

■ **GENDER EQUALITY,
DIVERSITY AND INCLUSION POLICY**

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1 About the document

Main related internal regulations	<ul style="list-style-type: none"> <input type="checkbox"/> Code of Ethics <input type="checkbox"/> Organization, Management and Control Model ex Legislative Decree 231/2001
Main related external legislation	<ul style="list-style-type: none"> <input type="checkbox"/> Civil Code <input type="checkbox"/> D. Lgs. 231/2001 <input type="checkbox"/> National Recovery and Resilience Plan (so-called NRP) <input type="checkbox"/> D. Lgs. 198/2006, as amended <input type="checkbox"/> L. 162/2021 <input type="checkbox"/> D. Lgs. 80/2015 <input type="checkbox"/> L. 300/1970, as amended <input type="checkbox"/> L. 53/2000, as amended <input type="checkbox"/> L. 68/1999 <input type="checkbox"/> D.Lgs. 62/2024, as amended <input type="checkbox"/> Universal Declaration of Human Rights <input type="checkbox"/> International Labor Organization (ILO) conventions on fundamental human rights <input type="checkbox"/> United Nations Global Compact <input type="checkbox"/> UN 2030 Agenda for Sustainable Development and related goals of (SDGs) <input type="checkbox"/> Women's Empowerment Principles of the United Nations <input type="checkbox"/> European Data Protection Regulation (EU) 2016/679 - (General Data Protection Regulation - "GDPR") <input type="checkbox"/> UNI/PdR 125:2022 <input type="checkbox"/> ISO 30415:2021 <input type="checkbox"/> SA8000®:2014
Approving Subject	<ul style="list-style-type: none"> <input type="checkbox"/> Direction
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2 Perimeter of application

This document is intended for all individuals operating within Lattanzio KIBS S.p.A. Benefit Corporation (Lattanzio KIBS), including shareholders, employees, contractors, and suppliers.

3 Foreword

3.1 Context of reference

Gender equality, diversity and inclusion are fundamental values for creating an open, respectful and plural work environment where everyone can express their potential. For this reason, Lattanzio KIBS recognizes and intends to guarantee the value of the principles of gender equality, diversity and inclusion as an integral part of its culture and actions, in line with what is expressed in the Code of Ethics and with the 2030 Agenda for Sustainable Development Goals #5 (Gender Equality) and #10 (Reducing Inequality).

In 2022, Lattanzio KIBS assumed the legal status of a **Benefit Corporation**. The purpose of common benefit is to promote, at all levels, the culture of innovation of institutions and public administrations with the aim of accelerating their modernization as an engine and multiplier of growth in competitiveness, productivity, sustainability and inclusiveness of the country system.

In pursuing this goal of common benefit in a work environment marked by a corporate culture that expresses a positive impact toward society and the environment, Lattanzio KIBS intends to invest in the growth of its staff, fostering their well-being in both the professional and private spheres, seeking to foster diversity and value the aptitudes and aspirations of each individual, with attention to *gender equality*.

3.2 Objectives of the document

With this document, Lattanzio KIBS defines the principles, tools and procedures it has adopted and intends to adopt to promote respect for gender equality, diversity and inclusion both within its own organization and externally to its stakeholders, sustaining attention to these principles.

4 General principles

Lattanzio KIBS considers equal treatment, respect for diversity and inclusion to be founding principles of its organization and is committed to ensuring fairness through impartial decision-making and creating the conditions necessary for everyone to freely express their value.

To ensure these principles, Lattanzio KIBS protects and encourages a supportive and inclusive culture, and respect for equal opportunity in all its meanings, regardless of gender, marital status, gender identity and affective-sexual orientation, health status, religious faith, political and labor union views, ethnic origin, nationality, age, and condition of different abilities.

These principles reflect the Company's approach to creating a work environment that fosters the overcoming of any bias in relation to gender, age, ability, culture, gender identity, and affective-sexual orientation, as forms of diversity that fuel innovation, productivity, and idea generation to meet daily professional challenges.

