



Diasorin Group Policy on Sustainability and Respect of Human Rights



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1. Diasorin

Diasorin is an Italian multinational company listed in the FTSE MIB index. It is a global leader in the field of In Vitro Diagnostics (IVD) and since 2021 has also been active internationally in the Life Sciences sector.

For more than 50 years, the Company has been developing, manufacturing and marketing reagent kits used by diagnostic laboratories around the world. As at the date of approval of this Sustainability Policy (the “Policy”), the Group maintains a presence on five continents with 35 companies, four branches, ten production sites and nine research centers.

Through continuous investment in research, Diasorin has positioned itself as the player with one of the broadest ranges of specialty solutions available in the industry, identifying the Group as the “**Diagnostics Specialist**”.





2. Purpose

The purpose of the Policy is to define the priorities and areas of commitment of Diasorin S.p.A. at an organizational level. (hereinafter “**Diasorin**” or the “**Company**”) and its subsidiaries (collectively with Diasorin, the “**Group**”) to its stakeholders, setting out the principles that should guide everyone within the Group in pursuing long-term value creation for all shareholders, while also taking into account other stakeholders.

Specifically, the Policy pursues the following general objectives::

- to formalize the Group’s commitment to sustainability issues;
- to define the responsibilities and bodies involved in managing ESG issues;
- to support the process of defining strategic sustainability choices, managing and mitigating ESG risks, and facilitating their operational implementation as part of relevant corporate procedures;
- to increase the level of knowledge and awareness of the policies adopted and the expected results regarding the relevant issues;
- to provide guidelines for Group-wide development and implementation of projects in the area of sustainability;
- **to disseminate the culture of sustainability**

3. Scope

The Policy was approved on December 15, 2023 by the Board of Directors Control, Risk and Sustainability Committee of the parent company Diasorin S.p.A., subject to the favorable opinion of Control, Risk and Sustainability Committee (the “**Committee**”).

It applies to all countries where Diasorin operates, either directly through subsidiaries or through distributors, and is supplemented by the provisions of the Group Code of Ethics.

The Policy is published on the website (www.int.diasorin.com) and remains available to all relevant staff through appropriate communication channels.

The Policy will be reviewed and, where necessary, amended whenever required by regulatory update requirements, business strategies or contextual changes (such as changes in business processes, significant business reorganizations, and changes in issues relevant to nonfinancial reporting).





LEGAL FRAMEWORK

4. Legal framework

This Policy has been drafted in accordance with the current regulations and industry supervisory guidelines below.

European legislation:

- Directive (EU) 2022/2464 of the European Parliament and of the Council of December 14, 2022 on corporate sustainability reporting;
- Directive 2014/95/EU of the European Parliament and of the Council of October 22, 2014, amending Directive 2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups;
- Communication from the Commission – Guidelines on non-financial reporting (methodology for reporting non-financial information) – C/2017/4234 of July 5, 2017;
- Communication from the Commission – Guidelines on non-financial reporting: Supplement on reporting climate-related information – C/2019/4490 of June 20, 2019;
- Regulation (EU) 2020/852 of the European Parliament and of the Council of June 18, 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.

Italian legislation:

- Legislative Decree No. 254 of December 30, 2016 – Implementation of Directive 2014/95/EU of the European Parliament and of the Council of October 22, 2014, amending Directive 2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups;
- CONSOB regulations implementing Legislative Decree. No. 254 of December 30, 2016, on the disclosure of non-financial information, adopted by Resolution No. 20267 of January 18, 2018;
- Legislative Decree No. 231 of June 8, 2001, “Regulation of the administrative liability of legal persons, companies and associations, even if not legal persons”;
- the Code of Corporate Governance adopted by the Corporate Governance Committee of Borsa Italiana, January 2020.

In-house regulations:

- Diasorin Group Code of Ethics;
- Organizational, management and control models adopted in accordance with Legislative Decree 231/2001 by the Group’s Italian companies;
- Modern Slavery Statement adopted from time to time by the Board of Directors of Diasorin S.p.A., Diasorin Italia S.p.A. and Diasorin Ltd (UK) under the UK Modern Slavery Act 2015.



