

Diversity, Equity and Inclusion

Namirial S.p.A. Policy



Category	SDEI	Document ID	NAM-SDEI-PO	Namirial S.p.A.
Written by	Compliance Team	Confidentiality note	Public document	Legal Representative
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Storia delle modifiche

Version	1.2
Date	11/11/2025
Reason	Periodic update to maintain the document's validity and to introduce minor yet meaningful additions aimed at improving the clarity of key concepts
Changes	---

Version	1.1
Date	30/11/2024
Reason	Overall revision Translation in English
Changes	All paragraphs

Version	1.0
Date	05/12/2022
Reason	First version
Changes	---

1. References

UNI PdR 125:2022 Guidelines on the management system for gender equality which provides the adoption of specific KPIs (Key Performance Indicator) relating to gender equality policies in organisations.

The reference schema defines the guidelines on the management system for gender equality, which requires the structuring and adoption of a set of performance indicators (KPIs) related to the gender equality policies in organizations.

The standard includes the measurement, reporting and evaluation of genderrelated data in organizations with the aim of closing the gaps that currently exist as well as incorporating the new paradigm related to gender equality gender in the DNA of organizations and produce sustainable and lasting change over time.

2. Definition of key terms

Terms	Definitions
Equity	the promotion of fairness and justice for each individual that considers historical, social, systemic, and structural issues that impact experience and individual needs
Diversity	is a measure of representation within a community or population that includes identity, background, lived experience, culture, and many more
Inclusion	is the creation of an environment where everyone shares a sense of belonging, is treated with respect, and is able to fully participate

3. Purpose

This document outlines the general principles that Namirial S.p.A. pursues in carrying out its activities, the virtuous behaviors and the protections measures identified in order to embrace the values of diversity, equity and inclusion.

The Policy is inspired by the principles of ethics, transparency, fairness and professionalism and aims at the continuous improvement of the sensitivity of all the employees of Group companies - in recognizing discriminatory phenomena, as well as in the responsiveness in taking an active part in preventing, repressing and reporting possible violations.

4. Responsibilities and applicability

The model described in this Policy aims to foster a culture of inclusion and diversity in the workplace through the design, development and promotion of people and diversity management initiatives.

On the basis of the above principles, Namirial S.p.A. is drawing up a strategic plan aimed at launching specific actions and initiatives to promote inclusion. The objectives defined are focused on the following priorities:

The creation and dissemination at all levels of a corporate culture with a focus on diversity, equality and inclusion, and a strategy to promote these principles both in our internal working practices and in our external relationships;

- The definition of governance to ensure gender balance in administrative bodies and managerial roles, a working environment inspired by transparent and inclusive behaviour, and the allocation of budgetary resources reserved for the achievement of the DEI objectives set out in the plan;
- The implementation of HR processes aimed at removing cultural, organisational and relational barriers to full inclusion in the workplace and creating reporting channels to uncover hidden situations of discomfort;
- The promotion of equal opportunities for people and increasing opportunities for women, who are under-represented compared to the industry benchmark;
- The identification of pay inequalities and closing gender gaps;
- The implementation of initiatives that facilitate the reconciliation of work and family life, with a particular focus on parental protection, guaranteeing the

possibility of using all the institutions provided for by law and supporting the return to work.

Top management, which is involved in the work of the DEI Committee, is strongly committed to identifying the company's objectives in relation to the above points and to carrying out concrete activities to achieve them.

First and foremost, managers behave in such a way as to create the conditions for each member of the team to fully express his or her contribution and potential, while respecting any personal needs.

Leaders strive to create a climate that's open to everyone's expression to encourage innovation and the generation of new ideas and projects.

Human Resources plays a central role in this dynamic: it ensures the long-term promotion of diversity at all levels, in the implementation phases of the company's policies and strategic plan. In particular, it is responsible for managing the life cycle of people from the moment they join the company, monitoring their growth, assessment and development, and ensuring maximum fairness and inclusion. In this sense, the Human Resources Management Policy is in line with the principles of the DEI and is based on equal opportunities and non-discrimination in the above mentioned HR processes.

In this context, HR, in synergy with management, acts as an activator and driver of cultural and organisational change, in close collaboration with employees and business functions, which in turn have the task of embracing the values of diversity and inclusion and internalising them in working relationships.

In fact, recruitment processes are designed to be inclusive: job descriptions are written using neutral language, selection panels are diverse where possible, and candidates from underrepresented groups are actively encouraged to apply.

