



POLICY FOR EQUAL OPPORTUNITIES

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1. INTRODUCTION

The METLAC Group, as established in its Strategic Plan, plans to uphold equal opportunities for staff working at its companies, promoting fair and extensive professional growth. In this sense, it will proceed by enhancing the diversity present in the roles that operate in the organisation and promote its development.

The organisation's attention, in the effort that ensures this goal is achieved and maintained, requires the company's culture to be developed and monitored, supported by Corporate Governance, by tools and strategies available to the HR function and by the analysis of risk impacts and opportunities. The company is committed to implementing a management system to promote equal opportunities, to enhance diversity and to avoid favouring one gender over the other.

This Policy describes how the organisation will implement equal opportunities. The METLAC Group firmly believes that a diverse corporate population will ensure a plurality of points of view, encourage innovation and contribute to creating a stimulating work environment.

2. BACKGROUND OF REFERENCE

The METLAC Group believes in developing a cultural model that promotes the equality of human resources, generating social value in the local economy and in the countries that host the Group's facilities. The main regulatory references of this Policy and its scope of application are below.

2.1 REGULATORY REFERENCES

The companies in the Group carry out their activities by pursuing the primary objective of complying with the legal and regulatory provisions in both Italy and in the countries in which they operate. The METLAC Group, for subsidiaries in Italy, adheres to the principles of this Policy in order to contribute to achieving "The National Strategy for Gender Equality" as prepared by the Italian Ministry for Equal Opportunities in July 2021, in accordance with the European Union's "Gender Equality Strategy 2020-2025".

These are the main references of this Policy:

- UNI 125:2022, which represents a guideline for promoting gender equality and in order to identify and adopt specific measurement and reporting indicators and which refers to, in turn, UNI ISO 30415:2021, "Human Resource Management: Diversity and Inclusion";
- the 2030 Agenda and the Sustainable Development Goals;
- the principles of the United Nations' *Global Compact*;
- the United Nations' *Women's Empowerment Principles*;
- the Universal Declaration of Human Rights of the United Nations General Assembly;
- the United Nations' Conventions on the Rights of Women, on the Elimination of All Forms of Racial Discrimination, on the Rights of the Child, on the Rights of Persons with Disabilities;
- the Declaration on Fundamental Principles and Rights at Work and Convention no. 190 of 21/06/2019 of the International Labour Organization (ILO) concerning the elimination of violence and harassment in the workplace (made enforceable by Italian Law no. 4 of 15 January 2021);

- Convention 100 of 1951 of the International Labour Organization (ILO) on Equal Remuneration for Men and Women Workers for Work of Equal Value;
- Italian Legislative Decree no. 198 of 11 April 2006, “The code of equal opportunities between men and women” as subsequently amended and supplemented;
- the METLAC Group’s Code of Ethics, which is an important internal reference for this Policy as it identifies and makes public to all recipients the behavioural and ethical principles that are to be respected and that are to be used as a basis in the performance of the company’s activities. This Code is aligned with the Organisation, Management and Control Model, pursuant to Italian Legislative Decree no. 231/2001, for which the METLAC Group complies with the regulatory requirements, laws and standards in effect concerning environmental and social matters;
- Directive (EU) 2023/970 of the Parliament and of the Council of 10 May 2023 which builds on the previous Directive (EC) 2006/54 with the aim of giving effect to the principle of equal pay and the prohibition of discrimination.

2.2 SCOPE OF APPLICATION

This Policy is applicable to company processes, regulations and procedures, and is extended to all METLAC Group companies, the parent company, METLAC SPA, based in Italy, and subsidiaries and investee companies operating both domestically and internationally. For the latter, the adoption of the principles set out in this document is done in compliance with local regulations, ensuring a balance between the Group’s guidelines and the legislative requirements in effect in the respective countries.

This document is addressed to all members of the organisation and applies, without distinction, to male and female workers regardless of the type of contractual relationship, be it subordinate, autonomous or para-subordinate. In addition, where relevant, it also involves external Stakeholders - customers, suppliers, consultants, collaborators and business partners - establishing itself as an essential reference in dealings with all corporate Stakeholders.

