



# Diversity Policy





# INDEX

1. PREMISE	4
2. STANDARDS OF REFERENCE	4
3. OUR COMMITMENT	5
4. APPROVAL, MONITORING AND UPDATING OF THE POLICY	6
5. REPORTING VIOLATION	6

# DIVERSITY POLICY OF THE EL.EN. GROUP

## 1. PREMISE

This document was adopted in 2022, however, since its foundation El.En has always attributed a fundamental importance to Human Resources which represent an indispensable element for the existence of the company. The sustainable development that the El.En Group continues to promote, the focus on ESG issues in the company strategy and the objectives related to energy transition require that the specialization and the talent of our people be sustained by an even greater commitment and effort.

In a legislative context which is in continual evolution, characterized by stakeholders who are increasingly sensitive to social issues, the El.En Group wishes to show that they are promoters of a cultural change which guarantees equal opportunity at every level, reduces the loss of talent and succeeds in exploiting the plurality of ideas and experiences present in the companies of the Group with an aim to increasing the commercial and financial performance.

The respect of the principles contained in this Policy, founded on the values of the El.En Group and the standards described in the Ethics Code and the Human Rights Policy, should be considered as an integral part of the duties of all the employees. The Diversity Policy promotes activities aimed at contributing to the achievement of Goal 5 “Gender Equality” and Goal 10 “Reduce Inequalities” of the Agenda 2030 of the United Nations for Sustainable Development.

The Policy is valid for all the companies of the Group, both in Italy and abroad.

## 2. STANDARDS OF REFERENCE

The El.En Group monitors the application and the respect of the Diversity Policy and expects that all of their employees and collaborators<sup>1</sup> respect the rules and principles which are based on the highest ethical standards and are in conformity with all of the applicable laws.

“Human resources represent an indispensable element for the existence and development of the Group, which considers the professionalism and the commitment of its employees and collaborators essential factors in the achievement of its objectives. The Group respects and safeguards the dignity, health, safety and privacy of its employees and collaborators and makes sure that, during the hiring process and following the modifications of the company processes, they are informed of their rights as well as the risk which they might incur while carrying out the tasks to which they have been assigned.

In particular, the Group protects the physical and moral integrity of its employees and collaborators by guaranteeing them working conditions which respect the dignity of the individual, in compliance with the present laws related to safety and health in the workplace. The Group supervises that no acts of psychological violence or coercion are committed, as well as any attitude or behavior which harms the dignity of the individual”. (*Paragraph 7.1 Ethical Code*).

---

<sup>1</sup> “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.

“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 is committed to avoiding any form of discrimination on the basis of gender race, class, national origin, language, religion, political and philosophical opinion, political or labor union association, state of health, disability or age.

This commitment is applied to all aspects of the working relationship, including hiring, training, work assignment, promotion, transfer and termination of employment”. (*Paragraph 7.2 Ethical Code*).

“The Group is committed to guaranteeing a positive working environment which is productive for all the employees and collaborators<sup>1</sup> and ensures equal treatment with the same level of dignity and respect.

The Group will not tolerate demands or threats intended to induce people to act against the law, against the Human Rights Policy or the Ethics Code; all behavior which threatens the safety of people or property or that is potentially violent must be reported immediately.

The behavior of all employees and collaborators must be following the principles of legality, loyalty, correctness, transparency and professionalism that are expressed in our regulations as well as in the respect of the Human Rights Policy and the Ethics Code, the legislation and contracts that govern the working relationship with the Group and company procedures”. (*Paragraph 7.3 Ethical Code*).

### **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;
- Achieving gender equality in the selection and development of the personnel;
- Removal of the causes which generate unfair treatment in relation to the definition of the organizational roles and their assignment;
- Creation of professional contexts which promote the exchange of skills and experience;
- Promotion of the balance between professional life and private life by means of the development of mobility and flexibility programs and initiatives;

### **4. APPROVAL, MONITORING AND UPDATING OF THE POLICY**

The Board of Directors, which has approved this Policy, agrees with the Commission for Controls, Risks, and Sustainability and with the Sustainability Manager on the definition of the objectives

of diversity and inclusion which are included in the Sustainability Plan.

By means of the objectives contained in the above-mentioned Plan, the El.En. Group is committed to the:

- Spreading the Diversity Policy to all of the subsidiary companies which will take action to implement it;
- Spreading the principles contained in the Diversity Policy to all the employees of the Group;
- Implementing and spreading a culture which promotes diversity and inclusion;
- Promoting surveys to monitor the perception of people in relation to wellbeing in the workplace and suggestions for improvement;
- Monitoring equality in the hiring process and career opportunities, salary level and reconciliation between work and private life.

## 5. REPORTING VIOLATIONS

An 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 listed below:

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 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.

The President

Calenzano (FI), 14<sup>th</sup> november 2022

Gabriele Clementi

