



PA. 03:  
DIVERSITY AND INCLUSION POLICY

## Revisions

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## Approvals

<b>APPROVED</b>	<b>DATE</b>
Board of Directors of SINELEC S.P.A.	3 March 2025

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## 1. DIVERSITY AND INCLUSION POLICY

*Developing human capital based on merit, professional skills, proper conduct, honesty and trust, while fostering an inclusive work environment that is open to diversity is the foundation on which SINELEC has built its personnel policies.*

### 1.1. SINELEC's commitment to promoting an inclusive environment and valuing diversity

Everyone is unique and diverse with their own personality, history and skills.

SINELEC S.p.A. ("SINELEC" or the "Company") recognises that its employees' diversity plays a part in its success and works to enhance their experiences, abilities and qualities every day. Diversity includes all the differences that make people unique.

SINELEC believes that diversity, in all its manifestations, represents a strategic advantage as it leads to cultural openness and enrichment, fostering an inclusive work environment centred around teamwork and creativity. The value of diversity is conveyed within the company by encouraging everyone to freely express themselves so that they are able to achieve their potential, increase their motivation and satisfy their ambitions.

### 1.2 Regulatory references

When defining its principles and commitments and when drafting this Policy, SINELEC took into account the principles set out in the following documents issued by the relevant international organisations:

- Declaration on Fundamental Principles and Rights at Work and Conventions (International Labour Organization);
- Guidelines on Diversity & Inclusion in the Workplace (UN Global Compact);
- Guiding Principles on Business and Human Rights (United Nations);
- United Nations International Bill of Human Rights, including the UN Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;
- ILO Convention no. 111 concerning discrimination;
- Agenda 2030 for Sustainable Development adopted on 25 September 2015 by the United Nations General Assembly and its 17 Sustainable Development Goals (SDGs, specifically Goal 5 on gender equality).

### 1.3 Definitions

The definitions of terms used in this Policy are given below:

- **Diversity:** the term “diversity” refers to the commitment to observe and promote the uniqueness and differences of each individual based on nationality, ethnicity, race, skin colour, sexual orientation, gender, age, political opinion, trade union affiliation, marital status, health status, physical and cognitive abilities, and any other social status or personal characteristic.
- **Equity:** “equity” implies ensuring equal treatment of people so that all individuals can have the appropriate conditions to be able to participate and contribute effectively to company life.
- **Inclusion:** the concept of “inclusion” encompasses the recognition, understanding and appreciation of diversity as a resource, creating a fair and welcoming physical and social environment. Inclusion is a conscious and concrete means of generating value from diversity, to the benefit of individuals, organisations and the social context.

### 1.4 Recipients and scope of application

The “Recipients” of this Policy include the members of the Board of Directors and Board of Statutory Auditors, executives, employees and all those who maintain any kind of relationship or business interaction with the same, including collaborators, consultants, suppliers, contractors and business partners.

All personnel are obliged to comply with the principles contained within this policy in all relationships with colleagues, clients, suppliers and anyone they come into contact with when carrying out their job.

Particular responsibility for the application, dissemination and implementation of this Policy is attributed to management who are involved, by virtue of their positions, in the daily management and supervision of employees, as well as in the personnel hiring, promotion and training processes.

## 2. PRINCIPLES

The Company pursues the goal of ensuring that all Recipients deal with others at all times with dignity, respect and fairness, demonstrating inclusive conduct that is aligned with the Company’s values. The following areas, therefore, are the main areas in which the Company is committed to respecting and promoting the principles of conduct concerning diversity, equity and inclusion.

### Discrimination

SINELEC strives to create a work environment that is free from any form of direct or indirect discrimination, whether collective or individual, or any type of violence or harassment, including sexual harassment and harassment based



on personal, political or cultural diversity. Recognising that people are the most important resource for the performance of its activities, the Company promotes a culture of respect and dignity in all work-related interactions, implementing the most appropriate measures to counter discriminatory behaviour and guarantee equal opportunities at every stage of employment, from recruitment to the assignment of roles, to professional growth and until the end of employment. The Company does not tolerate discrimination in any form, based on ethnicity, race, skin colour, gender, sexual orientation, religion, nationality, age, political opinion, trade union membership, marital status, health status or any other social status or personal characteristic, is not tolerated.

