

SANLORENZO	INTERNAL POLICY	Policy code: P082025
Policy title: HUMAN RESOURCES MANAGEMENT POLICY		
Edition no: 1	Revision no: 0	Issue date: 17/12/2025
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1 GENERAL OBJECTIVE AND CONTENT

This Human Resources Management Policy defines the strategic guidelines followed by the Sanlorenzo Group for purposes of managing and developing the human resources within its organisation (i.e. employees, collaborators, directors). The main objective is to ensure that each person is constantly supported and accompanied in their path within the organisation, encouraging their growth, motivation and full involvement in company life.

The principles contained in this policy are integrated with those in other company documents, jointly defining an integrated and coherent approach to human resources management. Particularly important among these are the Code of Ethics of each company, where present, and the Human Rights Policy.

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2 ADOPTION AND IMPLEMENTATION

The Policy is approved by the Board of Directors of Sanlorenzo S.p.A. and applies to all Group Companies.

Responsibility for its implementation lies with the relevant departments of each Group Company, where present, or alternatively with the employer. These are required to ensure that the Policy is adequately disseminated and understood by all employees, and to monitor that it is effectively applied.

3 SCOPE OF APPLICATION

This Policy applies to all the companies belonging to the Sanlorenzo Group, including all employees, collaborators and directors of the Sanlorenzo Group companies.

4 PRINCIPLES OF THE POLICY

The following paragraphs explain and expand upon the fundamental principles serving as the basis of the Human Resources Management Policy.

4.1 Selection of personnel

Within the Group, selection of personnel is guided by principles of transparency, merit, equity and fair pay, with the aim of attracting and hiring qualified and motivated resources in line with the corporate strategy, while adapting to market trends and anticipating future needs. Selection and recruitment decisions are based exclusively on the candidates' technical and professional skills, experience and aptitudes, free of any discrimination relative to gender, age, origin, orientation or individual beliefs. Each selection process therefore encourages the candidature of all individuals meeting the requirements and is based on the merit principle, which also guides assessments concerning mobility opportunities within the Group. Objective criteria and impartial procedures are followed during selection and assessment stages. The language used in communications and campaigns is clear, transparent and easily understood. The Group's talent acquisition strategy is supported through concrete actions and implemented, among others, through recruitment campaigns, the use of digital platforms and innovative tools, ensuring that the search for and placement of new talents is always consistent with the company's mission and vision.

In continuity with the selection process, the onboarding process constitutes a fundamental moment of welcoming, listening and integration. The aim is to ensure a clear, engaging

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experience consistent with the corporate culture, from the outset fostering a genuine sense of belonging and participation.

4.2 Human resources management

The Group promotes a working environment based on respect for differences, in which each person can freely express their skills and potential, regardless of gender, age, ethnicity, religion, sexual orientation, disability or other personal conditions.

In compliance with current regulations, and consistent with the Countries and context in which each company operates, the Group promotes the employment of people with disabilities and supports their integration, adopting tools and organisational solutions that guarantee equal opportunities for participation and professional growth.

The organisation of work is inspired by principles of fairness and compliance with the provisions of the law and applicable collective bargaining agreements, ensuring compliant conditions of employment and the protection of rights relating to working hours, breaks and rest.

The Group supports policies aimed at fostering a balance between professional and private life, through the promotion of forms of organisational flexibility, including - where possible – agile or hybrid working arrangements. As well, for protection of wellbeing, the Group guarantees transparency and respect of working hours. To these ends, consistent with the context and Countries in which each Group company operates, programmes such as parental leaves, authorised leaves and other initiatives for corporate welfare are supported.

Furthermore, the Group condemns all forms of violence, harassment or offensive behaviour in the workplace. The Sanlorenzo Group is committed to ensuring a safe and respectful working environment and to setting up reporting channels to counter any episodes of violence or harassment. All reports can be transmitted through the dedicated whistleblowing channel of Sanlorenzo S.p.A., accessible to all stakeholders at the link: [Whistleblowing - Corporate Governance - Sanlorenzo Spa.](#)

4.3 Human resources assessment

The Group adopts human resources assessment systems based on principles of fairness, transparency and consistency with corporate values. The purpose of the assessment is to measure performance, recognise individual contributions and encourage continuous improvement.

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The Group adopts a structured, fair and transparent approach to evaluation:

- Appraisals are carried out at least once a year, for monitoring of progress against objectives.
- Each appraisal takes into account results achieved, behaviour consistent with company values, and key competencies required by the role.
- The process encourages, where applicable, self-assessment by the employee, evaluation by the line manager, and where necessary a second-level review ensuring consistency and impartiality.
- A formal meeting is scheduled between supervisor and employee for feedback on results, discussion of strengths and areas for improvement, and setting of targets for the next period. This feedback, where applicable, is documented in writing and taken into account during the Salary Review and Development process.

