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1. INTRODUCTION

1.1 Preamble

IRS ITALIAN REMOTE SENSING S.R.L. (hereinafter referred to as IRS), with the aim of supporting and promoting respect for inviolable human rights, is committed to ensuring, towards all its stakeholders, professional relationships based on respect for human dignity and the fundamental guarantees recognized to all men by national and supranational laws.

This Human Rights Policy (hereinafter also "Policy") is adopted by the Administrator in order to reaffirm the Company's commitment to promoting and supporting all the values and principles affirmed by International Institutions and Conventions on human rights.

In particular, the Company protects and promotes the recognition and safeguarding of the dignity, freedom and equality of human beings, the protection of work and trade union freedoms, health, safety, the environment, and biodiversity, as well as the system of values and principles on the circular and efficient use of resources and sustainable development.

Any form of discrimination, corruption, forced or child labor is repudiated. In this regard, the Company operates within the framework of the United Nations Universal Declaration of Human Rights and the fundamental Conventions of the ILO - International Labour Organization.

In this context, the Company is committed to providing all its employees with a positive and stimulating work environment, free from discrimination, ensuring that everyone is recognized, respected, and valued for their dignity, their rights, their cultural and individual diversity, with the aim of creating a strong corporate culture.

1.2 Regulatory framework of reference

The company applies and promotes the founding principles of the following conventions and declarations of international and European law:

- International Charter of Human Rights of the United Nations (UN):
- a) Universal Declaration of Human Rights, 1948;
- b) International Covenant on Civil and Political Rights, 1976;
- c) International Covenant on Economic, Social and Cultural Rights, 1976;
- European Convention on Human Rights, 1950;
- UN Convention on the Rights of the Child, 1989;
- Fundamental Conventions of the International Labour Organization (ILO): for example, no. 29/1930, 87/1948, 98/1949, 100/1951, 105/1957, 111/1958, 135/1971, 138/1973, 182/1999;
- Declaration on Fundamental Principles and Rights at Work, 1998;
- Resolution of the European Parliament of 10 March 2021 with recommendations to the Commission on due diligence and corporate liability.

1.3 Purpose and scope of application

The Company's Human Rights Policy, approved by the Administrator, has the objective of defining the fundamental principles, behavioral rules and responsibilities regarding human rights that the Company recognises, respects and assumes as a binding value and imperative, and to which All Recipients of the Policy are required to comply.



This Policy applies to all Company personnel and to all those who work for or on behalf of the Company, within the scope of their activities and within the limits of their responsibilities.

1.4 Recipients

The set of ethical principles, values and rules of conduct set out in this Policy must inspire the activity of all those who operate, from within or outside, within the sphere of action of the Company (hereinafter the "Recipients").

In particular, by way of example, the Recipients of this Policy are:

- The Administrator, who is inspired by the principles of the Policy in setting the company objectives.
- **Employees**, who, in compliance with current legislation, adapt their actions and behaviours to the principles, objectives and commitments set out in the Policy.
- **Collaborators**, who on an ongoing basis (consultants, agents) align their conduct with the inspiring principles of the Policy.
- Suppliers.

1.5 Obligations of recipients

All Recipients are responsible, each to the extent of their competence, for compliance with this Human Rights Policy. In particular, all actions, operations, negotiations and in general the behaviours carried out by the Recipients in the performance of their work activities must be based on the principles and values expressed in this Policy. All Recipients are required to observe and, to the extent of their competence, to ensure compliance with the principles contained in the Policy: under no circumstances does the claim to act in the interest of the Company justify the adoption of behaviours in conflict with those set out herein and in general with applicable laws, regulations and disciplines.

2. PRINCIPLES

The fundamental principles on human rights identified below are an expression of the values in which IRS believes and on which the corporate culture is based.

These values express the standard of behaviour required of all employees and collaborators of the Company.

