**The organizational structure adopted by the company.**

 The company has a hierarchical and formalized organization to enable the clear definition of:

* Allocation of responsibilities;
* Contents of individual positions;
* Lines of dependence and reporting.

By defining duties and responsibilities and adopting clearly defined company procedures, the company intends to:

* Identify relevant stakeholders in a timely manner.
* Empower employees about the concepts of:
	+ Fairness and transparency in relations with corporate stakeholders.
	+ Traceability and documentability of the work performed.

**Introduction**

Changes and business choices have been many and varied over the years of our activity; one thing, however, that has never changed is the founding value on which the Company has developed its business activities: the most important Resources for a company are People. Without People every business concept falls apart; People must be respected, supported, and valued in every possible way. Over the years this founding value has taken shape and concreteness in a multiplicity of actions and has evolved into as many values such as: solidarity, sustainability, and Corporate Social Responsibility. In an organizational context where these values are at the center and guide business activity, everything that takes shape as activities of valuing and respecting differences, ensuring fair opportunities, and adopting policies of inclusion, can only be part of the value system of this company, in a very significant way. This centrality was also formalized in a very serious commitment made to all stakeholders when The Company decided to embark on the difficult and selective path of certification to become a B Corp, a path that began in late 2023 with the BIA. However, these goals do not represent a point of arrival, but new points of departure, because The Company is aware that the path to sustainability is a path of continuous improvement that must be monitored and nurtured, guided by the goals of the UN2030 Agenda, always keeping in mind that sustainability and Corporate Social Responsibility find implementation only if there is a balance between all aspects in play: People, the Planet and the ability to generate Prosperity.

**Reference context: DE&I**

Among sustainability issues, those related to inclusion, equity and diversity certainly have a prominent place. As a company that is virtuous in terms of sustainability which The Company believes it is, and as a Company, it has a moral duty to ensure that, also through its business activities, the conditions are created to guarantee the same opportunities and rights for all and everyone. In the corporate context, when we talk about Diversity, Equity & Inclusion (DE&I) we refer, therefore, to a set of programs, techniques and strategies aimed at recognizing and enhancing individual differences, so as to maximize the potential of all/all employees, no one excluded, and, at the same time, to identify and zero in on factors that generate discriminatory situations, whether voluntary or indirect. For The Company, as proudly stated in its Mission and Code of Ethics, difference is a value, a great opportunity for growth and innovation, but this valorization of differences can only find real application in a truly inclusive work context, where People are such, with their individual specificities and their potential to be expressed, and only by implementing tools of equity is the expression of this potential allowed. The Company is aware that making this effective in the work context is certainly not easy, because the dynamics between People are very complex, there are many factors and variables at play, organizational and structural factors of the production process can constrain certain actions, but the corporate will is strong, ethical awareness is always present and the most important value is and always will be People.

**Scope of the document**

This policy aims to formalize the ethical commitment and concrete actions implemented by The Company in the specific area of Gender Equality, so that the term Gender Equality does not remain just a now widespread slogan, few times really filled with meaning.

This document therefore seeks to define and map:

* What Gender Equality means for this company and the principles that guide the transformation of the ethical and social models of Diversity, Equity & Inclusion into concrete actions
* All business areas in which the company is committed to achieving real gender equality
* All processes, procedures, and tools put in place by the company for reporting and handling discriminatory and/or personally-harmful events .
* The communication plan for the dissemination and awareness of the present policy and all related documents .
* The tools for monitoring and evaluating the processes implemented in the various areas for the realization of concrete and real gender equality .
1. **Glossary**
* UN Agenda 2030 - is the new global framework consisting of the 17 Sustainable Development Goals (SDGs) defined by the UN for national and international efforts to find common solutions to the planet's grand challenges.
* B Corp - Certification awarded to companies that strongly believe in a new model of participatory economics that reconciles the creation of economic value with the realization of collective good. The rigorous certification process by the global body B Lab goes through a careful measurement of the initiatives undertaken by the company with respect to governance, workers/employees, community, environment and customers. See also Society ...
* Bias - More or less conscious error, bias. Biases are "judgments (or biases) that do not necessarily correspond to reality, developed on the basis of the interpretation of information in possession, even if not logically or semantically related, and thus leading to an error of judgment or lack of objectivity of judgment."

