

**STAR7**

# SUSTAINABILITY REPORT

2023



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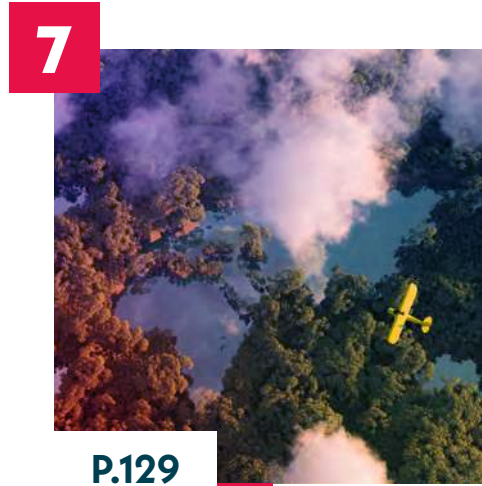


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CEO

# Letter to stakeholder

I am pleased to present to you the **Sustainability Report 2023**, a year that confirms our continued commitment to creating economic value, promoting responsible governance, improving social conditions and caring about the environment. Coming to our second year gives us the opportunity to begin measuring progress on our sustainable development goals from one year to the next.

Let me start with the most important asset for STAR7: **human capital**. With the consolidation of the integration of LocalEyes and Vertere and the leasing of the CAAR and STI business unit, we welcomed new people, **new expertise and new talents, not only in Italy but also abroad**, where we further consolidated our presence, especially in North and South America. 38.8% of our employees are **women**, a slight decrease from 45% in 2022, due mainly to the entry of expertise from the engineering world, a sector which historically has seen this gender underrepresented, although the trend has been improving over the last 10 years. The share of **managerial**

**positions occupied by women** increased to 31.8% (29% in 2022), which was one of the objectives we set ourselves. Our workforce represents more than **14 nationalities**, with 31% of employees **under the age of 30**, a figure which, although a decrease compared to 2022, confirms **STAR7 as a young company**, capable of attracting talent and blending diversity in ideas, a drive for innovation and aptitude for using new technologies. We have doubled the average hours of training per employee, from 16 hours in 2022 to 32 in 2023, confirming how important this topic is to us, not only with a view to improving expertise and increasing competitiveness, but above all to promote professional growth and the ability to adapt to the increasingly rapid and challenging changes in the economy and market.

**On the economic side**, we increased turnover to more than €104 million with a 25% increase in revenues and a temporary decrease in EBITDA, mainly due to the challenges posed by the integration of business unit leasing; the economic value distributed came close to €94 million (+29% vs 2022).

**Our environmental commitment** is demonstrated by the significant percentage of FSC-certified paper purchases, which reached 80% in 2023. Furthermore, more than 99% of waste is sent for recovery, a trend in line with last year's performance. Direct energy consumption and direct and indirect CO2 emissions saw a slight increase, proportional to the growth of the company population.

2023 was a crucial year for our **corporate innovation** project: we laid out our roadmap for innovation and created **7AI**, the STAR7 division dedicated to **generative artificial intelligence**. STAR7 is in a privileged position to embrace AI thanks to its consolidated experience in digital transformation, innovative approach and future-oriented corporate culture. **People are at the heart of our 7AI project**: their expertise and specialisation are the fundamental prerequisite for all projects to integrate generative AI with our service portfolio. We have the expertise and resources required to integrate new AI technologies into our services and to

create advanced solutions that meet customers' needs and improve operational efficiency. Our objective is to remain at the forefront of digital innovation, integrating generative AI in ethically and responsibly to improve both the customer experience and the work environment for our people.

All these results reflect our dedication to sustainable and responsible growth, but there is still much to do and we will continue to work to improve our performance, convinced as we are that everyone has their part to play in contributing to society and the environment.

Thank you to everyone who supports us and confirms their trust in us, every day.

**Lorenzo Mondo**  
Chairman and Chief Executive  
Officer STAR7 S.p.A.



# Highlights 2023

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

	2023
Revenues	€104.4 million
Economic value generated	€105.3 million
Economic value distributed	€93.9 million
Research & Development Investments – 2023	€0.5 million

## Governance & Policies

Compliance Programme as per Legislative Decree 231/2001  
 Three-star legality rating (maximum score)

## STAR7 S.p.A. Management Systems

Quality UNI EN ISO 9001:2015
Environment UNI EN ISO 14001:2015
Information security UNI EN ISO 27001
Translation services ISO 17100:2015/A1:2017
Post-editing ISO 18587:2017

## Social

### Quality and conformity of services

	2023
Non-conformities - Reduction % 2023 vs 2021 (Global Content Service Line)	41.3%
Data and Information Security - Privacy/ data breaches (No.)	None

## Social

### Freelancers

	2023
Number of freelancers (translators – interpreters – DTP)	716
Cultural diversity and social inclusion - Number of employees by nationality/geographical origin (% of total)	80% UE 20% non-UE



# ESG performance

## Social

### Human Resources

	2023
Number of employees as at 31 December 2023	1,269
Employment - increase in no. of employees 2021-2023 (%)	70.1%
Gender diversity - female gender share (% of total employees)	38.8%
Gender diversity - share of female gender in managerial positions (% of total)	31.8%

## Environment

	2023
Paper purchases - Percentage of FSC Chain of Custody Certified purchases	80%
Percentage of waste sent for recovery	Over 99%

## 2023

DCultural diversity and social inclusion - No. of nationalities/geographical origin of employees	Over 14 nationalities
New generations/age diversity – share of employees under 30 years of age (% of total)	31.0%
Training – Average training hours 2023 per employee	32.0
Health and Safety - Accident Frequency Index (number of accidents/hours worked x 1,000,000) (1 accident in 2023)	0.4

## 2023

Total direct energy consumption - GJ	19,778
Total direct (GHG Scope 1) and indirect (GHG Scope 2 location-based) emissions/t CO <sub>2</sub> e	1,270



# Objectives



## Environmental

Material topic	Description/Actions	Time span
<b>Energy, emissions and climate change</b>	↪ Increase the proportion of energy derived from renewable sources and establish electricity supply agreements that come with a Guarantee of Origin.	<b>2023-2025</b>
	↪ Map GHG Scope 3 emissions along the value chain.	
<b>Responsible use of natural resources</b>	↪ 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.	<b>2023-2025</b>



# S Social

Material topic	Description/Actions	Time span
<b>Human resources: talent attraction and retention</b>	↪ Group onboarding sessions (virtual and/or in-person) of new STAR7 resources.	<b>2023-2024</b>
	↪ Maintain an active communication network with schools and universities in order to attract young talent.	
<b>Development, training and enhancement of human resources</b>	↪ Introduce new internal training process management tools.	<b>2023-2025</b>
	↪ 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	
<b>Equity, diversity and inclusion</b>	↪ Adopt a Group-wide Diversity, Equity and Inclusion Policy.	<b>2023-2025</b>
	↪ Gender Gap analysis activities and subsequent evaluation of obtaining Gender Equality certification	
<b>Health and safety in the workplace</b>	↪ Maintain high safety standards and minimise accident rates.	<b>2023-2024</b>
	↪ “Health and Safety in the Supply Chain” project.	

# S Social

Material topic	Description/Actions	Time span
<b>Quality and reliability of products and services</b>	<ul style="list-style-type: none"> <li>Ensure that the products and services offered maintain and improve their high standards of quality and reliability.</li> </ul>	<b>2023-2024</b>
	<ul style="list-style-type: none"> <li>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.</li> </ul>	
	<ul style="list-style-type: none"> <li>Introduce a "Sample Picking" control to oversee the quality of translations through an automated sampling system, which will then be verified by qualified reviewers.</li> </ul>	
<b>Innovation, R&amp;D for the development of new products and service</b>	<ul style="list-style-type: none"> <li>R&amp;D activities, for the development of innovative solutions to improve service delivery and their ability to generate positive social and environmental impacts.</li> </ul>	<b>2023-2025</b>
	<ul style="list-style-type: none"> <li>"Next" is an internal competition aimed at generating innovative ideas and practical solutions related to services, technologies, and sustainability.</li> </ul>	
<b>Protection of privacy, IT security and data protection</b>	<ul style="list-style-type: none"> <li>Protect sensitive customer and company data with effective security measures and in compliance with regulations and the Management System.</li> </ul>	<b>2023-2025</b>
	<ul style="list-style-type: none"> <li>Training activities aimed at all staff in order to raise awareness of IT security.</li> </ul>	



# S Social

Material topic	Description/Actions	Time span
<b>Sustainability in the supply chain</b>	<ul style="list-style-type: none"> <li>Adopt a Code of Conduct to be signed by suppliers (new and pre-existing).</li> </ul>	<b>2023-2024</b>
<b>Protection of intellectual property</b>	<ul style="list-style-type: none"> <li>Adopt STAR7 intellectual property protection policies.</li> <li>Monitoring and verification of possible intellectual property infringement offences Compliance Programme as per Legislative Decree 231/2001.</li> </ul>	<b>2023-2025</b>

# G Governance

Material topic	Description/Actions	Time span
<b>Economic performance: generation and distribution of value</b>	<ul style="list-style-type: none"> <li>Actions aimed at developing and enhancing the competitive position strategy.</li> </ul>	<b>2023-2025</b>
<b>Transparency, ethics and integrity in the conduct of business</b>	<ul style="list-style-type: none"> <li>Establish an internal Risk and Sustainability Control Committee to manage the positive and negative impacts generated by STAR7.</li> </ul>	<b>2023-2025</b>



# Methodological note

GRI Standard

2-1

2-2

2-3

2-4

3-1

STAR7 S.p.A. and its subsidiaries, collectively known as the STAR7 Group, have released a Sustainability Report for 2023. This annual report aims to offer stakeholders a comprehensive overview of the STAR7 Group's most significant impacts on the economy, environment, and people, including human rights. It also outlines how STAR7 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 2023 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 sustainability Reporting Principles: 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 5-9

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 2023. This reporting covers the entire period from 1 January 2023 to 31 December 2023. The environmental data on waste does not include the subsidiary STAR Comunicação e Serviços LTDA as it is currently unavailable and in any case not significant with respect 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 does not fall within the obligations 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 25/06/2024, and it did not undergo a limited audit by an independent auditor.

The Sustainability Report is published on STAR7's institutional website at <https://www.star-7.com/en/esg/sustainability-report>. More information on this can be obtained by writing to the following e-mail address: [esg@star-7.com](mailto: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.

#### **EU Corporate Sustainability Reporting Standards Directive (CSRD) 2022/2464 and ESRS criteria**

The EU Corporate Sustainability Reporting Standards Directive (CSRD) 2022/2464, approved by the European Parliament in November 2022 and currently being transposed into Italian law, requires STAR7 to publish the Sustainability Statement as an

integral part of the Report on Operations accompanying the annual Consolidated Financial Statements, starting from the annual corporate reporting for 2025, and to adopt the European Sustainability Reporting Standards (ESRS) as the criteria for writing up and reporting on sustainability/ESG issues.

The first set of European Sustainability Reporting Standards (ESRS) was adopted by the European Commission on 31 July 2023, with the publication of the related Delegated Regulation EU 2023/2772 in the Official Journal of the European Union on 22 December 2023. The Commission's Delegated Regulation of 31 July 2023 supplements Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards (ESRS).



# STAR7: People of Content

Profile and identity

A global network

Culture and values of  
STAR7

The business model and  
value chain



# Profile and identity

## STAR7: People of Content

### Material topic

### Objectives

**Innovation, R&D for the development of new products and service**

### SDGs



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.



**STAR7 ENGINEERING** Product and process engineering

**STAR7 PRODUCT KNOWLEDGE** Technical product expertise

**STAR7 GLOBAL CONTENT** Advanced language services

**STAR7 PRINTING** Printing, packaging and kitting services

**STAR7 EXPERIENCE** VR, AR, 3D and computer graphics

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. Through its five Service Lines, designed and created to accompany customers’ projects throughout their entire life cycle, STAR7 is able to build up the body of content that products need alongside them to be a success.

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.

In continuing its development path, STAR7 aims to expand its geographical presence and into new end markets; offer greater quality in delivering different services, with an approach directed towards integrating them and constant value creation through the product information life cycle, aspects that also translate into cost reduction opportunities for customers; focus on innovation, especially new

Experience solutions, through virtual training, cloud services, AI and digital packaging.

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 2023 was €104.4 million. As of 31 December 2023, the company had a total of 1,269 employees. Out of these, 612 were based in Italy and 657 were working at foreign subsidiaries.

GRI Standard

2-1

2-6

# Shareholding structure

As of 31 December 2023, the share capital of the parent company STAR7 S.p.A. was €599,340, consisting of 8,999,752 ordinary shares. The largest shareholder Dante S.r.l. holds a 41.7% stake.

41.7%

33.4%

18.8%

6.1%

Dante S.r.l

STAR A.G.

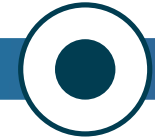
Mercato

KAIROS Partners  
SGR S.p.a



# Group History

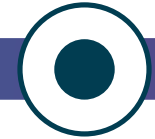
2000



## STAR Italia was founded

Italian subsidiary of the STAR Group for professional translations

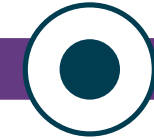
2006



## Authoring

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

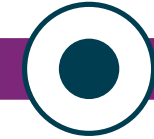
2010



## STAR log opens its doors

Division dedicated to digital print

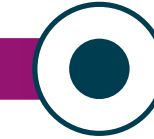
2013



## STAR comes to Brazil

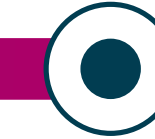
STAR Comunicação e Serviços LTDA is born

2014



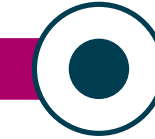
## STAR Engineering is founded

2015



## STAR becomes STAR S.p.A.

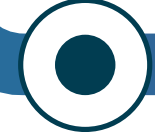
2016



## STAR USA 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 IAMdev

Company specialising in web software development

2021



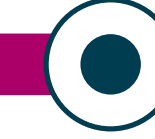
## STAR7 acquires The Geo Group

## STAR7 acquires LocalEyes Ltd. 🍏

## STAR7 is listed on the EGM 🌱

## Acquisition of Grafitec

2022



## Acquisition of Vertere S.r.l.

A language services provider

2023



## Lease of CAAR and STI business units

Companies specialising in engineering services

# Group History

## 2000

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.

## 2006

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

## 2010

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. partecipazione di controllo nella società brasiliana STAR Comunicação e Serviços LTDA attiva nel settore Printing & Logistics.

## 2013

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

## 2014

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.

## 2015

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.

## 2016

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).

## 2017

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.

## 2018

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.

## 2019

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.

## 2021

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.

## 2022

In 2022, STAR7 continued to expand by acquiring Vertere S.r.l., a company that specialises in language services. In 2023, the company signed a lease agreement for a business branch with the CAAR S.p.A. group. This move has greatly enhanced its engineering services in Italy and Brazil.

## 2023

The "UNCHARTED" company convention was held in 2023, bringing together more than 500 attendees and as many participating from abroad via live streaming, a unique opportunity to share the year's results, reflect on challenges and chart the way forwards for the Group.

## Today

STAR7's robust expansion continues, with a presence in over 30 countries and 9 offices in Italy, 19 offices worldwide, over 1.200 employees. We have established important partnerships with leading industrial companies.



# A global network

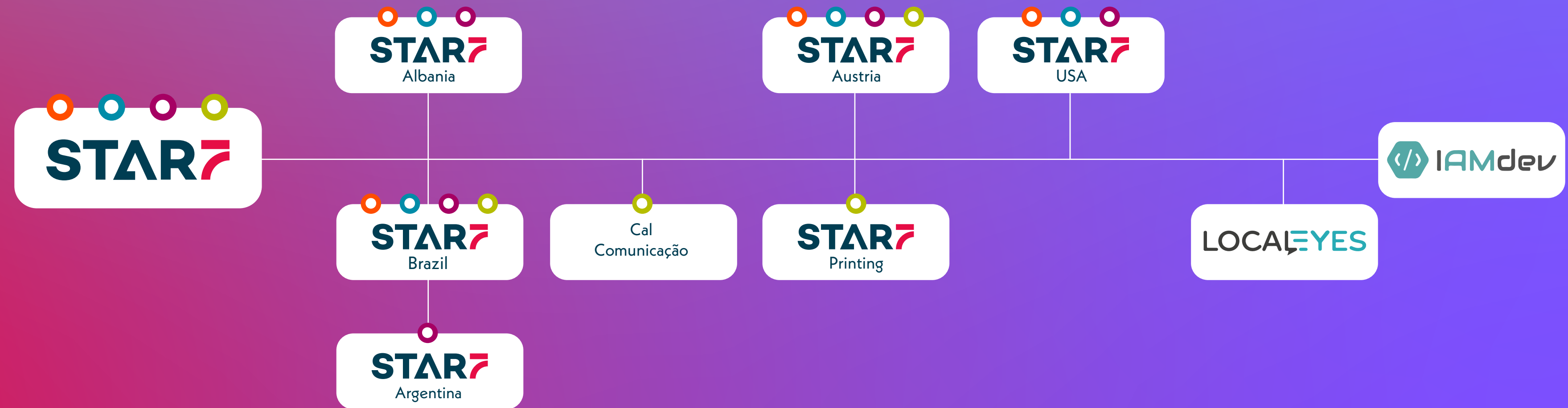
STAR7 is part of a global network with an established presence in many countries around the world, and is distinguished by its ability to combine a comprehensive perspective with a local character.