The HR function also has the crucial role of coordinating the Equality, Diversity and Inclusion management system. This responsibility takes the form of defining the DEI strategy, disseminating the culture around these issues, raising awareness at all levels of the business, outlining the strategic plan, initiating activities to achieve its objectives, allocating budgets, monitoring progress and drafting policies and procedures.

Namirial S.p.A. ensures mandatory DEI training for all employees upon onboarding, with additional refresher courses provided periodically. Training covers unconscious bias, inclusive leadership, intercultural communication and conflict management. Completion of these courses is tracked and encouraged as part of professional development.

In this context operates the DEI Committee. It is made up of top management, HR and other members selected on the basis of their role and commitment and is responsible for monitoring the business context regarding DEI issues, organising meetings, training and working groups throughout the year, and setting and monitoring the budget for DEI activities.

As part of the implementation of the DEI policy, internal and external communication plays a fundamental role in identifying an organisational culture that is open to inclusion and respects diversity: for this reason, the Marketing department is also actively involved in the implementation of equality and inclusion objectives.

A crucial and integral part of the system is the entire workforce, which systematically expresses its feedback, evaluates and makes suggestions through two organisational systems:

- The taskforce D.A.R.E. (Diversity Attitude to Reach Equity) established on 15.04.2022 and
- eVoice Anywhere, engagement survey and analysis tool, conducted twice a year throughout the Group. As a result, not only are all individuals affected by the above-mentioned communications, but they are also personally involved in the identification of issues, proactive discussions and the internal and external consolidation of corporate values.

Regarding the scope of application, this Policy applies to Group companies and all Namirial's partners, to the extent compatible, and is, in addition, brought to the attention of other investee companies for the purpose of promoting principles and behavior consistent with those expressed by the Group.

This Policy is available in the corporate repositories and publicly shared on the official Namirial website.

In general, the Policy applies to all those who collaborate professionally with Namirial, as well as any other person who acts, in any capacity, in the name of and/or on behalf of the Company, within the limits of his or her position and responsibilities.

5. Namirial Group's commitment to DEI matters

Namirial is committed to promoting the values of diversity, equity and inclusion through the adoption of corporate, organisational and management mechanisms characterised by respect for people's rights and freedom.

To this end, the path taken aims to identify the problems that exist in the corporate context to direct their resolution through the adoption of proactive strategies to overcome stereotypes.

The Company operates with impartiality and does not allow any form of direct or indirect, multiple and interconnected discrimination based on gender, age, sexual orientation and identity, disability, health status, ethnic origin, nationality, political opinion, social category of membership and religious beliefs.

We also promote the conditions that allow for the removal of cultural, organisational and material barriers that limit the full expression and development of people within the organisation.

Namirial Group preserves the value of its personnel and promotes the protection of their psychophysical, moral and cultural integrity through working conditions that respect individual dignity and behavioural rules.

Within this framework, this document aims to develop a clear approach in terms of mission, strategies, and active practices to promote a collaborative, supportive working environment, open to the contributions of all employees to increase the trust of people and customers.

The goal is to foster diversity in all its dimensions in order to take full advantage of the resulting opportunities and create value in the working environment, while also gaining a competitive advantage over the business.

Specifically, the DEI Policy intersects and mutually integrates with the following business systems (including related policies and implementation programs):

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- **ESG Model.** Namirial is deeply committed to the issue of environmental sustainability, aiming for a paperless and waste-free world, in the belief that it is possible to do business in the most responsible and environmentally friendly way. The company also advocates for a "green" culture when it comes to pursuing corporate growth and profit goals. For Namirial, implementing the ESG model means using environmental, social, and governance criteria to assess the company's positive impact on society and the environment, no longer assessing only the ability to generate a profit, but also the ability to deliver ethical results, such as social inclusion or environmental protection.
 - **Model 231.** Legislative Decree no. 231/2001, under the heading "Discipline of the administrative liability of legal persons, companies and associations, including those without legal personality," pursuant to Art 11 Law no. 300 of 29.9.2000, introduced for the first time into the Italian legal system the direct liability of companies and other legal entities for crimes committed by directors, executives, their subordinates and other subjects acting on behalf of the legal entity, when the unlawful conduct has been carried out in the interest of or to the benefit of the company concerned. By adopting this model, Namirial has provided itself with a Code of Ethics, which, in accordance with the provisions of the law in force, includes various provisions on corporate governance aimed at ensuring the proper performance of management activities and policies (in particular the Whistleblowing policy - procedure for reporting wrongdoing and irregularities), which aims to combat and sanction any cases of discrimination, sexual harassment, moral and psychological violence detected, using timely and impartial procedures, and reiterates that those who engage in such behaviour violate a specific duty of office and will be prosecuted as such.

