relation to their functions and objectives, is to incorporate the ESG requirements that customers demand as suppliers/partners, which are becoming increasingly stringent. CPs must be transferred immediately to the governance body of the team so that necessary decisions or corrective actions can be taken.

Furthermore, CPs are the main spokespeople of how STAR7's services can play an important social and environmental role in the economic and social context in which it operates and therefore the main contributors to STAR7's ESG identity.

Monthly meetings are organised for Cluster and Service Line where the main objectives of each function within the matrix are monitored.

Below is the organisational structure of the matrix:



Communication processes and conflicts of interest

GRI 2-15
GRI 2-16

As per the Code of Ethics, all STAR7 Group activities must seek to avoid leaving anyone involved in a conflict of interest. When carrying out their tasks on the STAR7 Group's behalf, all Group company employees must take special care not to take part in any social activity that might lead to conflicts of interest or any other situation that could bring to bear their personal interests or those of other people connected to them.

Group companies demand timely reports from the Group's heads and from the Supervisory Board on any situations that could lead to a conflict of interest. Managers must be informed of all potential conflicts, so they can use all the tools at their disposal to prevent these situations occurring.

Furthermore, potential conflicts of interest are prevented and mitigated by the overall system of governance tools and through the related party procedure. The Board of Directors is responsible for periodically evaluating the effectiveness of the procedure, considering the reports and observations of other corporate bodies. They must also determine the need and advisability of revising the procedure at least every three years.

The RPT Procedure is available for consultation on the STAR7 website.

During 2022, no reports were received by the Supervisory Board.

Responsible business conduct

GRI 2-23
GRI 2-26

Compliance Programme pursuant to Legislative Decree 231/2001

The Compliance Programme pursuant to Legislative Decree 231/2001 (the "231 Compliance Programme") was adopted by the parent company STAR7 S.p.A. in order to guarantee and ensure compliance with the law, fairness, clarity and transparency in the conduct of all company activities.

The Compliance Programme consists of a General Section and a Special Section relating to the different types of offences relevant under the Decree that the Group may be at risk of committing in its business. The General Section, which contains the main principles of the Compliance Programme, the Supervisory Board and the system of training and dissemination of the compliance programme among the recipients; The Special Section is divided into sections. The various sections are aimed at outlining the principles that must inspire the corporate protocols adopted (or that will be adopted in the future) by the Company. Specifically, each Special Section is divided into: a) description of the criminal offences; b) identification of sensitive processes in relation to the types of Offence; c) defining general principles of conduct; d) identification of operational principles. The sanctions system is also described in the Special Section.

The Code of Ethics forms an integral part of the Compliance Programme.

In accordance with the relevant legislation, a Supervisory Board (SB) has been established to oversee the functioning of operations and ensure compliance with the protocols outlined in the Programme. The SB is also responsible for ensuring that these protocols are regularly updated. The Programme defines the information flows to and from the Supervisory Board.

The Compliance Programme is available on the website.

It should be noted that, in addition to the parent company, the subsidiary STAR7 Printing has also adopted its own Compliance Programme.

The Code of Ethics

The Code of Ethics outlines the commitments and moral responsibilities of individuals working within or interacting with the company. Its purpose is to maintain and strengthen the trust between the company and its stakeholders, including corporate bodies, employees, customers, suppliers, public bodies, and trade associations. Additionally, it serves to discourage unethical behaviour.

The Code of Ethics of the STAR7 Group outlines all the ethical principles that must be followed to ensure the smooth operation of its activities and proper management of relation-ships with various stakeholders. This is done to achieve the company's economic and social objectives. It is based on the principles of loyalty, the physical and moral integrity of persons, respect for the law, confidentiality, quality of service, transparency of activities, protection of competition, and fairness in the event of conflicts of interest.

In particular, the Group is committed to:

- placing integrity and honesty at the heart of its corporate conduct at all times, in its work and in its relationships with its various stakeholders;
- protecting its employees from discrimination on the grounds of race, language, nationality, religion, political beliefs, age and sexual orientation;
- valuing and taking up their staff's own ideas, encouraging people to take part in the Group's growth and development;
- making all recipients aware of this principle using the most suitable means of communication, and to take further monitoring measures so that any conduct that is not in line with the principle does not occur;
- constantly improving the features of their services and the way they provide them, so as to respond as best they can to the market's shifting demands;
- ensuring maximum transparency and correctness in the communication of information;
- safeguarding the value of fair competition;
- honouring the principle of integrity and non-discrimination on the basis of race, gender, religion, political beliefs, language or age when carrying out their activities and in their relationships with their various stakeholders;
- respecting ethical principles in the authoring, translation and printing of documents requested by clients. The Code of Ethics is available on the website.

Whistleblowing

STAR7 has a whistleblowing system that guarantees the confidentiality of the data and iden-tity of the whistleblower. The Compliance Programme and the Code of Ethics also provide that any person who becomes aware of information relating to the commission of offences or facts and/or conduct that do not comply with the rules of conduct drawn up by STAR7 pursuant to Legislative Decree No. 231/2001, may make spontaneous reports to the Super-visory Board by e-mail to odv@star-7.com.

Legality rating

The Legality Rating is a tool introduced by the Italian Competition and Market Authority, aimed at promoting and introducing principles of ethical behaviour in business. The company is as-sessed on its compliance with current regulations and, more generally, on the degree of at-tention it pays to the proper management of its business, by the awarding of an accolade measured in "stars". In 2023, STAR7 S.p.A. was awarded the highest rating of 3 stars.

Management Systems and Certifications

GRI 2-24

The key objective of ensuring a high quality and reliability of the services offered, and the prospects for sustainable development, has led STAR7 S.p.A. to adopt a systematic approach to the management of its business, which is based, among other tools, on a number of management systems and certifications.

Regulation	Fields
ISO 9000:2015 Quality Management Systems	Provision of translation services and authoring of technical documentation, interpreting. Design and provision of technical training services (IAF 35, 37).
ISO 14001:2015 Environmental Management Systems	Design and implementation of multilingual technical and commercial communication services, using information technology systems and printing processes (IAF 35, 09).
ISO 17100:2015/A1:2017 Translation services	Translation Service Management System. Translation project management includes: ▌supervision of preparatory activities; ▌assignment of translators to the project; ▌assignment of reviewers and, if required, specialist reviewers; ▌transmission of instructions to all parties involved in the project; ▌activation and monitoring of translation consistency; ▌monitoring and supervision of the process schedule; ▌ensuring that contact is maintained with all parties involved in the process, including the customer; ▌release authorisation.
ISO 18587:2017 Post-editing	Post-editing management system for machine translation output. Post-editing is performed for the purpose of checking the: ▌comprehensibility of the post-edited MT output; ▌correspondence of source language content and target language content; ▌compliance with the post-editing requirements and specifications defined by the TSP.
ISO 27001 Information security management system	IT systems supporting the provision of infrastructure services and multilingual technical and commercial communication (translations and interpreting, and authoring of technical manuals)
Chain of custody FSC-STD-40-004 V3.1	Purchase of FSC MIX-certified paper and board for printing and sale of FSC MIX-certified printed material.

Other STAR7 Group companies have management systems and certifications, as depicted in the matrix below:

Management systems and certifications/ Entity	UNI EN ISO 9001:2015	ISO 17100:2015	UNI ISO 14001:2015	ISO 18587:2017	ISO/IEC 27001:2013	FSC-STD 40-004 V3.1 FSC-STD 50-001 V2.1
STAR7 S.P.A						
STAR7 Printing S.R.L.						
STAR Comunicacao e Servicos LTDA						
Vertere S.R.L.						

Environmental - Social - Economic Compliance

GRI 2-27

Environment

No environmental disputes occurred within the reporting period (2020-2022). At the time of writing, there are no environmental disputes that have given rise to significant penalties for non-compliance with environmental laws, rules, or regulations.

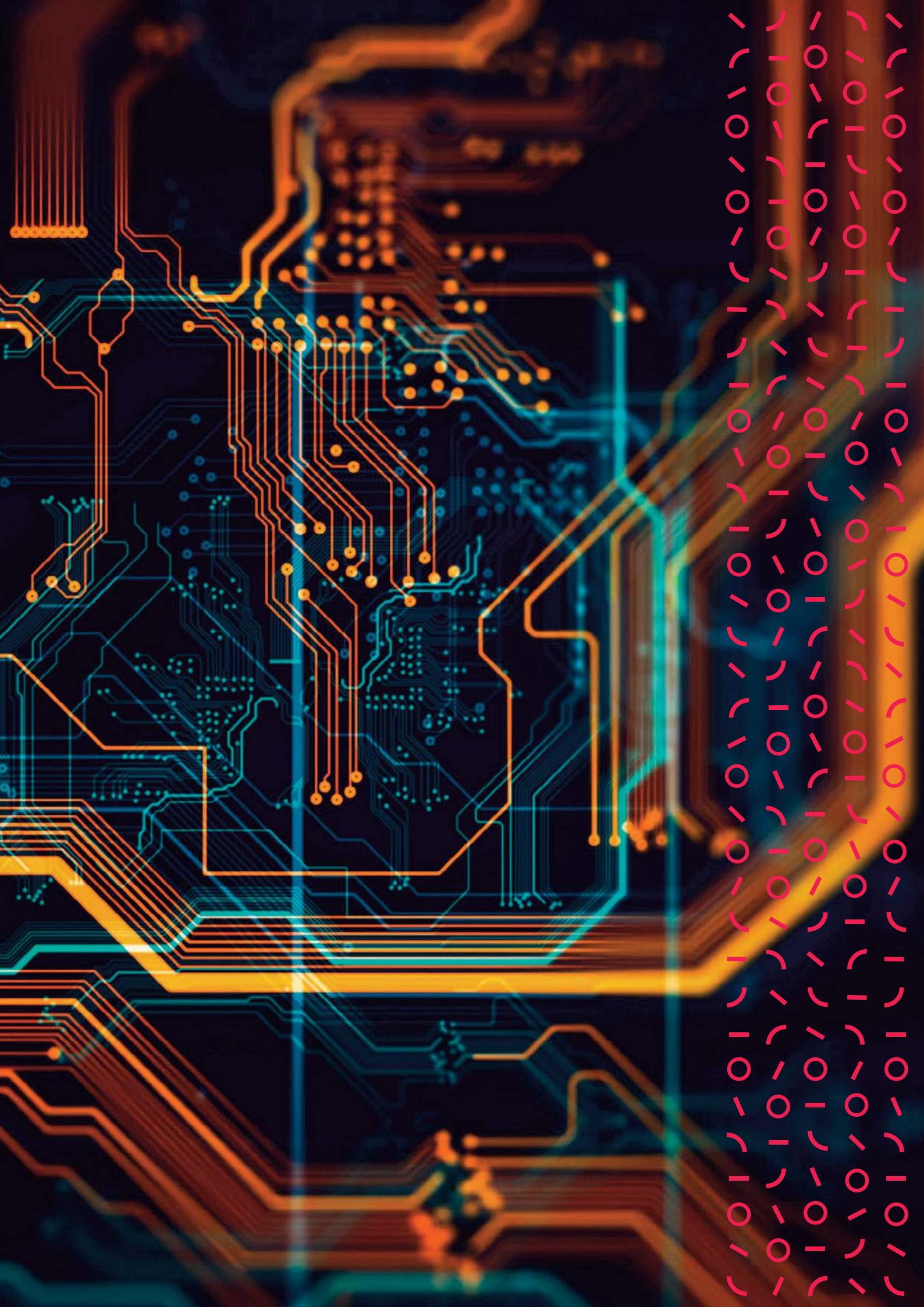
Social and economic area

No disputes or cases of violations of relevant social and economic laws and regulations arose during the reporting period (2020-2022). No significant penalties of this kind have been received between 2020 and 2022, and no significant legal actions have been reported in relation to this matter.

External Initiatives and memberships

STAR7 is a member of a number of associations: COM&TEC - Confindustria Alessandria - Confindustria Torino - Confindustria Modena - Unilingue - AIAD (Defence) - Manager Italia - Associazione Ferraristi - INPIU' - QUAS.

Membership is predominantly institutional in nature and STAR7 does not play an active role.



Material Topics

Impacts and material topics

GRI 3-1

As per the GRI Standards, impacts are the economic, environmental, and social effects that a company has or may have, including those on human rights, as a result of its activities, business, and trade relations. Impacts can take various forms, including actual or potential, negative or positive, short or long term, intentional or unintentional, reversible or irreversible. They can also reflect the organisation's contribution to sustainable development, whether positive or negative. The most significant impacts represent Material Topics.

The activities and business relationships of a company can have both positive and negative impacts on the economy, environment, and people. These impacts can also affect the company's operations, reputation, and financial standing in the medium and long term. As a result, they can impact the value of the company, its relationships with stakeholders, and its competitive position in the market.

European Union - EU Directive 2022/2464 and Dual Materiality

The European Parliament approved the EU Directive 2022/2464 (CSRD Corporate Sustainability Reporting Directive) in November 2022. It will be effective for financial year 2024 reporting. This directive introduces the concept of dual materiality, which expands the definition of material topics. Based on this approach, material topics include governance, environmental and social areas, and issues that the company has a significant impact on through its activities (known as Impact Materiality). b) aspects that may have significant impacts on the development, performance and, consequently, the financial value of a company (Financial Materiality).