Through 9 offices in Italy and 19 in Austria, the USA, France, Spain, Germany, Denmark, Ireland, Finland, Sweden, the Netherlands, Albania, Brazil, Serbia and Argentina., STAR7 can respond effectively to the specific needs of each market, while ensuring high quality and standards wherever it operates.

As of 31 December 2023, 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 2023, the STAR7 Group comprised 28 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 2023.

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.

### Revenues by geographical area

	2021	2022	2023
Italy	42,335,080	47,054,679	55,514,623
Europe	3,573,573	3,178,075	6,189,394
Non EU	13,083,773	33,018,424	42,701,617
<b>Total</b>	<b>58,992,426</b>	<b>83,251,178</b>	<b>104,405,634</b>



# 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.

STAR7 takes advantage of an international network with a strong, deep-rooted local presence, which has enabled the Group to gain cross-industry and multisectoral experience with the main objective of supporting both SMEs and the big Italian and international key players in the main industrial sectors and simplifying and streamlining customers' processes, constantly improving their product content.

Services are currently offered in the following areas:

**Aerospace & Defence**

**Agriculture & Construction Equipment**

**Air Conditioning & Household appliances**

**Automotive & Transportation**

**Engineering & Machine Tools**

**Fashion & Retail**

**Finance**

**Food & Beverage**

**IT, Software & Technology**

**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 Looking ahead 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.



# The business model and value chain

## 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) and 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<sup>1</sup> 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<sup>2</sup> 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)<sup>3</sup>. 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.<sup>4</sup>

<sup>1</sup> Market Research Future report available at the link: <https://www.marketresearchfuture.com/reports/augmented-reality-virtual-reality-market-6884>.

<sup>2</sup> 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-iiot-connected-industry-industry-4-0-come-together-create-new-model-business](http://www.iot-now.com/2018/10/12/89230-iiot-connected-industry-industry-4-0-come-together-create-new-model-business).

<sup>3</sup> Report "Retail e-commerce sales Worldwide from 2014 to 2024".

<sup>4</sup> Report "Digital printing market - Forecast (2021-2026)" by IndustryArc.



# STAR7's Integrale<sup>7</sup> approach

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 their Integrale7 approach.

The STAR7 Group has a unique advantage in offering specialized and complementary competencies across different business lines. This allows us to provide our clients with a vertically integrated service and position ourselves as a one-of-a-kind partner. We can also leverage the potential for cross-selling between our various business lines to further benefit our clients. Integrale7 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 ENGINEERING** Product and process engineering

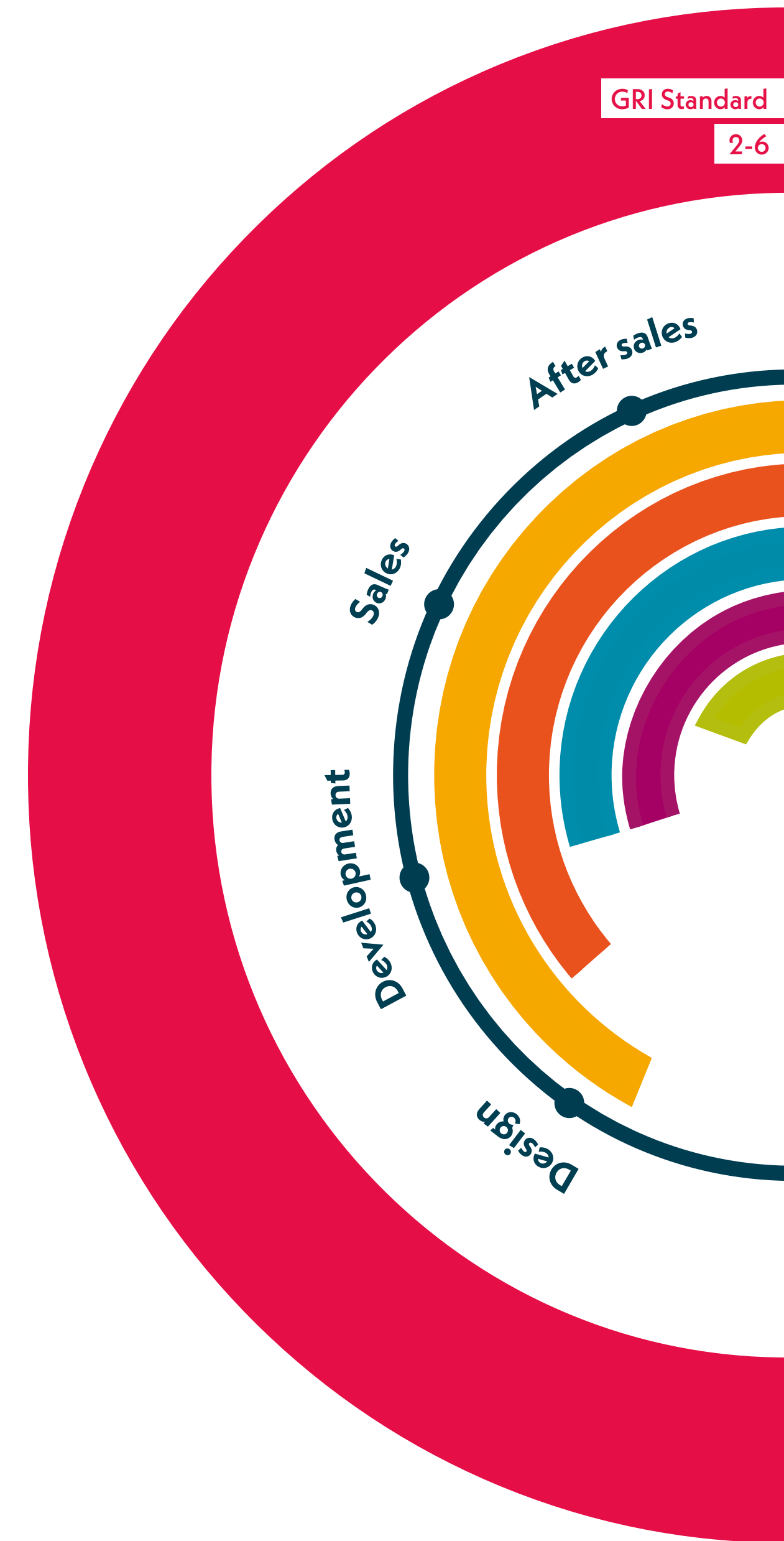
**STAR7 PRODUCT KNOWLEDGE** Technical product expertise

**STAR7 GLOBAL CONTENT** Advanced language services

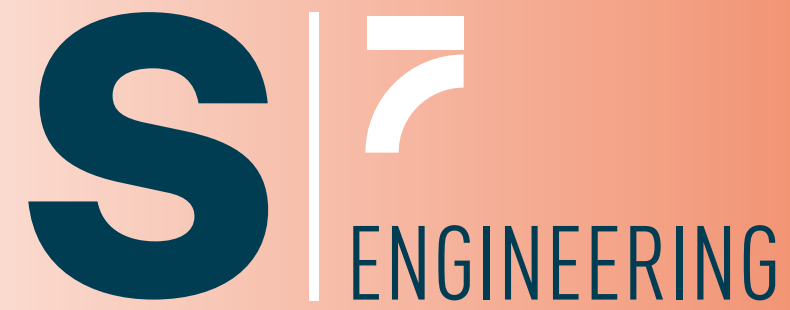
**STAR7 PRINTING** Printing, packaging and kitting services

**STAR7 EXPERIENCE** VR, AR, 3D and computer graphics

**STAR7 covers the entire product's life cycle**







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.

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

Scope	Service	Activities
<b>Design</b>	<b>Product development</b>	<ul style="list-style-type: none"> <li>From the product feasibility study to the CAD of components for making it.</li> <li>Engineering for complex industrial projects.</li> <li>Advice and assistance in construction, installation and production start-up.</li> </ul>
	<b>Electrical &amp; electronic engineering</b>	<ul style="list-style-type: none"> <li>Support in designing, developing, integrating and validating electronic control systems and devices.</li> <li>Particularly, assistance in developing electronic devices and systems, validation and testing, Hybrid/Electric Traction and ADAS.</li> </ul>
	<b>Manufacturing engineering</b>	<ul style="list-style-type: none"> <li>Developing aspects connected with product industrialisation and production, including the definition, set-up, design, control and optimisation of industrial processes.</li> <li>Optimising production and improving the technical efficiency of the production system.</li> <li>Creating the basis for robust and efficient processes and workflows, able to combine economic, operational and design requirements.</li> </ul>
	<b>Toolshop</b>	<ul style="list-style-type: none"> <li>Designing assembly equipment and servos for military and industrial applications.</li> </ul>



# S | 7 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 on 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

#### Product information

Service of authoring, layout and publication of technical documentation from engineering specifications, the use of 3D mathematical models and data and content gathering. Documentation includes user manuals, workshop manuals, spare parts catalogue and other useful information for customers.

#### 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 Codification system

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.

#### Smart diagnostic

Advanced remote diagnosis service for identifying and resolving faults that integrates big data and probabilistic data structure.





# PRODUCT KNOWLEDGE

## Scope

## Service

## Activities

### 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.

#### 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.





### Scope

### Service

### Activities

#### Technical consulting

##### Service Engineering

A series of activities linked to the preventive and corrective planning of product maintenance, starting with identifying the procedures required to avoid faults (preventive) and the procedures required to restore function in the event of a fault (corrective).

##### 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.

#### 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.





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**

**Language 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.





## Scope

### Consulting

## Service

### Terminology management

### Translation memory setup

### Web Accessibility Assessment

## Activities

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.

Retrieving existing translations, subsequent transformation into a database compatible with any CAT tool and quality check (TM Cleaning).

Reports on the accessibility compliance of websites, apps and documents, in accordance with international regulations.

### 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 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	Service	Activities
<b>Printing</b>	↪ 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..
<b>Logistics</b>	↪ 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.
<b>Dematerialisation</b>	↪ Paperless solutions	↪ Dematerialisation, document digitisation and digital archiving service.
	↪ Physical stock	↪ Service of storing digitised documentation assets, in venues and with advanced operating systems that guarantee high, flexible and customisable security standards.
	↪ Data loading & burning	↪ Customised data loading, duplication, burning on magnetic media and mass storage service.





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
<b>Virtual reality</b>	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
<b>Creativity</b>	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



# 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

Project analysis



Product development process



Definition of production processes



Verification and approval of production processes

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

Product analysis and development



Technical authoring



Technical training



After-sales support



Monitoring & update

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

Product & 3D Analysis



Briefing & Storyboard



3d Experience creation



User acceptance test



Delivery & Publication

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

Data analysis and project evaluation



Vendor management



Project Management



Translation and Quality Control



Formatting and delivery

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

Pre-press



Planning



Production



Definition



Quality control,  
packaging & delivery

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

During 2023, STAR7 recorded a significant increase in the total number of employees (48%), reaching 1,269 employees during the reporting period, of which 612 were employed in Italy and 657 abroad. This positive trend represents not only quantitative growth due to acquisition transactions, but reflects a phase of growth and development of the STAR7 Group, in terms of expertise and capabilities within the Company.

96.4% of workers are employed on open-ended contracts, a continually increasing percentage over the three-year period 2021-2023, and on full-time contracts (95.9%). By contrast, the percentage of employees with fixed-term contracts was not significant at the end of the period (3.6%). The proportion of

female workers on the same date was 38.8%.

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.





	2021			2022			2023		
<b>Employees</b>									
<b>Total number of employees at the end of the period/by gender</b>	Women	Men	<b>Total</b>	Women	Men	<b>Total</b>	Women	Men	<b>Total</b>
	343	403	<b>746</b>	386	473	<b>859</b>	490	779	<b>1,269</b>
<b>Geographical area</b>									
	Women	Men	<b>Total</b>	Women	Men	<b>Total</b>	Women	Men	<b>Total</b>
Italy	192	242	<b>434</b>	200	272	<b>472</b>	219	393	<b>612</b>
Europe	90	67	<b>157</b>	124	89	<b>213</b>	132	106	<b>238</b>
USA	26	11	<b>37</b>	24	7	<b>31</b>	37	10	<b>47</b>
South America	35	83	<b>118</b>	38	105	<b>143</b>	102	270	<b>372</b>
<b>Total</b>	343	403	<b>746</b>	386	473	<b>859</b>	490	779	<b>1,269</b>
<b>Contract/Gender</b>									
	Women	Men	<b>Total</b>	Women	Men	<b>Total</b>	Women	Men	<b>Total</b>
Open-ended	305	362	<b>667</b>	367	448	<b>815</b>	477	746	<b>1,223</b>
Fixed-term	38	41	<b>79</b>	19	25	<b>44</b>	13	33	<b>46</b>
<b>Total</b>	343	403	<b>746</b>	386	473	<b>859</b>	490	779	<b>1,269</b>



## Total number of permanent employees by gender/geographical area

	2021			2022			2023		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Italy</b>	156	202	<b>358</b>	182	254	<b>436</b>	210	382	<b>592</b>
<b>Europe</b>	88	66	<b>154</b>	123	85	<b>208</b>	128	91	<b>219</b>
<b>USA</b>	26	11	<b>37</b>	24	7	<b>31</b>	37	10	<b>47</b>
<b>South America</b>	35	83	<b>118</b>	38	102	<b>140</b>	102	263	<b>365</b>
<b>Total</b>	305	362	<b>667</b>	367	448	<b>815</b>	477	746	<b>1,223</b>

## Total number of fixed-term employees by gender/geographical area

	2021			2022			2023		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Italy</b>	36	40	<b>76</b>	18	18	<b>36</b>	9	11	<b>20</b>
<b>Europe</b>	2	1	<b>3</b>	1	4	<b>5</b>	4	15	<b>19</b>
<b>USA</b>	-	-	<b>-</b>	-	-	<b>-</b>	-	-	<b>-</b>
<b>South America</b>	-	-	<b>-</b>	-	3	<b>3</b>	-	7	<b>7</b>
<b>Total</b>	38	41	<b>79</b>	19	25	<b>44</b>	13	33	<b>46</b>

## Form of employment/gender

	2021			2022			2023		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Full-time employment</b>	315	395	<b>710</b>	359	463	<b>822</b>	458	759	<b>1,217</b>
<b>Part-time employment</b>	28	8	<b>36</b>	27	10	<b>37</b>	32	20	<b>52</b>
<b>Total</b>	343	403	<b>746</b>	386	473	<b>859</b>	490	779	<b>1,269</b>



### Total number of full-time employees by gender/geographical area

	2021			2022			2023		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Italy</b>	175	235	<b>410</b>	184	266	<b>450</b>	198	384	<b>582</b>
<b>Europe</b>	81	66	<b>147</b>	115	88	<b>203</b>	122	102	<b>224</b>
<b>USA</b>	24	11	<b>35</b>	22	7	<b>29</b>	36	10	<b>46</b>
<b>South America</b>	35	83	<b>118</b>	38	102	<b>140</b>	102	263	<b>365</b>
<b>Total</b>	315	395	<b>710</b>	359	463	<b>822</b>	458	759	<b>1,217</b>

### Total number of part-time employees by gender/geographical area

	2021			2022			2023		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Italy</b>	17	7	<b>24</b>	16	6	<b>22</b>	21	9	<b>30</b>
<b>Europe</b>	9	1	<b>10</b>	9	1	<b>10</b>	10	4	<b>14</b>
<b>USA</b>	2	-	<b>2</b>	2	-	<b>2</b>	1	-	<b>1</b>
<b>South America</b>	-	-	<b>-</b>	-	3	<b>3</b>	-	7	<b>7</b>
<b>Total</b>	28	8	<b>36</b>	27	10	<b>37</b>	32	20	<b>52</b>



## Other workers

The “other workers” category refers to workers who are not employed by the STAR7 Group but are utilised on a continuous basis to perform specific tasks. In detail, 238 individuals not employed were recorded in 2023, referring specifically to interns, project managers, instructors, mechanical and electrical installation workers, and freelancers.

## Non-employees

**2021**
**2022**
**2023**

	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Temporary workers</b>	5	-	<b>5</b>	1	1	<b>2</b>	-	-	<b>-</b>
<b>Interns</b>	1	-	<b>1</b>	4	3	<b>7</b>	2	17	<b>19</b>
<b>Other (Collaborators, VAT-registered, Project Managers, Mechanical and Electrical Installers)</b>	201	67	<b>268</b>	237	101	<b>338</b>	62	157	<b>219</b>
<b>Total</b>	<b>207</b>	<b>67</b>	<b>274</b>	<b>242</b>	<b>105</b>	<b>347</b>	<b>64</b>	<b>174</b>	<b>238</b>

The parent company also makes use of freelancers, including translators, interpreters and DTP (desktop publishing) specialists to carry out its activities. During 2023, STAR7 continued to operate through collaboration with an extensive network of freelancers. The number of freelancers is 716, of which 605 translators, 86 interpreters and 25 DTP specialists. In particular, STAR7 S.p.A. mostly makes use of freelancers from the European Union (EU) and, to a lesser extent, from non-EU countries, 80% and 20% respectively.

## Freelancers – Vendors

**2022**
**2023**

<b>Translators</b>	361	605
<b>Interpreters</b>	81	86
<b>DTP (desktop publishing)</b>	25	25
<b>Total</b>	<b>467</b>	<b>716</b>

\*The figures shown only include the parent company STAR7 S.p.A.