4.4 Career advancement

The Sanlorenzo Group recognises that professional development is strategic to organisational growth and success. The enhancement of personal skills and promotion of career paths are fundamental to strengthening a sense of belonging and to stimulating contributions to the achievement of the corporate objectives, from each person.

To this end, the Group promotes targeted initiatives, among which: programmes for mobility and exchange among the Group's various companies and units internationally; internal selection processes reserved for employees; specialised training; continuous refresher courses.

These tools make it possible to build growth paths that are clear and consistent with individual aspirations and the company's strategic needs, promoting integrated development between people and the organisation.

4.5 Staff remuneration

The Group ensures equal treatment, promoting equal opportunities for remuneration, to guarantee that all people receive recognition proportionate to their skills, experience and professional contribution.

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The Group is committed to ensuring remuneration practices that are fair, transparent and consistent with the principles of social responsibility and industry best practice. Remuneration is structured to attract, motivate and retain talents, valuing the skills and individual contribution of each employee.

Salaries and remuneration are defined for each role in keeping with the relative responsibilities, skills required and results expected, in full compliance with current regulations and guaranteeing compliance with the minimum wages required by law, where present, in the Countries where the Group operates. Remuneration levels are periodically reviewed, taking into account market conditions, individual performance and the economic context, in this way ensuring internal equity and external competitiveness.

The Group promotes gender equality in all areas of human resources management, ensuring equal pay for work of equal value and preventing any form of direct or indirect discrimination. Periodic salary monitoring and analysis tools are adopted to detect any discrepancies and implement the necessary corrective measures, ensuring transparency and respect for the principles of fairness.

The Group encourages clear and transparent communication of remuneration procedures, promoting understanding of the criteria for determining salary and professional development opportunities.

4.6 Training

The Group recognises that training is an essential element for the development of its people and the growth of the organisation.

The Group promotes training programmes aimed at strengthening the professional, transversal and managerial skills of its staff, in line with the organisation's needs and the evolution of the market context. All employees have equal access to training courses.

Training is designed as a strategic lever for:

- Retaining people by offering concrete growth opportunities;
- Motivating through the recognition and enhancement of skills;
- Involving each person in the company's transformation process, making them an active part of any changes.

4.7 Staff health, safety and welfare

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The Group views the health, safety and psychophysical well-being of its employees as fundamental priorities in the management of its activities. To this end, the company is committed to ensuring the protection of workers and the healthiness of the working environment, complying with the regulations in force in the Countries where it operates and adopting an approach aimed at continuous improvement.

In addition, the Group has implemented a UNI EN ISO 45001:2018 certified management system at its sites in Ameglia, La Spezia, Pisa, Massa, Viareggio and Cologne, thereby taking a structured and ongoing approach to the attainment of consistently higher health and safety conditions. In particular, the Sanlorenzo Group, within the requirements of the UNI EN ISO 45001:2018 standard, is committed to:

- Maintaining compliance with all applicable laws and regulations on occupational health and safety;
- Providing safe and healthy working conditions for prevention of work-related injuries and illnesses;
- Eliminating hazards and reducing occupational safety and health risks;
- Pursuing continuous improvement aimed at the prevention of occupational injuries and illnesses;
- Ensuring the consultation and participation of workers and workers' representatives.

The Group actively promotes a culture of safety through outreach and training initiatives, strengthening awareness, the sense of responsibility and the capacities for prevention in the workplace.

4.8 Internal communication

The Group recognises the essentiality of internal communication in ensuring cohesion, transparency and a sense of belonging. Communication is based on the dissemination of official and approved information, guaranteeing correctness and consistency, and, to reduce fragmentation and favour clarity, takes place via a limited selection of corporate channels.

The communication style favours a simple and accessible language, close to the people, so that each content is not only transmitted, but understood and internalised. Each communication aims to clearly illustrate the reasons behind initiatives, decisions or requests,

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favouring the full understanding of their meaning and strengthening the involvement of all resources in the Group's change and development paths.

5 DISSEMINATION AND MONITORING

The Group guarantees full accessibility to this Policy for the management of human resources through internal communication channels, including the Sanlorenzo S.p.A. corporate intranet.

To encourage wider dissemination, the Policy is also published on the Sanlorenzo S.p.A. corporate website, ensuring that transparency and accessibility extend to external stakeholders, including customers, suppliers, business partners, local communities and competent authorities.

The Group also promotes full understanding of the Policy through awareness-raising initiatives aimed at personnel, with the aim of consolidating knowledge and application in all corporate contexts.

6 VERSION HISTORY

Version	Issue date	Description
V1	17/12/2025	Initial version