The origin of the term is to be found in the Old Provençal bias meaning oblique, slanted. The term, which was originally used to define crooked pitches in the game of boules, as the centuries went by was employed more generally to denote a mental bias or inclination.

* social, environmental, economic, political, cultural through communication campaigns, events, initiatives and the like .
* Caregiver - One who cares for and provides care to dependent family members.
* DE&I (Diversity, Equity & Inclusion) - Acronym defining Diversity, Equity and Inclusion, see also JEDI and D&I.
* Discrimination - Absence of equal opportunity and treatment, effected as a result of judgment or classification.
* Diversity - Diversity, set of differences in a heterogeneous group of People pertaining to, for example, race/ethnicity, gender, age, sexual orientation, religion, or any other criteria.
* Women's Empowerment - process of women's self-determination and gaining self-awareness and power and control over their choices, decisions and actions, both in the sphere of personal relationships and in the sphere of political, social and economic life.
* Equity - Equity, fair and equitable inclusion in the workplace or society, ensuring that all People, regardless of their characteristics or affiliation, have opportunities to participate, prosper, and realize their potential.
* Gender gap - gender gap, with special reference to gender differences and social and professional inequality between men and women.
* Gender pay gap - gender pay gap, pay inequality according to gender affiliation.
* Inclusion - Inclusion, condition of involvement of traditionally excluded People and respective stable and functional inclusion in decision-making processes, systems or activities/groups to foster equal opportunities and non-discrimination by creating value for People, organizations and the social context. It requires the identification and removal of barriers that prevent People from participating or bringing their own contribution.
* Interdependence - is one of the pillars of Companies - and certified B Corp companies (the latter sign an ad hoc document when they join the B Lab community). Interdependence is a conscious choice, dictated not by need (dependence) but by the realization that each company, while it can do well on its own (independence), can do better - for itself, for its internal and external stakeholders, and for the 'world' - by working with other companies that are similar in terms of values and way of doing business.
* Key Performance Indicator (KPI) - Key performance indicators, benchmark metrics for monitoring established goals over time.
* Gender Equity (Gender Equality) - A condition that ensures People are treated equally, with equal ease of access to resources and opportunities, regardless of gender. The two terms are often used interchangeably, but the subtle difference lies in the meaning of equity from an ethical point of view held by the term Equity, i.e., the absence of avoidable or sanctionable differences between different Persons regardless of whether they belong to socially, economically, demographically or geographically different groups - such that each Person in his or her uniqueness has all the resources and masterful from the words of Paula Dressel, of the Race Matters Institute: "The route to achieving equity will not be accomplished through treating everyone equally. It will be achieved by treating everyone justly according to their circumstances."
* SDG (Sustainable Development Goal) - Sustainable Development Goal, see UN Agenda 2030
* Companies - Companies that indicate in their corporate purpose the specific purposes of common benefit that they intend to pursue and operate by putting first not only profit, but jointly the welfare of People, communities, the environment in which they operate. It is a legal form, a legal status of business that makes a binding commitment with respect to the pursuit of common benefit goals and respective transparent annual reporting in a special "impact report" by designating an Impact Manager. See also B Corp.
* Social sustainability - ability to ensure an equitable distribution of human welfare conditions in terms of quality of life, safety and services for People.
* Gender Stereotypes - Rigid set of shared and socially transmitted beliefs about what a Person's behaviors, role, occupations, traits, and physical appearance are and should be, in relation to their gender affiliation.
* Corporate Welfare - Set of actions aimed at improving the welfare of those who work in the company and their families. The corporate welfare system must be concerted in the company with the active participation of the staff in a participatory governance perspective and must be supplementary and complementary to public welfare measures. By virtue of their social relevance, the endowments, goods and benefits included in this framework are excluded, in whole or in part, from labor income.
* Whistleblowing - Reporting, usually anonymously, with respect to wrongdoing, fraud or danger encountered by an organization's Personnel during their work activities. Reporting of unethical or illegal activities committed within the organization. In the context of gender equality, this is a fundamental corporate compliance tool through which a company's internal or foreign Personnel, as well as stakeholders, can report, in a confidential and protected manner, any wrongdoing encountered during their activities. In English, the term literally means "whistle-blower," and is a metaphor for the arbitration or policing function assumed by those who report and draw attention to impermissible or illegal activities so that they may be thwarted.
1. **What Gender Equality means for The Company: guiding principles**

