

Diversity, Equity and Inclusion (DE&I) Policy

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1. Scope

The **Diversity, Equity, and Inclusion Policy** (hereinafter also the "**DE&I Policy**" or the "**Policy**") aims to outline the principles and commitments regarding diversity, equity, and inclusion (hereinafter also "DE&I") adopted by Epipoli S.p.A. (hereinafter also "Epipoli" or the "Company").

These values are a priority in the organization's management processes and are fundamental to creating a corporate culture that respects the uniqueness of every person and promotes a collaborative, inclusive, and pluralistic culture through:

- Awareness: Organizing educational moments, events, training, and dialogue to foster understanding and knowledge of the dimensions of diversity and build a more inclusive culture.
- Processes and Policies: Evolving all current human resource lifecycle processes to ensure inclusiveness and the adoption of impartial decisions at all levels of the organization.
- Objectives and Data: Developing clear objectives by leveraging data and metrics, measuring results and progress with systematicity.

The DE&I Policy is integrated and consistent with the Code of Ethics and the Organization, Management, and Control Model pursuant to Legislative Decree 231/01 adopted by Epipoli S.p.A.; in particular, the Company repudiates any form of discrimination based on race, gender, religious belief, age, health status, political and union opinions, nationality, sexual orientation, and any other personal characteristic. Diversity represents, indeed, an opportunity for innovation and development, fostering dialogue and the exchange of ideas, opinions, and experiences.

Epipoli also ensures working conditions that respect personal dignity and works to prevent any episodes of intimidation, *mobbing*, or *stalking* in the workplace.

2. Scope of Application and Exceptions

The DE&I Policy applies to all company activities and involves all personnel of Epipoli S.p.A. (including collaborators, consultants, and other professionals), including all personnel provided by third-party companies. The Company also commits to ensuring that its supply chain and partnerships embrace the principles of this policy, in line with the Code of Ethics.

3. Internal Reference Documents

- Code of Ethics.

4. DE&I Terms and Definitions

Diversity, Equity, and Inclusion (DE&I) are core values for Epipoli, essential for creating an open, fair, respectful, and pluralistic work environment where every person can express their full potential.

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Diversity embraces the differences between people, such as race and ethnic origin, skin color, sex, sexual orientation, gender identity, health status, disability, age, religion, political opinions, national ancestry or social extraction, as well as any other personal characteristic.

Inclusion, on the other hand, involves creating a corporate culture that allows all people to feel welcomed, respected, and valued, ensuring equal opportunities for participation and contribution.

Finally, **equity** is a process aimed at ensuring that processes and programs are objective and impartial, providing equal outcomes for every individual while taking into account the unique characteristics and differences of each person.

In line with Goals No. 5 (Gender Equality), No. 8 (Decent Work and Economic Growth), and No. 10 (Reduced Inequalities) of the United Nations 2030 Agenda for Sustainable Development, Epipoli promotes an inclusive environment, ensuring equal opportunities, the absence of discrimination, and encouraging mutual respect. This commitment is put into practice through training, awareness-raising, and support policies.

Epipoli constantly monitors its progress regarding equality and is committed to the continuous improvement of its practices.

5. References

This policy reaffirms Epipoli's commitment to conducting its business operations in full compliance with legal requirements at both local and international levels. This document has been drafted with reference to the principles of human rights protection established by international organizations, including:

- The 2030 Agenda for Sustainable Development and its corresponding Sustainable Development Goals (SDGs);
- The United Nations Universal Declaration of Human Rights;
- The core Conventions of the International Labour Organization (ILO);
- The OECD Guidelines;
- The UNI/PdR 125:2022 Reference Practice (*Guidelines on the gender equality management system, which entails the adoption of specific KPIs related to gender equality policies in organizations*).

These principles are put into practice through organizational structures, external engagement initiatives, and specific internal tools.

6. Dimensions of Diversity

Gender

In line with its Code of Ethics, Epipoli promotes a corporate culture aimed at fostering gender balance, where every person—at any level—contributes to overcoming stereotypes, discrimination, or prejudice, in order to create the ideal conditions for each individual to express themselves to their fullest potential.

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To this end, Epipoli is committed to systematically raising awareness among all personnel, aiming to foster the recognition and overcoming of unconscious bias and, in particular, gender stereotypes. Epipoli recognizes and supports the right of all personnel to become parents, regardless of their gender. Furthermore, the Company actively promotes policies and actions designed to foster equal opportunities, female empowerment, work-life balance, the shared responsibility of family care, and the removal of potential obstacles, including those related to parenthood.