Specifically:

- **Gender**

The Company promotes an environment that fosters gender equality at all levels and the overcoming of stereotypes. It engages in policies and actions aimed at promoting gender equality, eliminating the gender gap, and strengthening and supporting the presence of

women in key roles and in awareness-raising initiatives and training activities aimed at spreading a culture of gender balance.

- **Age**

The company promotes labor integration and the development of a multigenerational context in which to enhance and promote the development of individual professionals by facilitating dialogue and knowledge transmission between people of different ages.

- **Skills**

The Company ensures full accessibility to all employees and stakeholders with disabilities to facilitate their active participation in the life of the company by empowering everyone to contribute to the best of the company's processes.

- **Culture**

The Company fosters, supports and encourages openness to confrontation, integration and multiculturalism both internally and externally, viewing it as a source of knowledge, innovation and creativity.

- **Gender identity and affective-sexual orientation**

The Company promotes the creation of inclusive environments where everyone feels respected and valued, regardless of their gender identity and/or expression or affective-sexual orientation, rejecting and striving to eliminate all discrimination.

5 Enforcement of policy on gender equality, diversity and inclusion

In applying the principles described above, Lattanzio KIBS aims to operate towards its employees and all stakeholders with the goal of:

- breaking down all kinds of stereotypes and prejudices, and proactively identifying the elements that constitute an obstacle to the objective elimination of discrimination and penalization, including with reference to even unconscious *cognitive biases*;
- to create relationships based on trust and mutual respect in order to enable people to express themselves to the fullest without fear of being judged in relation to their gender, marital status, gender identity and affective-sexual orientation, health status, religious faith, political and trade union views, ethnic origin, nationality, age, and different ability status;
- Promote dignity and respect for everyone, not tolerating any form of intimidation, bullying or harassment;
- Use a communication style that is mindful of respect and inclusion;
- Promote equal opportunities throughout working life by (i) providing opportunities for growth and development based on merit and potential, regardless of age and prior background, and (ii) recognizing adequate opportunities for professional fulfillment for both young and older age groups consistent with each person's combination of experience/motivation/ductility;
- Promote work-life balance.

This approach, already part of the corporate culture, is evidenced by:

- Recalls within the company's *Code of Ethics* to the principles of equal treatment, diversity and inclusion;
- *SA8000:2014 certification* voluntary and verifiable standard to value and protect all staff falling within an organization's sphere of control and influence;
- *UNI/PdR 125:2022 certification*, the guideline for gender equality management systems;
- *ISO 30415:2021 certification*, the international standard outlining requirements and guidelines for integrating Diversity and Inclusion (D&I) principles into human resource management and organizational processes;
- Establishment of a *Social performance team* to ensure ongoing oversight and monitoring of compliance with principles and behaviors related to equal treatment, diversity and inclusion;
- A *Diversity Manager*, whose appointment reflects the company's commitment to promoting inclusion and gender equality by valuing differences to enhance organizational culture, innovation, and overall performance.

The main macro-environments on which the gender equality, diversity and inclusion policy focuses are identified below.

5.1 Recruiting

Lattanzio KIBS conducts its recruitment process in accordance with the principles of objectivity, competence, and professionalism, while fully upholding the values of diversity, equity, and inclusion.

To ensure transparency, impartiality, and equal access to opportunities, the Company follows a structured and merit-based selection process consisting of the following stages:

- a) a job posting drafted in compliance with the principle of equal treatment and explicitly promoting the workplace inclusion of people with disabilities, in line with Law 68/99;
- b) preliminary interviews with the HR team, aimed at assessing both technical skills and candidates' motivations and personal values;
- c) assessment tests and tools selected according to the role, standardized and free from discriminatory elements;
- d) evaluation interviews conducted by Managers and, where appropriate, Partners, all adequately trained on unconscious-bias awareness to ensure fairness and objectivity;
- e) a final hiring decision issued by HR Management based on transparent and merit-based criteria.

