

Our Sustainability Policy

1. Introduction

Legance - Avvocati Associati ("Legance" or the "Firm") is an independent full service Italian law firm.

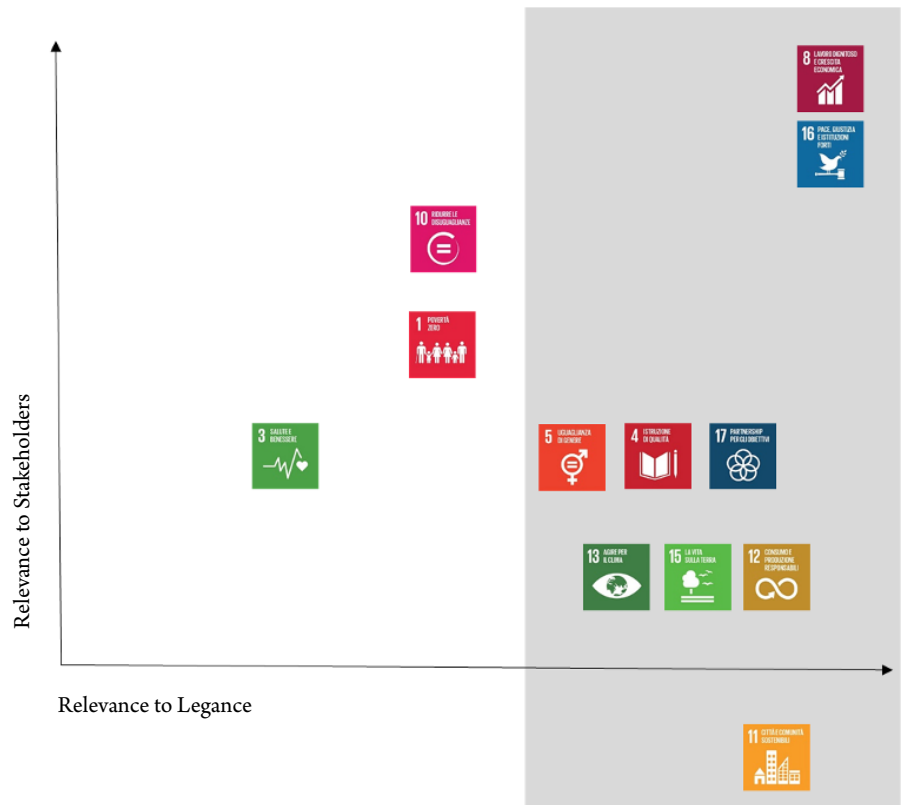
Legance believes that its actions must be based on the principles of legality, fairness, responsibility, professionalism and transparency, in order to ensure lasting sustainable growth, both through behaviour that creates positive impacts and through the reduction of direct and indirect negative impacts.

As part of its governance activities, Legance has therefore drafted the following sustainability policy (the "Policy"), where the Firm outlines its principles, objectives and policies concerning sustainability, i.e. risks relating to environmental, social and governance impact issues ("**ESG**"), which it considers appropriate in order to address both the importance Legance intends to give to them, as well as the expectations of its stakeholders (in other words all professionals, employees, suppliers, clients and public institutions connected to the legal world, businesses and public administrations).

Legance made this choice based on the analysis and understanding of the United Nations Sustainable Development Goals (the "**SDGs**") and the ten universal principles, which are divided into four areas, and are defined by the United Nations Global Compact ("UNGC"). In addition, Legance has also taken into account its Code of Ethics and the activities already being carried out with regards to anti-corruption, as defined by the documentation on which the Firm obtained the 37001 certification.

2. Framework Analysis

The drafting of the Policy is based on the analysis of Legance's social-economic reference framework (the "Framework"), as set out in Annex 1. This mapping and analysis provided the opportunity to understand the expectations of Legance's stakeholders and, in keeping with the importance that Legance has decided to give each SDG, it was possible to identify the Firm's medium- and long-term macro-objectives. The results of this analysis are shown in the following chart:



“SDG 11 - Sustainable Cities and Communities”, which has been the focus of Legance's work in recent years, was also added to the objectives identified through the Framework analysis.