3. COMMITMENTS

The METLAC Group is actively committed to promoting equal opportunities within the organisation and in its dealings with its Stakeholders, ensuring a fair, inclusive and diversity-friendly work environment. The company undertakes to integrate the principles of equity and the enhancement of diversity by adopting specific actions; in particular, it undertakes to:

- guarantee equal opportunities with regard to access to employment, professional growth and remuneration in compliance with the constitutional principles of parity and equality.
- Ensure compliance with the European standards of reference and best practices in compliance with domestic and international regulations on equal opportunities.
- Promote a culture of inclusion and diversity.
- Promote a balance between professional and personal life, adopting policies in favour of the well-being of employees (Welfare) and in support of family care.

- Ensure a safe and respectful work environment, opposing any form of discrimination, harassment, violence or bullying, including those of a sexual nature or through digital means.
- Promote a culture that respects differences in gender and nationalities.
- Enhance parenting, promoting initiatives in support of working mothers and fathers, with reference to current legislation.
- Promote meritocracy, ensuring that professional growth is based on skills and results, without gender discrimination.
- Monitor, improve and implement the policies on equal opportunities within the organisation, through the involvement of staff, and the planning and verification of corrective actions where necessary.

4. AREAS OF INTERVENTION

The company constantly monitors certain *Key Performance Indicators - KPIs*, based on the topic areas of UNI/PdR 125:2022, with the aim of ensuring the effective management of gender equality and the enhancement of diversity. The areas are:

- *Culture and strategy*: promoting an inclusive work environment, valuing diversity and supporting gender equality as a strategic element for the organisation's growth.
- *Governance*: implementing an organisational model that ensures that there are no obstacles impeding someone from accessing any professional position in the organisation.
- *HR processes*: developing human resource management practices based on equity and respect for diversity at all stages of the work life cycle, from recruitment to professional growth.
- *Opportunities for growth and inclusion*: ensuring gender-neutral career paths, fostering equal access to development opportunities and accelerating women's professional growth.
- *Pay equity*: ensuring processes guarantee equal pay between the genders, reducing any gaps and reinforcing transparency in pay policies.

The specific areas on which the organisation's interventions focus are:

- Selection and recruitment;
- Career management, pay equity, performance appraisals and professional development;
- Prevention of abuse and harassment;
- Communication.

A description of each area of intervention is given below.

4.1 SELECTION AND RECRUITMENT

The METLAC Group adopts a fair and inclusive approach in the selection and recruitment of personnel, undertaking to prevent any form of discrimination or prejudice. The selection process is based exclusively on the criteria of professionalism, competence, experience and specialisation, guaranteeing equal opportunities to every candidate, regardless of gender, marital status, maternity/paternity or family responsibilities.

To this end, the company undertakes to:

- ensure a gender-neutral selection process, avoiding influences linked to stereotypes;
- use transparent and merit-based evaluation criteria, valuing experiences, skills and abilities as the only determining factors;
- pursue gender equality in the company workforce, with particular attention on the distribution of positions of responsibility and managerial positions between men and women;
- ensure that the remuneration offered to new hires is commensurate with the job and responsibilities, without any gender disparity;
- constantly update the skills of recruiters to ensure correctness in the process of selecting new resources.

4.2 CAREER MANAGEMENT, PAY EQUITY, PERFORMANCE APPRAISALS AND PROFESSIONAL DEVELOPMENT

The METLAC Group puts human resources at the centre of its business model and is aware of the value they represent for the development of the business and the achievement of the company's goals. It pays particular attention to equal opportunities throughout the worker's professional career, ensuring that career development and promotion are based exclusively on skills, merit and professional level, without any gender discrimination. The company undertakes to create an inclusive and balanced work environment, promoting diversity and the psycho-physical well-being of all staff, regardless of sector or job.

With a view to continuous improvement, the company manages the careers of internal staff by respecting the following principles:

- Fair career management, ensuring that professional development and opportunities for advancement are based on transparent, objective and neutral criteria, which consider the professional profile, the objectives achieved and the organisational role.
- Gender equality in remuneration policies and in appointment and promotion processes, with a particular focus on key roles and leadership positions.
- Equitable access to opportunities for growth, ensuring that all employees, regardless of gender, can benefit from professional development, training and skills enhancement programmes.
- Ensure that pay and benefits are related to the role, the responsibilities and the results achieved, without gender discrimination.
- Periodically monitor the gender neutrality of wage policies and the *gender pay gap*, taking corrective action where necessary.
- Raise awareness and provide continuous training, through initiatives aimed at all staff, to promote the culture of inclusion, the appreciation of differences and the positive impact of diversity on the business. Specifically, resource managers are trained on key skills such as active listening and inclusive communication.

