

	POLICY ON DIVERSITY, INCLUSION AND HUMAN RIGHTS	PGQ – 6.2.3 Rev. 1 Data 06/06/2025
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Policy on Diversity, Inclusion and Human Rights

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1. INTRODUCTION: PURPOSE AND SCOPE

With this Diversity, Inclusion, and Human Rights Policy (the "**Policy**"), the Valvitalia Group aims to define the core principles, guidelines, and commitments of the Group in promoting and safeguarding the values of diversity, inclusion, and human rights. This is achieved through the implementation of governance, organizational, and management practices grounded in respect for individual rights and freedoms.

With this vision, the path taken aims to develop ways of addressing issues related to diversity, inclusion and respect of human rights by moving from an approach towards the protection and integration to a proactive strategy for overcoming all cultural stereotypes and removing all obstacles to the respect of human rights.

Valvitalia Group preserves the value of its own people and promotes the protection of their psycho-physical, moral and cultural integrity through working conditions that respect human rights, individual dignity and behavioural rules, understanding, valuing and respecting the differences of each person within the Group.

Valvitalia Group takes all necessary actions to prevent discrimination in relation to the following characteristics of each person:

- age,
- gender, gender change,
- sexual orientation,
- different abilities,
- geographical origin, ethnicity, nationality, skin colour,
- religious orientation,
- political and trade union orientation,
- marital status, pregnancy, maternity, paternity, women's and children's rights,
- socio-economic status and occupational background,
- contractual framework.

Additionally, the Group takes all necessary actions to ensure that the human rights set forth in this Policy are adopted, disseminated and respected.

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The Policy applies to all those who work in Valvitalia Group - without distinctions related to the classification and/or position of work - and to any person otherwise linked by working relationships with the Group Companies.

2. REGULATORY AND LEGAL REFERENCES

This Policy reaffirms the principles already established in the Code of Ethics concerning the protection of human rights and the value of the individual. It further outlines the reference principles, specific commitments, and related management approaches. Additionally, the Policy reinforces the Company's commitment to comply with, and actively promote, the principles set out in applicable laws, contractual obligations, and standards issued by relevant international organizations, such as...

- the principles established by the *Universal Declaration of Human Rights of the United Nations* and the *International Charter of Human Rights*.
- *UN Guiding Principles on Business and Human Rights*.
- *Conventions of the International Labour Organization (ILO)* such as, but not only, n. 29, 87, 98, 100, 105, 111, 138, 190.
- *United Nations Conventions* on the Rights of Women, the Elimination of All Forms of Racial Discrimination, the Rights of the Child, and the Rights of Persons with Disabilities.
- *OECD Guidelines* for multinational enterprises.
- *EU Charter of Fundamental Rights*.
- *European Charter of Human Rights*.
- *2030 Agenda for Sustainable Development* and its related Sustainable Development Goals with a particular focus on the following SDGs (Sustainable Development Goals):
 - SDG 4: "Providing quality, equitable and inclusive education and learning opportunities for all",
 - SDG 5: "Achieving gender equality and the empowerment of all women and girls",
 - SDG 10: "Reducing inequality within and between nations".
- Article 3 of the Constitution of the Italian Republic: "*It is the task of the Republic to remove the obstacles [...] that prevent the full development of the human person*" and Article 37 "*Working women have the same rights and, for equal work, the same wages as the worker*".
- *Valvitalia Group Code of Ethics*.
- *Organization, Management and Control Model ex D.Lgs 231/01 of the Valvitalia Group*.
- *Supplier Code of Conduct*.

3. DIVERSITY AND INCLUSION: GENERAL PRINCIPLES

Diversity and inclusion are values that must be protected and encouraged with concrete and pervasive actions in all organizational and management processes through the understanding, inclusion and valorisation of the differences of our people.

Valvitalia Group's commitment to fostering the value of people—so that everyone feels included and empowered to perform at their best—is founded on a human resources development and management strategy designed to promote an inclusive culture. This



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approach aims to celebrate the uniqueness of each individual and ensure equal access to professional growth opportunities, regardless of their role within the organization.

The goal is to boost diversity in all its dimensions to maximize opportunities and generate value within the workplace, while gaining a competitive advantage over the business and raising employees' awareness of these issues.

D&I PRINCIPLES OF VALVITALIA GROUP

Gender

The company promotes gender balance and overcoming any stereotypes, discrimination or prejudice to create the best conditions for each person to express himself/herself.

On the cultural level, Valvitalia Group is committed to an increasing strengthening of awareness initiatives at all levels, with actions aimed at overcoming unconscious bias.