5. Role and responsibilities of interested parties

<p>The Diasorin Board of Directors</p>	<ul style="list-style-type: none"> • approves, subject to the favorable opinion of Diasorin’s Control, Risk and Sustainability Committee, this Policy and its subsequent amendments, taking into account the relevant activities, risks and stakeholders; • is committed to the Group’s sustainability goals, creating long-term value for the benefit of shareholders, and taking into account the interests of other stakeholders relevant to the company; • Approves, with the prior opinion of the Control and Risk Committee and Sustainability, the Sustainability Plan; • oversees with the support of Control, Risk and Sustainability Committee and in accordance with the Guidelines for the Internal Control and Risk Management System, the model for identifying, assessing and managing major risks, taking into account ESG risks; • ensures the consistency of the content of this Policy with the provisions set out in the in-house regulations; • approves, after review by the Control, Risk and Sustainability Committee, the Sustainability Reporting set out therein.
<p>Control, Risk and Sustainability Committee</p>	<ul style="list-style-type: none"> • oversees sustainability aspects related to corporate activities with the aim of supporting the Board of Directors in developing an integrated business strategy with ESG issues and risks; • supports the Board of Directors in identifying and managing key business risks and in verifying that they are properly identified, adequately measured, managed and monitored, and compatible with business management consistent with identified strategic objectives; • expresses a favorable opinion with respect to the proposed adoption of the Sustainability Plan formulated by the ESG Steering Committee, analyzing its contents, feasibility and verifying its consistency with the Group’s strategy; • expresses its opinion on this Policy and its subsequent amendments, taking into account the relevant activities, risks and stakeholders; • expresses a favorable opinion on the approval of the Sustainability Reporting; • performs all the functions provided for in the Corporate Governance Code and assigned by the Board of Directors.
<p>The ESG Steering Committee</p>	<ul style="list-style-type: none"> • is appointed by the CEO of Diasorin; • consists of the CEO, CCO, CFO and Senior VP, Human Resources of Diasorin, by the Group General Counsel and any other manager whose presence shall be deemed appropriate from time to time; • approves all sustainable development projects funded or supported by the Group to implement the ESG Plan; • supports Control, Risk and Sustainability Committee in monitoring the issues in this Policy, oversees the progress of ESG Plans including through the definition of relevant KPIs.



COMMITMENT TO SUSTAINABILITY

6. Commitment to sustainability

Diasorin is committed to actively identifying opportunities to create value in the long run, vis-à-vis all stakeholders.

Through the dissemination of scientific knowledge and the pursuit of excellence, the Group aims to fulfill its role of “*Diagnostics Specialist*”.

Diasorin is aware of the growing importance of sustainability issues in defining its business strategy and, more broadly, the communities in which it operates. The Group is therefore deeply committed to integrating the principles expressed in this Policy into its activities.

Specifically, Diasorin:

- **is committed to contributing to sustainable development** as defined by the Sustainable Development Goals laid down by the UN in the 2030 Agenda (Sustainable Development Goals – “SDGs”);
- **confirms its adherence to the principles of the United Nations Global Compact (“UNGC”)**, with the aim of promoting the culture of corporate social responsibility by sharing, implementing and disseminating common principles and values in the areas of human rights, labor, environment, and anti-corruption;
- **respects and promotes universally recognized human rights** and is committed to supporting the elimination of all forms of forced and compulsory labor and the effective elimination of child labor within its sphere of influence.



7. Group-wide philanthropic and sustainability projects

Group-wide activities in the area of social sustainability are implemented through the founding of initiatives to support local communities and projects of Fondazione Diasorin (specifically, Mad for Science and Mad for Science for Teachers), to which up to **€1 million per year** are allocated.