The METLAC Group is committed to ensuring that career opportunities are fairly distributed, promoting the growth of skills without discrimination and enhancing individual skills. In addition, it ensures that each employee participates in at least one annual training course to strengthen their professional skills and improve their awareness of diversity and inclusion issues.

The company, as also reported in its Labour Policy, will implement a series of people management policies, processes and tools from 2025 that will allow it to actively intervene to reduce the *gender pay gap*. In detail, the tools applied to manage remuneration reviews will be:

- **the performance management process,**
- **the policy for assigning classification levels and pay bands,**
- **the merit matrix.**

These tools have been designed to reward people according to their position, their professionalism and their performance and will help correct any gender-related distortions that might historically have been created.

4.3 PREVENTION OF ABUSE AND HARASSMENT

The METLAC Group utterly condemns all forms of abuse and harassment and adopts a zero-tolerance policy towards unacceptable behaviour in the workplace. The company is actively committed to preventing and suppressing all forms of violence, abuse and harassment to ensure a safe and respectful work environment for all. No physical, verbal or digital abuse will be tolerated: it is contrary to the company's values and its commitment to a healthy, respectful and inclusive work environment. The main objectives and principles underlying this policy are:

- The identification and monitoring of risks associated with abuse and harassment at work, planning and implementing preventive actions.
- The creation of secure, confidential channels to report suspicious situations or facts related to harassment or abuse, ensuring every report is treated in a serious, timely manner, taking the necessary corrective measures should harassment be ascertained.
- The protection of people who report misconduct, ensuring there is no retaliation or discrimination as a result of a report made.

The METLAC Group's goal is to ensure that every employee is able to work in a safe environment, based on mutual respect and inclusivity, without fear of abuse, harassment or discrimination.

4.4 COMMUNICATION

The company, in its communication and marketing activities, promotes a language that reflects gender equality in all releases and publications, including those through digital channels.

It promotes gender-balanced representation at public events and conferences, ensuring the presence of speakers of both genders to promote an inclusive environment and reflect professional diversity.

Through these actions, the company aims to actively contribute to a culture of communication that promotes the inclusion, equality and visibility of all genders, without perpetuating prejudice or discrimination.

5. THE ROLES AND RESPONSIBILITIES OF THE PARTIES INVOLVED

Every member of the organisation, including those in senior management roles and members of corporate bodies, is responsible for adopting behaviour which is consistent with the principles expressed in this Policy for gender equality. It is essential that each person in the company uses respectful language and promotes ways of organising work that contribute to the creation of an inclusive and safe work environment, in which gender diversity is valued and respected. The psycho-physical well-being of all employees, regardless of their gender, must be a priority, as must the promotion of a culture that fosters diversity, inclusion and equality of opportunity. Every employee is encouraged to actively promote gender equality, adopt practices that promote fairness and report any situation that might breach the company's diversity and inclusion policy.

Such behaviour and attitudes must be observed in every professional situation, not only within traditional workspaces, but also in situations outside the workplace such as conferences, forums, virtual meetings, video calls and other professional interactions. At these times, the commitment to maintain an environment that is respectful of diversity and free of gender discrimination must be equally rigorous, helping to consolidate a company culture that is consistent in all circumstances.

The primary responsibility for implementing a gender equality policy is entrusted to the METLAC Group's management, which is responsible for monitoring the effectiveness of the actions implemented and for ensuring alignment with the corporate policies, verified and validated by the Board of Directors.

6. REPORTING BREACHES

The Italian companies in the METLAC Group, in accordance with Italian Legislative Decree no. 24 of 10 March 2023, have established a so-called *Whistleblowing* reporting channel through which anyone who has dealings with the company, including employees, collaborators, consultants, contractors, agents and other professional figures, can send a confidential, anonymous report of any breach of Italian or EU regulations, including the provisions of Italian Legislative Decree no. 231/2001.