3. Legance Sustainability Principles

Legance firmly believes that it is necessary to act in a sustainable manner by taking ESG issues into consideration.

It has identified, specific sustainability principles (the "Principles") consistent with the general principles set out in the Code of Ethics, - set out below - to which the activities of the Firm, the employees (the "**Employees**") and of all professionals (who perform their activities in the Firm, the "**Professionals**", including Interns, Associates, Counsel, Senior Counsel and Partners; the Employees and the Professionals, jointly, the "Legance Community") must be based.

Environment

- > The environment, biodiversity and ecosystems are primary and fundamental assets that Legance safeguards and protects, also in the interest of future generations.

Labour and human rights

- > Legance recognises that the correct application of current legislation and compliance with related regulations, together with the information and training activities of the Legance Community, are indispensable tools for achieving, maintaining and improving the conditions under which professional activities and the working environment are carried out, enabling the protection of health and safety.
- > Legance guarantees a suitable working environment to safeguard health and safety, with the aim of ensuring adequate environmental conditions for the carrying out of work activities. The members of the Legance Community, each within the scope of his/her duties, participate in the process of risk prevention, environmental protection and health and safety protection towards themselves, their colleagues and third parties, in compliance with applicable regulations.
- > Legance supports workers' freedom of association and recognises the right to collective bargaining.
- > Legance firmly believes that respect for human rights and workers' rights are fundamental and indispensable values and fights all forms of human rights abuses and violations.

Diversity, equality and inclusion

- > Legance avoids any discrimination based on age, gender, sexuality, medical conditions and physical disability, race, nationality, religious and political views. Activities and behaviour of Professionals and Employees must similarly refrain from any kind of discrimination.
- > Legance pays the utmost and constant attention to the development of its Professionals and Employees. To this end, it considers the meritocratic criterion, professional competence, honesty and behaviour the key foundations for the adoption of any decision concerning the internal growth of Professionals and Employees. All Legance's decisions and choices concerning Professionals and Employees of the Firm must only be based

on the skills demonstrated in the carrying out of the tasks given and on professional qualities. No Professional or Employee must receive advantages or suffer disadvantages due to factors that are not related to his/her professional and human skills and qualities.

Integrity, ethics and anti-corruption

- > Legance carries out its tasks in compliance with EU, national and international regulations, by refusing corruption and all illegal practices. Legance has adopted a Management System for the Prevention of Corruption called 'Legance's SGPC Policy', in compliance with the ISO 37001:2016 standard.
- > Legance does not accept requests, pressure or threats aimed at obtaining conduct that is contrary to laws, regulations and all other mandatory provisions in force or to the moral, religious and political views of individuals.
- > Legance ensures the privacy and protection of personal data, as required by relevant legislation and regulations.
- > Legance avoids any situation that could lead to conflicts of interest.

The Firm has also defined, on the basis of the SDGs, specific objectives (the "**Objectives**") - listed below - to promote ESG issues through its own work and that of the Legance Community.

- > Legance promotes lasting, inclusive and sustainable economic growth, full and productive employment and dignified work for all. It supports the adoption of immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking, and achieve the banning and elimination of the worst forms of child labour¹.
- > Legance ensures that the Legance Community "acquire the knowledge and skills necessary to promote sustainable development, through education for sustainable development and sustainable lifestyles, human rights, gender equality, the promotion of a culture of peace and non-violence, global citizenship and the appreciation of cultural diversity and the contribution of culture to sustainable development"².
- > Legance promotes peaceful and inclusive societies. As such, strives to reduce all forms of violence, including torture, and the fight against all forms of organised crime"³. Legance also promotes access to justice for all and builds effective, accountable and inclusive institutions at all levels. It promotes the fight against corruption and bribery in all its various shapes and forms and compliance with laws and non-discriminatory policies for sustainable development.
- > Throughout its activities, Legance "supports equal opportunities between men and women in the business world, the elimination of all forms of violence against women and girls"⁴ promotes the use of technology, particularly information technology and communication, including being aware that it also has a positive impact on the empowerment of women.

