

SUSTAINABILITY AND HUMANITARIAN AID POLICY

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1. Objective

The *Sustainability and Humanitarian Aid Policy* (hereinafter "Policy") implemented by OverIT S.p.A. and the companies subject to its direction and control (also "OverIT" or "Company") is intended to guide the Company's efforts in Sustainability and support for civil society.

The Policy is formulated in compliance with the principles of integrity and transparency set forth in the Code of Ethics adopted by OverIT and related documents. Furthermore, it is based on the values that inspire OverIT's decisions and actions: Trust, Customer Success, Excellence, and Simplicity.

This Policy states OverIT's commitment to contribute to the 17 Sustainable Development Goals (SDGs) of the United Nations' 2030 Agenda and to promote "development that meets the needs of the present without compromising the ability of future generations to meet their own needs" as defined by the United Nations in the 1983 Brundtland Report.

To promote this development model, OverIT adopts a comprehensive sustainability-by-design approach. This approach ensures that every business operation is crafted to achieve enduring benefits for both people and the planet. It encompasses the three core dimensions of Sustainability: environmental, social, and governance (also ESG).

Regarding civil society, this document outlines OverIT's commitment to the humanitarian sector and International Cooperation development programs. To this end, OverIT will share its technological solutions and expertise with organizations working to support those in need.

The term Humanitarian Aid, as used herein, refers to the provision of products, technologies, expertise, or financial support to public interest causes, while acknowledging that such activities may indirectly contribute to OverIT's reputation or to the image of its brand/product. Humanitarian Aid is also distinct from sponsorship, which is intended to make the Company, its brand or product known on a larger scale.

2. Recipients

The recipients of this Policy are the corporate bodies, employees, without exception, and anyone who collaborates however with OverIT. The Company's main internal and external stakeholders, such as customers, partners, the territory and community, Non-Governmental Organizations (NGOs), schools, universities, and industry associations, are all taken into consideration in the development and application of this Policy. Every activity is carried out in consideration of the environment and natural resources, which are regarded as key stakeholders of OverIT.

All employees sign an acknowledgment of the Code of Ethics, this Policy and other key documents relevant to business process management upon onboarding.

3. Context

The consequences of climate change and the worsening of inequalities are making it increasingly urgent for citizens, businesses, and governments to take responsible action.

Humanitarian crises, increasingly driven by natural phenomena and geopolitical factors, are becoming more complex and protracted, with a dramatic rise in the number of individuals requiring humanitarian assistance. Emerging technologies, technological platforms, Geographic Information Systems (GIS), and mobile applications can contribute to making human settlements more sustainable through a more efficient use of natural resources, while also enabling new intervention strategies, ensuring greater timeliness and amplifying their impact.

4. OverIT's Commitment

4.1. Commitment on Sustainability

OverIT is committed to assessing its impact on the environment and society, and to converting this impact into a positive and transformative force for change. The Company's commitment is defined by a holistic approach and a pursuit of excellence. Therefore, OverIT is dedicated to upholding the highest international standards of environmental and social accountability as the foundations of sustainable development.

4.2. Commitment on Humanitarian Aid

OverIT is committed to supporting community-based Organizations through the internal promotion of skills-based corporate volunteering. OverIT firmly believes that skills-based volunteering, along with specialized knowledge, professional experience and the training of in-house talents, is the most effective approach to support NGOs and social players in fulfilling their mission. To this end, OverIT commits to cooperate with institutions and local governments wherever it be feasible.

OverIT is a leader in the management of mission-critical operations on linear assets. Drawing on decades of experience in the for-profit world, the solutions offered for the non-profit scenario will prioritize the need for streamlining humanitarian emergency logistics operations, where effective and well-timed interventions are paramount.