In parallel, Diasorin develops and promotes a number of projects that involve local communities and express the founding values of the Group's social sustainability. Specifically, the Group is identified with initiatives concerning:

- a. **disseminating passion for science**, which results in the organization of numerous science events for high school students and symposia aimed at improving medical research each year.
- b. **integrating disability in sports**, to recognize and enhance human potential and to promote talent in all its forms.
- c. **improving hospital conditions** in departments that receive the youngest patients.

These projects are submitted from time to time to the ESG Steering Committee, which is responsible for their approval. Local community projects are managed at the Corporate level and reported annually within the sustainability reporting.



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INTERNATIONAL
CUP FOR GOLFER
WITH A DISABILITY

Progetto per gli Ospedali & l'Infanzia
Progetto Pinocchio





8. Respect for Human Rights

The Group is committed to respecting, protecting and promoting human rights in the way it does business.

In this regard, the Policy establishes the principles and norms of behavior for its employees and contractors, drawing inspiration from international standards such as the Universal Declaration of Human Rights, the Fundamental Conventions of the International Labour Organization (“ILO”), the ILO Declaration on Fundamental Principles and Rights at Work and relevant follow-up, the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact Principles, and the OECD Guidelines for International Business.

In particular, in line with the Diasorin Group Code of Ethics, in conducting its business the Company aims to avoid any behavior, act or decision that may result in, or contribute to, a negative impact on human rights. The Group is therefore committed to promoting respect for these rights in its dealings with employees, contractors, business partners, suppliers, and by anyone who has dealings with the Company, paying particular attention to the contexts that present the greatest risks.

a. Human Resources

i. Selection, staffing, and management of employment relations:

Diasorin condemns any form of discrimination, use of coercion, deception, and lack of transparency in the employee selection and hiring process. The Company further undertakes to manage the employment relationship with employees while ensuring respect for their dignity and rights as individuals, not to request, at any stage of the selection and hiring process, payment of any kind, and not to withhold employees’ identity documents for the purpose of holding them against their will.

ii. Irregular, child, forced and compulsory labor:

Diasorin demands the utmost respect for people and applicable labor laws and strongly condemns human trafficking, irregular, child, forced and compulsory labor. The Company is also committed to full compliance with specific ILO Conventions, as well as applicable labor laws in each of the countries in which the Group operates.

iii. Occupational health and safety:

Diasorin is committed to maintaining a safe working environment free from all forms of violence, harassment or intimidation, and to promoting high standards of health and safety by minimizing workers’ exposure to workplace hazards.



All locations comply with the health and safety legislation of the countries in which they are located and meet the standards set by international regulations and best practices.

The Company promotes the spread of an occupational safety culture by encouraging responsible behavior by employees and collaborators, including through training and information activities.

Finally, the Group cooperates with its employees to improve health and safety conditions in the workplace, inter alia by identifying hazards, resolving health and safety issues, and taking all necessary precautionary measures as a result.

iv. Diversity and inclusion:

Diasorin recognizes people and their talents as the most important resource for the performance of its activities and is committed to ensuring equal opportunity at every stage of the employment relationship, from the selection process to the assignment of roles, from professional development to termination, avoiding on equal merit any form of discrimination in employment or occupation, and promoting a culture in which people recognize the advantage that a diverse and inclusive workforce brings.

No discrimination is tolerated on the basis of ethnicity, race, color, gender, sexual orientation, religion, nationality, age, disability, political opinion, union affiliation, marital status, health status, and any other social status or personal characteristic.

v. Working hours, salary conditions, and benefits

Diasorin operates in full compliance with local laws and international industry standards with regard to working hours, wage, insurance and social security conditions, overtime work and employee benefits.

Working hours are established in accordance with local legislation and in full compliance with the provisions of the relevant ILO Conventions and with particular regard, where applicable, to the regulations set forth in national collective bargaining agreements and their supplements. Employees and contractors have at least one day off per week and paid vacation, leave and sick leave periods.

vi. Freedom of association and collective bargaining

Diasorin guarantees all its employees, without distinction, the right to form an association and join organizations of their choice without prior permission.

