



Diversity Policy





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DIVERSITY POLICY OF THE EL.EN. GROUP

1. PREMISE

This document was adopted in November 2022 but, since its inception, El.En. and subsequently all its subsidiaries have attached fundamental importance to Human Resources, which are an indispensable element for the very existence of the company. The sustainable development that El.En. Group is pursuing and the centrality of sustainability issues in its corporate strategy require that the specificity and talents of its people are supported by constant commitment and effort in a process of continuous improvement.

This document was approved by the Board of Directors of the parent company El.En. S.p.A. and subsequently approved by all Group subsidiaries, translated if necessary, into the local languages and sent to all employees. This Policy has been distributed to all Group employees and is made available on the Group's intranet or company notice boards as well as on the corporate website www.elengroup.com in the Governance/Ethics, Integrity and Compliance section.

In a constantly evolving legislative context, characterized by the presence of stakeholders who are increasingly sensitive to social issues, El.En. Group wants to demonstrate that it promotes a cultural change that guarantees equal opportunities at all levels, reduces the loss of talent and succeeds in harnessing the plurality of ideas and experiences present in the Group's companies to increase business and financial performance.

Compliance with the principles contained in this Policy, based on the values of El.En. Group and the principles expressed in the Code of Ethics and the Human Rights Policy, is to be considered an integral part of the duties of all collaborators.

The Policy applies to all Group companies, both in Italy and abroad.

2. STANDARDS OF REFERENCE

El.En. Group monitors the application of and compliance with the Diversity Policy, expecting all its Collaborators¹ and suppliers to respect its rules and principles and to operate in accordance with the highest ethical standards and in compliance with all applicable laws.

“Human resources represent an indispensable element for the existence and development of the Group, which considers the professionalism and commitment of its employees and other Collaborators as essential values for the achievement of its objectives.

The Group respects and protects the dignity, health, safety and privacy of its employees and other Collaborators, informing them, when they are hired and following changes in business processes, of their rights and the risks they may incur in performing their work.

The Group protects, in particular, the physical and moral integrity of its employees and other Collaborators, ensuring working conditions that respect individual dignity, in compliance with current legislation on workers' health and safety.

The Group supervises that no acts of psychological violence or coercion are committed, as well

¹ “Collaborators” are defined as administrators as well as all those who work with the Group on a contractual basis, even occasional or temporary, at all levels of the organization.

as any attitude or behavior which harms the dignity of the individual”. (Paragraph 7.1 Ethics Code).

One of the fundamental elements for the creation of a positive working environment is the way in which those who work in and with the Group collaborate.

The Group is committed to guaranteeing a positive, constructive and dynamic working environment which supports the heterogeneity of the people and their talents, by guaranteeing equal opportunity on the basis of principles of impartiality

The Group undertakes to avoid any form of discrimination that is based on ethnicity, skin colour, sex, sexual orientation, gender identity, disability, age, one's language, religion, political or philosophical opinions, national ancestry or social background, affiliation with political associations or trade unions as well as any other form of discrimination covered by EU and national law. The Group is also committed to avoiding and condemning any form of verbal or sexual harassment and gender-based violence in the workplace, as this represents a very serious violation of personal rights. This commitment applies to all aspects of the employment relationship, including recruitment, training, job assignment, promotion, transfer and the termination of the working relationship”. (*Section 7.2 Code of Ethics*).

“The Group is committed to ensuring a positive and productive working environment for all employees and collaborators, guaranteeing fair treatment with equal dignity and respect.

Requests or threats to induce people to act against the law, against the Diversity Policy, the Human Rights Policy and against the Code of Ethics are not tolerated; any behaviour that threatens the safety of people or property or that is potentially violent must be reported immediately.

The behaviour of each employee and collaborator conforms to the principles of legality, loyalty, correctness, transparency and professionalism expressed by our legislation, as well as compliance with the rules of the Code of Ethics, with the legislative and contractual regulations governing the employment relationship with the Group and with company procedures”. (*Section 7.3 Code of Ethics*).

3. OUR COMMITMENT

By means of the Diversity Policy, the El.En Group is committed to:

- Acting with impartiality, not tolerating discriminatory behavior; all employees must be considered on the sole basis of their professional capacity and professional competence;
- At all levels and in all the companies of the Group, spreading a culture based on reciprocal respect which promotes the best expression of the potential of the individual;
- Respecting diversity in order to guarantee equal opportunity and equal dignity to each individual in the various phases of their career, ranging from the hiring by the company to the opportunity for professional growth, level of retribution and termination of employment;
- Maintain gender equality in recruitment and staff development processes;
- Remove the causes that lead to unequal treatment regarding the definition and assignment of organizational roles;

- Create professional environments that promote the exchange of skills and experiences;
- Promote work-life balance through the development of mobility and flexibility programs and initiatives;
- Promoting diversity and inclusion through the inclusion of differently-abled resources in the company, in accordance with applicable practices and laws;
- Continuing to implement innovative welfare solutions compared to traditional ones and monitoring the projects implemented;
- Promoting continuous training for all employees, with both refresher and subject-specific courses in order to enhance the knowledge and specialisation of each resource within the organisation;
- Promoting a training programme on diversity and equal opportunities that reaches the majority of the corporate population.

4. APPROVAL, MONITORING AND UPDATING OF THE POLICY

The Board of Directors, which approves this Policy, shares with the Control, Risk and Sustainability Committee and the Sustainability manager the definition of diversity and inclusion targets, which are included in the Sustainability Plan.

Through the objectives contained in this Plan, El.En. Group is committed to:

- Disseminating the Diversity Policy to all subsidiaries, so that they can implement it;
- Disseminating the principles contained in the Diversity Policy to all Group collaborators;
- Implementing and disseminating a culture that promotes the principles of diversity and inclusion;
- Monitoring equality in selection processes and career opportunities, salary treatment and work-life balance.

5. REPORTING VIOLATIONS

For the submission of reports and for the procedure for managing them, please refer to the “*Whistleblowing Procedure*” available on the website www.elengroup.com in the *Governance\report handling\Whistleblowing* section. The undertaking has procedures in place to expeditiously, independently and objectively investigate incidents concerning the undertaking’s conduct. The El.En. Group guarantees the privacy of the sources and the information received, except for legal obligations.

The Group will not tolerate any kind of retaliation towards a person who reports in good faith nor towards a person who refuses to commit actions that are contrary to those in this document or in the other El.En. Group Policies, as a consequence of this refusal, there are negative consequences for the business.

Therefore, any employee or collaborator who becomes aware of a violation, either suspected or confirmed, of this Policy or the relative regulations, must report it immediately, even anonymously, through the channels outlined in the Whistleblowing procedure, which currently are:

e-mail address:
odv.elen@gmail.com

postal address:
El.En. S.p.A. –c/o Organismo di Vigilanza -via Baldanzese 17, Calenzano (FI), 50041, Italia

The President
Gabriele Clementi

Calenzano (FI), January 31st, 2025