- > In pursuing its strategic objectives, Legance aims to “enhance the global partnership for sustainable development by forming multi-stakeholder agreements that mobilise and share knowledge, expertise, technology and financial resources, to support the realisation of sustainable development goals in all countries, particularly developing countries”⁵.
- > Legance adopts “environmentally-friendly management of chemical products and all waste, as well as a substantial reduction in waste production through measures such as recycling”⁶ and “reduces the negative effects of the environmental impact of cities, particularly in terms of air quality and waste management.”⁷ Furthermore, Legance implements actions in order to “protect, restore and promote the sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, halt and reverse land degradation and halt biodiversity loss”⁸.

¹ <https://www.aics.gov.it/home-ita/settori/obiettivi-di-sviluppo-sostenibile-sdgs/> - SDG 8

² <https://www.aics.gov.it/home-ita/settori/obiettivi-di-sviluppo-sostenibile-sdgs/> - SDG 4

³ <https://www.aics.gov.it/home-ita/settori/obiettivi-di-sviluppo-sostenibile-sdgs/> - SDG 16

⁴ <https://www.aics.gov.it/home-ita/settori/obiettivi-di-sviluppo-sostenibile-sdgs/> - SDG 5

⁵ <https://www.aics.gov.it/home-ita/settori/obiettivi-di-sviluppo-sostenibile-sdgs/> - SDG 17

⁶ <https://www.aics.gov.it/home-ita/settori/obiettivi-di-sviluppo-sostenibile-sdgs/> - SDG 12

⁷ <https://www.aics.gov.it/home-ita/settori/obiettivi-di-sviluppo-sostenibile-sdgs/> - SDG 11

⁸ <https://www.aics.gov.it/home-ita/settori/obiettivi-di-sviluppo-sostenibile-sdgs/> - SDG 15

4. Sustainability Policy

In order to implement its Principles and Objectives, Legance has defined specific policies as means through which the Firm's sustainability objectives can be formulated. While carrying out their respective activities, the behaviour and decisions of the entire Legance Community must therefore be standardised with the policies, which represent the actual content of the Policy and which may be further clarified and explained in specific technical annexes, internal regulations and procedures.

4.1 Environmental Policy

The environment, biodiversity and ecosystems are primary and fundamental assets that Legance safeguards and protects also in the interest of future generations. In this regard, the Firm:

- > adopts energy efficiency measures both at its own premises and with regard to internal procedures, in order to reduce consumption and emissions;
- > monitors the environmental impact of its activities and adopts programmes aimed at limiting energy and water consumption;
- > manages raw materials in a responsible manner, especially with regard to paper consumption and the reduction in the use of plastic products by adopting a plastic-free approach ;
- > implements proper waste disposal programmes in its business activities through separate waste collection schemes, with particular regard to hazardous waste such as electronic equipment;
- > promotes the daily compliance with the principles of awareness and respect for the working environment also through initiatives that actually shape the daily *modus vivendi* as set out in the Rules of Conduct for Professionals;
- > promotes sustainable mobility in order to reduce CO2 emissions and traffic congestion;
- > also extends its principles of environmental protection and preservation to the entire supply chain.