The process of identifying - evaluating and prioritising issues

The process of analysis identification, evaluation and subsequent prioritisation of material topics was developed as required by GRI Standard 3 Material Topic 2021. Specifically:

Understanding the context of the organisation

The information regarding the background and framework of STAR7, the business model, business activities and relationships, as well as the sustainability context and stakeholder analysis, can be found in Chapters 2 and 4.

Identification of actual and potential impacts

We identified actual and potential impacts on the economy, environment, and people, including human rights, by analysing various external and internal sources. We also considered the results of our dialogue and relationships with stakeholders.

External Sources

- World Economic Forum - Strategic Intelligence/Global Risk Report
- OECD Organisation for Economic Co-operation and Development - Due Diligence Guidance for Responsible Business Conduct/OECD sectoral guidance on due diligence
- International Labour Organisation (ILO), 2022. Transforming enterprises through diversity and inclusion.
- United Nations Human Rights (UNHR), 2011. Guiding Principles on Business and Human Rights. Implementing the United Nations "Protect, Respect and Remedy" Framework
- Convention on Biological Diversity (2022), Kunming-Montreal Global Biodiversity Framework
- SASB - Sustainability Accounting Standards - Materiality Finder
- ESRS - European Sustainability Reporting Standards (Draft)
- IFRS-S - International Financial Reporting Standards - Sustainability (Draft IFRS S1-S2)
- Benchmarking main peers and strategic partners of STAR7: a) Material topics; b) Policies; c) Risk management
- Sector studies and research

Internal Sources

- Compliance Programme pursuant to Legislative Decree 231/2001
- STAR7 Group Code of Ethics
- Management Systems
- Risk Assessment Document
- ESG questionnaires received from customers and banks

With regard to some of the main sources analysed, the following should be noted:

SASB - Sustainability Accounting Standards – Materiality Finder – SASB. This search tool is among those created by the SASB - Sustainability Accounting Standards Board, Standard Setter, today part of the IFRS Foundation. This tool is organised by sectors and material topics, allowing you to identify potential issues that could impact the financial condition or operational performance of companies within the relevant sector. The analysis was conducted to verify whether the identified material topics were consistent with the findings of the SASB Materiality Finder. The analysis carried out for STAR7 focused on the Software & IT Services sector.

World Economic Forum – Strategic Intelligence/Global Risk Report. The Strategic Intelligence tool developed by the World Economic Forum and updated annually, at the same time as the Global Risk Report is published, is useful for mapping the main connections between different economies, industrial macro-sectors and risk issues in the global context, consequently identifying the main impacts, trends and dynamics of change characterising a given sector in the short, medium and long term.

The OECD Due Diligence Guidance for Responsible Business Conduct offers practical assistance to companies in implementing the non-binding OECD Guidelines for Multinational Enterprises. These guidelines help companies identify and manage negative impacts related to labor issues, human rights, the environment, corruption, consumers, and corporate governance.

Evaluation of materiality and prioritisation of impacts

The aim of assessing the materiality of identified impacts is to prioritise them. Prioritisation enables the company to identify the material topics to report on, and more importantly, to define commitments and actions needed to address the impacts in a more effective and relevant manner. The significance of the impact depends on the specific conditions of a company, the sector in which it operates, and its business model.

The significance of an actual **negative impact** depends on the severity of the impact, while that of a potential negative impact depends on the severity and likelihood of the impact. Severity is defined by the GRI Standards on the basis of three dimensions: a) scale: how severe the impact is; b) scope: how widespread the impact is; c) irremediable character.

The significance of an actual **positive impact** depends on the scale and scope of the impact, while the magnitude of a potential positive impact depends on both the scale and scope and the likelihood of the impact. In the case of positive impacts, the scale of an impact refers to the actual and/or potential benefits of the impact, while the scope refers to its actual or possible magnitude.

The final step of the process involved prioritising the impacts that were identified and assessed based on their importance and a predetermined threshold.

This document reports the impacts that have been identified as the most relevant. After completing the process described and commented on below, we analysed and discussed the material topics. We then shared our findings with the Chairman and CEO of STAR7.

Material Topics

GRI 3-2

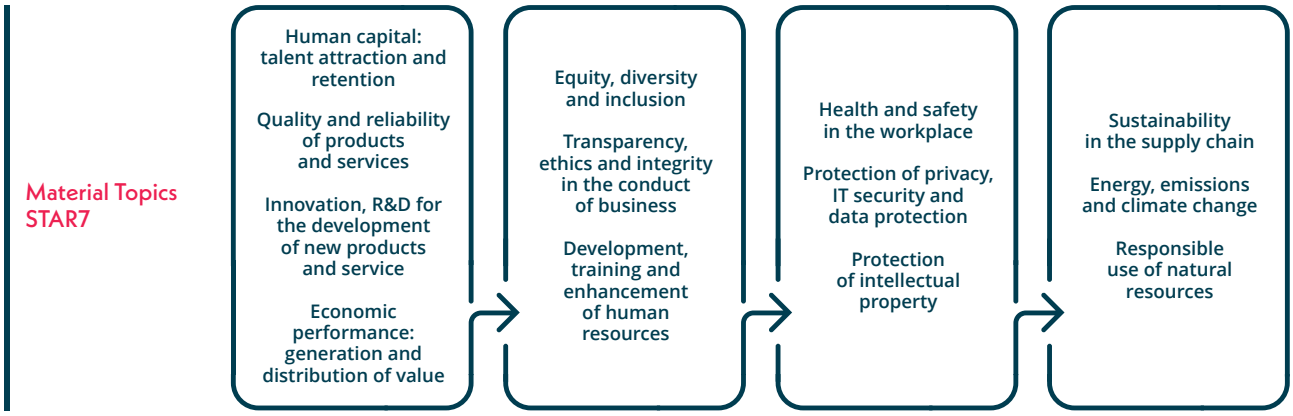
The following table summarises the activities that have been carried out. It highlights the material topics, the underlying impact areas (including descriptions and reasons for the relevance of the selected themes), the characteristics of the material topic, and the specific indicators (GRI Standards) used for reporting. The GRI Content Index, which is an integral part of this document, provides detailed information on these indicators. Material topics are grouped according to the ESG (Environmental, Social, Governance) classification, which is also provided for in the forthcoming EU Directive 2022/2464 (CSRD).

	Material topic	Impacts Summary	Characteristics	GRI Topic Standards
E	Environmental			
1	Energy, emissions and climate change	Emissions resulting from production activities and plans/projects aimed at reducing them for the purpose of mitigating climate change. [Negative]	Effective: emissions and energy consumption of the Group Direct: related only to direct activities Short, medium and long term (structural with respect to the business model) Planned as it relates to business processes	GRI 302 Energy GRI 305 Emissions
2	Responsible use of natural resources	STAR7's environmental impact is determined by several factors, including the use of materials and resources, efficient water management, adherence to circular economy principles, and proper management of waste generated throughout the entire value chain. [Negative]	Effective: Utilisation of resources for corporate activities Direct: related only to direct activities Short-term (structural with respect to the business model) Planned as it relates to business processes	GRI 301 Materials GRI 303 Water and Effluents GRI 306 Waste
S	Social			
3	Human resources: talent attraction and retention	Positive impacts on employment, level of knowledge and skills, and the ability to attract and retain talent. [Positive]	Effective: related to company procedures Direct: related only to direct activities Short-term (structural with respect to the business model) Expected as it relates to the business	GRI 401 Employment
4	Development, training and enhancement of human resources	Ability to provide all Group employees with support in their professional growth/development through training plans and skills development [Positive]	Effective: competence-development training plans Direct: related only to direct activities Short-term (structural with respect to the business model) Expected as it relates to the business	GRI 404 Training and education

	Material topic	Impacts Summary	Characteristics	GRI Topic Standards
5	Equity, diversity and inclusion	We aim to establish a work environment that promotes respect, equal opportunities, diversity, and inclusion for all employees. Our goal is to protect our workers from any form of discrimination. [Positive]	Effective: protection in the area of diversity and inclusion Direct: related only to direct activities Short-term (structural with respect to the business model) Expected as it relates to the business	GRI 405 Diversity and Equal Opportunity GRI 406 Non-discrimination
6	Health and safety in the workplace	The Group has the ability to provide working conditions that protect and monitor the health and safety of all individuals working within it. [Negative]	Potential: accident monitoring and health and safety policies Direct: related only to direct activities Short-term (structural with respect to the business model) Both intended and unintended	GRI 403 Occupational health and safety
7	Quality and reliability of products and services	Our company has the capability to produce and provide top-notch products and services that meet and exceed customer expectations. We adhere to compliance standards and prioritize the health and safety of end users. [Negative]	Potential: continuous development of products and services Direct: related to direct activities only (structural with respect to the business model) Short-term (structural with respect to the business model) Expected as it relates to the business	GRI 416 Customer health and safety GRI 417 Marketing and labelling
8	Innovation, R&D for the development of new products and service	Investing in research, development, and innovation of products and services can drive economic development for the enterprise. [Positive]	Effective: related to the products and services offered Direct: related only to direct activities Medium - and long-term (structural with respect to the business model) Expected as it relates to the business	Topic covered by GRI 2 General Disclosures
9	Protection of privacy, IT security and data protection	The implementation of an ICT governance system that safeguards information security and privacy, including cybersecurity and data protection for both customers and employees. [Negative]	Potential: protection of company and customer data Direct: related to direct activities only (structural with respect to the business model) Short-term (structural with respect to the business model) Both intended and unintended	GRI 418 Customer privacy
10	Sustainability in the supply chain	The process of selecting and qualifying suppliers is based on social and environmental criteria and assessments, which include the protection of human rights, ensuring the health and safety of workers, and proper environmental management. [Negative]	Effective: connected to suppliers Both direct and related to business relations Short-, medium- and long-term (structural with respect to the business model) Both intended and unintended	GRI 308 Supplier Environmental Assessment GRI 414 Supplier Social Assessment
11	Protection of intellectual property	Ability to protect intellectual property and technological innovation. [Positive]	Effective: intellectual property protection Direct: related only to direct activities Short-term Expected as it relates to the business	Topic covered by GRI 2 General Disclosures

	Material topic	Impacts Summary	Characteristics	GRI Topic Standards
G	Governance / Economic			
12	Economic performance: generation and distribution of value	The ability to generate positive economic outcomes that ensure the company's economic sustainability and the equitable distribution of the value created among all stakeholders. [Positive]	Effective: creation of economic value generated and distributed Direct: related to direct activities only (structural with respect to the business model) Short-term (structural with respect to the business model)	GRI 201 Economic performance
13	Transparency, ethics and integrity in the conduct of business	Ethical business conduct/management through policies and procedures that ensure integrity, regulatory compliance and fiscal transparency. [Negative]	Potential: related to business activities Direct: related only to direct activities Short-term (structural with respect to the business model) Expected as it relates to the business	GRI 205 Anti-corruption GRI 206 Anti-competitive behaviour GRI 207 Tax

The following are the priority impacts of STAR7, based on an assessment of its scale, scope, irretrievability, and impact on human rights. One of the key topics is **people** (human resources): **attraction and retention**, followed by the **quality and reliability of products and services and Innovation, R&D for the development of new products and services**, consistent with STAR7's business model and strategy.



Material Topics - Objectives and Actions

GRI 3-3

The graphic below outlines STAR7's commitments to the identified themes and demonstrates their correlation and coherence with the UN Agenda 2030 and the SDGs. The Agenda for Sustainable Development has identified 17 goals and 164 targets to achieve sustainable development. The objectives, actions, and their related impacts, as well as the processes and procedures used to monitor performance and the effectiveness of actions, are discussed in detail in the chapters of this document. The issues are addressed and reported on in these chapters.

	Material topic	Sustainability plan objectives		SDGs Sustainable Development Goals	
		Description/Actions	Time span	#	Target (Abstract)
E	**Environmental**				
1	Energy, emissions and climate change	The goal is to increase the use of renewable energy sources and to secure electricity supply contracts with a Guarantee of Origin. Mapping GHG Scope 3 emissions along the value chain.	2023-2025	7 AFFORDABLE AND CLEAN ENERGY 13 CLIMATE ACTION	7.2 Increase substantially the share of renewable energy in the global energy mix. 13.2 Integrate climate change measures into national policies, strategies and planning.
2	Responsible use of natural resources	Improving material utilisation processes and waste management in line with circular economy models. In this context: identifying and implementing measures to eliminate or reduce paper waste is crucial for printing companies.	2023-2025	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	12.2 Sustainable management and efficient use of natural resources.
Y	**Social**				
3	Human resources: talent attraction and retention	Group onboarding sessions (virtual and/or in-person) of new STAR7 resources. Maintain an active communication network with schools and universities in order to attract young talent.	2023-2024	8 DECENT WORK AND ECONOMIC GROWTH	8.5 Achieve full and productive employment and decent work, including for young people. 8.6 Reduce the proportion of youth not in employment.
4	Development, training and enhancement of human resources	Introduction of new internal training process management tools. Implementation of a performance evaluation system that involves most of the STAR7 staff. STAR7 actively involves on-the-job training in the creation of an internal register of trainers.	2023-2025	4 QUALITY EDUCATION	4.4 Increase the number of youth and adults who have relevant skills, including technical and vocational skills.