2.1 Work practices

2.1.1 Refusal of forced or compulsory labour and child labour

The Company is committed to promoting the effective elimination of all forms of forced or compulsory labor, as defined by ILO Convention No. 29, as well as all forms of exploitation of workers, including any form of abuse, coercion or psychological and physical violence, both towards its employees and employed workers and firmly condemns the trafficking and exploitation of human beings in all its forms. The Company also rejects the use of child labor, as defined by the legislation in force in the country where the activities are carried out, and in any case not lower than the minimum age established by ILO Convention No. 138¹.

¹ This is the ILO "Minimum Age Convention", which currently provides for a minimum age of 15 years.



2.1.2 Respect for diversity, non-discrimination and equal opportunities

The company respects the fundamental rights of all people, protecting their moral integrity and guaranteeing equal opportunities. In both internal and external relations, behaviours that have a discriminatory content based on political and trade union opinions, religion, gender, ethnicity, nationality, age, sexual orientation, health status, family responsibilities and in general on any characteristic of the human person are not permitted. The company considers diversity an opportunity and a resource on a cultural, human and professional level, to be enhanced through dialogue and the comparison of opinions, ideas and experiences.

2.1.3 Commitment against harassment and mobbing practices in the workplace

The Company is committed to ensuring a correct and professional working environment for all its workers,

regardless of the type of relationship established and the role they hold.

Gender harassment, as discrimination based on sex, deeply affects the dignity of the human being and violates the principle of equal treatment between people. Sexual harassment is a subset of it and represents an even more serious form, characterized by harmful behaviour (verbal insults, humiliation, intimidation, displays of contempt, denigrating comments, vulgar proposals, up to unwanted physical contact) directed at a person.

The Company also considers harassment to be any initiative that takes the form of threatening retaliation following a negative response to a verbal and/or physical approach, as well as any single isolated act, even if not repeated but unwanted for the person who suffers it.

The Company rejects and condemns harassment in all its forms, and considers it even more serious when it is implicitly or explicitly used to exert pressure in the case of hiring a worker, or in the case of decisions that concern his or her professional future, or when it has the purpose or effect of unreasonably interfering with the professional performance of the employee or creating an intimidating, hostile, humiliating or offensive work environment.

The Company is committed to promoting and implementing working methods aimed at achieving greater organizational well-being, as well as ensuring respect for the professional dignity and psychophysical integrity of employees in relation to the individual personality of each. In this regard, the Company requires that in internal and external work relationships there is no room for intimidating conduct and attitudes that can in any way be traced back, even in a hidden form, to mobbing practices; all such behaviors are, without exception, prohibited. They are considered as such: creating an intimidating, hostile, isolating or otherwise discriminatory work environment towards individuals or groups of workers; putting in place unjustified interference with the performance of work by others; hindering the individual job prospects of others for mere reasons of personal competitiveness.

The Company undertakes to ensure that no hidden forms of mobbing occur, monitoring, including through surveys, the corporate climate regarding the issues discussed.

Any employee or collaborator of the company who sees or suffers mobbing or harassment practices as described above is required to report them to the Administrator according to the methods described in the dedicated paragraph of this Policy (Ref. "Reporting system and principle of non-retaliation"). In order to monitor the actual observance of this aspect of the Policy, the reports received from the Recipients on any violation that has occurred are evaluated, in line with what is described in the dedicated paragraph. In response to such reports, if, in fact, the defined conditions exist, the Company undertakes in-depth investigations, at the end of which, in the event of confirmation of the harassment or intimidating practice having occurred, at the time in which it has been verified that the harassment and/or discrimination has actually taken place, corrective actions, as well as disciplinary ones, may be adopted.

2.1.4 Freedom of association and collective bargaining

The Company guarantees freedom of association and effective recognition of the right to collective bargaining, sharing with trade unions a system of industrial relations based on constant and constructive dialogue.



