



# SINA

## Company Directive

### DA42007

# BIODIVERSITY POLICY

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This document is effective from the date of approval and is valid indefinitely, without prejudice to the issue of amendments and/or supplements or replacement documents.

Changes made since the previous revision are highlighted in red in the text.

## CONTENTS

<b>1</b>	<b>PURPOSE .....</b>	<b>4</b>
<b>2</b>	<b>SCOPE AND APPLICATION .....</b>	<b>4</b>
<b>3</b>	<b>REFERENCES .....</b>	<b>4</b>
<b>4</b>	<b>DEFINITIONS .....</b>	<b>5</b>
<b>5</b>	<b>SCOPES AND RESPONSIBILITIES .....</b>	<b>5</b>
<b>6</b>	<b>PRINCIPLES .....</b>	<b>5</b>
<b>6.1</b>	<b>Risk assessment .....</b>	<b>5</b>
<b>6.2</b>	<b>Activity planning and impact mitigation .....</b>	<b>5</b>
<b>6.3</b>	<b>Stakeholder engagement .....</b>	<b>6</b>
<b>6.4</b>	<b>Continuous improvement.....</b>	<b>6</b>
<b>6.5</b>	<b>Internal and external communication.....</b>	<b>6</b>
<b>6.6</b>	<b>Policy approval, dissemination and monitoring .....</b>	<b>6</b>

This Human Rights Policy was approved by the Board of Directors of SINA S.p.A. on March 5, 2021.

Biodiversity, or biological diversity, is defined by the United Nations Conference on Environment and Development, held in Rio de Janeiro in 1992, as the variability of living organisms, including, inter alia, terrestrial, marine and other aquatic ecosystems, and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems<sup>1</sup>.

Biological diversity supports the provision of ecosystem services - benefits that ecosystems provide to humankind. Economic prosperity, business prosperity, and welfare depend on the state of natural capital, thus including ecosystems that provide essential goods and services.

## 1 PURPOSE

SINA S.p.A. ("SINA" or the "Company") and its subsidiaries are committed to the conservation and protection of biodiversity and ecosystem services. As such, this policy (the "Policy") establishes general principles in relation to the protection of biodiversity and landscape.

## 2 SCOPE AND APPLICATION

This policy applies to SINA S.p.A. and its direct or indirect subsidiaries in Italy and abroad ("Group" or "Companies of the Group") and is therefore binding for the conduct of all the employees and collaborators of these companies or of all those who, for whatever reason and regardless of the type of contractual relationship, contribute to achieving the company's aims and objectives.

This policy is addressed to the members of the Board of Directors and of the other corporate bodies and control bodies of the Companies of the Group, i.e. managers, employees and all those who have relationships with them, for any reason, such as collaborators, consultants, suppliers, contractors and business partners.

## 3 REFERENCES

This policy is applied, together with all the regulations in force in the countries where SINA S.p.A. operates, in addition to all the principles found in the code of ethics and conduct (the "Code of Ethics"), and in the Organization, Management and Control Model pursuant to Legislative Decree No. 231/2001 ("Model 231") in the current company policies and procedures.

The policy also refers to the following external elements:

- United Nations Convention on Biological Diversity (CBD);
- United Nations 2030 Agenda for Sustainable Development and Sustainable Development Goals;
- The EU's Biodiversity Strategy for 2030. Bringing nature back into our lives;
- EU Green Infrastructure Strategy;
- International Finance Corporation Performance Standard 6;
- Science-Based Targets;
- Global Inventory on Biodiversity Offset Policies (GIBOP);

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<sup>1</sup> Convention on Biological Diversity, Article 2.

- Integrated Biodiversity Assessment Tool (IBAT).

## 4 DEFINITIONS

**Undeclared work (or "off the books"):** is work carried out, in whole or in part, without contractual or tax (and, therefore, pension fund and insurance) regularization, or in violation of the law as it provides, for example, working hours that do not comply with regulations.

## 5 SCOPES AND RESPONSIBILITIES

During the performance of its business activities, SINA S.p.A. interacts with various species, habitats, ecosystems and landscapes and is therefore committed to promoting the biodiversity of ecosystems, developing new projects in a sustainable way, and protecting and promoting the development and growth of natural heritage. These commitments are made and promoted through this Biodiversity Policy so that the various levels of the organization can advance the development of methods of analysis and actions for biodiversity conservation in the planning and carrying out of their activities.