The Company believes that implementing Gender Equality policies means ensuring that everyone and everyone has the same opportunities for growth, self-realization and self-enhancement, even within the work context. Implementing Gender Equality means stripping the interpretation of realities from any erroneous social constructs that penalize and discriminate against the female sex, and instead dressing the organizational context in mutually enhancing dynamics that take into account disabling as well as enabling factors, creating awareness of aspects to be improved and strengths, with the aim of generating and

implement a self-explanatory concept of gender equality within a corporate context that has created the intrinsic and extrinsic possibilities for its realization.

These possibilities, according to The Company, can be created by following the following guiding principles:

1. **Respect**

The Company is committed to building an organizational context based on respect considered as the value base without which it is not possible to build an organizational structure oriented toward equity and inclusion. Respect is the basis of any social relationship that can be called harmonious and cooperative, and it finds application in so many forms: respect for choice, respect for needs, respect for difficulties, respect for willingness, respect for difference, respect for uniqueness, and respect as absence of judgment.

1. **Building a culture of gender equality**

For gender equality to find real application, we need to work toward building a corporate cultural approach that:

- demolishes stereotypes, cognitive errors, and biases.

-that targets an organization of work and the work environment that does not discriminate in any way according to gender

-that takes into account latent/poorly visible potentials and talents that can instead be enhanced

-that eliminates concrete barriers that prevent the full realization of women in the work environment

-that facilitates the full realization of the concept of equity.

-that ensures fair and inclusive languages and treatment.

-that enhances differences understood as potential.

1. **Promoting empowerment processes**

The Company is aware that even within the organizational context it is possible to implement paths of development and fulfillment, not an end in themselves, but that go to nurture in a positive and meaningful way the psychological contract between worker/employees and the company, triggering mechanisms of mutual enhancement, increasing levels of motivation, creating a serene and productive environment. The company wants to nurture such processes, with particular attention to women's empowerment, through training paths, active participation mechanisms, creating spaces for vertical and horizontal growth opportunities, implementing active listening at all company levels.

1. **Support**

In the management of People, The Company applies every day the principle that "no one should feel alone, no one should feel abandoned" and has built a structured system to be able to forward reports and a thorough methodology for handling them to deal with and best resolve any type of critical situation that is precisely reported by employees.

1. **Active participation in community activities**

The Company is aware that the company is not itself, but is an active part within the community, and also in spreading the culture of gender equality, it is essential to engage with the local area, other companies, and public and private institutions in order to spread good practices, break down barriers, and create opportunities for female achievement, not only within the company, but in the community as a whole

1. **Program for gender equality**

The principles described above find concrete application in the Gender Equality program developed by The Company, which includes 4 main areas of action:

1. Governance actions for the development, dissemination, and implementation of a Culture of Gender Equality both inside and outside the company
2. Development of a work environment in which gender equality is a founding value through the day-by-day application of best practices aimed at ensuring equal opportunity in all macro business processes.
3. Support and Protection of the Person through mechanisms for reporting discrimination and/or acts harmful to the Person and taking charge of it until resolution.
4. Monitoring and evaluation of all actions activated.