Generations

Epipoli recognizes the value of generational diversity and implements strategies to support and manage the needs of the different generations within the organization. Attention is focused not only on the age and professional seniority of personnel but also on identifying effective developmental pathways. These pathways aim to foster mutual enrichment across different social, cultural, and working experiences, as well as the unique perspectives, skills, knowledge, and competencies characteristic of each generation, thereby enabling effective intergenerational dialogue.

Sexual and Affective Orientation and Gender Identity

Epipoli aims to promote policies, solutions, and measures to enhance working conditions through inclusive processes for every individual, respecting the identity representations with which each person identifies and, in general, preventing and countering any form of direct or indirect discrimination related to affective or sexual orientation.

The objective is to help give concrete form to the principle of equal opportunities, protecting fundamental freedoms and the personal characteristics of individuals at every stage of the working relationship. This involves promoting both formal and substantive equality through preventative solutions and mechanisms against potential biased treatment unrelated to the job requirements, while fostering the Company's active commitment—both internally and externally—to launch and participate in cultural awareness, listening, and communication initiatives aligned with social sustainability strategies.

Disability

Epipoli guarantees equal opportunities to all its people, regardless of sensory, cognitive, or motor disabilities. Within this framework, the Company is committed to implementing concrete measures to facilitate the onboarding and inclusion of people with disabilities, fully valuing their talent and skills and thereby contributing to the removal of cultural, sensory, and physical barriers. Actions are designed to enable employees with disabilities to perform their duties effectively, ensuring that all personnel receive the necessary support to meet their individual challenges and feel valued within the organization.

Parenthood

Epipoli is committed to supporting caregiving and parenthood, promoting a model of shared family responsibility and gender equality while recognizing all forms of family structures. Epipoli commits to maintaining assigned benefits during leave periods, facilitating the subsequent reintegration of personnel into their roles, and safeguarding their professional growth and rights.

Intersectionality

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Epipoli is aware that diverse characteristics can coexist within a single individual and, as such, contribute to the development of a unique personal identity shaped by the intersection of multiple social identities. Consequently, any attempt to classify or restrict human variety into homogeneous categories represents an oversimplification and an undue constraint. In seeking to understand and manage personal expectations, while dismantling individual barriers to inclusion, Epipoli is committed to adopting an intersectional approach that takes into account the specific needs of each person.

7. DE&I Principles within Corporate Processes

During the recruitment and selection of candidates for new positions, Epipoli does not discriminate on the basis of gender, sexual orientation, race, trade union membership, political affiliation, nationality, religious belief, or disability, provided it is compatible with the job requirements.

The evaluation of personnel—both during the hiring phase and within the ongoing processes of management, development, and career advancement—is carried out strictly on the basis of the alignment between candidate profiles and expected role requirements, business needs, merit-based considerations, and in full respect of equal opportunities for all interested parties, relying solely on their professional qualifications and individual capabilities.

Within the limits of available information, the Human Resources (HR) Department adopts appropriate measures to prevent favoritism, nepotism, or any form of cronyism during recruitment and hiring. HR selects, appoints, compensates, and organizes human resources based on criteria of merit, competence, objectivity, and reasonableness, while respecting the privacy and personal opinions of candidates, without any discrimination based on religion, gender, race, nationality, political belief, or trade union affiliation.

Managers and coordinators fully leverage and value all professional skills within the Company to enhance and expand the competencies of every team member in the organizational context. This is achieved by utilizing all available tools to foster the growth and development of their team (for example, job rotation, mentoring by senior personnel, and experiences aimed at preparing individuals for roles of greater responsibility).

To this end, Epipoli considers merit, professional competence, honesty, and ethical behavior as the essential pillars for any decision regarding career progression and any other aspect concerning its employees.

Epipoli provides information and training tools to all personnel, including through the corporate Intranet, with the aim of enhancing specific competencies and preserving professional value. Training and professional development pathways, including leadership programs, are assigned to groups or individuals based on specific professional growth needs, always ensuring equal opportunities of access. Every manager is expected to value the working time of personnel, requesting performance that is fully consistent with their duties and with work organization plans. The active involvement of personnel in their work is guaranteed, including through opportunities to participate in discussions and decisions instrumental to achieving corporate objectives.

Epipoli is committed to promoting gender equality within the organization by improving women's access to positions of responsibility, developing managerial skills, inclusive leadership, and female empowerment.

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Gender diversity can, in fact, lead to greater inclusion of gender perspectives in decision-making processes and contribute to better management of the organization.

Epipoli is committed to ensuring compliance with the principles of inclusion and gender equality within the processes of internal mobility and succession to managerial positions. In the event of work reorganization, the value of human resources is safeguarded by providing, where necessary, training and/or professional retraining initiatives. The responsibilities of work reorganization must be distributed as evenly as possible across all personnel, consistent with the effective and efficient operation of the business.