# Suppliers

STAR7 used more than 800 suppliers in 2023 (49.2% of the Group's total procurement costs for products and 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 2023 of the parent company STAR7 S.p.A. and for STAR7 Printing, broken down by geographical area of origin of the suppliers:

## 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
- Consultancy services

## Geographical area of suppliers

## Euro

## %

Italy	16,471,545	71.8%
Europe	4,502,898	19.6%
Asia-Pacific and Middle East	728,929	3.2%
Great Britain	687,733	3.0%
North America	252,720	1.1%
South America	200,485	0.9%
Africa	109,492	0.4%
Grand total	<b>22,953,802</b>	<b>100%</b>





## Customers

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 2023, **over 75% of the top 20 customers of the company have been working with STAR7 for more than seven 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 Integrale7 approach. In 2023, the number of full-service contracts (67%) exceeded that of single service contracts (33%).



# Innovation, Research and Development and Cutting-edge Technologies



**STAR7**

## The role of research and development

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 2021-2022-2023, incurred in research and development activities was, at the consolidated level, €8,342,727. In the financial year 2023, this amounted to €528,531.

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.

During 2023, the Group completed the research and development projects developed during the previous five years. New emerging technologies such as generative artificial intelligence and the already established augmented and immersive reality technologies will be the next R&D and testing challenges that will see STAR7 engaged in the process of digital transformation for its offer portfolio across all service lines.

## Collaboration, partnerships and sustainability

Starting in 2022, STAR7 has pursued various projects through collaborations and strategic partnerships, with the objective of implementing the principles of the circular economy. Among them, three key projects demonstrate STAR7's commitment to sustainability and innovation.

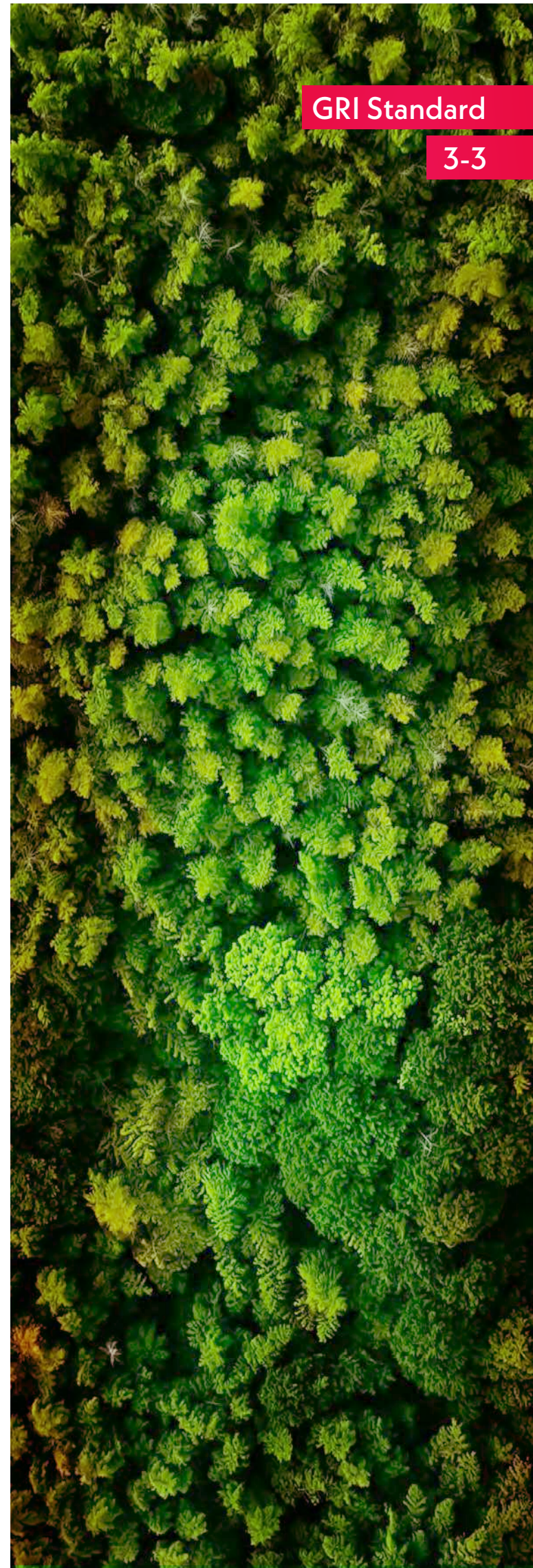
The first project, in collaboration with a customer in the automotive industry,

focused on the industrial battery sector, with the aim of minimising waste and potential CO2 emissions in the industrial sector.

Another project launched by STAR7 in 2023 is a partnership with the University of Turin, with the aim of raising awareness and promoting an exchange of knowledge regarding innovation and the principles of the circular economy. This collaboration involved a PhD student in 'Innovation for the Circular Economy'. The project not only keeps STAR7 up to date on the latest research, but also strengthens ties with the university.

The third project, which started at the end of 2023, involves collaboration with the CIM4.0 Competence Center, which not only explores the goals of the circular economy but also incorporates advanced technologies such as artificial intelligence (AI) and Industry 4.0 into its initiatives. This collaboration is aligned with the circular objectives outlined in the European Action Plan for a Circular Economy in the transport sector. Specifically, the project focuses on extending the life of battery modules, including issues of repair and reuse before recycling.

GRI Standard  
3-3





The aim of the project is to increase the service life of battery modules by emphasising repair and reuse before considering recycling. During the study, it was found that in 51% of the 2,000 battery packs analysed, just one module needed to be replaced to enable the battery to be reused in electric vehicles. Furthermore, during the experimental phase it emerged that only 1% of the battery packs required three modules to be replaced, while 40% of the battery packs required other components to be replaced. This project represents a significant step forward in the practical application of circular economy principles in the transport sector, contributing not only to environmental sustainability but also to economic efficiency through the integration of advanced technologies.

Through the know-how it can provide, STAR7 can support customers in adopting the principles of the circular economy, significantly reducing the need for new raw materials to produce batteries for electric vehicles, minimising the generation of e-waste and aiming to promote the adoption of the 4R model (Reduce, Reuse, Recycle, Recover).

### Corporate Innovation

In 2023, STAR7 embarked on a Corporate Innovation programme that complemented the Creative Lab project with a full-fledged venture

builder dedicated to GEN AI solutions: 7AI, thus reinforcing our research and development centre, the innovative driving force behind STAR7. This is where the most futuristic ideas are being developed, alongside research into immersive and augmented reality, the adoption of GEN AI in all STAR7's service lines with the specific aim of increasing the value of STAR7's value proposition in the market.

SMART7 IE (Internal Edition) was the first tangible result from the 7AI team: a customisable virtual assistant dedicated to all STAR7 employees to improve their work performance and start familiarising themselves with the important potential of GEN AI.

### Projects - Next: services for the well-being of people, the environment and the local community

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.

The "Next Call for Ideas" involved all STAR7 People, in Italy and abroad with the common objective of implementing concrete projects so that they become an integral part of STAR7 in the future,

focusing mainly on the following three drivers:

- Services
- Technology
- Sustainability

STAR7 People were encouraged to choose one of these themes to strengthen the Group's identity. They could 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 initiative met with a remarkable response, both in terms of participation – with over 80 projects presented and 100 people involved – and passion and commitment. There were prizes for the most innovative projects in the 3 categories: Technologies, Services and Sustainability. It also gave two special mentions for Creativity and Execution.

An expert jury selected the 25 most deserving projects, which were presented during a special Pitch Day held at the Valle San Bartolomeo headquarters on 18 September.





## Sustainability

The project involves the use of a platform with webinars, short videos and coaching aimed at boosting employee involvement in STAR7's commitment to sustainable development. During the course, employees will be able to measure and understand their carbon footprint, carry out training and propose improvement initiatives to reduce the impact of their lifestyle.

### 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.

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.



# Governance



Governance model and corporate bodies

Sustainability governance



# Governance model and corporate bodies

## Governance

### Material topic

### Objectives

**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.

### SDGs



Implementation of a compensation policy and performance assessment for the Board of Directors.



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 2025 are approved. The responsibility for conducting the legal audit of the financial statements as of 31.12.2025 has been assigned to BDO Italia S.p.A. and their approval is required.

### GRI Standard

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2-11

405-1

## Board of Directors

### Board of Directors

### Position

<b>Lorenzo Mondo</b>	Chairman and Chief Executive Officer
<b>Josef Zibung</b>	Director
<b>Andrea Farina</b>	Director
<b>Roberto Manzoni</b>	Director
<b>Isabella Mondo</b>	Director
<b>Paolo Rebaudengo</b>	Independent director
<b>Maria Luisa Vada</b>	Director



# Board of Directors



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 holders of shares which, at the time of submitting the list, individually or jointly hold 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 Bylaws 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	
No. 2	28.6%	No. 5	71.4%	No. 7	100%
Under 30		Between 30 and 50		Over 50	
No. -	-%	No. 1	14.3%	No. 6	85.7%

## 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
<b>Fabio Maria Venegoni</b>	Chairman of the Board of Statutory Auditors
<b>Vincenzo Gambaruto</b>	Standing auditor
<b>Alberto Bodiglio</b>	Standing auditor
<b>Stefano Cernuschi</b>	Alternate auditor
<b>Roberto Todisco</b>	Alternate auditor





# Sustainability governance

## The role of the Board of Directors

The STAR7 Board of Directors approves the Sustainability Report and 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.

GRI Standard

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2-15

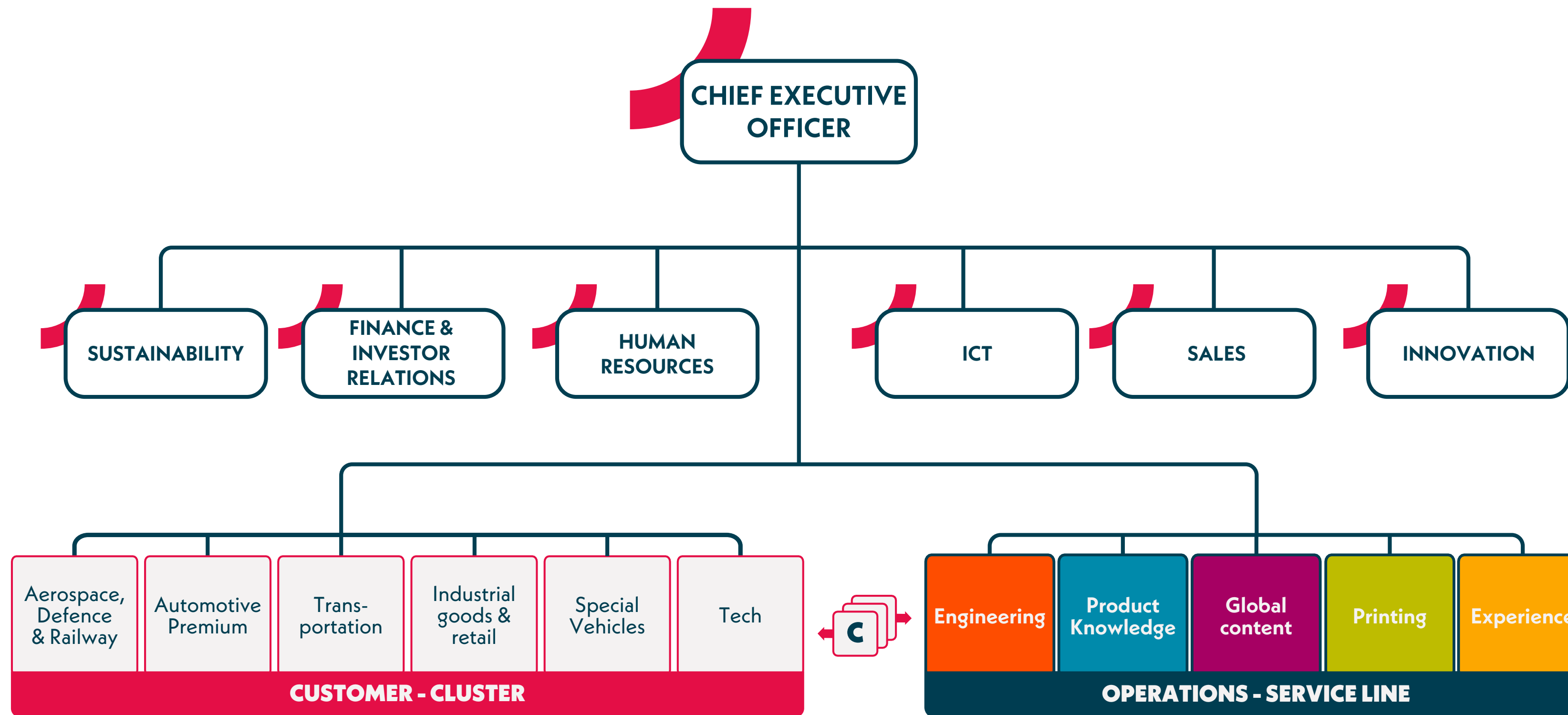
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# The organisational structure and the delegation process STAR7 S.p.A.

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.

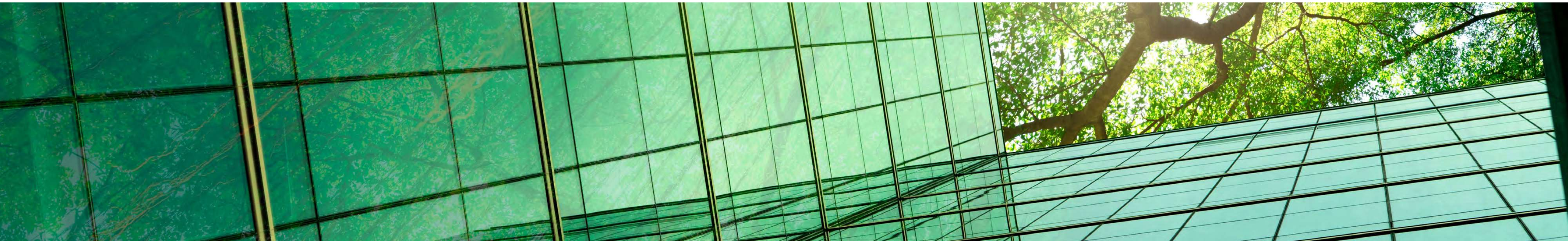
The system of operational governance is called *Équipe*: it comprises the CEO, Client Partner, Service Line Leader, and

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.





# Communication processes and conflicts of interest



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 2023, no reports were received by the Supervisory Board.**



# Strategies - Commitments - Policies

The role of STAR7 and its contribution to sustainable development

Responsible business conduct

Management Systems and Certifications

Environmental - Social - Economic Compliance

External initiatives and memberships

The role of stakeholders



# 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 megatrends 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

##### 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. 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 stages 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 optimise insights more quickly and accurately.

#### Food & Drink

##### Content expertise and cultural context

STAR7 offers valuable support in the creation and integrated management of all types of content, from translated text to images and CGI animations, to ensure the best possible end consumer engagement. Our authoring 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 experience 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.



## Industries

### STAR7 service offering and role

#### Life Sciences

##### Research documentation

In the life sciences field, documentation to support research is as essential as laboratory activities. Those operating 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 respecting the guarantee protocols. STAR7 has the best platforms and tools to manage sensitive information reliably and keep time to market as short as possible.

#### Media & Publishing

##### Content communication

On the one hand, through our Global Content services STAR7 fully meets the needs of content creation and translation for all types of media (including localisation, adaptation, transcription, subtitling, voice-over and dubbing); on the other hand, STAR7 Printing offers professional print-on-demand solutions for SMEs or key players in the publishing industry.

#### 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 enhance 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.



SDGs with prevalent impacts due to business model



SDGs with prevalent impacts due to internal activities



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."



# Responsible business conduct

## 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.

During the reporting period, the Compliance Programme was updated and is available on the [Corporate Governance | Compliance Programme Website](#). In order to guarantee the effectiveness of the Compliance Programme, STAR7 ensures wide dissemination of the Compliance Programme and adequate training for all the recipients concerned with regard to the application of the protocols as instruments for preventing the commission of the offences referred to in Legislative Decree 231/01 and subsequent amendments and additions. 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 relationships 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 [Corporate Governance | Codice oh Ethics](#) website



# Whistleblowing

On 10 March 2023, the Council of Ministers definitively approved the legislative decree transposing Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons who report breaches of Union law with provisions concerning such breaches, the so-called Whistleblowing Directive. The decree came into force on 15 July 2023 and the STAR7 Group has fulfilled the new obligations in accordance with the timeframe specified in the legislation.

Within the framework of current legislation, the STAR7 Group has adopted a whistleblowing policy (available on the [STAR7 | Whistleblowing Policy website](#)), and has set up a whistleblowing channel to allow whistleblowers to report relevant unlawful conduct under Legislative Decree 231/2001, offences within the scope of European Union or national acts relating to the

sectors identified by Legislative Decree 24/2023 or violations of company procedures. The Group has therefore set up a dedicated platform, available to internal and external stakeholders, for sending these reports (<https://whistleblowersoftware.com/secure/star7>), designed to guarantee the confidentiality of the whistleblower.

Reports are handled by the Chairman of the Supervisory Board, who carries out investigations in accordance with current legislation.

As of the date of publication of this document, no reports have been received through this channel.

# 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 assessed on its compliance with current regulations and, more generally, on the degree

of attention 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

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.

GRI Standard  
2-24





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### ISO 9001:2015 Quality Management Systems

- Provision of translation services and authoring of technical documentation, interpreting. Design and provision of technical training services (IAF 35, 37).

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### 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).

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### 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.