The company pursues initiatives dedicated to talent, remuneration and growth policies based on equity and performance, with the objective of ensuring gender equality through specific projects and positive actions.

One of Group's goal is to strengthen the female presence in programs aimed at developing managerial and leadership skills, increasing career opportunities by ensuring a gender balance in positions of responsibility.

The Group is committed to implementing specific performance evaluation policies and metrics to ensure equity at every stage of the employment relationship—from recruitment and role assignment to career development and salary determination—with the aim of promoting gradual alignment of compensation across genders.



Generations

The company recognizes and values integrated strategies for the development and management of the needs of the different generations that live within the organization.

With this in mind and considering demographic trends and their impact on workforce turnover, the policies aim to foster dialogue and intergenerational exchange, promoting the contamination of different social, cultural and work experiences as well as different skills, both soft and hard (such as digital).



Different abilities




The company recognizes equal opportunities to all its people regardless of different sensory, cognitive and motor skills. In this context, it undertakes to implement concrete measures to promote the integration and inclusion of people with different abilities, enhancing their talent and skills in the company and thus contributing to the removal of cultural, sensory and physical barriers.





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<p>Interculturalism</p> <p>The company is committed to promoting the integration of different cultures present within the company, through the promotion of an intercultural vision open multi-level dialogue and cooperation.</p> <p>This style of work promotes the competitive development of organizational, technical and procedural solutions that make it possible to improve the company's positioning on the market.</p> <p>The aim is to bring people from different cultures together to support innovation, accelerate growth and lead to firm decisions, communicating transparently diversity and different perspectives linked to this relationship model.</p>	
<p>Inclusive working environment, work-life balance</p> <p>Valvitalia Group believes that an adequate balance of different aspects of people's lives has a positive impact on the workplace, commitment, productivity and the sense of belonging to the company, helping to improve the quality of life and well-being of employees.</p> <p>For this reason, the Group is committed to creating an inclusive working environment where all employees can participate in business processes without barriers, promoting work-life balance as a key factor in supporting the integration needs between private and professional life. To promote this action, we also guarantee smart working, compatible with the organizational needs of the work and the specificities of individual positions.</p>	
<p>Safeguarding the culture of diversity in the company</p> <p>The Group has embarked on a path aimed at encouraging a culture that from the selection process values the diversity of our people, each with its own experience and cultural strength, regardless of gender, generation and all further dimensions in which diversity is expressed.</p> <p>The Group also considers fundamental spreading an inclusive company culture of diversity regarding the protection of rights and the value of the person by providing a specific reference within its Code of Ethics adopted and publicized in the company.</p>	

4. HUMAN RIGHTS IN THE WORKPLACE

Below Valvitalia Group establishes some of the human rights that it considers essential to follow and respect in all working environments in which the Group operates, as well as in all external companies that have working relationships with the Group.



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PRINCIPLES OF VALVITALIA GROUP

Prohibition of forced labour and child labour

Valvitalia Group rejects forced and illegal labour, as well as any form of modern slavery.

Child labour is prohibited: the Group does not employ workers under the applicable minimum age.



Respect of association freedom

Valvitalia Group respects the rights of workers to form and join trade unions of their choice for the promotion of their interests, as well as to refrain from such activities. The Group also recognizes the right of workers to share their ideas with the Management, without being in any way penalized or subjected to retaliation.



Upholding Fair and Equitable Working Conditions

Valvitalia Group complies with current regulations on pay and working hours, allowances, benefits and overtime, weekly rest periods, annual holidays and national holidays, as well as maternity and paternity leave, sick leave and any other leave to the extent permitted by laws, regulations, collective agreements and industry standards. The Group does not tolerate any deviation from current legislation. In addition, it is guaranteed that wages, benefits and working conditions are not lower than those stipulated by the collective agreement, allowing an adequate standard of living for employees and their families.



Prohibition of discrimination

Valvitalia Group supports the values of diversity and inclusion and takes all necessary actions to prevent incidents of discrimination related to gender and/ or change of gender, race, colour, religion, ethnic origin, national or social, civil status, family responsibilities, sexual orientation, political or other opinions, trade union membership, nationality, property, birth or other status including health, disability or age and contractual status.

The Group prohibits any discriminatory, vexatious or retaliatory behaviour in its workplaces. Finally, Valvitalia Group promotes the development of skills and employees without discrimination and on an equal basis.