## Program for gender equality

1. Governance actions for the development, dissemination, and implementation of a Culture of Gender Equality both inside and outside the company.
	* Maintenance and enhancement - Gender Equality and Inclusion work-life balance policy.
	* Articulated and structured corporate welfare system
	* Communication plan on DE&I issues
	* Development of a communication code of conduct
	* Training related to cognitive bias
	* Training related to DE&I
	* Corporate events related to DE&I themes in partnership with the community

Corporate integrative actions- Networking and exchange of best practices with virtuous companies on sustainability and DE&I issues

Active participation/Internal working groups Creation of Employees Collaboration Team active on dissemination of gender equality issues, abatement of discrimination related to religion, sexual orientation, etc.

Doing Good Ambassadors: engaged in proposing solidarity activities in collaboration with associations in the area and in spreading solidarity events and involving colleagues/staff in these activities

1. Developing a work environment in which gender equality is a founding value through the day-by-day application of best practices aimed at ensuring equal opportunities in all business macro processes

Recruitment The Company is committed to implementing a fair and neutral selection and recruitment process, free from any kind of discrimination, both from the point of view of the language used and from the point of view of a neutral approach at the interview and assessment stage with awareness of cognitive biases that lead to gender stereotypes.

Induction and on-boarding process The Company is committed to involving all newly hired Personnel in appropriate on-boarding and welcome paths in order to give an overview of the company's functioning, but also to acquaint newly hired People with company policies, procedures and values, creating the same information, training and value bases without discrimination on the basis of gender, ethnicity, religion, sexual orientation, age, etc.

Training The Company is committed to implementing a training process that provides equal opportunities and skills development equally between men and women, with a focus on DE&I and women's empowerment issues

Remuneration policies The Company is committed to implementing proper management of remuneration policies to ensure fairness and merit, without discrimination based on gender, ethnicity, religion, sexual orientation, age, etc.

Career development The Company is committed to implementing career development policies based on fair, objective and non-discriminatory evaluation, guaranteeing equal opportunities for personal growth and job fulfillment for both genders

Performance appraisal The Company is committed to implementing a performance appraisal and bonus allocation process that is based on objective data and that is implemented through both quantitative and qualitative tools that guarantee a neutral, fair and objective appraisal, considering in it the enabling and disabling factors related to the

1. Support and protection of the Person through mechanisms for reporting discrimination and/or acts detrimental to the Person and taking care of them until resolution

The Company has implemented a system to be able to receive reports regarding:

* Actions, rules, company policies that have a negative influence on the Person, 'environment, social context.
* Events that discriminate or harm the Person either psychologically, physically, religiously and/or related to gender, sexual orientation, age, ethnicity, disability, etc. .

This tool is usable by both internal Personnel and individuals/entities outside the organization, as it is available for compilation on the company website, in the appropriate section.

The compilation of such a report is also possible in anonymous mode, for this purpose The Company has put in place all necessary measures, to ensure the maintenance of anonymity of the reporter.

The effectiveness of the mechanism for reporting discrimination and/or acts harmful to the Person is evaluated annually through dedicated KPIs, which are fundamental to the process of continuous improvement.

All reports are saved in a dedicated network folder, which, however, complies with all privacy requirements. In addition, the Commission maintains a record of all activities carried out from receipt to closure of the report, ensuring adequate traceability of the mechanism and also total transparency.

Annually, internal surveys are also administered to the company employees that aim to bring out workers' and employees' perceptions of the issue of gender equality in the company, and of critical situations (and those that have not emerged from the reporting mechanisms) regarding discrimination, harassment, abuse, etc. Such questionnaires, which guarantee the total anonymity of respondents, also probe, and detect symptoms and problems arising from work-related stress and the coping strategies implemented.

The results of such a survey are analyzed with the aim of making improvements in the company to reduce any critical situations and improve the general work environment and well-being of people.

Person Support and Protection Actions.

Involvement of the RSSP and the competent doctor on the issues of prevention of abuse, harassment and discriminatory events in the workplace and their recognition

* analysis of risks related to such events in the DVR
* general safety training that includes these issues
* internal surveys on gender equality, work-related stress and coping strategies
* updating of the emergency plan by including scenarios attributable to this topic and emergency numbers to contact
* periodic safety meeting involving all prevention figures
1. Monitoring and evaluation of all activated actions.