It is also ensured, where workers so choose, that terms and conditions of employment are set through voluntary collective bargaining, in accordance with the provisions of ILO conventions and local legislation of the countries in which the Company operates and, where applicable, national collective bargaining agreements and their supplements.

vii. Privacy:

Diasorin is committed to respecting the privacy of its employees, refraining from disclosing personal data and information to third parties, except to the extent and for the purposes permitted by applicable regulations, and to the proper use of the data and information provided thereto, in accordance with relevant regulations.

b. Business partner and suppliers:

Diasorin undertakes not to establish business relationships with suppliers who employ irregular, forced, compulsory or child labor or, in general, who do not meet the requirements established by international regulations.

c. Communities:

Diasorin, recognizing its role in the communities in which it operates, is committed to engaging its stakeholders to ensure that their concerns are listened to in the conduct of its business.

The Company is committed to maintaining, on a regular basis, an open and constructive dialog with its stakeholders and to creating, where conditions exist, economic opportunities and promoting the well-being of the communities in which it operates through locally relevant initiatives.



All recipients of the Policy are required to report any alleged or actual Human Rights violations of which they have become aware in the course of their work and any other violations, or suspected violations, of the Policy. For this purpose, dedicated channels of communication are set up as defined in the Group Code of Ethics, the Whistleblowing Procedure and the Organizational Models in accordance with Legislative Decree 231/2001, as adopted by Diasorin S.p.A. and Diasorin Italia S.p.A.

The Company will evaluate the reports received in accordance with the current Whistleblowing Procedure and handle them by guaranteeing the whistleblowers against any form of retaliation, discrimination or penalization, and in any case the confidentiality of the identity of the whistleblower is ensured, without prejudice to legal obligations, to the protection of the rights of the Company or to the persons wrongly accused and/or in bad faith.

Diasorin is committed to the identification, assessment, prevention and mitigation of risks of Human Rights violations, promptly putting in place appropriate remedial actions should such events occur.

Compliance with this Policy, which implements the principles set out in the Group Code of Ethics, forms an integral part of the contractual obligations of employees, collaborators and, more generally, of all recipients. Any violations will thus result in the application of the measures provided for in the applicable regulations and collective bargaining.

For more information on the Code of Ethics and Whistleblowing Procedure, please refer to the Diasorin Group website which can be reached at <https://int.diasorin.com/en/company/governance/documents/code-ethics>





9. Areas for ESG action

Diasorin's commitment to sustainability issues was most recently set out in the ESG Plan 2023-2025¹, which formalizes the long-term goals that the Company intends to achieve and the related *milestones*.

“Environment”, “Social” and “Governance” (“ESG”) refer to a set of criteria likely to be incorporated into an organization’s sustainability strategy. They are useful criteria both for measuring progress in achieving social and environmental goals and for assimilating within corporate strategy the needs and ways in which to generate value for all of the organization’s stakeholders.

The identification of ESG issues relevant to DiaSorin guides the implementation and management of specific goals and will enable the Group to track and report progress over time.

In order to operationalize the ESG strategy of DiaSorin, **an ESG Steering Committee has been established**, which will be directly responsible for approving goals and prioritizing relevant issues among them.

The Plan aims to coordinate and align the Group towards shared goals to improve its social and environmental impact, in line with the principles of transparency and integrity that have always been a hallmark of the Company’s operations. These goals have also been defined by drawing on the SDGs and referring to them in light of the business, corporate culture and sensibility, then to be concretely inserted into everyday operations through a series of interventions grouped under the three criteria.

a. Environment



SDG 3
Good health and well-being



SDG 12
Responsible consumption and production



SDG 13
Climate action

Refers to the impact of the company’s activities on environmental issues, and on safety and health in the workplace.

¹ Reviewed by the Control and Risk Committee and Sustainability on November 24, 2022 and approved by the Board of Directors on December 1, 2022.