6. Diversity as a colourful chance of Inclusivity

Diversity is a value that must be protected and promoted through concrete and pervasive actions in all organisational and management processes, by understanding, including and valuing the differences of people.

Diversity enriches and opens up to new ideas by multiplying the possibilities of generating innovative solutions: people from different cultures, social and generational backgrounds, skills, competences and experiences represent a distinctive value that enables the confrontation with multiple perspectives and allows to reflect and anticipate the needs of customers and reference stakeholders. Namirial's commitment to cultivating the value of people, so that everyone feels included and can give their best, is embodied in a human resources development and management strategy capable of fostering an inclusive culture that promotes the uniqueness of people and access to the same opportunities for professional growth, regardless of their role in the organisation.

Namirial is committed to provide the environment for people to be treated fairly based on their merits and potential, regardless of race, nationality, gender, gender identity, age, marital status, sexual orientation, disability, socio-economic background, religious or political belief, caste or tribe.

Gender balance

The Company is committed to gender balance and overcoming stereotypes, discrimination and prejudice to create the best conditions for everyone to flourish.

At a cultural level, Namirial SpA is committed to a progressive strengthening of initiatives to raise awareness at all levels, with measures to overcome "unconscious bias". It also established Policies and measures to promote equality, to reconcile family and working life, to share family responsibilities and to remove potential barriers, including those related to sexual orientation.

Given the historical predominance of male employees and Managers in the corporate context and its professions, the Company's primary focus is on increasing the participation of women, particularly in programmes focused on management and leadership development. The aim is to achieve a gender balance in positions of responsibility within complex organisational structures, thereby expanding career opportunities for women.

The Company is also committed to combating gender-based violence and has adopted a policy on the prevention of harassment and violence in the workplace.

Interculturality and diversityThe Namirial Group comprises Companies located and operating throughout Europe, interacting with partners and customers around the world.

Through this corporate structure, Namirial embodies the mixing of different cultures, promoting an intercultural vision open to multi-level confrontation, characterised by organisational and social cooperation, all with a view to mutual exchange. During the year and at a defined interval Namirial proposes training projects on raising awareness on diversity as a strenght, as well as Webinars and meetings with specific speakers.

At the same time, this working style encourages the competitive development of organisational solutions, techniques and processes to improve and identify the company's market position. This thread is encouraged by an objective Performance Evaluation Program based on a continuous feedback process, which aims at the personal growth of each resource within the Company.

The aim is to bring together people from different cultures to support innovation, accelerate growth and lead to more robust decisions, while transparently communicating the diversity and multiple perspectives associated with this relational model.

Inclusivity and equity

Namirial is committed to creating an environment in which each individual or group can contribute to the global objectives in accordance with the skills, competencies and knowledge they have at their disposal, as well as everyone's Family status.

Because of that, Namirial is proud to put in place incentives to support maternal and paternal parenting, which intervene on both economic aspects and more specifically on the work organization.

Indeed Namirial aims to create an inclusive working environment where everyone feels valued and respected for who they are: it acknowledges equal opportunities for all employees regardless of sensory, cognitive and motor disabilities. In this context, Namirial is committed to implementing concrete measures to promote the recruitment and inclusion of people with disabilities, in order to leverage their talents

and skills in the Company and thus contribute to breaking down cultural, sensory and physical barriers.

Namirial guarantees accessibility in all physical offices and digital platforms. Workspaces are adapted to meet the needs of employees with sensory, cognitive, and motor disabilities. Digital tools and internal platforms follow accessibility standards to ensure full participation by all employees.

Retention and career development

Namirial is committed to fostering an inclusive work environment where all employees have the opportunity to grow and develop professionally. Namirial promotes fair access to training, career progression, and internal opportunities, encourages feedback and regular performance discussions, and seeks to recognize and support the contributions of each employee. These measures aim to ensure that everyone can reach their potential while feeling valued and included, regardless of gender, ethnicity, disability, or other personal characteristics.

7. Namirial values

Corporate values refer to the fundamental principles and beliefs that guide behavior and decisions within an organization. These values are established by company leadership and serve as the basis for company culture.

Company values should be more than just a statement: they must be embedded in the company culture and reflected in daily actions. Namirial builds and structure its corporate culture through 4 values, communicated internally and well anchored in all processes:



Of these values two in particular embody the principles of this policy: Colourful Inclusivity and Engaging Transparency.