4.2 Labour and Human Rights Policy

Legance firmly believes that respect for human rights and workers' rights are fundamental values. It condemns forced labour in all its various shapes and forms, human trafficking and the exploitation of child labour, and is committed to combating all forms of human rights abuses and violations. It supports the freedom of workers to join trade unions and recognises the right to collective bargaining. It guarantees a suitable working environment to safeguard the health and safety of the Legance Community, as well as suitable environmental conditions to carry out its business activities to the best of its ability. In this regard, the Firm:

- > maintains a healthy and safe working environment and prevents health and safety risks pursuant to applicable rules, as set out in the Code of Ethics, the Rules of Conduct for Professionals and the Internal Regulations for Employees (collectively, the "Regulations");
- > promotes mutual respect for the individual and, in particular, freedom, dignity, personality development, political and religious beliefs, as set out in the Code of Ethics and the Regulations;
- > promotes the so-called "work-life balance" through working practices, including, for example, working from home;
- > also extends its principles of protection for human, labour and personal rights to the entire supply chain.

4.3 Diversity, Equity and Inclusion Policy

Legance condemns any discrimination based on age, gender, sexuality, medical conditions and physical disability, race, nationality, religious and political beliefs. The business and behaviour of the Legance Community must likewise avoid any kind of discrimination. In this regard, the Firm:

- > guarantees fair, equal and merit-based working conditions based on mutual respect, offering a working environment where violence, harassment, intimidation and forms of discrimination of any kind are forbidden, as set out in the Code of Ethics and the Regulations;
- > condemns any behaviour that is detrimental to one's dignity, honour and reputation, taking prompt steps to prevent insulting, discriminatory or defamatory interpersonal behaviour, as set out in the Code of Ethics and the Regulations;
- > adopts specific measures to support parental leave;
- > adopts programmes to encourage the continuous professional training and growth of young talents;
- > selects the Professionals and Employees through processes based on transparency and merit, that respect the candidate's privacy and are limited to only requesting the information strictly necessary to assess their characteristics for the position offered; and
- > regulates career paths in a transparent manner and promotes programmes and initiatives aimed at enhancing young talent,

equality, equity and inclusion, as set out in the internal procedures to determine remuneration on an annual basis.

4.4 Pro bono Policy

Legance can also provide legal assistance and advice free of charge (pro bono) in certain circumstances or to certain people, including, for example, underprivileged individuals and third sector organisations who would otherwise not be able to receive adequate legal assistance.

The Firm's pro bono activities can also include:

- > initiatives, both legal and otherwise, to be promoted jointly with the Firm's clients in the area of shared values;
- > the organisation of internal meetings to reflect and discuss, in order to raise awareness on sustainability issues among the Legance Community, clients and stakeholders; and
- > the promotion of sustainability issues through "WeLegance", a house organ entirely dedicated to the Firm's Corporate Social Responsibility projects.

Finally, Legance provides sponsorships in favour of entities and projects of particular value and social impact, according to the procedures defined in the Sustainability Committee Procedure.

4.5 Anti-Corruption Policy

In compliance with the ISO 37001:2016 standard, Legance has adopted a Management System for the Prevention of Bribery and Corruption called "Legance's SGPC Policy". Although the policy is autonomous, it forms an integral part of the Policy and is set out in Annex 2.

5. Maintenance, Implementation, Updating and Transparency

Legance undertakes to:

- > define and periodically update the medium- and long-term strategic plan to identify specific actions needed to achieve the Firm's sustainability goals;
- > promote stakeholder involvement in order to monitor and update expectations and demands in the sustainability field;
- > report its social and environmental progress with a view to continuous improvement. As a member and founding partner of the UNGP in Italy, Legance annually publishes the Communication On Progress (COP), which is a report of the goals achieved on the road towards the implementation of the SDGs.

In order to ensure the achievement of its Objectives, Legance has set up the "Sustainability Committee", a special body responsible for driving, guiding, coordinating and monitoring the sustainability of the Firm.

Annex 1: Framework

Based on information gathered through informal discussions and internal surveys addressed to the Legance Community, or through roundtable discussions and webinars involving clients and institutions, the Firm's reference Framework has been defined as follows.