Respect for health and safety at work

Valvitalia Group promotes the safety of its workers and facilities and, in order to ensure a safe and healthy working environment, adopts a management system for the safety and health of workers in accordance with international standards (ISO 45001 or equivalent), to achieve the target of zero accidents at





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work. The Group trains and sensitizes its employees to adopt safe and health and safety-friendly behaviour.

5. IMPLEMENTATION OF THE DIVERSITY, INCLUSION AND HUMAN RIGHTS POLICY

The model aims to spread a corporate culture that promotes diversity, inclusion and respect for human rights in the workplace, without exception. This strategy is made possible through the design, development and promotion of resource-focused initiatives, diversity management, personal development and management (including the performance rating system and succession charts), but also:

- Spreading management and leadership styles at all levels of the organization that make inclusion as cultural paradigm of reference also through a responsible management of work teams, for an increasing sensibility and awareness of the value of differences.
- Identifying and removing cultural, organizational and relational obstacles that prevent full employment inclusion as well as facilitate the emergence of opportunities internal and external to the company also in terms of labour policies.
- Creating working relationships based on mutual respect and trust at all levels of the organization.

Within this framework, management plays a crucial role in ensuring fairness, inclusion and non-discrimination, intervening whenever it is aware of behaviour not inspired by respect for others.

Management behaviour must be geared towards creating the conditions in which each resource can fully express its contribution and potential, striving to create a climate open to participation by all, encouraging innovation and the generation of new ideas and projects.

The role of the Human Resources function is equally crucial to ensure the long-term trigger of diversity and respect for human rights at all levels and in the implementation stages of corporate policies., managing people's business lifecycle right from the start and monitoring their growth, evaluation and development, ensuring maximum fairness, inclusion and respect.

The Human Resources function is called to operate as an activator and promoter of cultural and organizational change. In particular, it is concerned to:

- implement a selection strategy that takes into account the principles of diversity & inclusion and ensures that profiles are identified for the various areas of the organisation in line with business needs, while respecting the principle of equal opportunities and impartiality in order to facilitate the creation of an environment where multi-level perspectives improve the achievement of business objectives, in response to the challenges of a constantly evolving market.
- Broaden the audience of people potentially interested in working in the company through dedicated activities, in collaboration with schools and initiatives aimed at increasing the ability to attract applicants, activating synergies with universities, to help spread an image of the Group sensitive to diversity and inclusion.



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- Ensure equal opportunities for development and professional growth according to meritocratic principles, through the management of the performance evaluation system.
- Prevent the gender pay gap and foster generational exchange.
- Promote a non-homologous culture oriented to the inclusion of diversity in all its declinations and meanings, overcoming stereotypes, to highlight the added value brought by diversity and generate a pervasive mindset that facilitates acceptance, integration and maximum expression by the most disadvantaged groups (e.g. parental needs, care givers, staff with different skills, etc.).
- Improve the organizational well-being, dialogue and motivation of people to support work-life balance needs and individual fragility situations.
- Monitor and supervise the respect of human rights throughout the organization, acting quickly in case of reports and/ or communications of situations at risk.

6. MONITORING AND REPORTING

The principles and commitments set forth herein must be respected by the members of corporate bodies, as well as by all persons linked by working relationships with each Group Company and, as stated in the Group Code of Ethics, Valvitalia Group promotes the same principles externally to those entities that operate on its behalf (such as suppliers or, in general, business partners).

This Policy, in fact, is brought to the knowledge of all the aforementioned subjects and made available on the website of the Valvitalia Group ([Inglese - Valvitalia](#)).

Diversity and inclusion programs will also be monitored in accordance with the evolutionary guidelines of the more general corporate sustainability plan: to this end, an inter-functional team is established (members of the management team) made up of representatives from all relevant business functions to assess and propose scenarios and new targets to be evaluated for an update of this procedure.

This Policy has been approved by the Chief Executive Officer and will be evaluated for updating at least once a year in light of the evidence arising from the monitoring activities described above, any changes in business strategies or activities and the evolution of national and international human rights trends and regulations.

Valvitalia Group provides its own whistleblowing platform for reporting possible violations of diversity, inclusion and human rights also by entities and persons outside the Group, via the following link <https://valvitalia.integrityline.com/>.

Valvitalia Group guarantees that any report and complaint sent in accordance with the procedures set out above will be taken into account and will be subject to verification in the appropriate places.



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7. SUMMARY OF REVIEW ACTIVITIES

Policy	Release
Diversity & inclusion policy and procedure	13/12/2022
Policy on Diversity, Inclusion and Human Rights	06/07/2025