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ICTLC Ethics, Innovation and Diversity Policy

Innovation, Ethics and Diversity, along with excellence, are the founding principles of ICT Legal Consulting Studio Legale Associato Balboni, Bolognini & Partners (“ICTLC”).

Our view is that a diverse and inclusive team is more apt to successfully deliver what our clients need. Our team is made up of people selected on the basis of their objective qualifications, without prejudice in terms of gender, sexual orientation, ethnicity, age, nationality, religion or socio-economic status. The people we work with come from all over the world, from different backgrounds and fields of expertise, which gives ICTLC an exceptional multicultural vision and remarkable linguistic capacity.

We believe that valuing people from different backgrounds, tackling discrimination, and encouraging meritocracy and innovation in the way we provide our consulting services are fundamental in creating a positive working environment and a sense of belonging among the people we work with. This approach to Innovation, Diversity and Ethics is essential for ICTLC’s sustainable development.

Our mission and our concrete actions are proof of our commitment to the fundamental principles of what we feel a diversified and inclusive workplace should be. These principles are:

Dignity and respect: We actively encourage an environment where all individuals are treated with respect and where difference is seen as an asset. We expect courtesy in all interactions between colleagues, ICTLC’s collaborators and its clients. Whatever the situation, we are proud to maintain dignity and decorum.

We forbid any form of harassment, bullying or violence.

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Offices in Italy, The Netherlands, Finland, France, Greece, Spain, Sweden, Australia, Kenya, Nigeria and Saudi Arabia. Partner law firms in 56 countries: Albania, Algeria, Andorra, Austria, Bahrain, Bangladesh, Belgium, Bosnia & Herzegovina, Brazil, Bulgaria, Canada, Chile, China, Colombia, Czech Republic, Denmark, Germany, Ghana, Hungary, India, Indonesia, Ireland, Israel, Japan, Jordan, Kuwait, Luxembourg, Mexico, Moldova, Montenegro, Morocco, New Zealand, North Macedonia, Norway, Pakistan, Peru, Philippines, Poland, Portugal, Romania, Serbia, Singapore, Slovakia, South Africa, South Korea, Switzerland, Taiwan, Tanzania, Thailand, Tunisia, Turkey, UAE, Uganda, UK, USA, Vietnam © 2025 ICT Legal Consulting - All rights reserved. This document or any portion thereof may not be reproduced, used or otherwise made available in any manner whatsoever without the express written permission of ICT Legal Consulting, except for the use permitted under applicable laws.

Non-discrimination: We believe in the power of diversity. We do not discriminate based on age, nationality, ethnic origin, disability, gender identity, sexual orientation, marital status, religion or socio-economic status.

Gender equality: We always look at the merits and substance of a person, not their gender identity. This is why we accept all forms of LGBTQIA+¹ gender expression and endorse the United Nations Sustainable Development Goals² for gender equality and the *empowerment* of women. We consider the full participation of women in our company as a priority. At ICTLC, women have taken leading roles since its establishment.³ We have achieved gender parity precisely through our choice to consider the merits of a person, not their gender identity. ICTLC is firmly convinced that a strong female presence and diversity at all levels of the organisation is not only an asset, but a prerequisite for developing our business and to uphold the principles set forth in this policy. Moreover, in 2020, we defined a maternity policy for our female collaborators.⁴

Healthy and positive workplace: Our aim is to develop an open, positive and stimulating environment in all of our offices. We implement this policy by sustaining all team members in their professional growth and by supporting the training of all our collaborators.

We actively work to promote a healthy balance between the professional and private lives of all our professionals, giving due consideration to the needs of each individual. In concrete terms, this means offering flexible, “smart” working solutions, and cooperation in the organisation of vacations and leisure time.

Training tomorrow’s leaders: We make certain that our trainee lawyers receive quality practical experience, in accordance with the criteria of our Code of Ethics and other applicable standards. We closely follow the professional development of our trainees, and put significant effort into transferring knowledge and competences from our more experienced professionals to trainees. We offer one week of paid leave from ICTLC in the final phase of preparation for the written part of the bar examination, and one month of paid leave from ICTLC in the final phase of preparation for the oral examination (first attempt). In case the collaborator does not pass the bar examination, ICTLC offers the same periods of

¹ “Lesbian, Gay, Bisexual, Transgender, Intersex, Queer and/or Questioning, and Asexual and/or Ally”, and often a plus sign meant to cover anyone else who’s not included ([link to the source](#)).

² The 17 Sustainable Development Goals, or SDGs, were adopted by the United Nations in 2015 as “a shared blueprint for peace and prosperity for people and the planet, now and into the future”. You can find more information on the SDGs and their mission, which include “strategies that improve health and education, reduce inequality and spur economic growth - all while tackling climate change and working to preserve our oceans and forests” at the address below: <https://sustainabledevelopment.un.org/?menu=1300>

³ As of March 2025, ICTLC's gender balance is 46,58% women, 53,42% men. ICTLC is comprised of the following entities: ICTLC S.p.A., ICT Legal Consulting – Studio Legale Balboni, Bolognini & Partners, ICT Legal Consulting International B.V. and ICT Cyber Consulting s.r.l. ICTLC publishes an annual report on gender balance.

⁴ ICTLC's maternity policy allows for a leave of absence of five months, at the conditions applicable for each local entity, beginning four weeks before the due date and deferrable on request of the mother. If necessary, the period of absence can be extended (without pay).

leave, but such leave is compensated at 50 percent (second attempt). In case the second attempt is not successful, ICTLC offers the same periods of unpaid leave for all future attempts.

Innovation: We encourage innovation in our services, offering our clients new instruments and products, anticipating their needs and market trends in our effort to truly distinguish ICTLC from other legal consulting firms. At ICTLC, we see innovation and creativity as prerequisites for successful collaboration. We work continually to improve cooperation, efficiency and productivity within the organisation.

Ethics: We are committed to acting fairly and honestly in delivering all the services that ICTLC provides. ICTLC holds Innovation, Respect, Kindness, Accuracy and Dedication as the pillars of effective and lasting professional relationships, both within and outside the working context. We mandate that our collaborators and employees adhere to behavioural guidelines that reflect these values.

We believe that this is ethically and morally right not only for our clients, collaborators and employees, but for the company as a whole. We are committed to applying this Policy of Innovation, Diversity and Ethics in its entirety.

Social responsibility: We work toward developing a business environment that considers data protection and security as a resource that helps our clients to pursue their economic goals in a responsible manner. Our consulting services go beyond simple legal compliance, transforming data protection into a new form of Corporate Social Responsibility. As a concrete demonstration of our commitment in this respect, we are actively involved in the research project entitled “Data Protection as a Corporate Social Responsibility” (UM DPCSR): <https://www.maastrichtuniversity.nl/ecpc/csr-project>, directed by Paolo Balboni at the University of Maastricht.

We are involved in a range of pro-bono activities, and support the **Centro Nazionale Anti-Cyberbullismo (CNAC)** by offering free consulting to victims of cyberbullying (and their families). We also support **OdVFiori di Campo**, a Bologna-based association that raises funds to help children experiencing physical and social difficulties.

ICTLC firmly believes that the environment is humanity’s greatest resource and must be protected. For this reason, we avoid using plastics, recycle all materials used in our offices to the greatest extent possible and discourage the use of paper wherever possible.