Through this approach, Lattanzio KIBS aims to build an organization that values individual differences, promotes inclusion, and strengthens a culture of respect and equity.

5.2 Choosing freelance experts

In the activity of selecting freelance experts, Lattanzio KIBS relies exclusively on criteria of objectivity, competence, and professionalism so as to ensure a fair and impartial process without any kind of discrimination in full compliance with the principle of equal opportunity and non-discrimination.

In addition, Lattanzio KIBS is committed within the contract standards to include express termination clauses in case of behavior in violation of the principles on gender equality, diversity, and inclusion.

5.3 Remuneration

The *compensation* system reflects the specific structure of professional profiles within the company.

The focus is on ensuring that individuals are remunerated in proportion to their abilities, competencies, performance, and contribution to the company's results, in line with the principles of equity, inclusion, and non-discrimination.

Grounded in its commitment to internal equity, Lattanzio KIBS regularly monitors compensation trends across the organization.

5.4 Training

The Company implements initiatives to foster skills development, ensuring inclusion and participation without distinction based on gender, age, ability, cultural background, gender identity, sexual orientation, full-time or part-time status, or disability. To support this, it has established its own "Academy," which manages training activities starting from mandatory baseline programmes.

New employees follow an onboarding process designed to facilitate their integration, support the gradual acquisition of skills, and fill any informational gaps that may hinder inclusion and personal growth. Upon entry and whenever roles or areas of responsibility change, continuous shadowing and on-the-job training are provided to support the handover of tasks and the understanding of company processes.

Online training opportunities represent an additional driver of inclusion, particularly for employees working remotely or on parental leave. This format enables staff on leave to benefit from the parenting experience while also acquiring new skills, staying updated on ongoing initiatives, and reducing informational gaps upon return. Such an approach preserves the relationship between the individual and the Company, ensures full alignment on activities and business developments, and prevents unjustified slowdowns in one's professional path.

The Company invests in internal communication activities and training programmes aimed at promoting gender equality, diversity, and inclusion, offering insights into both the broader context and specific topics. To strengthen a culture of non-discrimination, all new hires receive mandatory training on European legislation regarding equal opportunities and anti-discrimination.

5.5 Staff evaluation

Lattanzio KIBS uses a performance appraisal process and career processes in accordance with the principles of impartiality, proportionality, and competence, considering the organizational role held, in full compliance with the principles of equal opportunity, inclusion and non-discrimination.

The objective of this process is to ensure alignment between individual and corporate goals by promoting listening and discussion.

5.6 Work-life balance

Lattanzio KIBS recognizes the importance of *work-life balance* as a key factor in enabling individuals to pursue their professional ambitions and aspirations, while ensuring that personal circumstances or specific needs - such as parenthood or caring for non-self-sufficient family members - do not become obstacles or sources of indirect discrimination in their career path.

Work-life balance measures include:

- flexible start and end times, as outlined in the communication of standard working hours;
- teleworking and/or smart working, regulated pursuant to Articles 18 et seq. of Law No. 81/2017;
- additional flexibility for employees returning from maternity leave, including ad hoc arrangements to support better work-life balance based on specific personal needs (including part-time arrangements), subject to compatibility with organizational requirements.

5.7 Employee wellness programmes

Lattanzio KIBS provides its employees with a welfare plan governed by a dedicated annual regulation, which defines the scope of beneficiaries without distinction based on gender, age, marital status, sexual orientation, religious beliefs, political opinions, or disability status.

5.8 Communication and outreach

Lattanzio KIBS promotes respectful behaviour across the organization to prevent any discriminatory or offensive conduct. In this regard, the dissemination of Gender Equality, Diversity and Inclusion Plan strengthen an environment of trust and shared responsibility, ensuring that every employee understands the principles of non-discrimination and contributes - through their actions - to fostering a consistent and inclusive culture.

In line with its predominantly female demographic composition, the Company is committed to ensuring that the presence of women is appropriately valued in every context. This commitment is adapted on a case-by-case basis, considering the role, required competencies, and the specific nature of each event.

