**DIVERSITY & INCLUSION POLICY**

Approved by Elisabetta Fabri
Chair of the Board of Directors of Starhotels Finanziaria S.r.l.
Sole Director of Starhotels S.p.A.

Starhotels Finanziaria S.r.l., as the Parent Company, and Starhotels S.p.A., as its subsidiary, have always been committed to fostering an inclusive and respectful working environment. As also emphasized in their Code of Ethics, they recognize the value of human resources, respect for their autonomy within their role, and the importance of employees' contribution to the Company's activities.

The purpose of this Policy is to formalise the Company's commitment to creating a fair and diverse workplace while promoting awareness of these principles among all employees, reinforcing at the same time the values of equality, diversity and inclusion, in line with the requirements of ISO 30415 and the UNI PdR 125:2022.

The Company's aim is to safeguard equal opportunities and promote the recognition and appreciation of individual differences, while preventing all forms of discriminatory or harmful attitudes and behaviours towards any individual.

In particular, Starhotels Finanziaria S.r.l. and Starhotels S.p.A. are committed to establishing a corporate culture based on respect, where each person is valued as a key resource and has the opportunity to contribute to the fullest of their abilities, free from discrimination on the grounds of gender, age, sexual orientation, ethnic origin, nationality, political opinion or religious belief.

In line with the principles of diversity protection and gender equality, this Policy aims to prevent all forms of abuse and discrimination throughout the entire employee lifecycle, from workforce planning to the termination of employment.

Accordingly, these principles are reflected in a strategic approach to people management and development, under which the Company's key D&I initiatives include:

- ✓ Ensuring that individuals in managerial positions champion a culture of respect and apply the principles of inclusive leadership;
- ✓ Identifying the most relevant D&I measures for the organisation and implementing appropriate tools to constantly monitor progress towards achieving them;
- ✓ Informing employees about the Company's D&I objectives and engaging them to contribute to their achievement;

✓ Engaging external stakeholders by sharing and communicating the Company's D&I principles and best practices.

In this regard, the following principles guide the Company in its daily operations and in the ongoing development of its human capital.

- **Non-discrimination:** We adopt a zero-tolerance approach towards any form of discrimination, abuse or harassment, whether physical, verbal or digital.

- **Constructive dialogue:** We promote open dialogue focused on collaboration and mutual growth. All employees must be treated and must treat one another with dignity and respect.

- **Equal treatment:** We provide equal opportunities for training, career growth and professional development, regardless of gender, age, ethnicity, culture, ideology or physical characteristics.

- **Pay equity:** We monitor remuneration across all organisational levels to prevent unjustified pay disparities among employees performing comparable roles and duties, while taking into account experience and the complexity of their responsibilities.

- **Support for women:** We are committed to promoting gender balance in managerial positions and ensuring equal access to professional development opportunities, regardless of gender.

- **Work-life balance:** Where possible, we offer flexible working arrangements, such as hybrid working and reversible part-time employment, subject to individual agreements.

- **Support for employees with caregiving responsibilities:** We strive to accommodate the specific needs of employees with caregiving responsibilities, including by providing access to additional leave and time-off arrangements.

- **Preventive Measures:** We promote employees' participation in training opportunities about these topics, including those offered outside the organisation.
  We provide employees with multiple channels through which they can report concerns or suggestions.

- **Performance monitoring:** We monitor our progress annually against specific KPIs and identify any necessary corrective actions and opportunities for improvement.

- **Support for New Parents:** We are committed to supporting employees through childbirth, adoption and their return to work, including through extended leave options, additional paid time off and supplementary pay benefits.

Starhotels Finanziaria S.r.l. e Starhotels S.p.A. ensure that the objectives set in relation to gender equality and non-discrimination are achieved and they monitor this policy ensuring it remains relevant and up to date.

The following Policy has been defined by Top Management.
The Appointed D&I Committee is responsible for its implementation while its coordination lies with the Chief HR Officer, who is deemed to have the necessary skills and expertise to perform this role.

This D&I Policy is a public document, available on the company's website, and to all stakeholders upon request.

Florence, 25/11/2026

Elisabetta Fabri
Presidente & CEO