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### 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.	X	X	X	X	X	X
STAR7 Printing S.r.l.	X		X			X
STAR Comunicação e Serviços LTDA	X					X



# Environmental - Social - Economic Compliance

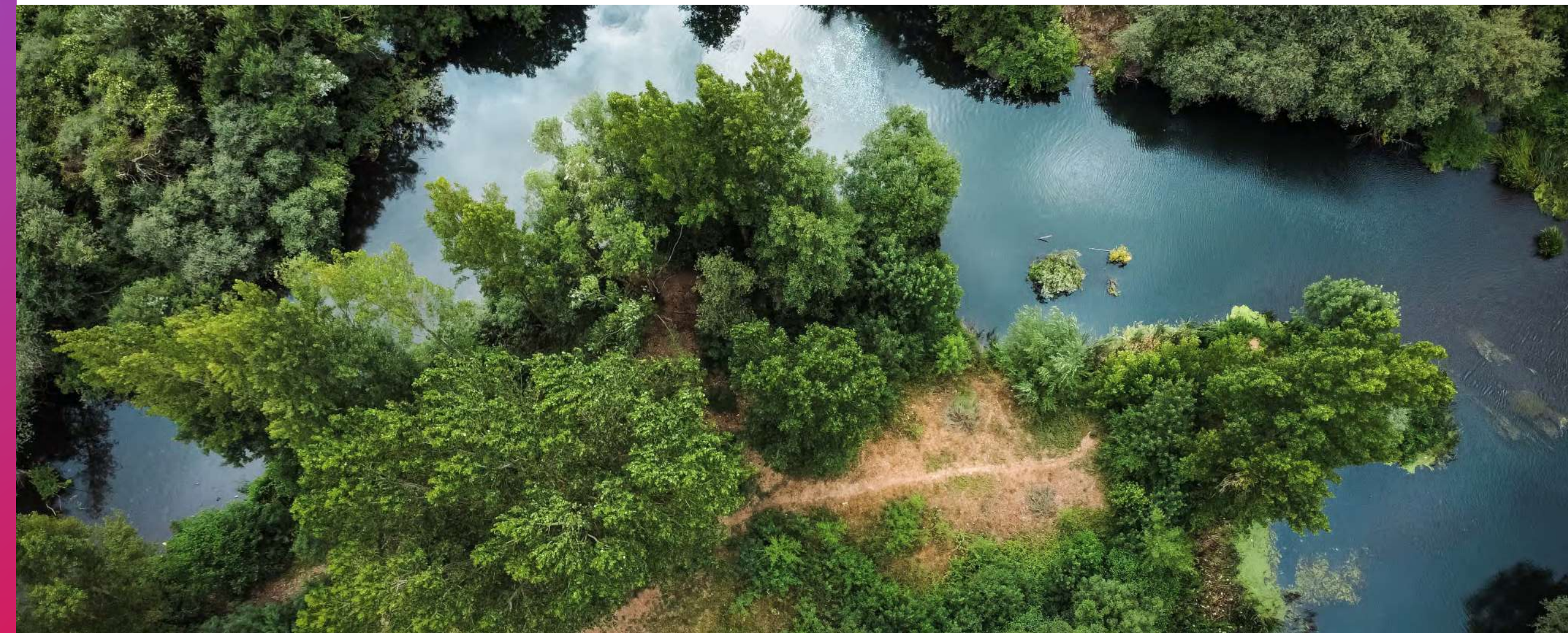
## Environment

No environmental disputes occurred within the reporting period (2021-2023). 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 (2021-2023). No significant penalties of this kind have been received between 2021 and 2023, and no significant legal actions have been reported in relation to this matter.

GRI Standard  
2-27



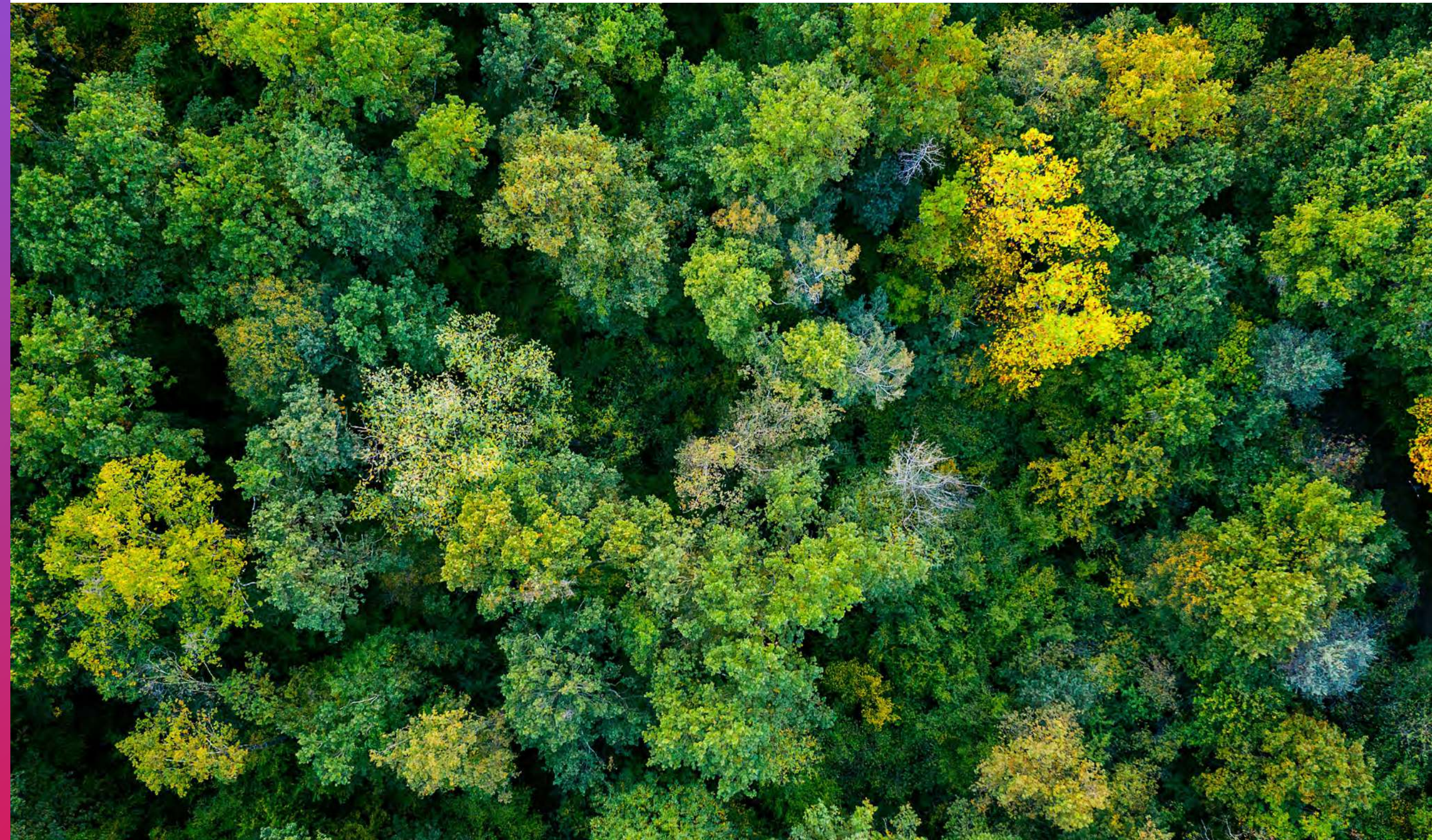


# External initiatives and memberships

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.

GRI Standard  
2-28





# The role of stakeholders

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.

GRI Standard  
2-29



# Stakeholder relations and engagement

Next 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 - Company conventions – “Call for Ideas”
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, relations and social responsibility (CSR) - Sponsorships and events - Institutional partnerships
Media	Press releases, social media, website, publications, events, interviews, and specialised insights.



# Material Topics



# Impacts and material topics

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.

GRI Standard 3-1

## European Union - EU Directive 2022/2464 and Dual Materiality

The (EU) 2022/2464 Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS) require that material topics be identified and assessed from the perspective of impact significance, financial significance, or both (IRO Impact Risk Opportunities) in the environmental, social and governance areas. The

significance assessment (Materiality Analysis) is the process by which a company determines the significant information on sustainability impacts, risks and opportunities (IRO).

Impact Materiality - Significant actual or potential impacts on people and the environment directly related to

an organisation's activities, products and services.

Financial Materiality - sustainability risks and opportunities that may influence the value of the company (in terms of financial effects).



# 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 2024

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 Code of Ethics

Management Systems

Risk Assessment Document

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.

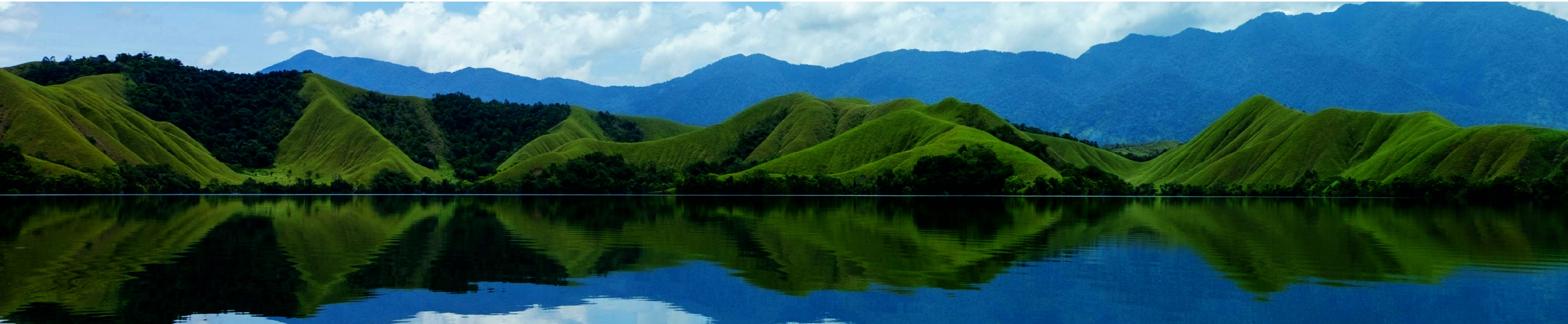
🔴 World Economic Forum – Strategic Intelligence/Global Risk Report – The Strategic Intelligence tool developed by the World Economic Forum and updated annually, at the same time as the Global Risk Report is published, is useful for mapping the main connections between different economies, industrial 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 labour 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 identification and assessment of impacts entails the involvement of key stakeholders, an activity carried out systematically as part of the business model, independent of the sustainability reporting procedure. In the context of this listening process and ongoing relations and relationships with stakeholders, a number of specific engagement initiatives were carried out relating to materiality analysis, and specifically to the prioritisation of impacts, contributing to the definition of STAR7's material topics. In detail, a survey assessing the impacts mapped by the preliminary source analysis was sent to all Group employees and 342 responses were obtained. The results of the questionnaires were integrated into the

management assessments in the prioritisation of impacts phase and the subsequent identification of material topics.

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.



# The material topics



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).

GRI Standard  
3-2







# Environmental

Material topic	Impacts - Summary	Impacts - Characteristics	GRI Topic Standards
<b>Energy, emissions and climate change</b>	<ul style="list-style-type: none"> <li>Emissions resulting from production activities and plans/projects aimed at reducing them for the purpose of mitigating climate change. [Negative]</li> </ul>	<p>Effective: emissions and energy consumption of the Group</p> <hr/> <p>Direct: related only to direct activities</p> <hr/> <p>Short, medium and long term (structural with respect to the business model)</p> <hr/> <p>Planned as it relates to business processes</p>	<p>GRI 302 Energy</p> <p>GRI 305 Emissions</p>
<b>Responsible use of natural resources</b>	<ul style="list-style-type: none"> <li>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]</li> </ul>	<p>Effective: Utilisation of resources for corporate activities</p> <hr/> <p>Direct: related only to direct activities</p> <hr/> <p>Short-term (structural with respect to the business model)</p> <hr/> <p>Planned as it relates to business processes</p>	<p>GRI 301 Materials</p> <p>GRI 303 Water and Effluents</p> <p>GRI 306 Waste</p>





# Social

Material topic	Impacts - Summary	Impacts - Characteristics	GRI Topic Standards
<b>Human resources: talent attraction and retention</b>	<ul style="list-style-type: none"> <li>Positive impacts on employment, level of knowledge and skills, and the ability to attract and retain talent. [Positive]</li> </ul>	<ul style="list-style-type: none"> <li>Effective: related to company procedures</li> <li>Direct: related only to direct activities</li> <li>Short-term (structural with respect to the business model)</li> <li>Expected as it relates to the business</li> </ul>	<b>GRI 401 Employment</b>
<b>Development, training and enhancement of human resources</b>	<ul style="list-style-type: none"> <li>Ability to provide all Group employees with support in their professional growth/development through training plans and skills development. [Positive]</li> </ul>	<ul style="list-style-type: none"> <li>Effective: competence-development training plans</li> <li>Direct: related only to direct activities</li> <li>Short-term (structural with respect to the business model)</li> <li>Expected as it relates to the business</li> </ul>	<b>GRI 404 Training and education</b>
<b>Equity, diversity and inclusion</b>	<ul style="list-style-type: none"> <li>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]</li> </ul>	<ul style="list-style-type: none"> <li>Effective: protection in the area of diversity and inclusion</li> <li>Direct: related only to direct activities</li> <li>Short-term (structural with respect to the business model)</li> <li>Expected as it relates to the business</li> </ul>	<b>GRI 405 Diversity and Equal Opportunity</b>  <b>GRI 406 Non-discrimination</b>



# S Social

Material topic	Impacts - Summary	Impacts - Characteristics	GRI Topic Standards
<b>Health and safety in the workplace</b>	<ul style="list-style-type: none"> <li>The Group has the ability to provide working conditions that protect and monitor the health and safety of all individuals working within it. [Negative]</li> </ul>	<p>Potential: accident monitoring and health and safety policies</p> <p>Direct: related only to direct activities</p> <p>Short-term (structural with respect to the business model)</p> <p>Both intended and unintended</p>	<b>GRI 403 Occupational health and safety</b>
<b>Quality and reliability of products and services</b>	<ul style="list-style-type: none"> <li>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]</li> </ul>	<p>Potential: continuous development of products and services</p> <p>Direct: related to direct activities only (structural with respect to the business model)</p> <p>Short-term (structural with respect to the business model)</p> <p>Expected as it relates to the business</p>	<p><b>GRI 416 Customer health and safety</b></p> <p><b>GRI 417 Marketing and labelling</b></p>
<b>Innovation, R&amp;D for the development of new products and service</b>	<ul style="list-style-type: none"> <li>Investing in research, development, and innovation of products and services can drive economic development for the enterprise. [Positive]</li> </ul>	<p>Effective: related to the products and services offered</p> <p>Direct: related only to direct activities</p> <p>Medium- and long-term (structural with respect to the business model)</p> <p>Expected as it relates to the business</p>	<b>Topic covered by GRI 2 General Disclosures</b>



# S Social

Material topic	Impacts - Summary	Impacts - Characteristics	GRI Topic Standards
<b>Protection of privacy, IT security and data protection</b>	<ul style="list-style-type: none"> <li>The implementation of an ICT governance system that safeguards information security and privacy, including cybersecurity and data protection for both customers and employees. [Negative]</li> </ul>	<p>Potential: protection of company and customer data</p> <p>Direct: related to direct activities only (structural with respect to the business model)</p> <p>Short-term (structural with respect to the business model)</p> <p>Both intended and unintended</p>	<b>GRI 418 Customer privacy</b>
<b>Sustainability in the supply chain</b>	<ul style="list-style-type: none"> <li>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]</li> </ul>	<p>Effective: connected to suppliers</p> <p>Both direct and related to business relations</p> <p>Short-, medium- and long-term (structural with respect to the business model)</p> <p>Both intended and unintended</p>	<p><b>GRI 308 Supplier Environmental Assessment</b></p> <p><b>GRI 414 Supplier Social Assessment</b></p>
<b>Protection of intellectual property</b>	<ul style="list-style-type: none"> <li>Ability to protect intellectual property and technological innovation. [Positive]</li> </ul>	<p>Effective: intellectual property protection</p> <p>Direct: related only to direct activities</p> <p>Short-term</p> <p>Expected as it relates to the business</p>	<b>Topic covered by GRI 2 General Disclosures</b>





# Governance

## Material topic

## Impacts - Summary

## Impacts - Characteristics

## GRI Topic Standards

**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)  
Expected as it relates to the business

**GRI 201 Economic performance**

**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



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 169 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.