Colourful Inclusivity

It means that:

- we are respectful and open minded, honest with each other;
- we are empathetic: we put ourselves in each other shoes;
- we openly embrace different opinions and point of views, avoiding judgments and blames;
- we look at the uniqueness and not to stereotypes;
- we leverage on people ability & potentiality, regardless gender, skin colour, body type, orientations, etc.;
- we do anything possible guarantee full accessibility;
- we use a clear, understandable, non-biased language to include everyone;
- we develop an international mindset, respecting & valuing different customs and approaches;

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- we encourage international synergy, network and collaboration;
 - we make people understand the impact and value of their personal contribution.



Engaging Transparency

It means that:

- we communicate openly, honestly and effectively;
- we promote feedback culture: upward, downward and laterally;
- we actively communicate directly regardless of hierarchical levels;
- we take Everyone's opinions into consideration;
- we constantly guarantee line of sight to share common vision, goals and results;
- we develop & share transparent work processes & procedures;
- we share good and bad news;
- we quickly update on issues and criticalities as soon as they happen;
- we celebrate our success.

When followed correctly, company values help create a positive work environment, promote team cohesion and guide the organization towards long-term success.

8. DEI goals and objectives

Namirial's DEI goals and objectives are set out in the Strategic Plan 2025-2027 and are organically structured into key focus areas, each designed to address specific aspects of our organisation's structure and culture.

These include:

- Culture & Governance;

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- Recruitment;
 - Career Management;
 - Equal pay;
 - Parenting and Caregiving;
 - Work-life balance;
 - Prevention of all forms of physical, verbal and digital abuse (harassment) in the workplace.

The Strategic Plan is redacted every other year and continuously monitored and updated according to the actual state of each goal.

9. Reporting and accountability

Namirial encourages the reporting of suspicions in good faith, or based on reasonable belief, of violations of this Policy and the principles of diversity, equality and inclusion.

To this end, Namirial S.p.A. has adopted a Whistleblowing Policy, which is deemed to be fully referred to and applicable to this Policy.

Legislative Decree 24/2023 on Whistleblowing provides for the establishment of channels that enable employees, consultants, collaborators and any other person who comes into contact with the Company to report any act or omission of which they may have become aware in the exercise of their function, which constitutes a violation of national or European Union regulatory provisions (in criminal, civil or administrative matters) that harm the public interest or the integrity of the Namirial Group, as well as violations of the Group's Code of Ethics, Model 231 and the system of rules and procedures in force.

The same regulations provide that, with the exception of unfounded reports made with malice or gross misconduct (which may lead to disciplinary sanctions), the reporting person is always protected from retaliatory or discriminatory acts, direct or indirect, for reasons related, directly or indirectly, to the report. In fact, the disciplinary system provides for sanctions against those who violate measures to protect the reporting person.

10. Communications and transparency

Namirial recognizes that effective communication is pivotal in fostering a culture of DE+I. Transparent and inclusive communication not only reinforces our commitment internally but also shapes our external reputation as a responsible and values-driven organization.

Internal communication strategies

In our pursuit of DE+I, we commit to providing regular updates through various internal channels such as company-wide communications, messaging channels and emails. These updates not only highlight achievements and milestones but also spotlight success stories that exemplify our ongoing commitment to DE+I.

Our dedication extends to hosting quarterly town hall meetings where leadership engages directly with employees, fostering an open dialogue and ensuring a two-way communication channel. We encourage active participation, questions, and feedback to strengthen our internal communication process. Establishing guidelines for inclusive language is another crucial aspect of our internal communication strategy. We create awareness and train employees on the importance of using inclusive language, creating a respectful and welcoming environments for all.

External communication strategies

Active engagement on social media platforms is a cornerstone of our external communication strategy. Through social media, we regularly share updates, stories, and insights related to DE+I, using these platforms as tools to showcase our organisational values and commitment to diversity.

Our website has a dedicated section highlighting our DE+I initiatives, goals, and progress. Additionally, DE+I updates are incorporated into our annual reports, demonstrating our ongoing commitment to stakeholders and the wider public.

Externally, we will communicate our DE+I efforts through partnerships and collaborations with external organizations. By participating in industry-wide initiatives in regard to that matter, we actively contribute to the broader conversation and collective progress.

11. Continuous improvement

Namirial is committed to continuous improvement of the system outlined in this Policy.

The DEI Committee also meets periodically for this purpose: through the analysis of the results of internal audits, third-party audits and monitoring of the strategic plan, the Committee draws insights for improvement and makes proposals for progressive upgrading of the system.