	Material topic	Sustainability plan objectives		SDGs Sustainable Development Goals	
		Description/Actions	Time span	#	Target (Abstract)
5	Equity, diversity and inclusion	Adoption of a Group-wide Diversity, Equity and Inclusion Policy. Gender Gap analysis activities and subsequent evaluation of obtaining Gender Equality certification.	2023-2025	5 GENDER EQUALITY 10 REDUCED INEQUALITIES	5.1 End all forms of discrimination against women and girls. 5.5 Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making. 10.2 Promote universal social, economic and political inclusion. 10.3 Ensure equal opportunities.
6	Health and safety in the workplace	Maintain high safety standards and minimise accident rates. STAR7 "Health and Safety in the Supply Chain" project.	2023-2024	8 DECENT WORK AND ECONOMIC GROWTH	8.8 Protect labor rights and promote safe and secure working environments of all workers.
7	Quality and reliability of products and services	Ensure that the products and services offered maintain and improve their high standards of quality and reliability. To improve customer satisfaction and reduce product non-conformities, we have implemented a dedicated internal quality control resource and strengthened our quality control system. Implementation of "Sample Picking" control for monitoring the quality of translations by means of an automatic sampling system and verification by qualified reviewers.	2023-2024	4 QUALITY EDUCATION 5 GENDER EQUALITY 8 DECENT WORK AND ECONOMIC GROWTH 10 REDUCED INEQUALITIES	4.6 Ensure that all youth and a substantial proportion of adults, both men and women, achieve literacy 5.b Enhance the use of enabling technology, in particular information and communications technology, to promote the empowerment of women. 8.2 Achieve higher levels of economic productivity through diversification, technological upgrading and innovation. 10.2 Strengthening and promoting social, economic and political inclusion.
8	Innovation, R&D for the development of new products and service	R&D activities, for the development of innovative solutions to improve service delivery and their ability to generate positive social and environmental impacts. "Next" is an internal competition aimed at generating innovative ideas and practical solutions related to services, technologies, and sustainability.	2023-2025	3 GOOD HEALTH AND WELL-BEING 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	3.b Support the research and development of vaccines and medicines for diseases. 9.1 Develop quality, reliable, sustainable and resilient infrastructure to support economic development and the well-being of individuals. 9.4 Upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes.
9	Protection of privacy, IT security and data protection	Protect sensitive customer and company data with effective security measures and in compliance with regulations and the Management System. Training activities aimed at all staff in order to raise awareness of IT security.	2023-2025	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	9.1 Develop quality, reliable, sustainable and resilient infrastructure to support economic development and the well-being of individuals.
10	Sustainability in the supply chain	Adoption of a Code of Conduct to be signed by suppliers (new and pre-existing).	2023-2024	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	12.6 Encouraging companies to adopt sustainable practices.

	Material topic	Sustainability plan objectives		SDGs Sustainable Development Goals	
		Description/Actions	Time span	#	Target (Abstract)
11	Protection of intellectual property	Adopt STAR7 intellectual property protection policies. Monitoring and verification of possible intellectual property infringement offences Compliance Programme as per Legislative Decree 231/2001.	2023-2025	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	Guarantee public access to information and safeguard fundamental freedoms, in compliance with national laws and international treaties.
D	**Governance**				
12	Economic performance: generation and distribution of value	Actions related to the strategy of developing and strengthening the competitive position.	2023-2025	8 DECENT WORK AND ECONOMIC GROWTH	8.3 Promote policies that support productive activities, decent job creation, entrepreneurship, creativity, and innovation with a focus on development.
13	Transparency, ethics and integrity in the conduct of business	Establish an internal Risk and Sustainability Control Committee to manage the positive and negative impacts generated by STAR7. Implementation of a compensation policy and performance assessment for the Board of Directors.	2023-2025	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	16.6 Develop effective, accountable and transparent institutions at all levels.

Innovation, Research and Development and Cutting-edge Technologies

The role of research and development

GRI 3-3

STAR7 stands out for its ability to combine expertise, established technologies and innovation to serve its customers, both in its projects and in developing its own services. This makes it possible to create and offer personalised services of a very high technical and technological quality.

The STAR7 Group's dedication to research and development is evident in the expenses and investments they have made. Total expenditure for the three-year period 2020-2021-2022, incurred in research and development activities was, at the consolidated level, € 8,342,727.66 million In the financial year 2022, this amounted to € 2,624,376.66 million in operating costs.

Research and development, as well as its strategic importance, have also influenced the company's acquisitions, particularly in enhancing the technology of the services offered in the areas of Virtual Training, Virtual Showroom, Product Experience, and artificial intelligence. Today, the STAR7 Group is able to deliver state-of-the-art solutions, by making the most of its technical information management skills acquired over time through engineering and technical authoring.

In this area, STAR7 has received official recognition following its participation, as a guest on the IVECO stand, for the first time at the IAA Transportation - Europe's largest trade fair dedicated to commercial transport, which took place in Hannover, Germany, from 20 to 25 September 2022 – presenting two virtual training experiences dedicated to the sales and after-sales world.

Creative Lab

STAR7 Creative Lab is the research and development centre, the innovative driving force behind STAR7. The most futuristic ideas are developed here. It operates on a plane which has specialisation of applications on the Y axis and integration of services on the X axis. Our suite collates every need that STAR7 has identified in the course of its activity, responding with a platform enabling design, configuration, learning and diagnosis in virtual spaces.

Next: Question the Status Quo

In 2023, STAR7 launched **"Next"** a corporate innovation and creativity programme that has been implemented in order to search for and find ideas and projects with the capacity to bring STAR7 in line with the next generation of product information services. STAR7 is not new to this kind of initiative: in 2018, as part of Road to 2020, individuals were tasked with imagining the future of STAR7, with a view to sparking a new growth curve. Some of the outcomes of this initiative included offshoring to Albania, the establishment of a Creative Lab, and expansion into the US market.

Next is an **internal contest** involving all Group employees with the common goal of realising concrete projects so that they become an integral part of STAR7 in the future. The first step involves calling for ideas with the goal of identifying and rewarding projects and ideas that come from within. This process primarily focuses on three key drivers:

Services → Technology → Sustainability

STAR7 People are encouraged to choose one of these themes to strengthen the Group's identity. They can either brainstorm **new product information services that can be developed in the future or improve existing services** using new technologies. Moreover, as we move into a new era of product information, it is crucial to prioritize sustainable business practices. **This entails taking into account projects, ideas, and activities that can genuinely and positively impact the well-being of people, the environment, and the local community, both within and outside the company**. The outcomes of this initiative will be disclosed and accessible in the upcoming Sustainability Report.

Innovation: development of cutting-edge technologies

Because we belong to the STAR Group network, STAR7's activities and services have been gone hand-in-hand with innovative proprietary tech solutions, to aid and enhance the creation, management and use of content and information for any product. This background, combined with the innovation and technological know-how developed within the Creative Lab, which allows STAR7 to offer its customers advanced solutions that can meet any need and, in some cases, even anticipate it.

During 2022, STAR7 carried out several research and development projects, including:

MACHINE TRANSLATION - "Statistial Machine Translation (SMT) uses statistical methods to generate translations. When presented with a new text to translate, the system generates potential translations based on matches found in the first database. From the various translation options, it selects the best one using the second database, which is specific to the target language. This ensures the most accurate and appropriate translation. The quality of translation improves as the size of the language corpora in the databases increases. Thanks to the implementation of AI analysis algorithms, it is now easier to interpret and contextualise text.

As a member of the STAR Group network, STAR7 has access to the language and authoring technology that the STAR Group has developed over the years.

Language Technologies

STAR CLM - Language service management platform. It incorporates terminology functions, machine translation, online review and cost and project progress tracking. Interacts with the main CMS (Content Management System). The goal is to enhance efficiency and streamline processes through tailored workflows.

Transit - Advanced software that uses translation memory to optimise times and maximise performance. It incorporates localisation, multimedia content management and machine translation functions.

STAR MT - Automatic translation tool. It can produce large volumes of translation, considerably reducing costs and facilitating the work of the teams. This tool reduces time-consuming efforts while increasing the quality and consistency of the text in the target language.

TermStar - Terminology management tool to make product communication nimble, uniform and unambiguous. It includes terminology analysis functions able to facilitate the work of authors and translators by improving translation quality control.

WebTerm - Portal for accessing terminology databases, and for sharing and updating information in real time It responds to the complex requirements of terminology management, allowing database access to many users working in different parts of the world.

CLM Web Edit - Web-based online translation tool that does not require specific software applications for editing and revision. This technology offers editing tools for modifying content and accessing real-time preview and change history, all via web.

Authoring Technologies

GRIPS - Platform for the creation, semantic classification, management and publication of multilingual product documentation. Powerful and versatile CMS, capable of managing information based on knowledge graphs generated using artificial intelligence. Information can be automatically generated and prepared for publication across all channels.

PRISMA - Portal for customised, multichannel publication of product documentation with integrated artificial intelligence. It delivers the information users need based on their level of experience and the context in which they are operating.

SDM - Technical information life cycle management portal with customisable reporting system. It can produce dedicated reports on the main stages of the authoring, translation and printing processes. It supports the MySTAR and MySTAR Print vertical applications for managing the translation and print-on-demand workflow.

STAR EC Monitoring System - A tool designed to monitor and report engineering changes (EC). It interfaces with the customer's engineering tools and allows change tracking, evaluating their impact on the documentation to be produced.

Approval Portal - Portal for managing and reporting on the content validation workflow and logistics for printing. It can retrieve information from GRIPS, divide it by topic, send it to the relevant managers and keep track of the corresponding approvals, with the ability to customise.

CMS Custom Solutions - Customised web-based solutions for creating and managing technical documentation. Starting from the VIN (Vehicle Identification Number), it can manage and present the end user with the spare parts catalogue, the time schedule, the workshop manual, the wiring diagrams and the troubleshooting.

To complete the technology suite, STAR7 has developed its own technology that enables us to support the entire product information lifecycle in a comprehensive and innovative manner.

Product experience technologies

Alcor – Immersive virtual reality training platform designed to promote learning and overcome physical distance. The platform features two training solutions, single-player and multi-player, with a structure that offers both on-demand, autonomous use of content and real time participation in a virtual classroom.

Mizar - Immersive design software: offers an experience of perceived product quality in the stages before production. Thanks to a virtual room offering a 1:1 scale photorealistic view of the 3D model using VR technology, Mizar enables development in processes by offering the possibility of studying and testing the characteristics and functionality of a product even in the stages before production, providing a hyperrealistic experience of perceived quality. By combining physical and digital workspace, through concrete interaction with the virtual model, it configures the product for the following stages of development, allowing times to be optimised and economic impact on the production cycle to be limited.

Antares - Software enabling a 4D product presentation experience. Antares can combine the quality and flexibility of 3D with the fourth dimension, time. The result is an engine capable of providing a real-time, interactive and fully customisable product presentation. Thanks to a digital environment with photorealistic rendering, the interactive functionality offered by the dashboard and the specific options that can be activated in the case of a VR hardware system, Antares engages the user in a dynamic, in-depth exploration of the details, characteristics and functionality of any kind of product, shifting sales from the perspective of an onlooker to an immediate experience and transporting the user into a new digital reality.

DW7 - An innovative service developed as a diagnostic support application, which uses mixed reality to superimpose virtual wiring diagrams directly onto the physical vehicle. The flexibility, precision, freedom of movement and intuitive quality of the interface allow users to interact simply, directly and intuitively with every little detail.

After Sales Digital Twin - An innovative solution for creating and managing aftersales documentation in a virtual workshop, thanks to VR technology. Creation of a digital twin of the physical product, obtained by simplifying the 3D mathematical models and placed into a "gaming" environment to achieve high performance with commercial tools (workstations, VR helmets), permits advance operation whether or not physical prototypes or models are available.

Creation and distribution of value

Economic value generated and distributed

GRI 3-3
GRI 201-1

The determination of the Value Generated and Distributed is based on the Consolidated Income Statement of the Group. This representation provides evidence of the economic value directly generated by STAR7 that is distributed to internal and external stakeholders. Please refer to the Consolidated Financial Statements of STAR7 S.p.A. for further details on the company's performance, including economic, financial, and asset performance.

The term "Generated Value" refers to STAR7's revenues from an accounting standpoint. This includes revenues, other operating revenues, net of credit losses and tax benefits. On the other hand, "Distributed Economic Value" encompasses costs that have been reclassified according to stakeholder category. In addition, the amount of dividends is also added to the costs shown in the consolidated income statement, if they were distributed to shareholders (which was not the case for STAR7).

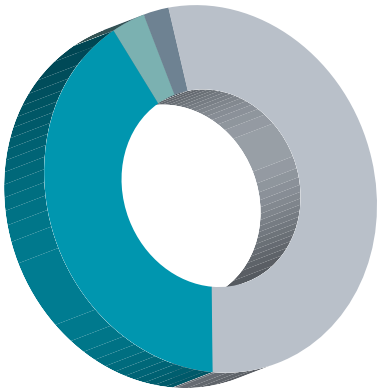
Retained Economic Value refers to the difference between the Economic Value Generated and Distributed, which takes into account the depreciation of tangible and intangible assets, provisions, bad debts, and deferred taxes.