STAKEHOLDERS	NEEDS AND EXPECTATIONS	United Nations Sustainable Development Goals (or "SDGs")	United Nations Global Compact (UNGC) Targets
Clients	No corruption	SDG 1 - Overcoming poverty SDG 16 - Peace, justice and strong institutions	X. Companies undertake to fight corruption in all its various shapes and forms, including extortion and bribery.
	Fair labour policies	SDG 8 - Dignified work and economic growth SDG 10 - Reducing inequalities	III. Companies are required to support the freedom of workers to join trade unions and recognise the right to collective bargaining. IV. Companies are required to support the elimination of all forms of forced and compulsory labour. V. Companies are required to support the effective elimination of child labour. VI. Companies are required to support the elimination of all forms of discrimination in employment and occupation.
	Payment of taxes	SDG 1 - Overcoming poverty	I. Companies are required to promote and respect the universally recognised human rights within their area of influence.
	Compliance with laws and contractual parameters	SDG 16 - Peace, justice and strong institutions	X. Companies undertake to fight corruption in all its various shapes and forms, including extortion and bribery.
	Environmental protection	SDG 15 - Life on Earth SDG 13 - Taking action for the climate	VII. Companies are required to support a preventive approach to environmental challenges. VIII. Companies are required to undertake initiatives that promote greater environmental responsibility. IX. Companies are required to encourage the development and use of environmentally-friendly technologies.
PA (both as "Client" and "Supplier")	Payment of taxes	SDG 16 - Peace, justice and strong institutions	X. Companies undertake to fight corruption in all its various shapes and forms, including extortion and bribery.
	Compliance with laws	SDG 16 - Peace, justice and strong institutions	X. Companies undertake to fight corruption in all its various shapes and forms, including extortion and bribery.

STAKEHOLDERS	NEEDS AND EXPECTATIONS	United Nations Sustainable Development Goals (or "SDGs")	United Nations Global Compact (UNGC) Targets
Employees / Professionals	Fair labour policies	SDG 3 - Ensuring health and well-being SDG 8 - Dignified work and economic growth SDG 10 - Reducing inequalities SDG 5 - Gender Equality	III. Companies are required to support the freedom of workers to join trade unions and recognise the right to collective bargaining. IV. Companies are required to support the elimination of all forms of forced and compulsory labour. V. Companies are required to support the effective elimination of child labour. VI. Companies are required to support the elimination of all forms of discrimination in employment and occupation. VII. Companies are required to ensure that they are not, even indirectly, complicit in human rights abuses. Human rights are universal and are recognised for all human beings indiscriminately.
	Safe workplace	SDG 8 - Dignified work and economic growth SDG 10 - Reducing inequalities SDG 3 - Ensuring health and well-being	III. Companies are required to support the freedom of workers to join trade unions and recognise the right to collective bargaining. IV. Companies are required to support the elimination of all forms of forced and compulsory labour. V. Companies are required to support the effective elimination of child labour. VI. Companies are required to support the elimination of all forms of discrimination in employment and occupation.
	Professional growth	SDG 4 - Quality education	III. Companies are required to support the freedom of workers to join trade unions and recognise the right to collective bargaining. IV. Companies are required to support the elimination of all forms of forced and compulsory labour. V. Companies are required to support the effective elimination of child labour. VI. Companies are required to support the elimination of all forms of discrimination in employment and occupation.
	Environmental protection	SDG 15 - Life on Earth SDG 13 - Taking action for the climate	VII. Companies are required to support a preventive approach to environmental challenges. VIII. Companies are required to undertake initiatives that promote greater environmental responsibility. IX. Companies are required to encourage the development and use of environmentally-friendly technologies.
	Involvement	SDG 17 - Partnership for the goals SDG 8 - Dignified work and economic growth SDG 10 - Reducing inequalities	III. Companies are required to support the freedom of association of workers and recognise the right to collective bargaining. IV. Companies are required to support the elimination of all forms of forced and compulsory labour. V. Companies are required to support the effective elimination of child labour. VI. Companies are required to support the elimination of all forms of discrimination in employment and occupation.
	Sustainable social and environmental commitment	SDG 12 - Responsible consumption and production	VII. Companies are required to support a preventive approach to environmental challenges. VIII. Companies are required to undertake initiatives that promote greater environmental responsibility. IX. Companies are required to encourage the development and use of environmentally-friendly technologies.
	Specific training	SDG 4 - Quality education SDG 5 - Gender equality SDG 8 - Dignified work and economic growth	III. Companies are required to support the freedom of association of workers and recognise the right to collective bargaining. IV. Companies are required to support the elimination of all forms of forced and compulsory labour. V. Companies are required to support the effective elimination of child labour. VI. Companies are required to support the elimination of all forms of discrimination in employment and occupation.