5. Principles

5.1. Sustainability

1. We respect the environment in which we operate and the communities we serve
2. We support the right of every individual to express themselves freely
3. We believe that gender equality and women's empowerment reduce inequalities and bring immense benefits to any organization

4. We believe that a diversity of experiences and backgrounds fuels innovation
5. We adopt clear and efficient governance practices that ensure transparency and respectful growth

5.2. Humanitarian Aid

1. We only support NGOs and non-profit entities that adhere to our Code of Ethics
2. We do not support entities whose primary purpose is to promote religious exclusivism or political affiliation
3. We make sure that there are no conflicts of interest in the selection of partners and projects to be implemented
4. We carefully select those projects which will benefit from our intervention in terms of a measurable positive impact
5. We are most respectful of the projects, strategic decisions, and expertise of the entities we collaborate with
6. We demand utter transparency regarding the use of donated products, expertise, and funding
7. We encourage our collaborators to support our philanthropic initiatives

6. OverIT Sustainability and Humanitarian Aid Steering Committee

The screening and selection of sustainability and Humanitarian Aid projects oversees the OverIT *Sustainability and Humanitarian Aid Steering Committee* (also "Committee"). The Committee is composed of the VP Humanitarian Aid, the Chief Executive Officer, and the Sustainability Manager. The Committee regularly meets with other C-Level executives to monitor the progress and effectiveness of ongoing projects.
With specific regard to Humanitarian Aid actions, this body unanimously selects partnerships and projects based on the following criteria:

- appropriateness of the proposals in relation to OverIT's technical capacity;
- implementation timeframe required;
- measurability of impact.

Selected projects shall be implemented through the activation of corporate volunteering. Dedicated regulations shall govern time management logics and the coordination of resources to be allocated to each project.
The Board of Directors (also “Board”) is updated at least once a year on the progress of activities.
Anyone who becomes aware of violations (whether alleged or ascertained) to this Policy or to the Company's internal regulatory system (e.g., OMC Framework and Code of Ethics) is required to promptly report them through the following channels:

- “Whistleblowing” platform available at https://overit.whistleblowing.it/;

- e-mail contact omc_supervisorybody@overit.ai;
- external channel made available by the Italian National Anticorruption Authority (ANAC).

7. Disclosure and communication

OverIT will share progress in the areas of Sustainability and advancements in philanthropic activities in accordance with the principles of relevance, transparency, and verifiability, using the internal and external communication tools regularly employed by the Company.

Regarding the communication of Humanitarian Aid activities, OverIT aims to increase the visibility of the commitment of the organizations it collaborates with and highlight the social impact and value of the actions undertaken. All communication activities must respect the dignity and integrity of all parties involved.

8. Conclusion and references

This Policy falls within the provisions set forth in the OMC Framework and OverIT's Integrated Management System, which are outlined below.

Reference	Description
Code of Ethics	Comprehensive collection of principles and guidelines that define the values, conduct standards and moral expectations that guide activities and relationships within OverIT and drafted in accordance with the provisions of the Italian Legislative Decree 231/2001.
Organization, Management and Control Framework (OMC Framework)	Set of protocols that regulate and define the corporate framework and the management of its sensitive processes. If properly developed, adopted, updated, and implemented, this tool mitigates the risk of wrongdoing in criminal offenses.
Integrated Management System Manual	Central guidance and support of OverIT's entire Integrated Management System for Quality, Environment, Social Responsibility and Equal Opportunity, and all related documents.

Furthermore, this Procedure complies with the contents of the following relevant Italian legislation.

Reference	Description
Codice del Terzo Settore (Italian Third Sector Code)	Legislative Decree July 3, 2017, n.117 and subsequent amendments and integrations.
Italian Legislative Decree 231/2001	Rules and regulations governing the administrative liability of legal persons, companies, and associations, including those without legal status, pursuant to the Italian Legislative Decree 231 of 2001.

9. Approval and updates

This Policy is deemed approved by the Board of Directors. Members of the *OverIT Sustainability and Humanitarian Aid Steering Committee* are responsible for updating the document whenever appropriate.

Document approval details

	Role	Name	Signature
Written by:	VP Humanitarian Aid	Monica Simeone	*Signatures have been executed in the Italian version of the document.*
	Sustainability Manager	Alessandra Piai	
Approved by:	Chief Executive Officer	Pierpaolo Bergamo	

Review history

Version	Date	Major amendments
1.0	February 15, 2024	First draft of the *Ethical and Responsible Philanthropy Policy*.
2.0	August 29, 2024	Expansion of the document to include sustainability aspects. The document's title is now *Sustainability and Philanthropy Policy*.
2.1	October 20, 2026	The title is updated into *Humanitarian Aid and Sustainability Policy*. Integrated information regarding the acknowledgement of this Policy by each employee upon joining the Company.

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