Economic Value (Euro)	2020	2021	2022
Economic value generated	44,680,273	59,980,115	84,766,735
Economic value distributed			
Suppliers - Operating Costs	23,497,725	27,591,725	39,136,706
Human Resources - Personnel costs	15,936,832	22,977,581	29,156,658
Banks and other lenders - Financial expense	315,909	632,581	2,300,042
Public Administration - Taxes	576,914	962,101	1,984,537
	40,327,379	52,163,987	72,577,942
Shareholders - Dividends distributed	-	-	-
Economic value distributed	40,327,379	52,163,987	72,577,942
Economic value retained	4,352,894	7,816,127	12,188,793

Economic value distributed

In 2022, 53.9% of the total value distributed was allocated to suppliers. The majority of this amount was attributed to the supplier category comprising of translators and interpreters. This figure confirms the significant role played by these stakeholders in STAR7's value creation chain. 40.2% of the generated value was distributed to employees. Over the course of three years, the resolutions passed by STAR7 shareholders did not include any provisions for distributing dividends to shareholders.

Distributed value 2022 - Proportion



0%
Shareholders - dividends distributed

2.7%
Public Administration - taxation

53.9%
Suppliers - operating costs

40.2%
Human resources - staff costs

3.2%
Banks and other lenders - financial charges

Ethics and Integrity

Corruption prevention measures

GRI 3-3
GRI 205-3

STAR7 has implemented tools and policies to mitigate potential corruption risks. The system includes in particular: Compliance Programme pursuant to Legislative Decree 231/2001 (Compliance Programme) and Code of Ethics.

To learn about STAR7's management approach for combating corruption, please refer to Chapter 4, "Strategies – Policies and Process Management – Responsible Business Conduct".

No instances of active or passive bribery involving directors or employees of STAR7 (parent company and subsidiaries) were identified during the reporting periods, as well as in previous reporting periods, including those that required reporting.

Corruption prevention measures

GRI 3-3
GRI 206-1

Throughout the reporting period, STAR7 did not experience any incidents or legal proceedings related to violations of free competition, monopolistic practices, or antitrust laws in 2022 or previous years.

Tax transparency

GRI 3-3
GRI 207-1
GRI 207-2
GRI 207-3

Approach to taxation

STAR7 adheres to the tax regulations in the different jurisdictions where it operates. Despite having an international profile and corporate structures in numerous countries, STAR7 has not yet developed or implemented a dedicated tax strategy. At STAR7, we are committed to upholding the values of honesty and fairness in our management practices. This includes adhering to all tax laws and regulations in the countries where our Group operates. We strive to maintain compliance with taxation policies in a responsible manner. Under no circumstances does the STAR7 Group pursue or realise its interest in violation of tax laws.

STAR7 aims to meet its tax obligations, both formal and substantive, in a timely, complete, and accurate manner. This is to reduce the tax risks that may arise from the application of tax laws and regulations in all the countries where the Group operates. This includes addressing any uncertainties in the interpretation of tax matters.

Tax governance, control and risk management

STAR7 has little exposure to tax risk. When deciding how to tax a specific transaction or activity, the approach taken is to use sensible, well-supported, and logically reasoned tax decisions and interpretations. Considering the vastness and intricacy of the Group's operations, there is a possibility of encountering risks related to the interpretation of complicated tax regulations. The Group identifies and analyses risks internally, with the assistance of qualified tax advisors. This process takes into consideration the countries in which the Group operates.

Relationship with tax authorities (stakeholders)

STAR7 is committed to complying with all relevant legal provisions and upholding the principles of transparency, honesty, and fairness when dealing with tax authorities in the countries where it operates. The STAR7 Group does not exert any improper influence on the decisions of tax authorities in the countries where it operates, even through third parties. On the contrary, our aim is to maintain open and constructive relationships with all relevant tax authorities. We strive to resolve any disputes in a collaborative spirit, which may include the use of litigation-defining instruments. When there is uncertainty regarding the tax treatment of certain issues, STAR7 recommends using tools to determine the position of the relevant tax authorities beforehand.

Privacy, data and information

Data Security and Privacy

GRI 3-3
GRI 418-1

Ensuring corporate IT security management is a crucial matter for STAR7 to safeguard both customer data and the company's interests.

As per the Code of Ethics, the STAR7 Group guarantees the safeguarding of personal data and information during its business operations by preventing any improper or unlawful use.

All recipients should keep sensitive data on Group companies completely confidential, including outside of work and after their working relationship has ended, so as to protect information on the companies' technical skills, assets, finances, legal and administrative workings.

In accordance with GDPR legislation, a "personal data breach" refers to the accidental or unlawful access, destruction, loss, modification, or unauthorised disclosure of personal data stored or transmitted on electronic networks by the Company due to a breach of its security system. Under the GDPR, if there is a breach of personal data, the data controller must inform the relevant supervisory authority (in Italy, this is the Garante per la protezione dei dati personali) within 72 hours of becoming aware of the breach. However, if the breach is unlikely to pose a risk to the rights and freedoms of individuals, notification is not required.

If a personal data breach is likely to pose a significant risk to the rights and freedoms of individuals, the controller must inform the data subject of the breach. However, this requirement does not apply if the controller has taken appropriate technical and organisational measures to protect the data (such as encryption). (b) The holder has implemented suitable measures to prevent any high-risk situations that may affect the rights and freedoms of the data subjects. or (c) such communication would require disproportionate efforts. In such a scenario, a public notice or a similar measure is implemented to inform the concerned individuals with equal effectiveness.

To foster a culture of information security and data protection, STAR7 has implemented the ISO 27001:2017 standard.

STAR7 implements good practices in the described areas to safeguard the organisation's information assets against internal or external information security threats, whether intentional or accidental. aligning information security management with the strategic risk management framework of the organisation; Establishing information security objectives and defining a clear direction and set of principles for action. establishing criteria for risk assessment and risk acceptance; To ensure adherence to the relevant information security standards, it is necessary to comply with the requirements outlined in ISO/IEC 27001:2013. regularly reviewing the effectiveness of the ISMS and continuously improving it.

The information security management system's objectives align with the organisation's business, strategy, and activity plans. Management and the ISMS manager regularly review and monitor these objectives to ensure they are fulfilled and achieved. The objectives are described as follows:

- Minimising damage caused by potential security incidents
- Ensuring continuous business operations with minimal interruptions
- Ensuring the integrity of all information managed by the company
- Handling all relevant information with appropriate confidentiality
- Imparting information security training to all employees, including new recruits

In 2022, as well as in the preceding reporting periods of 2020 and 2021, there were no incidents of data loss (data breaches) and no substantiated complaints regarding breaches of customer privacy or loss of customer data.

Protection of intellectual property

GRI 3-3

Alongside the Civil Code, the Industrial Property Code and the Copyright Law are the primary legal sources in Italy concerning industrial and intellectual property. These laws are particularly pertinent to the activities of STAR7.

The Group manages its intellectual property to protect its production activities from possible counterfeiting by both international competitors and local operators.

Confidential materials provided by the Customer may concern: a) the information, documentation and data provided by the customer; b) know-how, intellectual property and customer personal data; c) information and documents prepared by STAR7 for the customer; d) printed documents to be delivered to the customer.

If this documentation is used in business processes, the product will still belong to the customer. Nonetheless, the company bears legal responsibility for appropriately storing and utilising the material as defined in the contract.

Quality and reliability of products and services

Quality Policy

GRI 3-3

STAR7 aims to be the first choice for product content, thanks to our high-quality services that span the entire information life cycle and our philosophy of delivering maximum efficiency and added value every step of the way. Our approach involves a combination of modular and integrated methods, which utilise our expertise, extensive network and innovative STAR Group technologies. The outcome is a comprehensive selection of fully customisable services, which include content creation, localisation, printing, logistics, and multimedia content creation.

At STAR7, we consider the quality and reliability of our products and services to be crucial for our daily operations and growth. Therefore, we adhere to the following principles:

- understanding and meeting the expectations of our clients and stakeholders;
- complying with legal and voluntary standards applicable to our products and services;
- continuously improving our processes in pursuit of maximum effectiveness and efficiency.

Product health and safety

GRI 416-2
GRI 417-2
GRI 417-3

At STAR7, our top priority is to ensure the health and safety of our end-users. We are committed to providing the highest quality goods and services to guarantee customer satisfaction. Accurate and dependable product information is crucial for ensuring safe product usage, which in turn has a positive impact on people's health and safety. This also contributes to greater customer satisfaction, both directly and indirectly.

Using a non-conforming translation or technical authoring can have negative impacts not only on the quality of the product, but also on its functionality. This can have repercussions on the health and safety of the user, the client's image, and the reputation of STAR7.

Thanks to collaboration between technology and human expertise, STRA7 provides top-notch services that deliver precise and dependable translations to the end user. By ensuring a better user experience, the company can limit its liability in case of complaints arising from product misuse.

To ensure the safety of our solutions, STAR7 S.p.A. adheres to regulatory guidelines, customer compliance requirements, and our quality system by monitoring and evaluating the impact of all products and services offered.

During the reporting period of 2022, as well as in the preceding years of 2021 and 2020, there were no notable instances of non-compliance with standards, regulations, or voluntary codes related to the health and safety impacts of our products and services.

In addition, STAR7 constantly ensures that marketing communications for its products and services follow the principles of ethics and integrity. In the reporting period there were no significant incidents of non-compliance with standards, regulations or voluntary codes concerning the health and safety impacts of products and services.

Product conformity

Non-conformity management process

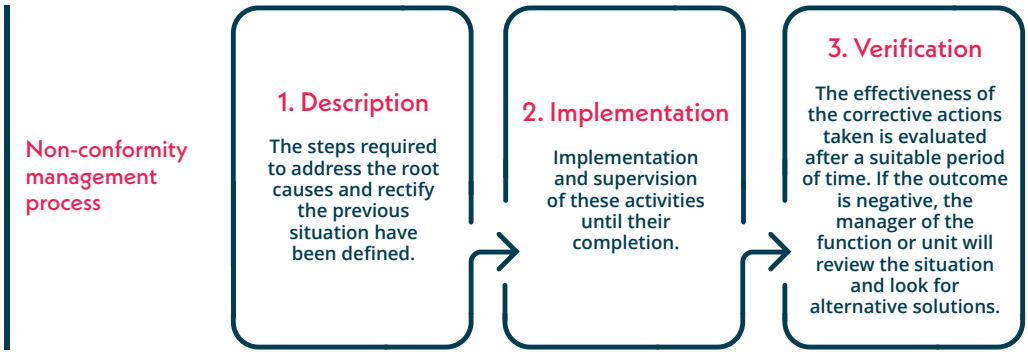
STAR7 has adopted an internal procedure with the aim of ensuring appropriate management of non-conformities (detected or potential) that have a possible impact on product/service quality, customer satisfaction, the environment and the effectiveness of the management system and the consequent implementation of corrective, corrective or preventive actions.

Non-conformities that can typically be encountered are distinguished by type, including those related to complaints (reports by the customer, or by a competent third party, deemed "justified"), accidents (breakdowns/failures of plant, machinery and equipment) product/service (deviations from pre-established requirements), organisational (such as delivery delays), operational (attributable to a failure to comply with an internal provision), supply (attributable to products/services supplied) and system (referring to deviations from system requirements).

It is the responsibility of anyone who comes across a possible non-conformity to take action to reduce any negative impact and try to resolve the issue. They should also inform their manager in a timely and appropriate manner, taking into account the level of importance and urgency.

The Department Head must evaluate the reported situation's scope and importance and determine whether there is a non-conformity. If something is considered significant, it will be recorded in the relevant register and a thorough analysis of the causes will be conducted.

Once the causes of non-conformity have been identified, appropriate corrective action is taken. This may provide an opportunity to take preventive action, which can be represented in the following steps:

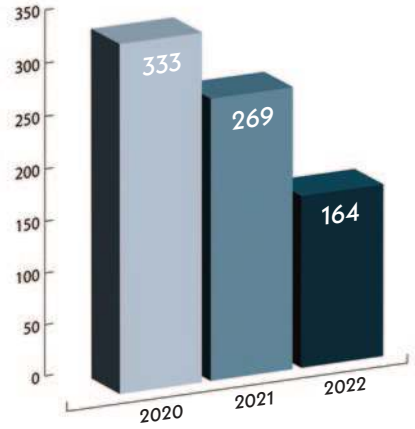


Complaints and Non-Conformities in Service Delivery Processes

Non-conformities related to service delivery processes are handled internally within the relevant processes. The methods for dealing with non-conformities are organised and managed differently for each process.

In 2022, the Service Line Global Content saw a significant decrease of 51% in detected non-compliances compared to 2020.

Non conformities by year



Selection, qualification and monitoring of suppliers

GRI 3-3
GRI 308-1
GRI 414-1

STAR7's Code of Ethics states that the selection process for new suppliers is based on evaluation criteria of reliability, timely delivery and integrity. When it comes to selecting a new supplier, Group companies strive to use impartial criteria so it can give everyone the same opportunities and make sure procedures are transparent and fair. The STAR7 Group also undertakes only to enter supply contracts with parties whose conduct is considered to be in line with the Code's rules and values.

When it comes to managing relationships with suppliers, whether they are based in the UK or abroad, the personnel at STAR7 Group always strive to maintain an open and fair dialogue. They make sure that correct and transparent information is communicated effectively to ensure a smooth flow of communication.

The parent company, STAR7 S.p.A., has implemented a Management System that includes **criteria for evaluating, selecting, monitoring, and reassessing external suppliers**, based on their ability to provide products and services that meet the required standards. The aim of this process is to verify that suppliers possess the necessary characteristics and capabilities to meet the expected quality standards for the product or service.