# Environmental

## Sustainability plan objectives

## SDGs Sustainable Development Goals

Material topic	Description/Actions	Time span	#	Target (Abstract)
<b>Energy, emissions and climate change</b>	<ul style="list-style-type: none"> <li>The goal is to increase the use of renewable energy sources and to secure electricity supply contracts with a Guarantee of Origin</li> </ul>	<b>2023-2025</b>		7.2 Increase substantially the share of renewable energy in the global energy mix
	<ul style="list-style-type: none"> <li>Mapping GHG Scope 3 emissions along the value chain</li> </ul>			13.2 Integrate climate change measures into national policies, strategies and planning
<b>Responsible use of natural resources</b>	<ul style="list-style-type: none"> <li>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</li> </ul>	<b>2023-2025</b>		12.2 Sustainable management and efficient use of natural resources



# S Social

## Sustainability plan objectives

## SDGs Sustainable Development Goals

Material topic	Description/Actions	Time span	#	Target (Abstract)
<b>Human resources: talent attraction and retention</b>	<ul style="list-style-type: none"> <li>Group onboarding sessions (virtual and/or in-person) of new STAR7 resources</li> </ul>	<b>2023-2024</b>		8.5 Achieve full and productive employment and decent work, including for young people
	<ul style="list-style-type: none"> <li>Maintain an active communication network with schools and universities in order to attract young talent</li> </ul>			8.6 Reduce the proportion of youth not in employment
<b>Development, training and enhancement of human resources</b>	<ul style="list-style-type: none"> <li>Introduction of new internal training process management tools</li> </ul>	<b>2023-2025</b>		4.4 Increase the number of youth and adults who have relevant skills, including technical and vocational skills
	<ul style="list-style-type: none"> <li>Implementation of a performance evaluation system that involves most of the STAR7 staff</li> </ul>			
	<ul style="list-style-type: none"> <li>STAR7 actively involves on-the-job training in the creation of an internal register of trainers</li> </ul>			



# S Social

## Sustainability plan objectives

## SDGs Sustainable Development Goals

Material topic	Description/Actions	Time span	#	Target (Abstract)
<b>Equity, diversity and inclusion</b>	<ul style="list-style-type: none"> <li>Adoption of a Group-wide Diversity, Equity and Inclusion Policy</li> </ul>	<b>2023-2025</b>		5.1 End all forms of discrimination against women and girls
	<ul style="list-style-type: none"> <li>Gender Gap analysis activities and subsequent evaluation of obtaining Gender Equality certification</li> </ul>			5.5 Ensure women’s full and effective participation and equal opportunities for leadership at all levels of decision-making
<b>Health and safety in the workplace</b>	<ul style="list-style-type: none"> <li>Maintain high safety standards and minimise accident rates</li> </ul>	<b>2023-2024</b>		10.2 Promote universal social, economic and political inclusion
	<ul style="list-style-type: none"> <li>STAR7 “Health and Safety in the Supply Chain” project</li> </ul>			10.3 Ensure equal opportunities
<b>Health and safety in the workplace</b>	<ul style="list-style-type: none"> <li>Maintain high safety standards and minimise accident rates</li> </ul>	<b>2023-2024</b>		8.8 Protect labour rights and promote safe and secure working environments of all workers
	<ul style="list-style-type: none"> <li>STAR7 “Health and Safety in the Supply Chain” project</li> </ul>			



# S Social

## Sustainability plan objectives

## SDGs Sustainable Development Goals

### Material topic

### Description/Actions

### Time span

### #

### Target (Abstract)

**Quality and reliability of products and services**

- ↪ Ensure that the products and services offered maintain and improve their high standards of quality and reliability
- ↪ Reduction of product non-conformities and improvement of customer satisfaction, also through the insertion of a specific resource for internal quality control and a strengthening of the 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**





8.2 Achieve higher levels of economic productivity through diversification, technological upgrading and innovation



# S Social

## Sustainability plan objectives

## SDGs Sustainable Development Goals



Material topic	Description/Actions	Time span	#	Target (Abstract)
<b>Innovation, R&amp;D for the development of new products and service</b>	<ul style="list-style-type: none"> <li>R&amp;D activities, for the development of innovative solutions to improve service delivery and their ability to generate positive social and environmental impacts</li> </ul>	<b>2023-2025</b>		9.1 Develop quality, reliable, sustainable and resilient infrastructure to support economic development and the well-being of individuals
	<ul style="list-style-type: none"> <li>“Next” is an internal competition aimed at generating innovative ideas and practical solutions related to services, technologies, and sustainability</li> </ul>			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
<b>Protection of privacy, IT security and data protection</b>	<ul style="list-style-type: none"> <li>Protect sensitive customer and company data with effective security measures and in compliance with regulations and the Management System</li> </ul>	<b>2023-2025</b>		9.1 Develop quality, reliable, sustainable and resilient infrastructure to support economic development and the well-being of individuals
	<ul style="list-style-type: none"> <li>Training activities aimed at all staff in order to raise awareness of IT security</li> </ul>			



# S Social

## Sustainability plan objectives

## SDGs Sustainable Development Goals

Material topic	Description/Actions	Time span	#	Target (Abstract)
<b>Sustainability in the supply chain</b>	<ul style="list-style-type: none"> <li>Adoption of a Code of Conduct to be signed by suppliers (new and pre-existing)</li> </ul>	<b>2023-2024</b>		12.6 Encouraging companies to adopt sustainable practices
<b>Protection of intellectual property</b>	<ul style="list-style-type: none"> <li>Adopt STAR7 intellectual property protection policies</li> <li>Monitoring and verification of possible intellectual property infringement offences Compliance Programme as per Legislative Decree 231/2001</li> </ul>	<b>2023-2025</b>		16.10 Guarantee public access to information and safeguard fundamental freedoms, in compliance with national laws and international treaties

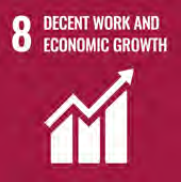





# Governance

## Sustainability plan objectives

## SDGs Sustainable Development Goals

Material topic	Description/Actions	Time span	#	Target (Abstract)
<b>Economic performance: generation and distribution of value</b>	<ul style="list-style-type: none"> <li>Actions related to the strategy of developing and strengthening the competitive position</li> </ul>	<b>2023-2025</b>		8.3 Promote policies that support productive activities, decent job creation, entrepreneurship, creativity, and innovation with a focus on development
<b>Transparency, ethics and integrity in the conduct of business</b>	<ul style="list-style-type: none"> <li>Establish an internal Risk and Sustainability Control Committee to manage the positive and negative impacts generated by STAR7</li> <li>Implementation of a compensation policy and performance assessment for the Board of Directors</li> </ul>	<b>2023-2025</b>		16.6 Develop effective, accountable and transparent institutions at all levels



# Environmental Impacts

Environmental policy and responsible use of resources

Materials

Waste

Water

Energy - Emissions and Climate Change



# Environmental policy and responsible use of resources

## Material topic

## Objectives

### 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.

### 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.

#### SDGs



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.

#### GRI Standard

- 3-3
- 301-1
- 303-1
- 303-2
- 303-3
- 306-1
- 306-2
- 306-3
- 306-4
- 306-5



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

STAR7 has two production units for the digital printing of technical and commercial documentation, STAR7 Printing S.R.L. and STAR Comunicação e Serviços LTDA respectively.

The table below shows the main materials used by the companies for printing activities. Paper is the main material used, with a total consumption of 1,526 tonnes in 2023, 80% of which is FSC-certified (Forest Stewardship

Council), ensuring that paper comes from responsibly and sustainably managed forests. Furthermore, various materials are utilised, including glue, water-based ink, toner, and packaging materials.

## Materials

**2021**
**2022**
**2023**

### Raw materials

	Unit	Non-newables	Renewables	Total	Non-newables	Renewables	Total	Non-newables	Renewables	Total
<b>Paper</b>	ton		1,110.6	1,110.6	-	1,235.1	1,235.1	-	1,526.0	1,526.0
<b>Ink</b>	ton	5.5	-	5.5	5.3	-	5.3	6.1	-	6.1
<b>Glue</b>	ton	3.3	-	3.3	2.4	-	2.4	2.8	-	2.8
<b>Toner</b>	ton	5.5	-	5.5	5.7	-	5.7	3.7	-	3.7

### Packaging materials

	Unit	Non-newables	Renewables	Total	Non-newables	Renewables	Total	Non-newables	Renewables	Total
<b>Plastic packaging</b>	ton	103.5	-	103.5	139.4	-	139.4	157.4	-	157.4
<b>Cardboard packaging</b>	ton	-	0.9	0.9	-	4.0	4.0	-	7.0	7.0
<b>Plastic containers</b>	Pz	5,978.0	-	5,978.0	6,203.0	-	6,203.0	6,978.4	-	6,978.4
<b>Wooden pallets</b>	Pz	-	158.0	158.0	-	400.0	400.0	-	642.0	642.0



# Waste

As indicated previously, STAR7's environmental policy includes a commitment to responsible management of environmental aspects and impacts, including improving the management and sorting of waste produced. Waste generated by STAR7 refers to those companies with activities that produce industrial waste, related to printing activities. The waste produced along the STAR7 value chain concerns paper and cardboard in particular.

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. For the reporting year, it was not possible to collect waste data from the production company STAR Comunicação e Serviços LTDA, which will engage in collection in coming years. These companies are characterised by their industrial processes and generate waste that is not considered municipal waste.

In 2023, STAR7 Printing produced exclusively non-hazardous

waste, mainly consisting of paper and cardboard, totalling 208.2 tonnes, a trend in line with the amount of waste generated in previous reporting periods. The classification of waste (recovery/disposal) is based on the technical documentation completed during collection (waste forms) and takes into account information from environmental managers. During the reporting period, almost all the waste produced (99.2%) was sent for recovery.



**Waste by category (t)****Non-hazardous waste****2021****2022****2023**

	Recovery	Disposal	Total	Recovery	Disposal	Total	Recovery	Disposal	Total
<b>Paper and cardboard</b>	209.2	-	209.2	207.8	-	207.8	208.2	-	208.2
<b>Aqueous liquid wastes containing ink</b>	-	0.3	0.3	-	0.7	0.7	-	1.0	1.0
<b>Out-of-print toners</b>	0.5	-	0.5	0.7	-	0.7	0.6	-	0.6
<b>Waste adhesives and sealants</b>	-	0.2	0.2	-	0.1	0.1	-	0.8	0.8
<b>Plastic packaging</b>	6.2	-	6.2	3.0	-	3.0	3.7	-	3.7
<b>Wood Packaging</b>	-	-	-	-	-	-	-	-	-
<b>Mixed Material Packaging</b>	0.3	-	0.3	3.5	-	3.5	0.5	-	0.5
<b>Equipment no longer in use</b>	-	-	-	0.3	-	0.3	-	-	-
<b>Iron and steel</b>	3	-	3	-	-	-	-	-	-
<b>Total</b>	<b>219.2</b>	<b>0.6</b>	<b>219.8</b>	<b>215.3</b>	<b>0.9</b>	<b>216.1</b>	<b>212.9</b>	<b>1.7</b>	<b>214.6</b>
<b>Percentage of waste sent for recovery (%)</b>			<b>99.7%</b>			<b>99.6%</b>			<b>99.2%</b>

\*The figures for plastic packaging differ in a non-significant manner from those indicated in the Sustainability Report 2022 following a revision of the data collection system processes.



**Waste/Recovery (t)****2021****2022****2023****Non-hazardous waste**

	On site	External site	Total	On site	External site	Total	On site	External site	Total
<b>Recycling</b>	-	219.2	219.2	-	214.6	214.6	-	212.9	212.9
<b>Other recovery operations</b>	-	-	-	-	0.3	0.3	-	-	-
<b>Total non-hazardous waste</b>	-	219.2	219.2	-	214.8	214.8	-	212.9	212.9

**Waste - Disposal (t)****2021****2022****2023****Non-hazardous waste**

	On site	External site	Total	On site	External site	Total	On site	External site	Total
<b>Landfill</b>	-	0.2	0.2	-	0.1	0.1	-	0.8	0.8
<b>Other disposal operations</b>	-	0.3	0.3	-	0.7	0.7	-	1.0	1.0
<b>Total non-hazardous waste</b>	-	0.6	0.6	-	0.9	0.9	-	1.7	1.7



# Water

## Water management policies

With respect to the characteristics of internal production processes, mainly printing, water withdrawals do not represent a particularly significant figure for the STAR7 Group. The withdrawal sources

are largely those of public aqueducts. Effluents, resulting from predominantly sanitary use, and the relevant minimum quality standards set and criteria for their determination comply

with the relevant limits set by Legislative Decree 152/2006 for Italian locations, and in accordance with local regulations for foreign companies.

## Management of water discharge-related impacts

Effluents include all water discharges, used water and unused water released as surface water, groundwater, seawater or water supplied to third parties no longer used by the organisation in the reporting period. Water discharges, resulting from predominantly sanitary use, take place in accordance with the directives established by Legislative Decree 152/2006 for

Italian STAR7 companies. As far as foreign subsidiaries are concerned, effluent management practices are adopted in line with current local laws and regulations.

As per the GRI Standards, water withdrawal data is presented in Mega Litres, where 1 Mega Litre is equivalent to 1,000 cubic metres. It should be noted that the figures shown refer to the parent company

and STAR7 Printing S.R.L., STAR Comunicação e Serviços LTDA, STAR7 USA LLC and CAAR do Brasil. 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)****2021****2022****2023****Third-party water resources (aqueduct)**Freshwater ( $\leq 1,000$  mg/L Total Dissolved Solids)

1.2

2.4

2.4

Other water types ( $> 1,000$  mg/L Total Dissolved Solids)

-

-

-

**Total****1.2****2.4****2.4****Water withdrawals – Surface water**Freshwater ( $\leq 1,000$  mg/L Total Dissolved Solids)

-

-

0.1

Other water types ( $> 1,000$  mg/L Total Dissolved Solids)

-

-

-

**Water withdrawals – Groundwater**Freshwater ( $\leq 1,000$  mg/L Total Dissolved Solids)

-

-

0.1

Other water types ( $> 1,000$  mg/L Total Dissolved Solids)

-

-

-

**Total**Freshwater ( $\leq 1,000$  mg/L Total Dissolved Solids)

1.2

2.4

2.6

Other water types ( $> 1,000$  mg/L Total Dissolved Solids)

-

-

-

**Total****1.2****2.4****2.6**

\*The reporting boundary includes STAR7 Spa, STAR7 Printing; STAR Comunicação; STAR7 USA LLC and CAAR do Brasil. – the most relevant companies for water withdrawals / restricted to office sanitary uses.

**Water stress** - Water stress refers to the ability or inability to meet the demand for water, both human and for ecosystems as a whole, i.e. the ratio of total water withdrawal to the available renewable supply from surface and groundwater sources. Water withdrawals include domestic, industrial, irrigation, livestock and non-consumption uses. Higher values indicate greater competition between users. As a tool for assessing water stress areas, reference was made to the Aqueduct Water Risk Atlas [Aqueduct | World Resources Institute \(wri.org\)](#) of the World Resources Institute.

[wri.org](#) of the World Resources Institute.

The companies are located in areas that are not characterised by particular water stress problems, and STAR7's uses do not have a significant impact on the availability of water for the area in question.



# Energy - Emissions and Climate Change

STAR7's energy consumption (which is represented in gigajoules (GJ), in accordance with the GRI Standards) relates to electricity used for the activities carried out in the operational and commercial offices, fuels (diesel and petrol)

power the fleet of company cars required for the Group's commercial and operational activities, and methane is used to heat company premises. In 2023, there was an increase in total energy consumption mainly due to expansion of

the Group's activities and a consequent increase in productivity and travel.

GRI Standard

3-3

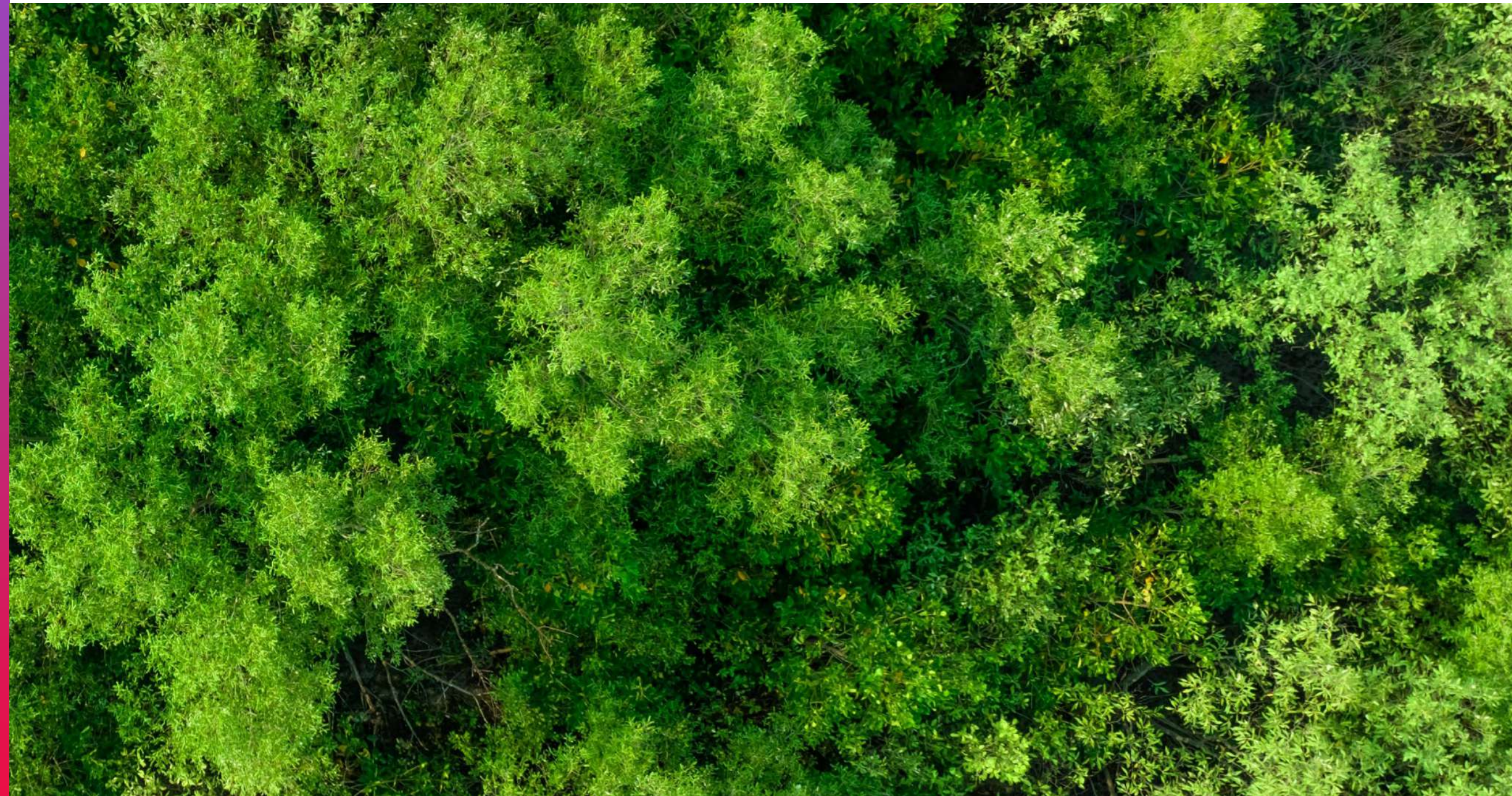
302-1

302-3

305-1

305-2

305-4





**Energy consumed - GJ****2021****2022****2023****Electricity****Purchased electricity**

4,530

6,053

6,591

**Electricity produced by photovoltaic system**

62

59

54

**Minus: energy sold to the grid produced by photovoltaic system**

0.8

0.2

0.4

**Total**

4,591

6,112

6,645

**Of which from renewable sources**

61

59

54

**Vehicle Fuel****Diesel**

4,843

5,144

6,852

**Petrol**

2,434

4,253

5,175

**Total**

7,277

9,397

12,027

**Methane/heating**

1,106

824

1,106

**Total energy consumption - GJ**

19,778

16,333

19,778

**Proportion of renewable energy**

0.3%

0.4%

0.3%

1 The reporting boundary for 2023 includes STAR7 Spa, STAR7 Printing; STAR Comunicação e Serviços LTDA; LocalEyes Ltd, LocalEyes Tirana, STAR7 USA LCC, CAAR do Brasil; the figures of the other companies are not significant with respect to the Group's total consumption.