This document is subject to analysis and monitoring by the steering committee and management at the annual meeting aimed at management review.

 At this meeting, the following aspects will be analyzed:

* The continued congruity of the strategic plan with the gaps detected within the processes mapped in this document
* The results of the improvement activities included in the strategic plan .
* The need for updates and amendments to this document, including as a result of significant regulatory changes .
* Additional training needs

Surveillance and monitoring activities are also applied to:

* All Governance actions.
* All Processes
* All Person Support and Protection actions mentioned in this document.
1. **Strategic plan**

For each of the 4 action areas described above, the company has developed a Gender Equality strategic plan containing:

* All areas and processes impacted by Gender Equality dynamics.
* All actions planned by the company for the realization of real and concrete Gender Equality
* The monitoring actions.
* The reference procedures and tools
* All the KPIs related to each action/process.
* The data collected.
* The gaps detected.
* The improvement actions that want to be taken to heal any gaps detected the reference document is the Strategic Plan.
1. **Communication plan**

The Company plans a Communication Plan consisting of different types of events, meetings, through different tools, aimed at the dissemination of this policy, as well as all the Policies related to the reporting of discrimination or harmful acts of the Person, to disseminate them both inside and outside the company. Specifically:

* Publication on the website of the Gender Equality Policy
* Publication on the website Reporting Discriminatory Events and Complaints
* Publication on the website-Submission of Discrimination or Complaint Reporting
* Annual training and information session during an internal meeting called Education & Empowerment to share this Policy and all related documents
* Annual drafting of the Impact Report and its publication on the website
* Publication of the company's Code of Ethics and Code of Conduct on the website
* Updates and communications related to Gender Equality and DE&I issues.
1. **Evaluation instruments**

In addition to the monitoring and evaluation of detailed KPIs, in order to assess the company's commitment and impact on Gender Equality issues, the following tools are identified:

* B Impact Assessment and maintenance of B Corp certification.
* Obtaining UNI/PDR 125:2022 Gender Equality Certification and maintaining it .
* Annual preparation of the Impact Report.

**Regulatory references**

* Prassi di riferimento UNI/PdR 125:2022 Parità di genere https://store.uni.com/uni-pdr-125-2022
* GRI 405-2 Diversity and Equal Opportunity https://www.globalreporting.org/standards/media/1020/gri-405-diversity-and-equal-opportunity- 2016.pdf
* Definizione ufficiale dell’SDG5 con relativi Target e link utili https://www.un.org/sustainabledevelopment/gender-equality/ https://www.globalgoals.org/goals/5-gender-equality/
* Strategia di gender equality della Commissione Europea - https://ec.europa.eu/info/policies/justice- and-fundamental-rights/gender-equality/gender-equality-strategy\_en
* Gender Equality Index che misura lo stato di avanzamento della parità di genere in Europa e nei singoli Paesi dell’Unione Europea https://eige.europa.eu/gender-equality-index/2021
* ILO Convention 100 - Equal Remuneration https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\_INSTRUMENT\_ID, P12100\_LANG\_CODE:312245,en
* ILO Convention 111 – Discrimination https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100\_INSTRUMENTID,P12100\_LA NG\_CODE:312256,en:NO
* Convenzione ILO del 21/06/2019 n. 190 e relativa Raccomandazione del 21/06/2019 n.206 – Eliminazione della Violenza e delle Molestie sul luogo di lavoro https://www.ilo.org/rome/norme-del-lavoro-e-documenti/WCMS\_713379/lang--it/index.htm https://www.ilo.org/rome/norme-del-lavoro-e-documenti/WCMS\_713418/lang--it/index.htm
* Codice delle Pari Opportunità (Dlgs 198/06) https://www.parlamento.it/parlam/leggi/deleghe/06198dl.htm#:~:text=303%2C%20articolo%205)-
* 1.,utilizzazione%20dei%20relativi%20fondi%20europei.
* B Lab B Impact Assessment https://app.bimpactassessment.net/get-started
* UNGC e B Lab SDG Action Manager https://app.bimpactassessment.net/get-started/partner/ungc