STAKEHOLDERS	NEEDS AND EXPECTATIONS	United Nations Sustainable Development Goals (or "SDGs")	United Nations Global Compact (UNGC) Targets
Suppliers	No corruption	SDG 1 - Overcoming poverty SDG 16 - Peace, justice and strong institutions	X. Companies undertake to fight corruption in all its various shapes and forms, including extortion and bribery.
	Compliance with laws and contractual parameters	SDG 16 - Peace, justice and strong institutions	X. Companies undertake to fight corruption in all its various shapes and forms, including extortion and bribery.
	Respect of payment deadlines	SDG 8 - Dignified work and economic growth	III. Companies are required to support the freedom of workers to join trade unions and recognise the right to collective bargaining. IV. Companies are required to support the elimination of all forms of forced and compulsory labour. V. Companies are required to support the effective elimination of child labour. VI. Companies are required to support the elimination of all forms of discrimination in employment and occupation.
	Involvement	SDG 17 - Partnership for the goals SDG 8 - Dignified work and economic growth SDG 10 - Reducing inequalities	III. Companies are required to support the freedom of workers to join trade unions and recognise the right to collective bargaining. IV. Companies are required to support the elimination of all forms of forced and compulsory labour. V. Companies are required to support the effective elimination of child labour. VI. Companies are required to support the elimination of all forms of discrimination in employment and occupation.

Annex 2: Legance's SGPC Policy

This document describes Legance's Policy on the Management System for the Prevention of Corruption (SGPC), in accordance with the ISO 37001:2016 standard.

- > Legance forbids corruption in all its various shapes and forms (e.g. requests for or acceptance of bribes by Staff, Professionals or anyone working on behalf of Legance) and encourages the reporting of any circumstances that may appear suspicious, provided that the report is made in good faith or on the basis of a reasonable belief by the person reporting it and, in any case, confidentially, without fear of retaliation.
- > The Management Committee, representing Legance, has identified Risk Owners and interfaces on corruption prevention issues (SGPC Committee and RFPC Committee). The Risk Owners will report to the Management Committee on the progress and status of information security on a six-monthly basis.
- > Failure to comply with this policy will result in sanctions which will be decided from time to time by the Management Committee.
- > Legance has defined objectives for the prevention of corruption (in a specific document), which will be updated when necessary. Each Risk Owner is accountable to the Management Committee in terms of monitoring said objectives and detecting any anomalies in relation to what has been set.
- > Legance sets up annual training programmes and/or internal audits whereby it ensures the monitoring of its SGPC.
- > Legance is committed to comply with anti-corruption laws and directives.
- > Partners, Risk Owners and all Professionals and Staff in general are committed to ensuring continuous improvement of the SGPC through the measurement of performance, internal audits, and reviews.
- > This Policy is shared within Legance by means of special training sessions and communications by Partners and Risk Owners.
- > This Policy may be disclosed externally (to the press, suppliers, authorities, etc.) following prior consent of the Management Committee.
- > This Policy and all related documents are reviewed periodically to ensure their ongoing relevance and suitability.
- > The System generates measurable objectives that are carefully monitored.