The consumption of electricity from photovoltaic system for 2021 and 2022 has been changed from that indicated in the Sustainability Report 2022 following an improvement in the data collection process.

Source

Electricity: [Conversione, fattori di - ENEA - Dipartimento Unità per l'efficienza energetica](#)Fuels: [Greenhouse gas reporting: conversion factors 2023 - GOV.UK \(www.gov.uk\)](#)Methane: [EU ETS - Italia: News \(minambiente.it\)](#)



# 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 2023, there was 17.8% improvement in energy intensity, mainly due to an increase in the number of Group employees and the resulting increase in hours worked.

Energy intensity	2021	2022	2023
<b>Energy consumption</b>	13,155	16333	19,778
<b>Hours worked</b>	1,278,575	1,545,008	2,275,614
<b>Intensity ratio</b>	10.29	10.57	8.69

# Emissions

The emission figure is measured in tonnes of carbon dioxide equivalent (t CO<sub>2</sub>e) 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/CO <sub>2</sub> - Scope 1 + Scope 2 t CO <sub>2</sub> e	2021	2022	2023
<b>Total GHG emissions Scope 1</b>	575	696	883
<b>Total GHG emissions Scope 2 Location based</b>	285	333	388
<b>Total</b>	860	1,029	1,270



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 CO<sub>2</sub> 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 2023 did not uncover any leaks. As a result, it was assumed that there were no emissions from refrigerant gas leaks in air conditioning systems.

## Emissions intensity

In 2023 a decrease in the emission intensity index was indicated. This improvement is due to the same reasons as the improvement in the energy indices.

CO <sub>2</sub> emissions - Scope 1 tCO <sub>2</sub> e	2021	2022	2023
<b>Vehicle Fuel</b>			
Diesel	339	366	484
Petrol	164	283	336
Methane	72	46	63
<b>F Gas</b>	-	-	-
<b>Total - Scope 1 emissions</b>	<b>575</b>	<b>696</b>	<b>883</b>

Emission intensity - Location based	2021	2022	2023
<b>Scope 1 + Scope 2 emissions</b>	<b>860</b>	<b>1,029</b>	<b>1,270</b>
<b>Hours worked</b>	<b>1,278,575</b>	<b>1,545,008</b>	<b>2,275,614</b>
<b>Intensity ratio</b>	<b>0.67</b>	<b>0.67</b>	<b>0.56</b>

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.

\*The emission values for 2021 and 2022 were changed to a non-significant extent compared to the figure published in the Sustainability Report 2022 due to marginal variations in emission factors.

Source

Fuels: Greenhouse gas reporting: conversion factors 2022 - GOV.UK ([www.gov.uk](http://www.gov.uk))

Methane: EU ETS - Italia News ([minambiente.it](http://minambiente.it))

Italy / Albania: ISPRA - Ministry of Environment Report 386/2023

Ireland: ISPRA - Ministero Ambiente Rapporto 366/2022

Brazil: Climate Transparency Report 2022



# People

Human Resources Management

Employment and turnover

Diversity and equal opportunity

Training

Occupational Health and Safety



# Human Resources Management

## SDGs



GRI Standard

3-3

2-30

### Material topic

### Objectives

#### 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.

#### 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.

#### 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

#### Health and safety in the workplace

- Maintain high safety standards and minimise accident rates.
- STAR7 "Health and Safety in the Supply Chain" project.



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.

86.6% of employees of the parent company STAR7

## 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 believes in the value of young talent and takes part in many university Career Days organised in various cities in Italy. In

S.p.A. are covered by the National Collective Bargaining Agreement for the Commerce sector, 9.6% for the Engineering sector, and the remaining 3.8% for the Graphic Design and Publishing sector. Regarding the STAR7 Group as a whole and in compliance with relevant local labour laws, 59% 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.

2023 STAR7 S.p.A. took part in 11 events at universities in Italy, as well as at other institutions of higher education. We always look carefully at CVs from young people and recent graduates interested in joining our team with a view to future employment opportunities.

In order to make direct contact with students about to receive a high school diploma or university degree, STAR7 maintains systematic contact with universities and institutions of higher education in the areas of Turin, Lugo, La Spezia, Bolzano and Modena. In particular, 7 curricular internships were initiated in 2023, 4 of which are still ongoing, and 3 led to employment on an open-ended contract. In addition, STAR7 collaborates with schools to offer school-work alternation courses; in 2023 it initiated four.





## 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.

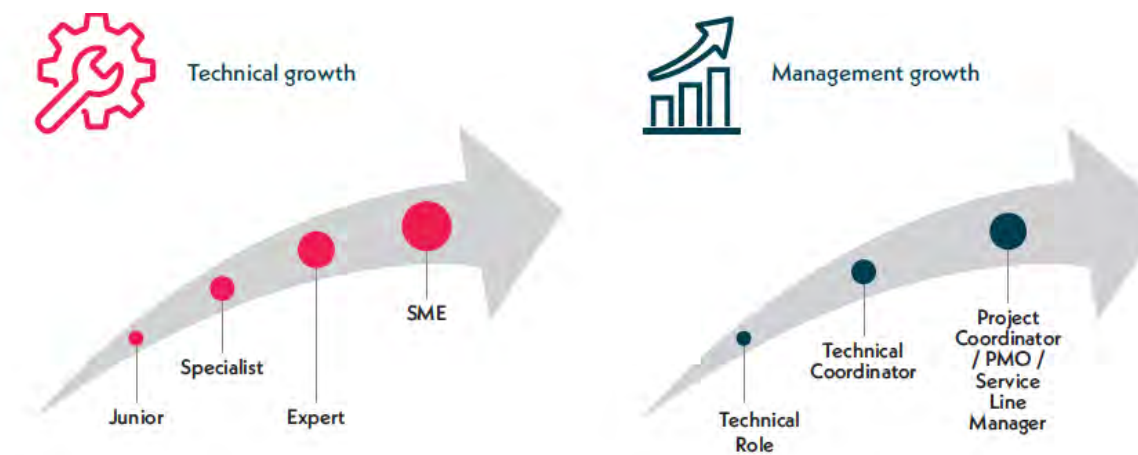
STAR7 believes in the importance of onboarding training as it contributes to the improvement of individual performance and of the team as a

whole. Onboarding sessions last 2 hours and are conducted monthly via Teams. They are conducted by the Human Resources department and involve all newly recruited employees in the period. The main topics covered are the company overview (vision, mission, business areas); company organisation (culture, organisational charts and main roles) and the use of portals and requests. In 2023, 272 hours were provided involving 136 employees.

In 2023, the leasing of the CAAR and STI business units brought 123 new employees with engineering expertise to STAR7. In order to facilitate the integration of new colleagues, two in-person onboarding sessions were organised (in Turin and Bolzano), as well as a plan of individual interviews with HR aimed at deepening the knowledge of individual resources.

### 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 role 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 questionnaires 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 their role.

In 2023, the process was extended in the evaluation phases 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. 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.

In 2023, a reorganisation of the Product Knowledge Service Line was implemented to promote the cross-fertilisation of expertise and job rotation through the creation of 'competence centres' per deliverable, to support the development of Nearshoring in Albania, and to promote uniformity of internal roles and closeness of managers to resources.





The new organisational set-up extended the management structure of the Service Line and 100% of the new positions were filled by developing internal resources. With a view to promoting the integration of expertise and the possibility of internal development paths, STAR7 is increasing job rotation plans, with a particular focus on the Product Knowledge and Engineering Service Lines, which have a common technical-engineering background.

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 employees. 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. STAR7 conducted analysis through a survey involving 450 employees in order to better understand employees' needs and preferences for supplementary health insurance.

Since 2023, with the aim of facilitating the work of translators and making it more efficient, the Group has been providing freelancers who request it with personal computers to carry out their tasks until the end of the contract.

## 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, in force until 31/12/2024. 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

The turnover of staff indicates the gradual growth of the STAR7 Group's operations. In 2023, there was a positive overall turnover of 29.5%.

In addition, 46.8% of new recruitments in 2023 involved resources under the age of 30, a figure that confirms STAR7's focus on young people.

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**New recruits and turnover****2021****2022****2023****Recruitment**

	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Up to 29 years</b>	48	75	<b>123</b>	83	104	<b>187</b>	89	166	<b>255</b>
<b>30 to 50 years</b>	32	36	<b>68</b>	56	69	<b>125</b>	64	172	<b>236</b>
<b>Over 50 years</b>	3	4	<b>7</b>	3	9	<b>12</b>	15	39	<b>54</b>
<b>Total</b>	<b>83</b>	<b>115</b>	<b>198</b>	<b>142</b>	<b>182</b>	<b>324</b>	<b>168</b>	<b>377</b>	<b>545</b>

**Total**

	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Up to 29 years</b>	23	20	<b>43</b>	48	56	<b>104</b>	42	90	<b>132</b>
<b>30 to 50 years</b>	23	15	<b>38</b>	45	49	<b>94</b>	52	87	<b>139</b>
<b>Over 50 years</b>	-	6	<b>6</b>	6	7	<b>13</b>	4	17	<b>21</b>
<b>Total</b>	<b>46</b>	<b>41</b>	<b>87</b>	<b>99</b>	<b>112</b>	<b>211</b>	<b>98</b>	<b>194</b>	<b>292</b>



**New recruits and turnover****2021****2022****2023****Reason for termination**

	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Voluntary terminations</b>	36	36	<b>72</b>	77	87	<b>164</b>	68	102	<b>170</b>
<b>Retirement</b>	-	1	<b>1</b>	-	-	<b>-</b>	1	1	<b>2</b>
<b>Dismissal</b>	10	2	<b>12</b>	14	20	<b>34</b>	10	26	<b>36</b>
<b>Other (e.g. end of fixed-term contracts)</b>	-	2	<b>2</b>	8	5	<b>13</b>	19	65	<b>84</b>
<b>Total</b>	46	41	<b>87</b>	99	112	<b>211</b>	98	194	<b>292</b>

**Turnover**

	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Positive turnover - recruitment</b>	34.9%	38.5%	<b>36.9%</b>	41.4%	45.2%	<b>43.4%</b>	43.5%	79.7%	<b>63.4%</b>
<b>Negative turnover - terminations</b>	19.3%	13.7%	<b>16.2%</b>	28.9%	27.8%	<b>28.3%</b>	25.4%	41.0%	<b>34.0%</b>
<b>Overall turnover</b>	15.5%	24.7%	<b>20.7%</b>	12.5%	17.4%	<b>15.1%</b>	18.1%	38.7%	<b>29.5%</b>



# Appointments and terminations by geographical area

(Figures reported only for the financial years 2021 and 2022 to calculate the turnover for these periods).

Recruitment	Italy		Europe		USA		South America		Total	
	2022	2023	2022	2023	2022	2023	2022	2023	2022	2023
Up to 29	71	107	93	70	5	8	18	70	187	255
from 30 to 50	64	129	22	36	4	14	35	57	125	236
Over 50	9	39	-	-	-	8	3	7	12	54
<b>Total</b>	<b>144</b>	<b>275</b>	<b>115</b>	<b>106</b>	<b>9</b>	<b>30</b>	<b>56</b>	<b>134</b>	<b>324</b>	<b>545</b>

%	Italy		Europe		USA		South America		Total	
	2022	2023	2022	2023	2022	2023	2022	2023	2022	2023
Up to 29	9.5%	12.5%	12.5%	8.1%	0.7%	0.9%	2.4%	8.1%	25.1%	29.7%
from 30 to 50	8.6%	15.0%	2.9%	4.2%	0.5%	1.6%	4.7%	6.6%	16.8%	27.5%
Over 50	1.2%	4.5%	-%	-%	-%	0.9%	0.4%	0.8%	1.6%	6.3%
<b>Total</b>	<b>19.3%</b>	<b>32.0%</b>	<b>15.4%</b>	<b>12.3%</b>	<b>1.2%</b>	<b>3.5%</b>	<b>7.5%</b>	<b>15.6%</b>	<b>43.4%</b>	<b>63.4%</b>



**Terminations**

	Italy		Europe		USA		South America		Total	
	2022	2023	2022	2023	2022	2023	2022	2023	2022	2023
<b>Up to 29</b>	50	46	32	42	5	3	17	41	104	132
<b>from 30 to 50</b>	49	66	27	43	8	6	10	24	94	139
<b>Over 50</b>	7	15	-	-	2	5	4	1	13	21
<b>Total</b>	<b>106</b>	<b>127</b>	<b>59</b>	<b>85</b>	<b>15</b>	<b>14</b>	<b>31</b>	<b>66</b>	<b>211</b>	<b>292</b>

**%**

	Italy		Europe		USA		South America		Total	
	2022	2023	2022	2023	2022	2023	2022	2023	2022	2023
<b>Up to 29</b>	6.7%	5.4%	4.3%	4.9%	0.7%	0.3%	2.3%	4.8%	13.9%	15.4%
<b>from 30 to 50</b>	6.6%	7.7%	3.6%	5.0%	1.1%	0.7%	1.3%	2.8%	12.6%	16.2%
<b>Over 50</b>	0.9%	1.7%	-%	-%	0.3%	0.6%	0.5%	0.1%	1.2%	2.3%
<b>Total</b>	<b>14.2%</b>	<b>14.8%</b>	<b>7.9%</b>	<b>9.9%</b>	<b>2.0%</b>	<b>1.6%</b>	<b>4.2%</b>	<b>7.7%</b>	<b>28.3%</b>	<b>34.0%</b>



**Age group**

	Italy		Europe		USA		South America		Total	
	2022	2023	2022	2023	2022	2023	2022	2023	2022	2023
<b>Up to 29</b>	21	61	61	28	0	5	1	29	83	123
<b>from 30 to 50</b>	15	63	(5)	(7)	(4)	8	25	33	31	97
<b>Over 50</b>	2	24	-	-	(2)	3	(1)	6	(1)	33
<b>Total</b>	<b>38</b>	<b>148</b>	<b>56</b>	<b>21</b>	<b>(6)</b>	<b>16</b>	<b>25</b>	<b>68</b>	<b>113</b>	<b>253</b>

**Turnover  
Age group**

	Italy		Europe		USA		South America		Total	
	2022	2023	2022	2023	2022	2023	2022	2023	2022	2023
<b>Up to 29</b>	2.8%	7.1%	8.2%	3.3%	0.0%	0.6%	0.1%	3.4%	11.1%	14.3%
<b>from 30 to 50</b>	2.0%	7.3%	(0.7)%	(0.8)%	(0.5)%	0.9%	3.4%	3.8%	4.2%	11.3%
<b>Over 50</b>	0.3%	2.8%	-%	-%	(0.3)%	0.3%	(0.1)%	0.7%	(0.1)%	3.8%
<b>Total</b>	<b>5.1%</b>	<b>17.2%</b>	<b>7.5%</b>	<b>2.4%</b>	<b>(0.8)%</b>	<b>1.9%</b>	<b>3.4%</b>	<b>7.9%</b>	<b>15.1%</b>	<b>29.5%</b>



# Diversity and equal opportunity

The STAR7 Group has a robust global presence, with operations in 14 countries across three continents and a workforce of over 1,200 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 38.6% of the total 1.269 employees as of 31 December 2023. According to this figure, 31.8% of all women in Italy and abroad hold management positions. In the white-collar and middle management roles (which are similar categories), 40.2% 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 2023, this

group accounted for 31.0% 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.