Epipoli is committed to ensuring that compensation policies are inspired by the principles of equity—including to prevent gender pay gap phenomena—and the valuation of the knowledge, skills, competencies, professionalism, attitudes, behaviors, results, and contribution of every person to the organization.

Compatible with general work efficiency and the specific nature of the services guaranteed, Epipoli encourages flexibility in work organization that facilitates the management of maternity and paternity and, in general, parental care. This comes with the commitment to strengthen the offer of corporate welfare services and tools to improve organizational well-being and the motivation of people in all phases of their professional and personal lives.

Epipoli is committed to disseminating, through dedicated training plans, a non-conforming culture oriented toward the inclusion of diversity, overcoming stereotypes to highlight the added value of each individual. Within the Company, all personnel, at all levels, are sensitized to the use of inclusive, respectful, polite, and correct language, aimed at avoiding any polemical, judgmental, or offensive approach.

Epipoli is committed to protecting the moral integrity of personnel, guaranteeing the right to working conditions that respect personal dignity. For this reason, Epipoli safeguards personnel from acts of psychological violence and counters any discriminatory or harmful attitude or behavior toward any individual, their beliefs, and their preferences (for example, in the case of insults, threats, isolation or excessive intrusiveness, professional limitation, hindering better job prospects, unjustified interference with the work performance of others), and ensures that an intimidating or uncomfortable working environment is not created.

Epipoli does not tolerate, prevents as far as possible, and prosecutes mobbing and sexual or personal harassment of any kind. Therefore, behaviors or speech that could disturb personal sensitivity in this regard must be avoided.

Epipoli is also committed to fostering opportunities for dialogue and listening with personnel for a better understanding of legitimate expectations regarding diversity, equity, and inclusion; to basing its internal and external communication on responsibility, committing to disseminating images and content that respect diversity; to disseminating the values of diversity and equal opportunities, actively contributing—also through communication and local initiatives—to creating an open culture for the full realization of individuals in all their dimensions, valuing and respecting the uniqueness of every person and ensuring that genders are equitably represented, including among speakers at panel discussions, events, conferences, or any other event in which the Company participates.

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8. Responsibility

Every employee shares a personal responsibility to adhere to the principles of equality and equal opportunities, and to maintain an inclusive attitude.

Epipoli actively promotes DE&I principles throughout its activities to ensure that all individuals receive fair, equitable treatment consistent with their personal attitudes, skills, and potential.

9. Governance and Monitoring

This Policy is drafted by the Lead of the Gender Equality Management system (GEMS), in coordination with the Diversity, Equity, and Inclusion (DE&I) Committee, and is approved by Executive Management.

The DE&I Committee defines the DE&I objectives and indicators to be achieved, monitoring their progress with the support of the expertise within the data ownership roles, and guides individual processes regarding the need to implement specific corrective actions and/or improvements to ensure full compliance with and promotion of DE&I principles within the Company and the external environment.

Epipoli also commits to promoting training sessions and surveys to help identify and remove stereotypes and biases of all kinds, as well as engaging in dialogue with company personnel to better understand their expectations and responsibilities on DE&I issues.

10. Dissemination and Updates

The DE&I Policy is communicated to all employees, including through dedicated and specific training sessions tailored to their operational areas, roles, and responsibilities. It is made available on the corporate Intranet and website to ensure full awareness and to further drive the promotion of DE&I by all interested parties as an integral part of Epipoli's value system.

This Policy will be evaluated for potential updates at least once a year, taking into account the evidence emerging from periodic assessments and the monitoring of national and international trends.

11. Reporting Systems

Behaviors, language, and, in general, any failure to comply with the principles outlined in this document have a direct impact on the overall workplace environment and, consequently, on the motivation, trust, morale, and well-being of personnel, with repercussions on job performance and Epipoli's corporate reputation.

Such non-compliances constitute a violation of the Code of Ethics and the Organization, Management, and Control Model pursuant to Legislative Decree 231/01, and are addressed in accordance with the provisions contained therein. In the event of discrimination, intimidation, physical, verbal, or psychological abuse, or harassment, personnel or any interested parties are expected to report such incidents—including anonymously—through the reporting channel made available to all interested parties via the Whistleblowing IT platform, accessible at the following link: <https://epipoli.integrityline.com/> .

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Epipoli will make every effort to conduct appropriate investigations and implement any necessary measures, with the objective of managing and resolving reports in a sensitive, impartial, effective, and timely manner.

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