The Group is committed to protecting the environment, nature and the land in which it operates, acting in scrupulous **compliance with environmental protection regulations**. As such, the Group aims to continuously strengthen its Environment, Health and Safety system and, to integrate carbon emissions reduction initiatives and evaluate any useful initiatives to achieve **energy savings**.

Diasorin actively works to reduce CO₂ emissions from its operations. In line with its sustainability strategy, the Group promotes the implementation of energy from renewable sources, the use of electric company cars and the installation of photovoltaic systems to contribute to supporting the company's energy needs.



In particular, in order to **reduce its impact on the environment and biodiversity**, the Group's goal is to pursue policies aimed at **reducing the consumption of single-use plastics** in offices and to incentivize the use of energy from renewable sources over time at all of the Group's operating sites.

b. Social

	SDG 3 Good health and well-being		SDG 8 Decent work and economic growth		
	SDG 4 Quality education		SDG 10 Reduced inequalities		SDG 17 Partnership for the goals

Management of people based on merit, ensuring respect for human rights, with no tolerance for any form of discrimination. Support, including through the Fondazione Diasorin, for local communities with projects that result in a positive impact on young people and are in line with the corporate culture and values.

The Group values its human capital according to **meritocratic criteria** that aim to **reward commitment, professional competence, fair behavior and honesty**. The Group is also committed to ensuring the utmost **respect for human dignity**, avoiding any discrimination based on gender, ethnic origin, nationality, age, political opinions, religious or philosophical beliefs, health status, sexual orientation and socioeconomic conditions.

These initiatives make it possible to pursue a staff selection and management policy aimed respectively at **attracting and valuing talent**, while respecting equal opportunities.



Diasorin is also committed to ensuring a **healthy and safe working environment** for anyone involved in business activities by providing facilities, workplaces, principals, and relevant training and information activities in line with relevant international standards.

Diasorin's commitment to its employees fosters opportunities for growth and **integral promotion of the individual** in the communities where it operates, including through philanthropic initiatives in line with its vision of sustainable development.

Diasorin also manifests its **commitment to local communities by allocating a proportion of annual revenues to projects that reflect the Group's social sustainability principles.**

Finally, Diasorin contributes to the fight to limit and sometimes eradicate infectious diseases, including in countries and geographic areas with limited **access to healthcare.** Through collaboration with global networks, the Group is committed to fostering the deployment of specialty and disease diagnostics solutions at a broad scale in all regions of the world.



c. Governance



SDG 3
Good health and well-being



SDG 16
Peace, justice and strong institutions



SDG 9
Industry, innovation and infrastructure



SDG 17
Partnership for the goals

Full adherence to the principles of "Governance" and "Compliance" required of listed companies; definition of the governance of the ESG Plan 2023-2025.

To confirm the commitments made by Diasorin by adhering to the **2020 Corporate Governance Code** of Italian Listed Companies in order to **promote value creation for stakeholders** through the achievement of long-term goals.

To implement a **functional compensation system** to motivate and retain key employees, geared toward achieving sustainable success by incorporating ESG goals.





The Group ensures corporate integrity through the adoption of codes of conduct and organizational procedures aimed at **preventing the commission of offenses**, combating corruption and, in general, violations of the Code of Ethics, including by means of the provision of an organizational model aimed at preventing the commission of crimes in the interest and benefit of the Company and channels for the possible reporting of misconduct (e.g., whistleblowing).

The main governance objectives that serve as bases for the Group’s sustainability strategy include the implementation of a governance model inspired by the most widely recognized international standards and ensuring high levels of ESG risk management. Diasorin is further committed to formalizing its Governance criteria, through the establishment of an internal figure and an ESG Steering Committee dedicated to the development and proper achievement of ESG issues at Group level. In order to ensure the achievement of the Group’s sustainability goals and strategy, in 2023 a **variable compensation target was assigned for all strategic executives linked to the ESG 2023-2025 plan**, approved by the Board of Directors on December 1, 2022.





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