### Disabilities

SINELEC promotes an inclusive culture that is welcoming of disabilities, based on mutual respect that involves all people and offers them opportunities to develop their talent.

### Gender diversity

So that fair gender representation can be fostered, any career opportunity or professional advancement will be handled without any kind of discrimination and while respecting diversity.

### Personnel selection and acquisition

The Company pursues a personnel selection policy that aims to recognise merit, in compliance with equal opportunity principles. This policy is applied by conducting a transparent assessment of skills and competencies.

### Valuing people in terms of training and performance

ASTM is also committed to training and promoting personnel, improving the professional development of its resources, inspiring all employees to achieve their full potential and supporting the sharing of best practices across the entire organisation.

### Enhancing skills and talent diversity

The company aims to ensure that it can effectively utilise the skills of all its employees by drawing on their diverse range of talents, aware that people with different experiences and competences can create value.

## 3. IMPLEMENTATION, CONTROL AND MONITORING

### 3.1 Stakeholder engagement

SINELEC believes that engagement with stakeholders, both internal and external, is fundamental for the implementation of effective strategies in the management of social issues, and that the promotion of this Policy is crucial to its success. Therefore, SINELEC is committed to promoting and spreading, both internally and externally, a culture of social sustainability by creating awareness and fostering commitment among all stakeholders, including employees, end users, local communities, suppliers and business partners.

### 3.2 Whistleblowing

All persons with a relationship with the Company are required to promptly report any doubts around any requirement of the Policy, as well as any alleged or actual violation thereof and/or of the law. This includes violations committed by any employee, consultant, partner or other representative acting in the name of and/or on behalf of the Company.

In accordance with the “Whistleblowing Management” procedure, which can be viewed on the Company’s website at <https://www.sinelec.it/whistleblowing/>, reports may be sent to the attention of the Company via the following channels:

- in written or oral form via the specific digital platform accessible at <https://sinelec.integrityline.app>;
- in writing via ordinary or registered mail sent to the following address: SINELEC S.p.A. SP 211 della Lomellina 3/13 – Località San Guglielmo, 15057 Tortona (AL) Italy;
- in oral form through a meeting with the person responsible for receiving the report.

The utmost confidentiality in regard to the whistleblowers is guaranteed when managing reports, without prejudice to legal obligations. Furthermore, in the event of reports not made anonymously, the Company will not engage in any retaliatory actions (disciplinary sanctions, demotion, suspension, dismissal or the termination of collaborative relationships) nor will it discriminate – in any way – against whistleblowers who have acted in good faith to report events or situations that are in violation of the Diversity and Inclusion Policy.

### 3.3 Disciplinary system

SINELEC strives to identify, assess, prevent and mitigate the risks associated with the issues covered by this Policy, by promptly taking appropriate action to remedy the situation should any events occur. Compliance with this Policy is an integral part of employees’ contractual obligations and, more generally, of all Recipients. Any violations will therefore lead to the application of the measures laid out in the applicable law. Failure to comply with the Policy by external parties may result in the termination of the contract, assignment or, more generally, the existing relationship with the Company, as well as compensation for damages, where specific conditions are met.

## 4. APPROVAL AND DISTRIBUTION OF THE POLICY

By resolution of the Board of Directors, SINELEC S.p.A. approves this Diversity and Inclusion Policy and promotes its adoption by all its subsidiaries which will adopt this document independently by resolution of their own administrative bodies, ensuring the timely adoption of the same by their respective subsidiaries.

SINELEC and its subsidiaries will also work to encourage the implementation of this Policy by the companies in which it holds a non-controlling interest (including joint ventures).

SINELEC publishes this Diversity and Inclusion Policy on the company website and its intranet and promotes its distribution to all Recipients using the methods deemed most appropriate.



This Policy is subject to revision when national and international regulations or the principles and values referred to as best practice, are subject to revision or, in any case, when the opportunity arises in relation to strategic and/or operational changes and variations or the results of materiality analyses.