The evaluation covers all significant aspects, including the quality of products and services provided and their compliance with mandatory regulatory requirements; the reliability of the processes and equipment used; the experience gained and the professional competence offered; the organisational structure, production capacity and available equipment and resources. This activity is planned in two separate stages: A preliminary assessment is conducted to determine the essential requirements, followed by a confirmatory assessment to evaluate the actual level of supply delivered.

The Procurement Service documents the outcome of the supplier screening activity and any necessary corrective actions. This information is then shared with the resources involved in the procurement process to aid in the allocation of supplies. The Procurement Service regularly updates the evaluation results based on evidence discovered during the supply process.

At this initial stage of monitoring, there was no formal procedure in place to provide evidence of supplier performance in relation to environmental and social impacts. Additionally, there was no process to map significant negative impacts along the supply chain.

STAR7 has implemented a specific procedure for managing **freelancers, including interpreters and translators**. This process is overseen by the Vendor Managers. The objective

is to establish a varied resource chain and a team of subject matter experts to guarantee proficiency that aligns with the needs of STAR7 customers.

Candidates are selected based on specific requirements, including a degree in languages or other relevant qualifications, at least one previous experience in the required field, and being a native speaker of the target language. The proficiency of a language resource is evaluated through one or more tests that are specifically designed to assess their skills in the desired field. This test file is only sent to candidates who have signed STAR7's general non-disclosure agreement (NDA). This is done to ensure confidentiality is maintained throughout the process, starting from the initial stages. If the candidate is being considered for a permanent position within the in-house team, either as an employee or on-site contractor, they will be required to undergo multiple tests and participate in 2-4 interviews with different individuals.

STAR7's senior auditors conduct evaluations that consider the potential of resources based on the client's requirements, including style and tone of voice. The selection process for freelance resources involves multiple steps:

- screening/shortlisting of CVs received;
- an initial approach by e-mail;
- signing of STAR7's general NDA (non-disclosure agreement);
- filling in a questionnaire to collect relevant information such as type of company/years of activity etc.;
- screening call;
- the initial test requires a minimum of two translators to conduct. Additionally, the SLV should be prepared to provide STAR7 with the resumes of the translators who participated in the first test;
- evaluation of the test;
- if approved, the following steps will be taken: signing of specific NDAs, defining of terms, signing of the SLA (service level agreement), completing the supplier's form, and entering data into the STAR7 Group's system;
- onboarding by LRM/Production.

Once the test has been successfully completed and an agreement on fees has been reached, the supplier will send the Service Level Agreement (SLA) and datasheet to the successful applicant. The applicant should then sign these documents and return them by post. The vendor stores the CV, test, fee agreement, auditor's feedback sheet, signed NDA, signed SLA, and completed vendor form in their internal database, following ISO standards and for future reference. The Language Resource Manager can now follow the new resource and provide any technical training.

People

Human Resources Management

GRI 3-3
GRI 2-30

STAR7 firmly believes in the power of its people, who are the true asset of the Group. That is why it deems it necessary and essential to invest in the development of human resources to achieve corporate and economic goals.

All staff are employed under regular employment contracts. The employment relationship is governed by the collective bargaining regulations of the sector, as well as social security, tax, and insurance regulations.

All 437 employees of the parent company START7 S.p.A. are covered by the National Collective Bargaining Agreement for the Commerce sector. Regarding the STAR7 Group as a whole and in compliance with relevant local labour laws, 57% of employees are subject to collective bargaining agreements.

The information regarding human resources management policies pertains specifically to the parent company, STAR7 S.p.A.

Attraction and retention

STAR7 Group companies adhere to the Code of Ethics and the law when selecting personnel. The criteria used are based on fulfilling the professional, psycho-aptitude, and behavioural requirements for the desired profile at STAR7.

One of the primary goals for some Service Lines is to maintain a constant saturation of resources and provide opportunities for employees to **develop cross-functional knowledge in new projects, customers, and areas of expertise. These elements are essential for career advancement, increasing technical proficiency, autonomy, and responsibility**.

STAR7 also recognises the importance of nurturing young talent and actively participates in various university Career Days held across different cities in Italy. We always look carefully at CVs from young people and recent graduates interested in joining our team with a view to future employment opportunities.

Search, selection and placement

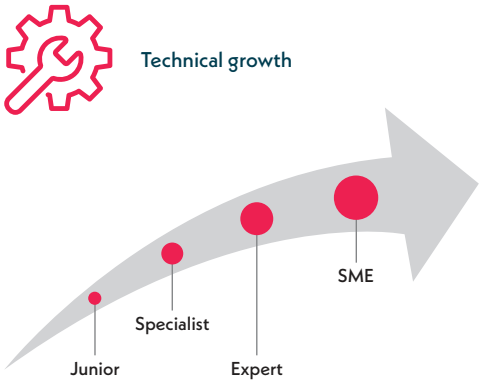
The recruitment process and plan of the STAR7 Group begins with budgeting, followed by an initial phase of internal discussion to determine business needs. The HR department first analyses the internal database to determine if the organisation's needs can be met by rotating employees' job roles. If the required figure cannot be found internally, we activate the selection process through external means such as publishing advertisements on various

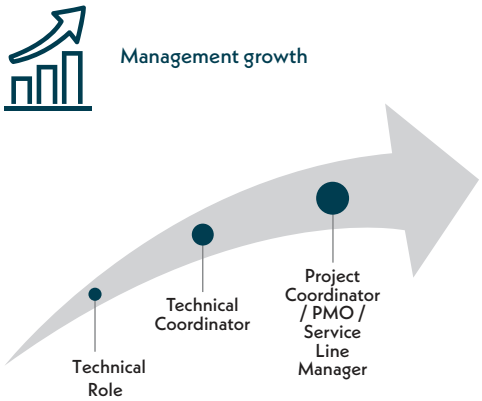
channels and engaging external headhunting companies. The process of onboarding new resources includes:

- During the initial meeting with the site's HR representative, the **Welcome Kit will be presented to the employee. This kit contains informative materials and company-branded items**. Afterwards, the device will be delivered along with an introduction and explanation of the portals and systems utilised.
- During the **second direct alignment meeting** with the head of function, you will receive an overview of the organisation, a tour of the premises, and an introduction to new team colleagues. Additionally, you will be introduced to the tools related to the tasks you will be performing.

Opportunities for growth and performance evaluation

Knowing how to see and recognise value. STAR7 is committed to enhancing the potential and contribution of people, enabling them to express themselves to the full. The five Service Lines require different professional skills, and it is important to respect and value each individual's aptitude and predisposition. This approach allows for **growth in two directions**: The first approach focuses on developing **specialised "vertical" skills**, while the second approach is geared towards **management and managerial growth**.





In 2022, the HR department initiated a **performance appraisal project for PMOs** (Project Management Officers) at STAR7. The project aimed to create **professional development plans and define training actions to support growth paths** for this central role. The objective is to comprehensively examine different facets of the selected cluster being analysed, such as defining roles and individuals' perspectives. role performed and theoretical role (difference between job description and what people do), the perception of the strategic nature of the role and role satisfaction. The process involved several steps. During the initial phase, we conducted a series of structured interviews, compiled evaluation ques-

tionnaires with our client partners, analysed salaries, and reviewed interview data and evaluations.

It was subsequently planned to share the results of the interviews with management, highlighting any emerging aspects, strengths, and areas for improvement. Following this, a workshop would be held to provide feedback to the PMO on its role.

In 2023, the process was extended to five more cluster roles. STAR7 is committed to creating and managing a process that includes everyone.

Furthermore, STAR7 has a system in place for **assigning both general and specific objectives** to each of its internal employees through the use of **Management by Objectives (MBO)** which provide for specific financial incentives. The extent to which these objectives are met is regularly assessed through staff meetings.

In 2022, the **Global Content Service Line** underwent a reorganisation aimed at promoting internationalisation, integrating the structure, improving process efficiency, and expanding resources. The activity involved Human Resources and Service Line Managers. To date, 57 individual interviews have been conducted. The objectives were to clarify the new company reorganisation within the Global Content service line, define potential changes to the scope of activities for each resource, collect feedback on the reorganisation, and communicate actions related to merit and development.

At STAR7, valuing people also involves being able to **give and receive feedback effectively**. Encourage a culture of continuous, transparent, and constructive two-way feedback that focuses on learning from mistakes. This will help to maximise opportunities for growth and development. To this end, STAR7 created and implemented two processes.

The first step is to **evaluate the probationary period** by creating and implementing an evaluation questionnaire for the manager. During the period of October to December, 56% of the newly hired employees underwent the process (with 93% successfully completing their probationary period). It is expected that managers take part in the feedback interview with employees and engage in discussions regarding their evaluations. The second step involves creating and implementing an **exit interview process** to analyse the primary reasons for employees resigning. To achieve this, a structured interview template was prepared, feedback was provided to the manager, and the data was analysed. In the July-December period, the process involved 55% of resigning staff. In this instance, the objective of STAR7 is to enhance the data collection process by making it more quantitative, as well as providing feedback to the Service Lines to further enrich the data. STAR7 is committed to structuring both processes and ensuring full coverage of newly recruited and resigned individuals.

Corporate welfare systems and tools

A corporate welfare plan was introduced in **February 2023**: Following a successful pilot project in 2019 that included employee conventions and discounts, STAR7 S.p.A. has further improved its offer by introducing a structured platform and an annual budget for all em-

ployees. This budget can be used for various types of expenditure. from reimbursement for expenses already paid, such as public transport, education and training, mortgages, and elderly care, to welfare tickets or vouchers for the purchase of goods and services, without requiring advance payments (e.g. for sports, travel, wellness, culture, leisure, and fuel), to payments to social security and health insurance funds.

Furthermore, starting from March 2023, STAR7 S.p.A. has decided to offer a Supplementary Health Plan to all its employees who have completed their probationary period and have an open-ended contract. This plan will also cover their families. This cover is an additional benefit to the existing coverage provided by the CCNL. It reimburses medical expenses that are not included in the basic insurance package.

Flexible working agreement

The parent company, STAR7 S.p.A., has made two agreements with its employees to work flexibly. These agreements are in accordance with Articles 18 et seq. of Law 81/2017. The first option applies to the majority of the company population and allows for a maximum of three days per week remote working. The second option allows for a maximum of five days per week and is intended for specific and special requirements, such as employees working on customers' premises; health reasons; Law 104; pregnancy/nursing, etc.). Agreement on the scheduling of agile working days must be made in advance with the line manager, typically on a weekly basis. On agile working days, the service can be provided without a designated workstation. STAR7 S.p.A. provides its employees with a personal computer (PC) that comes equipped with the necessary software to enable them to perform their job.

STAR7 S.p.A. is committed to ensuring the health and safety of workers who engage in agile work. This is achieved through the provision of comprehensive information on both general and specific risks associated with the particular mode of work, use of equipment, correct workstation, and optimal ways of carrying out activities with reference to personal protection.

Employment and turnover

GRI 3-3
GRI 401-1

The turnover of staff indicates the gradual growth of the STAR7 Group's operations. In 2022, STAR7's focus on young people is confirmed by a **positive overall turnover of 15.1%. In 2022, 57.7% of newly hired resources were under the age of 30**.

New recruits and turnover

			2020			2021			2022
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Recruitment									
Up to 29 years	24	24	48	48	75	123	83	104	187
30 to 50 years	21	36	57	32	36	68	56	69	125
Others 50 years	-	8	8	3	4	7	3	9	12
Total	45	68	113	83	115	198	142	182	324
Terminations									
Up to 29 years	9	6	15	23	20	43	48	56	104
30 to 50 years	9	14	23	23	15	38	45	49	94
Others 50 years	3	-	3	-	6	6	6	7	13
Total	21	20	41	46	41	87	99	112	211
Reason for termination									
Voluntary terminations	19	16	35	36	36	72	77	87	164
Retirement	-	-	-	-	1	1	-	-	-
Dismissal	1	3	4	10	2	12	14	20	34
Other (e.g. end of fixed-term contracts)	1	1	2	-	2	2	8	5	13
Total	21	20	41	46	41	87	99	112	211
Turnover									
Positive turnover - recruitment				34.9%	38.5%	36.9%	41.4%	45.2%	43.4%
Negative turnover - terminations				19.3%	13.7%	16.2%	28.9%	27.8%	28.3%
Overall turnover				15.5%	24.7%	20.7%	12.5%	17.4%	15.1%

Appointments and terminations by geographical area

Recruitment	Italy		Europe		USA		South America		Total	
	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022
Up to 29	52	71	35	93	7	5	29	18	123	187
from 30 to 50	33	64	2	22	2	4	31	35	68	125
Over 50	6	9	-	-	1	-	-	3	7	12
Total	91	144	37	115	10	9	60	56	198	324
%										
Up to 29	9.7%	9.5%	6.5%	12.5%	1.3%	0.7%	5.4%	2.4%	22.9%	25.1%
from 30 to 50	6.1%	8.6%	0.4%	2.9%	0.4%	0.5%	5.8%	4.7%	12.7%	16.8%
Over 50	1.1%	1.2%	-%	-%	0.2%	-%	-%	0.4%	1.3%	1.6%
Total	16.9%	19.3%	6.9%	15.4%	1.9%	1.2%	11.2%	7.5%	36.9%	43.4%

Terminations	Italiy		Europe		USA		South America		Total	
	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022
Up to 29	21	50	12	32	2	5	8	17	43	104
from 30 to 50	29	49	2	27	3	8	4	10	38	94
Over 50	3	7	-	-	1	2	2	4	6	13
Total	53	106	14	59	6	15	14	31	87	211
%										
Up to 29	3.9%	6.7%	2.2%	4.3%	0.4%	0.7%	1.5%	2.3%	8.0%	13.9%
from 30 to 50	5.4%	6.6%	0.4%	3.6%	0.6%	1.1%	0.7%	1.3%	7.1%	12.6%
Over 50	0.6%	0.9%	-%	-%	0,2%	0.3%	0.4%	0.5%	1.1%	1.2%
Total	9.9%	14.2%	2.6%	7.9%	1.1%	2.0%	2.6%	4.2%	16.2%	28.3%

Age group	Italia		Europa		USA		Sud America		Totale	
	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022
Up to 29	31	21	23	61	5	0	21	1	80	83
from 30 to 50	4	15	0	(5)	(1)	(4)	27	25	30	31
Over 50	3	2	0	0	0	(2)	(2)	(1)	1	(1)
Total	38	38	23	56	4	(6)	46	25	111	113

Turnover age group	Italy		Europe		USA		South America		Total	
	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022
Up to 29	5.8%	2.8%	4.3%	8.2%	0.9%	0.0%	3.9%	0.1%	14.9%	11.1%
from 30 to 50	0.7%	2.0%	-%	(0.7)%	(0.2)%	(0.5)%	5.0%	3.4%	5.6%	4.2%
Over 50	0.6%	0.3%	-%	-%	-%	(0.3)%	(0.4)%	(0.1)%	0.2%	(0.1)%
Total	7.1%	5.1%	4.3%	7.5%	0.7%	(0.8)%	8.6%	3.4%	20.7%	15.1%

(FIGURES REPORTED ONLY FOR THE FINANCIAL YEARS 2021 AND 2022 TO CALCULATE THE TURNOVER FOR THESE PERIODS).