2.1.5 Health and safety at work

The Company is committed to ensuring high standards of health and safety protection at work, promoting the consolidation of a culture of safety through the adoption of responsible behaviour and awareness of operational risks by all employees and collaborators. In compliance with respect for the person and in compliance with the legal provisions binding from time to time, the Group ensures the creation and management of environments and workplaces that are adequate from the point of view of the health and safety of employees. Workers must contribute to safeguarding their own and others' safety by respecting the rules and standards established in this area and promptly reporting to the Administrator any situation of danger to their own safety and that of third parties.

2.1.6 Adequate working conditions

The Company undertakes to require work performances in compliance with the provisions of the law and the collective bargaining agreement in force in terms of hours and days worked, as well as to guarantee adequate rest and fair remuneration to all employees. In particular, remuneration takes into consideration the principle of fair compensation for work and equal pay between women and men for work of equal value, based on an objective assessment. The minimum remuneration of IRS employees cannot be lower than that established by collective agreements and by the legislative and regulatory treatments in force of reference, in line with the provisions of the ILO Conventions.

2.2 Community and Society

2.2.1 Fight against corruption

The Company recognizes corruption as one of the factors that undermine institutions and democracy, ethical values and justice, the well-being and development of societies and therefore rejects it in all its direct and indirect forms. It therefore prohibits all forms of corruption without any exception, both in relations with private individuals and in relations with the Public Administration, which must be characterised by maximum transparency and correctness.

2.2.2 Privacy and confidentiality

The Company respects the right to confidentiality and privacy of its stakeholders, committing to the correct use of personal data and information provided to it.

In particular, it undertakes to process personal data and information in compliance with the fundamental rights and freedoms, as well as the dignity of the interested parties, with particular reference to confidentiality, personal identity and the protection of personal data.

The Company guarantees that personal data are processed lawfully and in accordance with the provisions of the current regulations, ensuring, in particular, the relevance of the data processing with the declared and pursued purposes.

The company undertakes to promote and guarantee adequate knowledge of the Policy by disseminating it to the interested parties, through the appropriate tools to reach the entire company population, such as publication on the website.

3. IMPLEMENTATION AND MONITORING

The Company Administrator is primarily responsible for giving substance to the principles and contents of this Policy and representing, with his/her own behaviour, an example for his/her collaborators, both internal and external to the Company, in order to ensure the diffusion of the ethical culture, founded on the respect and protection of human rights, promoted by IRS.



3.1 Monitoring your business relationships

The Company adopts selection policies for its suppliers, collaborators and commercial partners based on fair, transparent processes that comply with applicable laws, and works to ensure responsible management of the value chain, based on respect and promotion of human rights and the principles inspiring this Policy.

3.2 Reporting system and non-retaliation principle

All stakeholders may report, even anonymously, any violation or suspected violation of the Human Rights Policy. Reports may also be sent verbally, as well as by regular mail and email, to the contact addresses published on the IRS institutional website. In the event of any reports, the identity of the person making the report in good faith is guaranteed to be absolutely confidential, protecting them against any form of retaliation, discrimination or penalization during and after the inspection activity. Failure by an employee to report an illicit action, known or suspected, of which they have become aware, may result in the application of disciplinary sanctions.

3.3 Sanctioning system

The Company undertakes to use all reasonable efforts to prevent any conduct that violates this Policy and to interrupt and sanction any conduct contrary to it carried out by any employee, partner or third party who generally works for the Company. Violation of the principles expressed in this Policy by employees damages the relationship of trust established between the employee and the company to which they belong and may lead to disciplinary and compensatory actions. In such cases, the Company undertakes to take appropriate measures in order to adopt the most appropriate measures provided by law.

4. COMMUNICATION

The company undertakes to promote and guarantee adequate knowledge of the Policy by disseminating it to interested parties through specific and adequate communication activities, using tools suitable for reaching the entire company population, such as publication on the Company's website.