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## Employee diversity

### 2021

### 2022

### 2023

### Employees per category/by gender

	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Executives</b>	1	5	<b>6</b>	2	5	<b>7</b>	7	15	<b>22</b>
<b>Office workers - Middle Managers</b>	308	348	<b>656</b>	333	359	<b>692</b>	426	633	<b>1,059</b>
<b>Manual workers</b>	34	50	<b>84</b>	51	109	<b>160</b>	57	131	<b>188</b>
<b>Total</b>	343	403	<b>746</b>	386	473	<b>859</b>	490	779	<b>1,269</b>

### Employees per category/by gender %

	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Executives</b>	0.1%	0.7%	<b>0.8%</b>	0.2%	0.6%	<b>0.8%</b>	0.6%	1.2%	<b>1.7%</b>
<b>Office workers - Middle Managers</b>	41.3%	46.6%	<b>87.9%</b>	38.8%	41.8%	<b>80.6%</b>	33.6%	49.9%	<b>83.5%</b>
<b>Manual workers</b>	4.6%	6.7%	<b>11.3%</b>	5.9%	12.7%	<b>18.6%</b>	4.5%	10.3%	<b>14.8%</b>
<b>Total</b>	46.0%	54.0%	<b>100.0%</b>	44.9%	55.1%	<b>100.0%</b>	38.6%	61.4%	<b>100.0%</b>

### Employees per age group/by gender

	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Up to 29 years</b>	112	134	<b>246</b>	136	180	<b>316</b>	155	238	<b>393</b>
<b>30 to 50 years</b>	210	225	<b>435</b>	229	246	<b>475</b>	284	445	<b>729</b>
<b>Over 50 years</b>	21	44	<b>65</b>	21	47	<b>68</b>	51	96	<b>147</b>
<b>Total</b>	343	403	<b>746</b>	386	473	<b>859</b>	490	779	<b>1,269</b>



## Employee diversity

### 2021

### 2022

### 2023

### Employees per age group/by gender %

	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Up to 29 years</b>	15.0%	18.0%	<b>33.0%</b>	15.8%	21.0%	<b>36.8%</b>	12.2%	18.8%	<b>31.0%</b>
<b>30 to 50 years</b>	28.2%	30.2%	<b>58.3%</b>	26.7%	28.6%	<b>55.3%</b>	22.4%	35.1%	<b>57.4%</b>
<b>Over 50 years</b>	2.8%	5.9%	<b>8.7%</b>	2.4%	5.5%	<b>7.9%</b>	4.0%	7.6%	<b>11.6%</b>
<b>Total</b>	<b>46.0%</b>	<b>54.0%</b>	<b>100.0%</b>	<b>44.9%</b>	<b>55.1%</b>	<b>100.0%</b>	<b>38.6%</b>	<b>61.4%</b>	<b>100.0%</b>

### 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
<b>Executives</b>	-	3	3	<b>6</b>	-	4	3	<b>7</b>	-	8	14	<b>22</b>
<b>Office workers - Middle Managers</b>	219	385	52	<b>656</b>	274	373	45	<b>692</b>	344	614	101	<b>1,059</b>
<b>Manual workers</b>	27	47	10	<b>84</b>	42	98	20	<b>160</b>	49	107	32	<b>188</b>
<b>Total</b>	<b>246</b>	<b>435</b>	<b>65</b>	<b>746</b>	<b>316</b>	<b>475</b>	<b>68</b>	<b>859</b>	<b>393</b>	<b>729</b>	<b>147</b>	<b>1,269</b>

### 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
<b>Executives</b>	-%	0.4%	0.4%	<b>0.8%</b>	-%	0.5%	0.3%	<b>0.8%</b>	-%	0.6%	1.1%	<b>1.7%</b>
<b>Office workers - Middle Managers</b>	29.4%	51.6%	7.0%	<b>87.9%</b>	31.9%	43.4%	5.2%	<b>80.6%</b>	27.1%	48.4%	8.0%	<b>83.5%</b>
<b>Manual workers</b>	3.6%	6.3%	1.3%	<b>11.3%</b>	4.9%	11.4%	2.3%	<b>18.6%</b>	3.9%	8.4%	2.5%	<b>14.8%</b>
<b>Total</b>	<b>33.0%</b>	<b>58.3%</b>	<b>8.7%</b>	<b>100.0%</b>	<b>36.8%</b>	<b>55.3%</b>	<b>7.9%</b>	<b>100.0%</b>	<b>31.0%</b>	<b>57.4%</b>	<b>11.6%</b>	<b>100.0%</b>



# Maternity and paternity leave

STAR7 ensures that all employees have equal opportunities for parental leave, for the birth of a child, in compliance with local regulations. The table below shows the figures for employees who took maternity/paternity leave and the rates of return to work and retention.

In 2023, a total of 56 employees took maternity or paternity leave, with 41 being women and 15 being men. At the conclusion of their leave period, the majority of employees who had taken leave returned to work.

Maternity/paternity leave	2021			2022			2023		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Number of employees entitled to maternity/paternity leave, by gender</b>	343	403	<b>746</b>	386	473	<b>859</b>	489	780	<b>1,269</b>
<b>Number of employees who took maternity/paternity leave</b>	19	10	<b>29</b>	26	13	<b>39</b>	41	15	<b>56</b>
<b>Days</b>	2,107	75	<b>2,182</b>	1,740	84	<b>1,824</b>	2,335	113	<b>2,448</b>
<b>Number of employees returning to work after maternity/paternity leave</b>	19	10	<b>29</b>	21	13	<b>34</b>	35	15	<b>50</b>
<b>The number of employees who returned to work and remained employed by the organisation for 12 months after their return</b>	19	5	<b>24</b>	19	10	<b>29</b>	23	13	<b>36</b>
<b>Return rate</b>	100%	100%	<b>100%</b>	81%	100%	<b>87%</b>	85%	100%	<b>89%</b>
<b>Retention rate</b>	100%	100%	<b>100%</b>	100%	100%	<b>100%</b>	100%	100%	<b>100%</b>



# 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

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, 10 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 2023, there was a continued investment in training. An average of 32.0 hours per employee were provided at Group level, an increase over 2022.

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## Average hours of training per employee

2021

2022

2023

### Average training hours

	Women	Men	Total	Women	Men	Total	Women	Men	Total
<b>Executives</b>	-	54.0	<b>45.0</b>	-	-	-	7.1	4.0	<b>5.0</b>
<b>Office workers - Middle Managers</b>	7.2	12.1	<b>9.8</b>	11.9	21.6	<b>16.9</b>	23.8	38.4	<b>32.6</b>
<b>Manual workers</b>	29.9	34.6	<b>32.7</b>	19.8	18.0	<b>18.6</b>	22.0	36.6	<b>32.2</b>
<b>Total</b>	9.4	15.4	<b>12.7</b>	12.9	20.5	<b>17.1</b>	23.4	37.5	<b>32.0</b>

The average training figures for the years 2021 and 2022 have been changed from those indicated in the Sustainability Report 2022 following an improvement in data collection processes.

In particular, for the parent company STAR7, training courses were provided in various areas in order to meet the objectives and needs of employees. The training courses provided covered topics such as occupational health and safety, hard and soft skill development, as well as foreign language learning. Particular emphasis was placed on training in people management, effective communication and time management.

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

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.

**GRI Standard**

3-3

403-1

403-2

403-3

403-4

403-5

403-6

403-7

403-9



# 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.

During the three-year period under review, only a small number of STAR7 employees were affected by work-related accidents. During 2023, as in previous years, there were no fatal or serious accidents and the accident severity index has been steadily decreasing over the three-year period.

## 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.

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

## 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.

for translation work. It should be noted, however, that during 2023, as in previous years, no reports were made by these employees concerning incidents that occurred during their work for STAR7

## Accidents



**Work-related injuries****Unit****2021****2022****2023****Accidents at work**

No.

**Deaths**

-

-

-

**Serious accidents**

-

-

-

**Other accidents**

2

1

1

**Total registered accidents**

2

1

1

**Travel accidents**

1

1

1

**Total hours worked<sup>1</sup>**

h

1,278,575

1,545,008

2,275,614

**Days of absence due to accidents**

No.

31

5

1

**Accident ratios****Accident Frequency Index (No. of accidents/hours worked x 1,000,000)****Deaths**

-

-

**Serious accidents**

-

-

-

**Other accidents**

1.56

-

-

0.4

**Accident Severity Index (accident absence days/hours worked x 1,000)****Average number of days lost due to injury per 1000 days worked**

0.0242

0.0032

0.0004

<sup>1</sup> Hours worked by the ABACAAR company were estimated for 2023.

The accident figures for 2022 have been changed from those indicated in the Sustainability Report 2022 following an improvement in tracing.



# Quality and reliability of products and services

Quality Policy

Product health and safety

Product conformity

Selection, qualification and monitoring of suppliers



# Quality Policy

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. 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.

## Material topic

## Objectives

### Quality and reliability of products and services

- Ensure that the products and services offered maintain and improve their high standards of quality and reliability.
- Reduction of product non-conformities and improvement of customer satisfaction, also through the insertion of a specific resource for internal quality control and a strengthening of the 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.

### Sustainability in the supply chain

- Adoption of a Code of Conduct to be signed by suppliers (new and pre-existing).

#### SDGs





# Product health and safety

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, STAR7 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 2023, as well as in the preceding years of 2022 and 2021, 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.

GRI Standard

416-2

417-2

417-3



# Product conformity

GRI Standard

416-2

417-2

417-3

## 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.

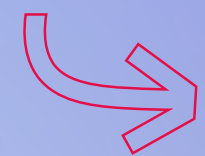
The Department Head must evaluate the reported situation's scope and importance and determine whether there is a non-conformity. If something is considered significant, it will be recorded in the relevant register and a thorough analysis of the causes will be conducted.



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:

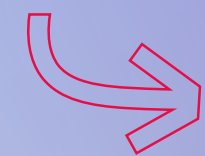
# 1. Description

The steps required to address the root causes and rectify the previous situation have been defined.



# 2. Implementation

Implementation and supervision of these activities until their completion



# 3. Verification

The effectiveness of the corrective actions taken is evaluated after a suitable period of time. If the outcome is negative, the manager of the function or unit will review the situation and look for alternative solutions.

# Complaints and Non-Conformities in Service Delivery Processes

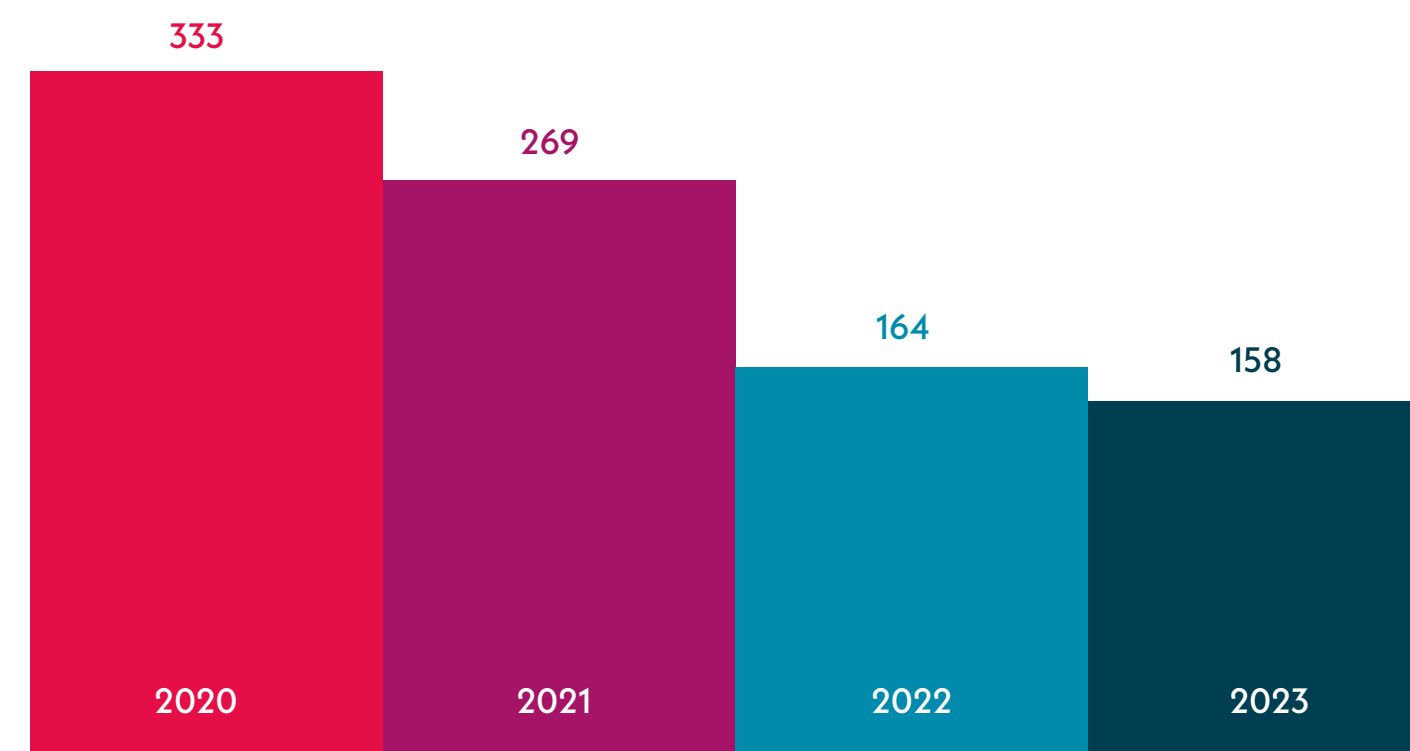
Non-conformities related to service delivery processes are handled internally within the relevant processes. The methods for dealing with non-conformities are organised and managed differently for each process.

In 2023, the Service Line Global Content saw a decrease of 3.6% in detected non-conformities compared to 2022.

STAR7 aspires to apply machine translation to the majority of its projects. In order to prevent errors due to this type

of service, the Group has implemented a procedure for managing non-conformities due to machine translation. Project Managers receive complaints from Vendors and forward them to Quality Control which proceeds to identify the most significant non-conformity reports which are analysed in order to improve their service. Reports may or may not contain a request for compensation. Following analysis of the non-conformity, the Project Manager advises the Vendor whether there is a compensation fee for reporting it.

## NON CONFORMITIES BY YEAR



In line with the objectives of the sustainability plan, as of May 2023, the Global Content Service Line implemented a new way of monitoring translation quality by defining a scorecard that takes customer-specific service levels into account. The new scorecard (S7 Adequacy-Fluency Scorecard) makes it possible to expand the 'sample picking' process and to monitor translation quality more flexibly.



# Selection, qualification and monitoring of suppliers

GRI Standard
3-3
308-1
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 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.



As indicated above, STAR7 makes use of freelancers such as translators and interpreters to deliver its products and services. In order to promote and reinforce the quality of work, confidentiality, ethics and integrity, confidentiality of information provisions, and professional behaviour of its employees, it has adopted a Code of Conduct applicable to all contractors, where guidelines and rules of engagement are defined.

For interpreters and freelance translators, STAR7 has adopted a specific recruitment procedure given the specific nature of the expertise required in localisation and interpreting. Candidate interviews are conducted by the Talent Acquisition team and Senior 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 the following steps:

- 🔴 CV screening/selection
- 🔴 Signing an NDA (non-disclosure agreement)
- 🔴 Test 1
- 🔴 In cases where highly specialised teams need to be

formed, if test 1 is passed, a further test can also be requested.

- 🔴 Evaluation and feedback on tests
- 🔴 Feedback shared with the freelancer tested
- 🔴 Outcome (pass/fail)
- 🔴 In the event of a pass: signing of specific NDAs, definition of terms, SLA signature, supplier form and entry of data into the STAR7 Group system
- 🔴 Onboarding by LRM/Production

The language service provider (LSP) selection process includes the following steps:

- 🔴 Screening/selection of the LSP.
- 🔴 Initial contact by e-mail.
- 🔴 Signing of an NDA (non-disclosure agreement).
- 🔴 Written questionnaire to collect relevant information such as: type of company/years of activity/number of employees, in-house translators, reviewers, DTP specialists, PMs, etc./main clients/main areas of expertise/CAT tools/secure server/etc.
- 🔴 Screening call.
- 🔴 Briefing + Test: Test 1 must be carried out by at least 2 translators and the LSP must be prepared to

send STAR7 the CVs of the translators who worked on TEST 1 if they pass.

- 🔴 Evaluation.
- 🔴 In the event of a pass: signing of specific NDAs, definition of terms, SLA signature, supplier form and entry of data into the STAR7 Group system
- 🔴 Onboarding by LRM/Production.

If the test is passed and an agreement on fees is reached, the supplier sends the SLA (Service Level Agreement) and the datasheet to the successful applicant, who sends these signed documents back by e-mail. The Vendor Manager 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 and/or Project Manager can now follow the new resource and provide any technical training.





# Privacy, data and information



# Data Security and Privacy

## Governance

### Material topic

### Objectives

#### Protection of privacy, IT security and data protection

#### SDGs



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.

#### Protection of intellectual property

#### SDGs



Adopt STAR7 intellectual property protection policies.

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.