Lattanzio KIBS also invests externally in gender equality initiatives through participation in national and international networks.

6 Monitoring and control

6.1 The Steering Committee

The Steering Committee, appointed by the Administrative Body, is responsible for monitoring the implementation and progress of the company's gender equality, diversity, and inclusion policies and strategies. It is composed of one representative from management (the HR Department) and one employee representative (elected pursuant to the SA8000 standard).

The functions of the Steering Committee include:

- Risk mapping related to areas of potential criticality regarding gender equality, diversity, and inclusion;
- Identification of corporate policy improvement actions;
- Monitoring the status of implementation of gender equality, diversity and inclusion policies and related key indicators by highlighting any deviations from what was planned;
- Conducting periodic audits of performance on planned policy matters and areas for improvement;

- processing of observations, reports, and complaints by informing the Management and coordinating the resolution of problems with a view to giving support and concrete contribution to the interested party who is a victim or witness of forms of abuse, offense or phenomena of impropriety or illegality.

The Steering Committee coincides with the Social Performance Team appointed under the SA8000 standard.

6.2 Corporate compliance

To provide greater transparency to the entire process, the Compliance Team will be able to operate independently of the Steering Committee and verify through periodic audits compliance with procedures regarding policy monitoring and stakeholder processing of reports. The Compliance Team will also be able to provide support to the Certifying Body in the quality standards compliance audit processes.

6.3 Periodic surveys

To strengthen the effectiveness of its gender equality, diversity, and inclusion policies, the company conducts periodic surveys. These assessments measure employees' knowledge and awareness of the principles, procedures, and tools related to inclusion, while also evaluating their willingness to use them.

6.4 Reporting and complaints

In order to ensure proper oversight of behaviours within the company, as required by the Code of Ethics, every employee or stakeholder may file a complaint regarding any facts or events involving abuse, misconduct, offence, or unlawful behaviour occurring in the workplace or connected to it, and that conflict with the principles of gender equality and social responsibility. Complaints may also be submitted anonymously. The Company guarantees the highest degree of confidentiality regarding the reported facts, within the limits of investigative requirements, and undertakes to conduct inquiries even in the case of anonymous reports.

Reports concerning issues related to social responsibility, gender equality, and non-discrimination may be submitted to the **dedicated non-discrimination and equal opportunities** desk (csr@lattanziokibs.com) or addressed to the SA8000 Workers' Representative.

The Company also provides a dedicated channel for anonymously reporting any unlawful or improper conduct or behaviour that constitutes a violation - or an inducement to violate - this policy. The channel is accessible at the following link: <https://lattanzio.whistlelink.com>

6.5 Reporting

Lattanzio KIBS reports on gender equality, diversity, and inclusion matters in its Management Report accompanying the annual financial statements and in its annual Impact Report.

7 Roles and responsibilities

As part of the establishment and implementation of the policy on gender equality, diversity, and inclusion below are the main management bodies as per the approved corporate organizational chart:

- **HR Management**

- approves the plan on gender equality, diversity and inclusion;
- is briefed periodically on the progress of policies and the performance of indicators, to verify compliance with policies and implementation of strategies and take action on any reports on non-compliant behavior;

- **the Steering committee**

- formulates proposals for corporate strategy on gender equality, diversity and inclusion, defining initiatives, targets and action plans;
- monitors the implementation of the policy, relevant processes and key indicators, implementing any corrective actions;
- captures any reports of behavior that does not comply with the policy and manages follow-ups;
- provides input for the dissemination, management, and application of the activities in the above points at the group level as well.

- **the Compliance Team**

- ensures the correct application of procedures and verifies the evolution of the scenario in line with the standards set by company policy and quality certification, including by performing periodic internal audits;
- supports the certifying body in the planned audit and control activities;

- **the Communication Team**

- takes care of the promotion activities of the policy and related initiatives to external and internal stakeholders ("stakeholders"), strengthening its positioning, including through the care of communication activities aimed both internally and externally.