## 6 PRINCIPLES

### 6.1 Risk assessment

SINA S.p.A. promotes the analysis of exposure to biodiversity risk and the implementation of dedicated management models in order to prevent or mitigate any impacts on biodiversity linked to its activities that take into account the multiple contexts it operates in, characterized by different specifications as regarding habitats, species and ecosystems.

In this context, SINA S.p.A. also intends to promote an appropriate interrelation between environmental aspects such as biodiversity conservation, climate change, natural resource management, landscape protection and social aspects such as local community development.

### 6.2 Activity planning and impact mitigation

Priority aspects related to biodiversity conservation are assessed and managed during the decision-making process for the implementation of new projects, the redevelopment of existing infrastructure and the management of business activities.

More specifically, in order to promote the principle of "no net loss" of biodiversity and, where applicable and possible, of a positive "net gain", SINA S.p.A.'s approach to biodiversity, defined in line with the best practices in the field of application of the "mitigation hierarchy framework", is divided into four sequential phases and a commitment across them:

- Avoid;

Take steps, where possible, to avoid creating negative impacts on biodiversity, such as site selection, planning, programming, etc.

- Minimize;

Take feasible steps to reduce the duration, intensity, and/or negative impacts on biodiversity that cannot be completely avoided, such as wildlife crossings, physical and

operational logging controls, etc.

- Restore and Regenerate;

Take all feasible measures to restore and or regenerate ecosystems degraded due to impacts that cannot be fully avoided or minimized such as green infrastructure for flood control, and activities to restore habitat, biodiversity, and ecosystem services.

- Compensate;

Take all possible measures to compensate, repair or pay for damages for biodiversity loss caused by activities that cannot meet the "no net loss" biodiversity target, such as restoration and reverse loss offsets<sup>2</sup>.

- Transform.

Promote progressive internal and external transformation to address systemic drivers of biodiversity loss (see Stakeholder engagement).

### **6.3 Stakeholder engagement**

Involving stakeholders, both internal and external, is critical to implementing effective strategies in managing biodiversity and landscape protection issues, and promoting a transformational approach to the systemic drivers of biodiversity loss.

For this reason, SINA S.p.A. promotes the creation of partnerships with public organizations, scientific institutes, research centers and international non-governmental organizations (NGOs) in the area to ensure the alignment of its activities and objectives with international and national best practices.

In order to trigger a systemic change, with a view to progressive transformation, SINA S.p.A. undertakes to promote, both internally and among all stakeholders and along the value chain, a culture focused on raising awareness of biodiversity protection, promoting training, research and conservation activities, awareness campaigns and any sponsorship activities.

### **6.4 Continuous improvement**

SINA S.p.A. is committed to the continuous improvement of the management of issues related to the conservation of biodiversity, the enhancement of ecosystem services and the protection of the landscape through the study of methodologies for monitoring performance and the definition of specific objectives.

### **6.5 Internal and external communication**

SINA S.p.A. undertakes to regularly inform all stakeholders of its performance in relation to the protection of biodiversity and landscape, including the progress of current activities, planning and future objectives.

### **6.6 Policy approval, dissemination and monitoring**

The policy is made available to all stakeholders and can be accessed on the SINA S.p.A. website.

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<sup>2</sup> Compensation is intended by SINA S.p.A. as a residual strategy, where negative impacts cannot be avoided, minimized and/or directly restored or regenerated.

SINA S.p.A. approves this biodiversity policy by resolution of the Board of Directors and promotes its adoption by all subsidiaries, which will independently adopt this document by resolution of their administrative bodies, ensuring its timely adoption by their respective subsidiaries.

SINA S.p.A. and its subsidiaries shall endeavor to encourage companies in which it has a non-controlling interest (including joint ventures) to adopt this policy.

Should local law or custom apply higher standards than those set forth in this policy, local law and custom must always apply. If, on the other hand, the policy provides for a more restrictive standard, the latter prevails.

This Policy is subject to periodic review whenever national and international regulations, to which reference is made as best practices, are amended or differently interpreted by courts or whenever the need arises.