Diversity and equal opportunity

GRI 3-3
GRI 405-1
GRI 406-1

The STAR7 Group has a robust global presence, with operations in **14 countries** across three continents and a workforce of over 800 employees. STAR7's commitment to **multiculturalism** is a source of great strength and enrichment. This is evident in the increased creativity, improved intercultural and cross-cultural skills, and new business opportunities that arise in local markets.

As previously mentioned, **women** make up **45% of the total 859 employees** as of 31 December 2022. According to this figure, **29%** of women in Italy and abroad hold **management** positions. In the white-collar and middle management roles (which are similar categories), 48% of the total workforce is made up of women.

In terms of age demographics, it is worth noting that a **significant proportion of employees in this sector are under the age of 30**. As of 31 December 2022, this group accounted for **37%** of the workforce, indicating a growing and relatively youthful industry.

Regarding the reporting periods, it is important to note that there were no instances of discrimination in the management of human resources relations, nor were there any reported incidents of human rights violations. STAR7 is dedicated to promoting equal opportunities in both the workplace and the professional growth of its staff.

Employee diversity

			2020			2021			2022
Employees per category/by gender	Women	Men	Total	Women	Men	Total	Women	Men	Total
Executives	-	2	2	1	5	6	2	5	7
Office workers - Middle Managers	215	259	474	308	348	656	333	359	692
Manual workers	23	38	61	34	50	84	51	109	160
Total	238	299	537	343	403	746	386	473	859
%									
Executives	-%	0,4%	0,4%	0,1%	0,7%	0,8%	0,2%	0,6%	0,8%
Office workers - Middle Managers	40,0%	48,2%	88,3%	41,3%	46,6%	87,9%	38,8%	41,8%	80,6%
Manual workers	4,3%	7,1%	11,4%	4,6%	6,7%	11,3%	5,9%	12,7%	18,6%
Total	44,3%	55,7%	100,0%	46,0%	54,0%	100,0%	44,9%	55,1%	100,0%

Employee diversity

	2020			2021			2022		
Employees per age group/by gender	Women	Men	Total	Women	Men	Total	Women	Men	Total
Up to 29 years	81	81	162	112	134	246	136	180	316
30 to 50 years	144	190	334	210	225	435	229	246	475
Over 50 years	13	28	41	21	44	65	21	47	68
Total	238	299	537	343	403	746	386	473	859
%									
Up to 29 years	15.1%	15.1%	30.2%	15.0%	18.0%	33.0%	15.8%	21.0%	36.8%
30 to 50 years	26.8%	35.4%	62.2%	28.2%	30.2%	58.3%	26.7%	28.6%	55.3%
Over 50 years	2.4%	5.2%	7.6%	2.8%	5.9%	8.7%	2.4%	5.5%	7.9%
Total	44.3%	55.7%	100.0%	46.0%	54.0%	100.0%	44.9%	55.1%	100.0%

	2020				2021				2022			
Employees by category /age group	Up to 29 years	30 to 50 years	Over 50 years	Total	Up to 29 years	30 to 50 years	Over 50 years	Total	Up to 29 years	30 to 50 years	Over 50 years	Total
Executives	-	1	1	2	-	3	3	6	-	4	3	7
Office workers - Middle Managers	149	293	32	474	219	385	52	656	274	373	45	692
Manual workers	13	40	8	61	27	47	10	84	42	98	20	160
Total	162	334	41	537	246	435	65	746	316	475	68	859
%												
Executives	-%	0.2%	0.2%	0.4%	-%	0.4%	0.4%	0.8%	0.0%	0.5%	0.3%	0.8%
Office workers - Middle Managers	27.7%	54.6%	6.0%	88.3%	29.4%	51.6%	7.0%	87.9%	31.9%	43.4%	5.2%	80.6%
Manual workers	2.4%	7.4%	1.5%	11.4%	3.6%	6.3%	1.3%	11.3%	4.9%	11.4%	2.3%	18.6%
Total	30.2%	62.2%	7.6%	100.0%	33.0%	58.3%	8.7%	100.0%	36.8%	55.3%	7.9%	100.0%

Maternity and paternity leave

GRI 401-3

STAR7 ensures that all employees have equal opportunities for parental leave in compliance with local regulations. In 2022, a total of 39 employees took maternity or paternity leave, with 26 being women and 13 being men. At the conclusion of their leave period, the majority of employees who had taken leave returned to work as per their regular schedule.

Maternity/paternity leave	2020			2021			2022		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Number of employees entitled to maternity/paternity leave, by gender	238	299	537	343	403	746	386	473	859
Number of employees who took maternity/paternity leave	20	5	25	19	10	29	26	13	39
Days	1,842	38	1,880	2,107	75	2,182	1,740	84	1,824
Number of employees returning to work after maternity/paternity leave	19	5	24	19	10	29	21	13	34
The number of employees who returned to work and remained employed by the organisation for 12	-	-	-	19	5	24	19	10	29
Return rate	95%	100%	96%	100%	100%	100%	81%	100%	87%
Retention rate				100%	100%	100%	100%	100%	100%

Access to Digital

Accessibility refers to the capacity of information systems to offer services and provide information that can be utilised by everyone, including those who require assistive technologies or special configurations due to disabilities, without any form of discrimination. According to the World Health Organization's World Disability Report, the global population of disabled individuals has increased to 1.3 billion, which accounts for 15% of the world's population. In Italy, there are 3.1 million individuals with disabilities, which accounts for 5.2% of the country's entire population.

The UN Convention on the Rights of Persons with Disabilities recognises access to information and communication technologies as a fundamental human right. Directive 2019/882, also known as the European Accessibility Act (EEA), is the latest legal framework for digital

accessibility. It aims to harmonise accessibility requirements for products and services across Europe. The aim of this provision is to universalise the WCAG, which are the web accessibility guidelines of the World Wide Web Consortium (W3C).

The reference standard for digital accessibility in Italy is the "Stanca Law" aims to facilitate access to IT tools for disabled individuals. As per this law, a computer service or website can be deemed "accessible" when the means of accessing the information it holds are easily accessible for the user. Efficiency in use is guaranteed by separating the content, presentation, and mode of operation of the interfaces. Additionally, the ability to obtain the same information through different sensory modalities, regardless of the device used for access, further enhances efficiency.

STAR7's role in this challenge for digital inclusion is to offer services in the area of Accessibility, providing state-of-the-art technology, providing high value-added consulting, offering innovative solutions and providing training programmes. The main solutions implemented from 2023 onwards are:

- Accessibility Audit – STAR7 offers audit services that detect issues by indicating their degree of conformity, level of importance, and location. We provide suggestions for resolution and explain how each type of error impacts accessibility in accordance with the international guidelines set by the W3C consortium.
- Accessibility Widget – An AI-based solution that provides users with an additional interface to customise their browsing experience on the website. This feature makes the site more suitable for their specific needs. Visitors to the site will have dozens of customisation features at their disposal, including: To enhance the usability of the website, you can adjust the colour contrast, increase the font size, utilise screen-reading tools, and implement other modifications. These changes will improve the effectiveness and accessibility of the site's content.
- Accessibility Statement - An Accessibility Statement is a written document that declares compliance with web accessibility standards. STAR7 provides support for compiling documents in compliance with current regulations. This includes incorporating information on actions taken and planned to enhance the accessibility of digital services offered.

Training

GRI 3-3
GRI 401-4

STAR7 is committed to supporting the growth and development of its employees and freelancers, which includes providing various training opportunities. The Group believes that training and keeping up-to-date are essential requirements for the personal and professional development of its employees. **The HR department is accountable for identifying training requirements and creating a training plan**. This is done by gathering requests from different service lines and approving the budget. To ensure that specific skills are met, HR examines whether internal Subject Matter Experts can provide on-the-job training before delivering a course externally. Currently, six SMEs have been identified.

At STAR7, our people are continuously trained and updated through ongoing investment. This enables us to form teams where everyone can develop their talents and utilise the necessary skills to tackle and solve problems in a creative and innovative manner.

In 2022, there was a continued investment in training. An average of 16.0 hours per employee were provided at Group level, an increase over 2021.

Average hours of training per employee

			2020			2021			2022
Training hours - Total	Women	Men	Total	Women	Men	Total	Women	Men	Total
Executives					270	270			
Office workers - Middle Managers	1,635	1,842	3,477	2,101	3,846	5,947	3,823	7,107	10,930
Manual workers	452	798	1,250	861	1,456	2,317	852	1,981	2,833
Total	2,087	2,640	4,727	2,962	5,572	8,534	4,675	9,088	13,763
Average training hours	Women	Men	Total	Women	Men	Total	Women	Men	Total
Executives					54.0	45.0			
Office workers - Middle Managers	7.6	7.1	7.3	6.8	11.1	9.1	11.5	19.8	15.8
Manual workers	19.7	21.0	20.5	25.3	29.1	27.6	16.7	18.2	17.7
Total	8.8	8.8	8.8	8.6	13.8	11.4	12.1	19.2	16.0

The parent company STAR7 was provided with 25 training courses on time management, Excel, and English. To evaluate the quality of the training activities, each participant is required to complete a satisfaction questionnaire. The questionnaire covers various aspects, including the degree of satisfaction, the comprehensiveness of the topics, and the usefulness of the knowledge acquired. This tool is beneficial and efficient for the HR department,

as it enables them to identify areas for improvement in future initiatives by processing the information received.

Post-Editing training courses

In 2023, Service Line Global Content launched a course aimed at training post-editors. The course will utilise automated video generation AI technologies and will be delivered through an e-learning platform to provide a seamless user experience. The content is fully powered by STAR7, thanks to our extensive experience in content creation and in-depth knowledge of the localisation industry. The course has three main objectives:

- Talent attraction and their introduction to STAR7 and the post-editing world. The course will be shared with universities and graduate schools in Italy, as well as other international markets where STAR7 operates;
- Creating a community of STAR7 Post-Editors is essential for implementing effective retention, communication, and brand awareness policies among global localisation resources;
- Skill Building: In line with Forbes' "reskilling revolution", our course provides STAR7's in-house and supplier translators with the chance to enhance their professional capabilities by acquiring new skills that align with market trends. This will make both our translators and our company more competitive.

Occupational Health and Safety

GRI 3-3
GRI 403-1
GRI 403-2
GRI 403-3
GRI 403-4
GRI 403-5
GRI 403-6
GRI 403-7
GRI 403-9

STAR7 is dedicated to promoting a safety culture among all its employees. This involves encouraging responsible behaviour and implementing internal procedures and measures to prevent workplace accidents and protect workers.

To guarantee working conditions that uphold individual dignity and provide a safe and healthy work environment, STAR7 S.p.A., the parent company, has established procedures for managing and monitoring the workplace. This includes ensuring compliance with safety and environmental regulations, as well as promoting employee well-being. Management defines appropriate control and maintenance plans for premises, installations, and equipment that affect the working environment. These plans are implemented to ensure effective management of the working environment.

Occupational health and safety management

Hazard identification, risk assessment and accident investigation. In order to comply with local regulations, STAR7's workplaces are equipped with suitable signage that provides information on evacuation and rescue routes; deployment of firefighting equipment and medical supplies; dangers present in the workplace; prohibitions in the workplace. All employees receive general and task-specific training as outlined in the Risk Assessment Documents (DVR).

Occupational health service. All STAR7 locations have a nominated company doctor. All employees benefit from a health surveillance plan and periodic examinations to determine their suitability for the job, conducted by a competent doctor.