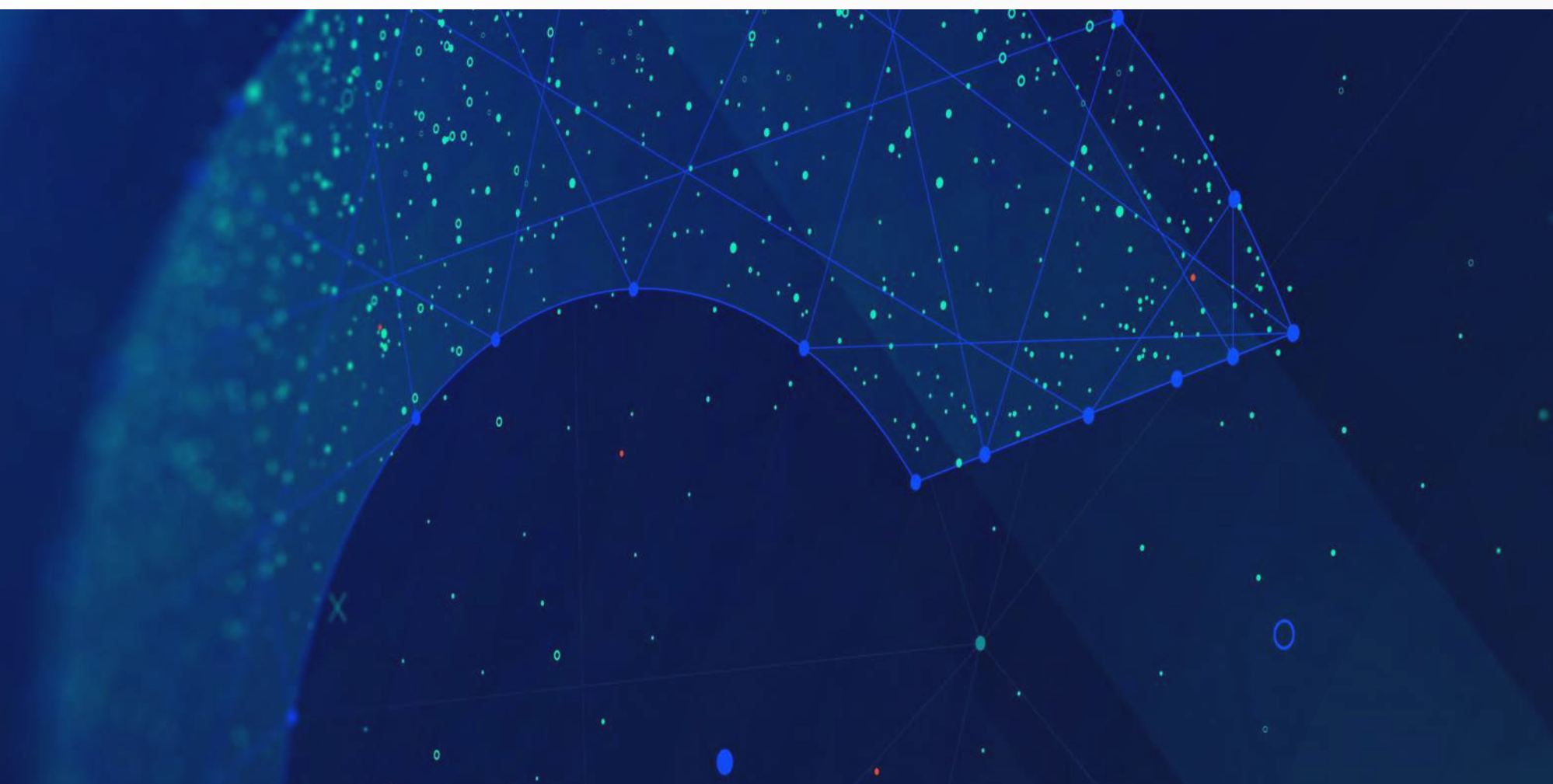
In accordance with GDPR legislation, a "personal data breach" refers to the accidental or unlawful access, destruction, loss, modification, or unauthorised disclosure of personal data stored or transmitted on electronic networks by the Company due to a breach of its security system. Under the GDPR, if 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 (a) 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; ensuring adherence to the relevant information security standards, including 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 2023, as well as in the preceding reporting periods of 2021 and 2022, 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



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.



# Integrity and creation of shared value

Corruption prevention measures

Respect for competition

Tax transparency

Economic value generated and distributed



# Corruption prevention measures

## Material topic

## Objectives

### Economic performance: generation and distribution of value

- Actions related to the strategy of developing and strengthening the competitive position

SDGs



### 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.

SDGs



GRI Standard  
3-3  
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. In addition, STAR7's Whistleblowing Policy provides the opportunity for employees, partners, suppliers and stakeholders in general (such as employees, former employees, freelancers, consultants, customers, suppliers, job applicants, shareholders and anyone with a legitimate interest in the STAR7 Group's business activities) to report incidents of corruption through the Whistleblowing reporting channel.

To learn about STAR7's management approach for combating corruption, please refer to **Chapter 3, "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



# Respect for competition

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 2023 or previous years.

GRI Standard

3-3

206-1





# Tax transparency

## 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.

GRI Standard

3-3

207-1

207-2

207-3



# Economic value generated and distributed

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.

GRI Standard

3-3

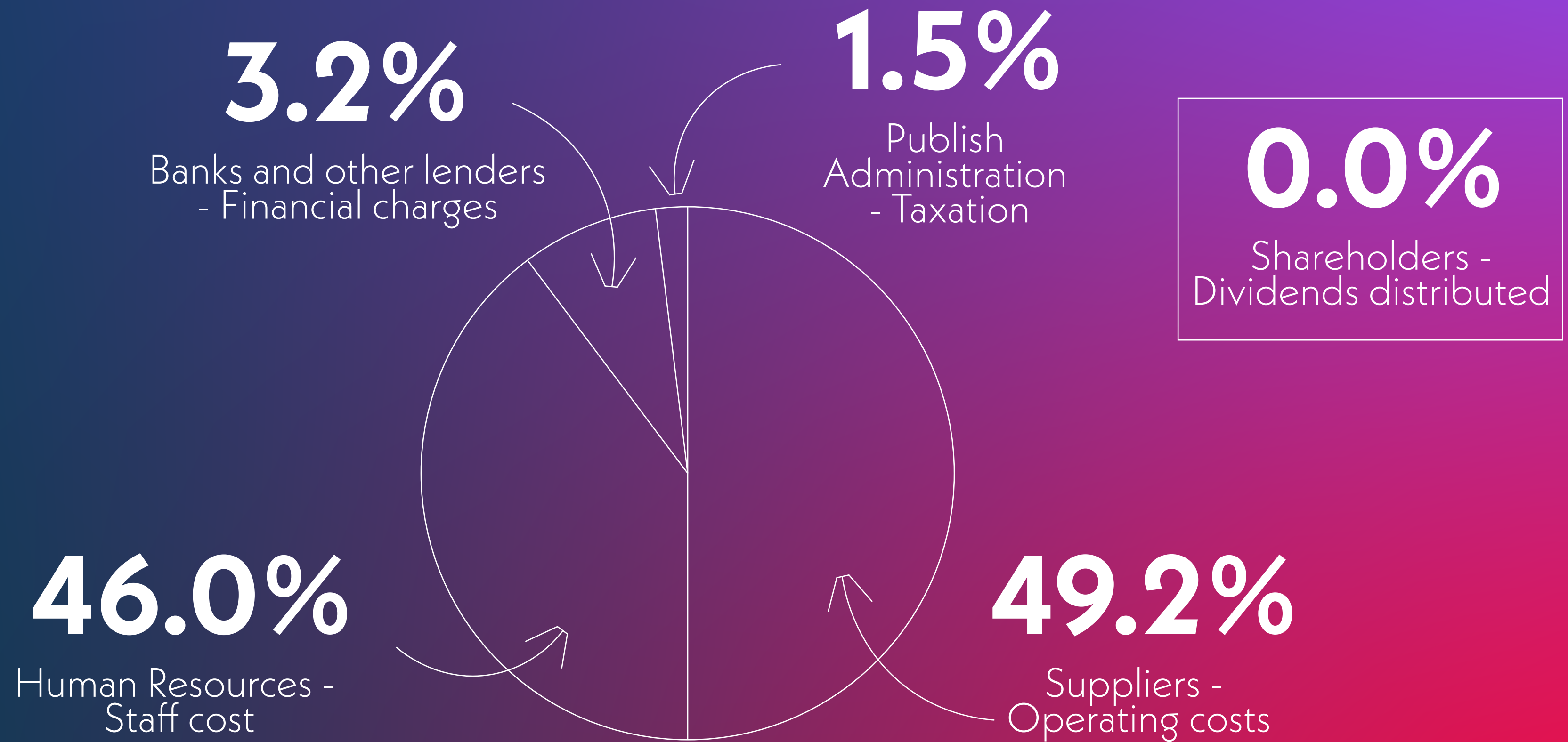
201-1

Economic Value (euros)	2021	2022	2023
<b>Economic value generated</b>	<b>59,980,115</b>	<b>84,766,735</b>	<b>105,337,061</b>
<b>Economic value distributed</b>	<b>27,591,725</b>	<b>39,136,706</b>	<b>46,216,411</b>
Suppliers - Operating Costs	22,977,581	29,156,658	43,236,653
Human Resources - Personnel costs	632,581	2,300,042	3,027,097
Banks and other lenders - Financial expense	962,101	1,984,537	1,447,921
Public Administration - Taxes	52,163,987	72,577,942	93,928,081
Shareholders - Dividends distributed	-	-	-
<b>Economic value distributed</b>	<b>52,163,987</b>	<b>72,577,942</b>	<b>93,928,081</b>
<b>Economic value retained</b>	<b>7,816,127</b>	<b>12,188,793</b>	<b>11,408,980</b>



# Economic value distributed

In 2023, 49.2% 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. 46.0% 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.







# GRI Content Index



# GRI Content Index

## Statement of use

The Sustainability Report of STAR7 S.p.A. for the financial year 2023 [01 January - 31 December 2023] was prepared with reference to GRI Standards.

## GRI 1 adopted

GRI 1 Foundation 2021

## 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 1 STAR7: People of Content / Profile and identity
2-2	Entities included in the organisation's sustainability reporting	Methodological note
2-3	Reporting period, frequency and contact point	Methodological note
2-4	Restatements of information	Methodological note



## Activities and workers

2-6	Activities, value chain and other business relationships	<ul style="list-style-type: none"> <li>1 STAR7: People of Content / Profile and identity</li> <li>1 STAR7: People of Content / A global network</li> <li>1 The business model and value chain / STAR7's Integrale<sup>7</sup> approach</li> <li>1 The business model and value chain / Production and delivery of products and services</li> <li>1 The business model and value chain / Suppliers</li> <li>1 The business model and value chain / Customers</li> </ul>
2-7	Employees	1 The business model and value chain / Employees and freelancers
2-8	Non-employees	1 The business model and value chain / Employees and freelancers

## Governance

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2-10	Nomination and selection of the highest governance body	2 Governance / Governance model and corporate bodies
2-11	Chair of the highest governance body	2 Governance / Governance model and corporate bodies
2-12	Role of the highest governance body in overseeing the management of impacts	2 Governance / Sustainability governance
2-13	Delegation of responsibility for managing impacts	2 Governance / Sustainability governance
2-15	Conflicts of interest	2 Governance / Sustainability governance
2-16	Communication of critical concerns	2 Governance / Sustainability governance

## Strategy, policies and practices

2-22	Statement on sustainable development strategy	Letter to stakeholders
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2-23	Policy commitments	3 Strategies - Commitments - Policies / Responsible business conduct
2-24	Embedding policy commitments	3 Strategies - Commitments - Policies / Management Systems and Certifications
2-26	Mechanisms for seeking advice and raising concerns	3 Strategies - Commitments - Policies / Responsible business conduct
2-27	Compliance with laws and regulations	3 Strategies - Commitments - Policies / Environmental - Social - Economic Compliance
2-28	Membership associations	3 Strategies - Commitments - Policies / External initiatives and memberships

### Stakeholder engagement

2-29	Approach to stakeholder engagement	3 Strategies - Commitments - Policies / The role of stakeholders
2-30	Collective bargaining agreements	6 People / Human Resources Management

## GRI 3 - Material Topics - version 2021

3-1	Process to determine material topics	Methodological note 4 Material Topics / Impacts and material topics
3-2	List of material topics	4 Material Topics / The material topics
3-3	Management of material topics	1 The business model and value chain / Innovation, research and development and cutting-edge technologies 4 Material Topics / Material Topics - Objectives and Actions 5 Environmental Impacts / Environmental Policy and Responsible Use of Resources 5 Environmental Impacts / Energy - Emissions and Climate Change 6 People / Human Resources Management 6 People / Employment and turnover 6 People / Diversity and equal opportunities 6 People / Training 6 People / Occupational Health and Safety 7 Quality and reliability of products and services / Quality policy 7 Quality and reliability of products and services / Selection, qualification and monitoring of suppliers 8 Privacy, Data and Information / Data Security and Privacy 8 Privacy, data and information / Protection of intellectual property 9 Integrity and creation of shared value / Corruption prevention measures 9 Integrity and creation of shared value / Respect for competition 9 Integrity and creation of shared value / Tax transparency 9 Integrity and creation of shared value / Economic value generated and distributed



# 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. GRI 207 Tax (2019) was applied in the reporting of tax issues.

## GRI Sustainability Reporting Standard

## References Chapter/Paragraph

### GRI 200 ECONOMIC TOPICS

#### 201 ECONOMIC PERFORMANCE

201-1 Direct economic value generated and distributed

9 Integrity and creation of shared value / Economic value generated and distributed

#### 205 ANTI-CORRUPTION

205-3 Confirmed incidents of corruption and actions taken

9 Integrity and creation of shared value / Corruption prevention measures

#### 206 ANTI-COMPETITIVE BEHAVIOUR

206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices

9 Integrity and creation of shared value / Respect for competition



## 207 TAX - 2019

207-1	Approach to taxation	9 Integrity and creation of shared value / Tax transparency
207-2	Tax governance, control and risk management	9 Integrity and creation of shared value / Tax transparency
207-3	Stakeholder engagement and management of concerns related to tax	9 Integrity and creation of shared value / Tax transparency

## GRI 300 ENVIRONMENTAL TOPICS

### 301 MATERIALS

301-1	Materials used by weight or volume	5 Environmental Impacts / Environmental Policy and Responsible Use of Resources
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### 302 ENERGY

302-1	Energy consumed within the organisation	5 Environmental Impacts / Energy - Emissions and Climate Change
302-3	Energy intensity	5 Environmental Impacts / Energy - Emissions and Climate Change

### 303 WATER AND EFFLUENTS - 2018

303-1	Interactions with water as a shared resource	5 Environmental Impacts / Environmental Policy and Responsible Use of Resources
303-2	Management of water discharge-related impacts	5 Environmental Impacts / Environmental Policy and Responsible Use of Resources
303-3	Water withdrawal	5 Environmental Impacts / Environmental Policy and Responsible Use of Resources

### 305 EMISSIONS

305-1	Direct (Scope 1) GHG emissions	5 Environmental Impacts / Energy - Emissions and Climate Change
305-2	Energy indirect (Scope 2) GHG emissions	5 Environmental Impacts / Energy - Emissions and Climate Change



305-4 GHG emissions intensity 5 Environmental Impacts / Energy - Emissions and Climate Change

## 306 WASTE

306-1 Waste generation and significant waste-related impacts 5 Environmental Impacts / Environmental Policy and Responsible Use of Resources

306-2 Management of significant waste-related impacts 5 Environmental Impacts / Environmental Policy and Responsible Use of Resources

306-3 Waste generated 5 Environmental Impacts / Environmental Policy and Responsible Use of Resources

306-4 Waste diverted from disposal 5 Environmental Impacts / Environmental Policy and Responsible Use of Resources

306-5 Waste directed to disposal 5 Environmental Impacts / Environmental Policy and Responsible Use of Resources

## 308 SUPPLIER ENVIRONMENTAL ASSESSMENT

308-1 New suppliers that were screened using environmental criteria 7 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 6 People / Employment and turnover

401-3 Parental leave 6 People / Diversity and equal opportunities

## 403 OCCUPATIONAL HEALTH AND SAFETY - 2018

403-1 Occupational health and safety management system 6 People / Occupational Health and Safety

403-2 Hazard identification, risk assessment and accident investigation 6 People / Occupational Health and Safety

403-3 Occupational health services 6 People / Occupational Health and Safety



403-4	Worker participation and consultation and communication on occupational health and safety	6 People / Occupational Health and Safety
403-5	Training of workers on occupational health and safety	6 People / Occupational Health and Safety
403-6	Workers' health promotion	6 People / Occupational Health and Safety
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	6 People / Occupational Health and Safety
403-9	Work-related injuries	6 People / Occupational Health and Safety

## 404 TRAINING AND EDUCATION

404-1	Average hours of training per year per employee	6 People / Training
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## 405 DIVERSITY AND EQUAL OPPORTUNITY

405-1	Diversity of governance bodies and employees	2 Governance / Governance model and corporate bodies 6 People / Diversity and equal opportunities
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## 406 NON-DISCRIMINATION

406-1	Incidents of discrimination and corrective actions taken	6 People / Diversity and equal opportunities
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## 414 SUPPLIER SOCIAL ASSESSMENT

414-1	New suppliers that were screened using social criteria	7 Quality and reliability of products and services / Selection, qualification and monitoring of suppliers
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## 416 CUSTOMER HEALTH AND SAFETY

416-2	Incidents of non-compliance concerning health and safety impacts of products and services	7 Quality and reliability of products and services / Product health and safety
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## 417 MARKETING AND LABELLING

417-2	Incidents of non-compliance concerning product and service information and labelling	7 Quality and reliability of products and services / Product health and safety
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417-3 Incidents of non-compliance concerning marketing communications

7 Quality and reliability of products and services / Product health and safety

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**418 CUSTOMER PRIVACY**

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418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data

8 Privacy, Data and Information / Data Security and Privacy

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**STAR7**