Worker participation and consultation and communication on occupational health and safety. At each STAR7 S.p.A. site, there are designated health and safety officers known as RSLs. These officers receive specialised training to fulfil their role. The RSLs are consulted during every DVR update and are also involved in the annual safety meeting.

Training of workers on occupational health and safety. STAR7 S.p.A. relies on external training providers for both general and task-specific training, as defined in the DVR. The Human Resources department keeps current training calendars that offer and track employee training opportunities.

Workers' health promotion. Every STAR S.p.A. employee has access to the inPiù Supplementary Health Plan, a service for preventive screening services and discounts on medical services.

Process and equipment management. The activities carried out by STAR7 S.p.A. consist mainly of office work and technical inspections/surveys at customers' premises. The necessary personal protective equipment for tasks involving its use is provided to employees at the time of recruitment through a letter that is signed by the employee.

Accidents

During the three-year period under review, only a small number of STAR7 employees were affected by work-related accidents. In 2022, as in previous years, there were no fatal or serious accidents. There was only one accident during the reporting period. The accident frequency index shows an improvement over the previous year.

It should be noted that the current procedure for managing data on accidents at work does not provide for the systematic collection of data on "other workers", i.e. workers who are not employees but whose work and/or workplace is controlled by the company. These cases may relate in particular to translators and interpreters, whom STAR7 uses for translation work. It should be noted, however, that during 2022, as in previous years, no reports were made by these employees concerning incidents that occurred in the course of their work for STAR7.

Accidents at work

	2020	2021	2022
Accidents at work			
Deaths	-	-	-
Serious accidents	-	-	-
Other accidents	1	2	-
Total registered accidents	1	2	-
Travel accidents	-	1	1
Total hours worked[1]	933,027	1,278,575	1,545,008
Days of absence due to accidents	8	31	5
Accident ratios - Accident Frequency Index (No. of accidents/hours worked x 1,000,000)			
Deaths	-	-	-
Serious accidents	-	-	-
Other accidents	1.07	1.56	-
Accident Severity Index (accident absence days/hours worked x 1,000)	0.009	0.024	0.003
Average number of days lost due to injury per 1000 days worked			

[1] The hours worked of some subsidiaries report estimated values.

Environmental Impacts

Environmental policy and responsible use of resources

GRI 3-3
GRI 301-1
GRI 303-3
GRI 306-3
GRI 306-4
GRI 306-5

STAR7 firmly believes that in order to establish a competitive position and enhance economic and financial performance, it is crucial to attain and uphold a position of excellence. This involves not only delivering high-quality services and products, but also ensuring that they are provided in full compliance with legal regulations, environmental sustainability principles, and compatibility with the surrounding area.

The company has implemented an Environmental Management System that meets international regulatory standards. This system is designed to help the organisation manage and control its environmental aspects and impacts, and to guide it towards continuous improvement of its environmental performance.

STAR7's environmental policy is founded on a commitment to responsible resource management, which is guided by the following principles:

- Prevent environmental pollution at every opportunity;
- Comply with statutory and mandatory environmental regulatory requirements that apply to its services/products, processes, means of production and company facilities;
- Evaluate the significance of its own environmental aspects and impacts and incorporate the results into daily practice and business development;
- Control the implementation of its processes and monitor the development of environmental performance in order to identify possible areas for improvement;
- Pursue environmental performance improvement objectives including: selecting relevant suppliers and ascertaining their compliance with STAR7's environmental principles, establishing relationships aimed at improving their environmental performance; improve the management and separation of waste; optimise energy consumption; train and raise awareness of the principles of environmental protection among staff, suppliers, and all stakeholders whose actions have an impact on the company's environmental aspects.

Materials

The table below shows the materials used in printing activities, mainly **paper**, amounting to 1,235.1 tonnes (of which **45.1% FSC certified**). Furthermore, various materials are utilised, including glue, water-based ink, toner, and packaging materials. The figures shown refer to the Group's two production companies, respectively STAR7 Printing S.R.L. and STAR Comunicacao e Servicos LTDA.

Materials

		2020			2021			2022		
	Unit	Non renewables	Renewables	Total	Non renewables	Renewables	Total	Non renewables	Renewables	Total
Raw materials										
Paper	tons	-	521.8	521.8	-	1,110.6	1,110.6	-	1,235.1	1,235.1
Ink	tons	3.6	-	3.6	5.5	-	5.5	5.3	-	5.3
Glue	tons	2.0	-	2.0	3.3	-	3.3	2.4	-	2.4
Toner	tons	5.0	-	5.0	5.5	-	5.5	5.7	-	5.7
Packaging materials										
Plastic packaging	tons	26.0	-	26.0	103.5	-	103.5	139.4	-	139.4
Cardboard packaging	tons	-	1.6	1.6	-	0.9	0.9	-	4.0	4.0
Plastic containers	units	4,640.0	-	4,640.0	5,978.0	-	5,978.0	6,203.0	-	6,203.0
Wooden pallets	units	-	150.0	150.0	-	158.0	158.0	-	400.0	400.0

Waste

The reported quantities of waste pertain to **STAR7 Printing S.r.l,** a company engaged in production activities that generate industrial waste in connection with its printing operations. The personal protective equipment needed for different tasks is provided to employees at the time of recruitment. This is done through a letter signed by the employee. These companies are characterised by their industrial processes and generate waste that is not considered municipal waste.

In 2022, **only non-hazardous waste** was produced, primarily consisting of paper and cardboard, with a total weight of 207.8 tonnes. **Almost all (99%) of the waste generated was sent for recovery**.

Waste by category (t)

	2020			2021			2022		
Non-hazardous waste	Recovery	Disposal	Total	Recovery	Disposal	Total	Recovery	Disposal	Total
Paper and cardboard	175.8	-	175.8	209.2	-	209.2	207.8	-	207.8
Aqueous liquid wastes containing ink	-	0.4	0.4	-	0.3	0.3	-	0,7	0.7
Out-of-print toners	0.3	-	0.3	0.5	-	0.5	0.7	-	0.7
Waste adhesives and sealants	-	0.2	0.2	-	0.2	0.2	-	0.1	0.1
Plastic packaging	5.4	-	5.4	6.2	-	6.2	2.6	-	2.6
Wood Packaging	1	-	1	-	-	-	-	-	-
Mixed Material Packaging	0.1	-	0.1	0.3	-	0.3	3.5	-	3.5
Equipment no longer in use	-	-	-	-	-	-	0.3	-	0.3
Iron and steel	0.1	-	0.1	3	-	3	-	-	-
Total	182.6	0.6	183.2	219.2	0.6	219.8	214.8	0.9	215.7

Waste - Disposal (t)

	2020			2021			2022		
Non-hazardous waste	On site	External site	Total	On site	External site	Total	On site	External site	Total
Landfill									
Waste adhesives and sealants		0.2	0.2	-	0.2	0.2	-	0.1	0.1
Total	-	0.2	0.2	-	0.2	0.2	-	0.1	0.1
Other disposal operations									
Aqueous liquid wastes containing ink		0.4	0.4	-	0.3	0.3	-	0.7	0.7
Total	-	0.4	0.4	-	0.3	0.3	-	0.7	0.7
Total non-hazardous waste	-	0.6	0.6	-	0.6	0.6	-	0.9	0.9

Waste/Recovery (t)

	2020			2021			2022		
Non-hazardous waste	On site	External site	Total	On site	External site	Total	On site	External site	Total
Recycling									
Toner for printing	-	0.3	0.3	-	0.5	0.5	-	0.7	0.7
Plastic packaging	-	5.4	5.4	-	6.2	6.2	-	2.6	2.6
Wood Packaging	-	1.0	1.0	-	-	-	-	-	-
Mixed Material Packaging	-	0.1	0.1	-	0.3	0.3	-	3.5	3.5
Iron and steel	-	0.1	0.1	-	3.0	3.0	-	-	-
Paper and cardboard	-	175.8	175.8	-	209.2	209.2	-	207.8	207.8
Total	-	182.6	182.6	-	219.2	219.2	-	214.6	214.6
Other recovery operations									
Equipment no longer in use	-		-	-		-		0.3	0.3
Total	-	-	-	-	-	-	-	0.3	0.3
Total non-hazardous waste	-	182.6	182.6	-	219.2	219.2	-	214.8	214.8

Water

As per the GRI Standards, water withdrawal data is presented in Mega Litres, where 1 Mega Litre is equivalent to 1,000 cubic metres. **Please note that the figures reported pertain to the parent company and its two production companies, namely STAR7 Printing S.R.L. and STAR Comunicacao e Servicos LTDA**. Data could not be collected for the remaining subsidiaries. Therefore, the samples only pertain to sanitary uses in occupied offices and should not be deemed significant.

Water withdrawals (megalitres)

	2020	2021	2022
Third-party water resources (aqueduct)			
Freshwater (≤1,000 mg/L Total Dissolved Solids)	0.2	1.2	2.4
Other water types (>1,000 mg/L Total Dissolved Solids)	-	-	-
Total	0.2	1.2	2.4

[1] The reporting boundary includes STAR7 Spa, STAR7 Printing; STAR Comunicacao. - the most relevant companies for water withdrawals/not restricted to office sanitary uses.

Energy - Emissions and Climate Change

GRI 3-3
GRI 302-1
GRI 302-3
GRI 305-1
GRI 305-2
GRI 305-4

STAR7's energy consumption, measured in GJoules according to the GRI Standards, refers to the electricity used for operational and business activities at various locations. Methane is utilised to heat the premises, whereas fuels are used to power the company cars required for business and operational activities. The expansion of STAR7 Group's activities and the return to in-person work after the pandemic have had a significant impact on the dynamics of direct energy consumption.

The notable decrease of 36% in methane usage in 2022, compared to the previous year, can be attributed to the increased electrification of plants and the streamlining of remote working practices.

Energy consumed - GJ

	2020	2021	2022
Electricity			
Purchased electricity	1,428	4,530	6,053
Electricity produced by photovoltaic system	-	511	495
Total	1,428	5,040	6,548
Of which from renewable sources	-	511	495
Vehicle Fuel			
Diesel	557	4,843	5,144
Petrol	1,196	2,434	4,253
Total	1,753	7,277	9,397
Methane/heating	393	1,287	824
Total energy consumption - GJ	3,574	13,605	16,770
Percentage of energy consumption from renewable sources	0%	3.7%	3.0%

[1] The reporting boundary includes STAR7 Spa, STAR7 Printing; STAR Comunicacao; The most significant companies involved in the data collection process are LocalEyes Ltd, LocalEyes Tirana, and Vertere S.r.l. The completeness of the perimeter will be progressively improved as the data collection process continues.

Energy intensity

The table presented below displays the energy intensity measurement indicator, which is calculated based on the **number of hours worked by the Group**. In 2022, there has been a slight decline as a result of the resumption of activities following the pandemic crisis.

	2020	2021	2022
Energy consumption	3,574	13,605	16,770
Hours worked	933,027	1,278,575	1,545,008
Intensity ratio	3.83	10.64	10.85

Emissions

The emission figure is measured in tonnes of carbon dioxide equivalent (t CO2e) and includes both direct emissions (GHG Scope 1 - Greenhouse Gas) and indirect emissions from the consumption of electricity purchased from the grid (GHG Scope 2).

The STAR7 Group has not signed any power purchase agreements that ensure a particular combination of primary energy sources for generating electricity. Similarly, there are no supply contracts with Guarantee of Origin (GO), an electronic certification that verifies the renewable origin of the energy sources used to produce purchased electricity. As a result, we calculated the indirect emissions from electricity consumption (GHG - Scope 2) using the location-based approach. The Location-based method involves calculating emissions from electricity consumption by using national average emission factors for the countries where the electricity is bought.

Emissions GHG / CO2 - Scope 1 + Scope 2 t CO2e	2020	2021	2022
Total GHG emissions Scope 1	142	575	696
Total GHG emissions Scope 2 Location based	98	275	320
Total	240	850	1,016

The increase in energy consumption due to the expansion of the Group's size and business volume determined the trend in emissions over the three-year period. The company's fleet vehicles (petrol and diesel) are the primary source of CO2 and direct emissions (GHG Scope 1). These emissions increased compared to the previous year due to the full resumption of post-pandemic activities.

The maintenance work conducted in 2022 did not uncover any leaks. As a result, it was assumed that there were no emissions from refrigerant gas leaks in air conditioning systems.

CO emissions2 - Scope 1 tCO2and	2020	2021	2022
Vehicle Fuel			
Diesel	40	339	366
Petrol	80	164	283
Methane	22	72	46
F Gas	-	-	-
Total - Scope 1 emissions	142	575	696

SOURCE: METHANE ENVIRONMENT MINISTRY ITALY – NATIONAL PARAMETERS EU ETS – ITALY: NEWS (MINAMBIENTE.IT)
FUELS AND OTHER EMISSION SOURCES – DEFRA UK – GREENHOUSE GAS REPORTING: CONVERSION FACTORS 2022 - GOV.UK (WWW.GOV.UK).

GHG emissions/CO2 - Scope 2 Location basedt CO2e	2020	2021	2022
Purchased electricity	98	275	320

SOURCE: ITALIA – ISPRA – MINISTERO AMBIENTE - ISPRA EFFICIENCY & DECARBONIZATION INDICATORS ITA EUROPE 366-2022 TAB A 2 20 – EMISSION FACTORS IN THE ELECTRICITY SECTOR FOR ELECTRICITY PRODUCTION. USA - US EPA – SUMMARY DATA – RELEASED 1/30/2023. OTHER COUNTRIES (BRAZIL) – CARBON FOOTPRINT - COUNTRY SPECIFIC ELECTRICITY GRID GREENHOUSE GAS EMISSION FACTORS – LAST UPDATED: MARCH 2022 – CLIMATE TRANSPARENCY – THE CLIMATE TRANSPARENCY REPORT 2022.
.

Emissions intensity

In 2022, the emission intensity index has remained largely unchanged from the previous year.

Emission intensity - Location based	2020	2021	2022
Scope 1 + Scope 2 emissions	240	850	1,016
Hours worked	933,027	1,278,575	1,545,008
Intensity index	0.26	0.66	0.66

In the upcoming reporting periods, STAR7 aims to clarify the calculation scope of its Scope 3 emissions. These emissions refer to resources outside of the organisation's direct control but within its value chain. To achieve this, STAR7 will refer to the GHG Protocol, which is the most authoritative source for calculating and managing greenhouse gas emissions from an organisation's value chain operations. The GHG Protocol has identified 15 emission categories that will serve as a reference for STAR7's calculations.

for
to be
point of
Translat
another
langua
written

Gri Content Index

Statement of use	The Sustainability Report of STAR7 S.p.A. for the financial year 2022 [01 January - 31 December 2022] was prepared according to the reporting option with reference to GRI Standards.
GRI 1 adottati	GRI 1 Foundation 2021

GRI Standards - General Disclosures

GRI Sustainability Reporting Standard		References Chapter / Paragraph
GRI 2 - General Disclosures - version 2021		
	The organisation and its reporting practices	
2-1	Organisational details	Methodological note
		01 STAR7/People of content
2-2	Entities included in the organisation's sustainability reporting	Methodological note
2-3	Reporting period, frequency and point of contact	Methodological note
2-4	Information management	Methodological note
	Activities and workers	
2-6	Activities, value chain and other business relations	01 STAR7/People of content
		01 STAR7/A global network
		02 Business Model - Value chain and sustainable development/STAR7's Integrale[7] approach
		02 Business Model - Value chain and sustainable development/Suppliers
		02 Business Model - Value chain and sustainable development/Customers
2-7	Employees	02 Business Model - Value Chain and Sustainable Development/ Employees and Freelancers
2-8	Non-employees	02 Business Model - Value Chain and Sustainable Development/ Employees and Freelancers
	Governance	
2-9	Governance structure and composition	03 Governance and business conduct/ Governance model and corporate bodies
2-10	Appointment and selection of the highest governance body	03 Governance and business conduct/ Governance model and corporate bodies
2-11	Chairman of the highest governance body	03 Governance and business conduct/ Governance model and corporate bodies
2-12	Role of the highest governance body in impact management control	03 Governance and Business Conduct/Sustainability Governance
2-13	Delegation of responsibility for impact management	03 Governance and Business Conduct/ The organisational structure and delegation process

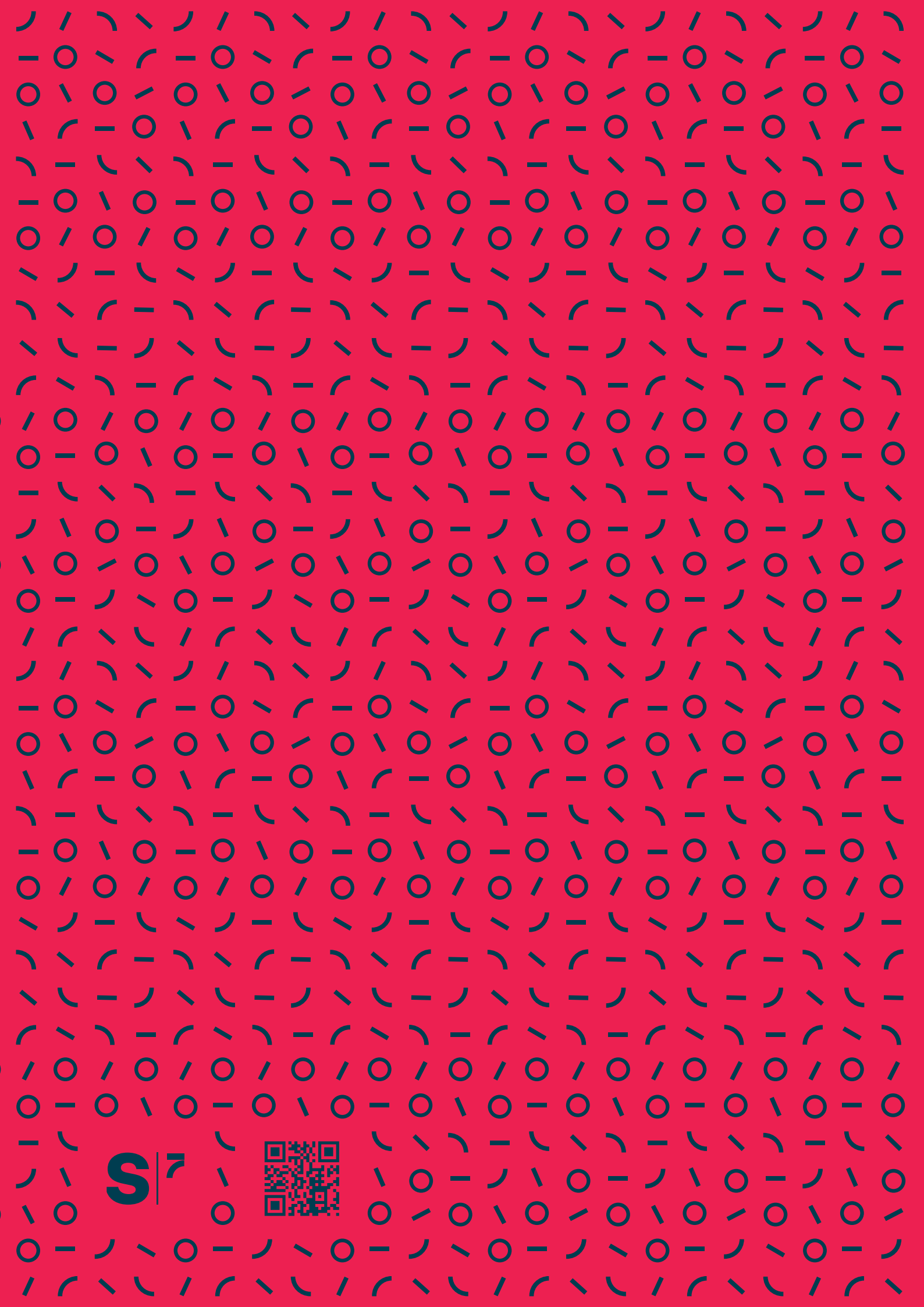
2-15	Conflicts of interest	03 Governance and Business Conduct/ Communication Processes and Conflicts of Interest
2-16	Communication of critical issues	03 Governance and Business Conduct/ Communication Processes and Conflicts of Interest
	Strategy, policies and practice	
2-22	Sustainable Development Strategy Statement	Letter to stakeholders
2-23	Policy commitment	03 Governance and Business Conduct/ Responsible Business Conduct
2-24	Integration of policy commitments	03 Governance and Business Conduct/Management Systems and Certifications
2-26	Mechanisms for requesting clarification and raising concerns	03 Governance and Business Conduct/ Responsible Business Conduct
2-27	Compliance with laws and regulations	03 Governance and Business Conduct/ Environmental - Social - Economic Compliance
	Stakeholder engagement	
2-29	Approach to stakeholder engagement	02 Business Model - Value chain and sustainable development/ The role of stakeholders
2-30	Collective bargaining	09 People/Human Resources Management
GRI 3 - Material Topics - version 2021		
3.1	Process of determining material topics	Methodological note
		04 Material topics/Impacts and material topics
3.2	List of material topics	04 Material topics/The Material topics
3.3	Management of material topics	04 Material Topics/Material Topics - Objectives and Actions
		05 Innovation, Research and Development and Cutting-edge Technologies
		06 The creation and distribution of value/ Economic value generated and distributed
		07 Ethics and Integrity/Corruption Prevention Measures
		07 Ethics and Integrity/Respect for Competition
		07 Ethics and Integrity/Fiscal Transparency
		08 Privacy, Data and Information/Data Security and Privacy
		08 Privacy, data and information/Intellectual property protection
		09 Quality and reliability of products and services/Quality policy
		09 Quality and reliability of products and services/ Selection, qualification and monitoring of suppliers
		10 People/Human Resources Management
		10 People/Employment and turnover
		10 People/Diversity and equal opportunities
		10 People/Training
		10 People/Occupational Health and Safety
		11 Environmental Impacts/Environmental Policy and Responsible Use of Resources
		11 Environmental Impacts/Energy - Emissions and Climate Change

GRI Standards - Material Topics/Specific Indicators disclosure

Please note that, unless stated otherwise, the GRI Standards published in 2016 have been used. In 2018, the GRI 301 Water and Discharges standard was used to report on water withdrawals, while the GRI 403 Occupational Health and Safety Standards were used to report on occupational health and safety. In 2020, the GRI 306 Waste standard was adopted and published for waste reporting purposes. With regard to reporting on tax issues, GRI 207 Taxes (2019) was applied.

GRI Sustainability Reporting Standard		References Chapter / Paragraph
GRI 200 - ECONOMIC TOPICS		
201	**Economic performance**	
201-1	Directly generated and distributed economic value	06 The creation and distribution of value/ Economic value generated and distributed
205	**Anti-corruption**	
205-3	Confirmed incidents of corruption and actions taken	07 Ethics and Integrity/Corruption Prevention Measures
206	**Anti-competitive behaviour**	
206-1	Actions for anti-competitive behaviour, antitrust and monopolistic practices	07 Ethics and Integrity/Respect for Competition
207	**Tax - 2019**	
207-1	Approach to taxation	07 Ethics and Integrity/Fiscal Transparency
207-2	Tax governance, control and risk management	07 Ethics and Integrity/Fiscal Transparency
207-3	Stakeholder engagement and addressing tax concerns	07 Ethics and Integrity/Fiscal Transparency
GRI 300 - Environmental disclosures		
301	**Materials**	
301-1	Materials used by weight or volume	11 Environmental Impacts/Materials
302	**Energy**	
302-1	Energy consumed within the organisation	11 Environmental Impacts/Energy - Emissions and Climate Change
302-3	Energy intensity	11 Environmental Impacts/Energy - Emissions and Climate Change
303	**Water and effluents - 2018**	
303-3	Water withdrawal	11 Environmental Impacts/Water
305	**Emissions**	
305-1	Direct (Scope 1) GHG emissions	11 Environmental Impacts/Energy - Emissions and Climate Change
305-2	Indirect (Scope 2) GHG emissions from energy consumption	11 Environmental Impacts/Energy - Emissions and Climate Change
305-4	Intensity of GHG emissions	11 Environmental Impacts/Energy - Emissions and Climate Change

GRI Sustainability Reporting Standard		References Chapter / Paragraph
306	**Waste**	
306-3	Waste generated	11 Environmental impacts/Waste
306-4	Waste not intended for disposal	11 Environmental impacts/Waste
306-5	Waste for disposal	11 Environmental impacts/Waste
308	**Supplier environmental assessment**	
308-1	New suppliers assessed using environmental criteria	09 Quality and reliability of products and services/Selection, qualification and monitoring of suppliers
GRI 400 - Social topics		
401	**Employment**	
401-1	New recruits and turnover	10 People/Employment and turnover
401-3	Parental leave	10 People/Diversity and equal opportunities
403	**Occupational health and safety - 2018**	
403-1	Occupational Health and Safety Management System	10 People/Occupational Health and Safety
403-2	Hazard identification, risk assessment and accident investigation	10 People/Occupational Health and Safety
403-3	Occupational health services	10 People/Occupational Health and Safety
403-4	Worker participation and consultation and communication on occupational health and safety	10 People/Occupational Health and Safety
403-5	Training of workers on occupational health and safety	10 People/Occupational Health and Safety
403-6	Workers' health promotion	10 People/Occupational Health and Safety
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	10 People/Occupational Health and Safety
403-9	Work-related injuries	10 People/Occupational Health and Safety
404	**Training and education**	
404-1	Average annual training hours per employee	10 People/Training
405	**Diversity and equal opportunities**	
405-1	Diversity of governance bodies and employees	03 Governance and business conduct/ Governance model and corporate bodies
		09 People/Diversity and equal opportunities
406	**Non-discrimination**	
406-1	Incidents of discrimination and corrective measures taken	10 People/Diversity and equal opportunities
414	**Supplier social assessment**	
414-1	New suppliers that have been evaluated using social criteria	09 Quality and reliability of products and services/Selection, qualification and monitoring of suppliers

GRI Sustainability Reporting Standard		References Chapter / Paragraph
416	**Customer health and safety**	
416-2	Incidents of non-compliance concerning health and safety impacts of products and services	09 Quality and reliability of products and services/Product health and safety
417	**Marketing and labelling**	
417-2	Incidents of non-compliance with regard to information and labelling of products and services	09 Quality and reliability of products and services/Product health and safety
417-3	Cases of non-compliance concerning marketing communications	09 Quality and reliability of products and services/Product health and safety
418	**Customer privacy**	
418-1	Proven complaints regarding breaches of customer privacy and loss of customer data	08 Privacy, Data and Information/Data Security and Privacy

JUNE 2023