The company undertakes to safeguard those who make a report, ensuring they are protected from any form of retaliation, in particular with regard to harassment in the workplace. If an individual believes that they have been discriminated against or treated unfairly because of their gender, or finds a lack of gender equality within the organisation, they are encouraged to submit a report without fear of negative consequences, (see the company's Whistleblowing Policy).

Any breach of this Policy, once confirmed, may result in the adoption of appropriate and proportionate disciplinary measures, taking into account the seriousness of the conduct and any criminal

relevance. Reports of breaches or alleged discriminatory behaviour shall be examined promptly by the company's management team, which will evaluate the need to intervene with corrective actions.

7. APPROVAL AND REVIEW

This Policy document has been prepared by *HR* in collaboration with *SQHSE*. This version has been approved by the METLAC Group's Board of Directors.

This document may be revised or amended in the event of a change or update to the Strategic Plans as a result of organisational needs and will take into account any changes to the reference context, regulatory developments related to gender equality and the results of internal audits and monitoring. Any new documents, in order to be considered valid, shall be submitted to and approved by the Board of Directors.

8. DISSEMINATION

The METLAC Group undertakes to disseminate this Policy as widely as possible, both internally and externally, through communication initiatives aimed at the entire corporate population and its Stakeholders.

In addition, this Policy is published in the Sustainability section of the METLAC Group's institutional website, together with the Sustainability Report within which the company's social, environmental and economic performance is reported transparently [<https://www.metlac.com/sostenibilita/>].

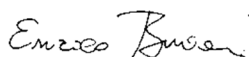
The METLAC Group also reports annually on the activities carried out with regard to promoting Workers' Rights as part of its Sustainability reporting, to inform and raise awareness among its Stakeholders and to communicate the relative results obtained.

CEO
Pier Ugo Bocchio

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9. GLOSSARY

The 2030 Agenda for Sustainable Development is a global programme of action, of unprecedented scope and relevance, aimed at eradicating poverty, protecting the planet and ensuring prosperity and peace, adopted unanimously by the 193 member states of the United Nations (page 3).

Code of Ethics: the document containing a series of social and moral rules drawn up by the company and to which every member of the organisation is to adhere (page 4).

Convention no.190 of 21/06/2019: the Convention provides the first internationally recognised definition of work-related violence and harassment, including gender-based violence and harassment (page 4).

Universal Declaration of Human Rights: this document details the rights of the person, adopted by the United Nations General Assembly at its third session, on 10 December 1948 in Paris with resolution 219077° (page 3).

Italian Legislative Decree no. 231/2001 or MOG 231: Organisation and Management Model pursuant to Italian Legislative Decree no. 231/01. Pursuant to Italian law, it can be adopted by a legal person, or an association without legal personality, and is aimed at preventing the criminal liability of entities (pages 4 and 8).

Italian Legislative Decree no.198/2006: The equal treatment and equal opportunities between women and men must be ensured in all fields, including employment, work and pay (page 4).

Gender Equality Strategy 2020-2025: the European Strategy for Gender Equality 2020-2025 whose goal is a Union in which women and men, girls and boys, in all their diversity, are free to pursue their life choices, have equal opportunities to fulfil themselves and can, in equal measure, participate in and lead European society (page 3).

Gender pay gap: this is the difference between the average annual salary received by women and that received by men (page 7).

Global compact: the United Nations Global Compact is the largest strategic enterprise citizenship initiative in the world. It is a project established to encourage companies around the world to promote a sustainable global economy: respectful of human rights and labour, environmental protection and the fight against corruption (page 3).

Governance: the set of principles, rules and procedures that concern the management and governance of a company, an institution, a collective organisation (pages 3 and 5).

HR: the abbreviation referring to the *Human Resources* function of the METLAC Group, which exercises its function at the parent company, METLAC SpA (pages 3, 5 and 9).

ILO: referring to the International Labour Organization. This is a specialist agency within the United Nations that deals with promoting social justice and internationally recognised human rights, with particular reference to those concerning work in all its aspects (page 4).

SQHSE: meaning the *Sustainability, Quality, Health, Safety, the Environment* function at METLAC SPA (page 9).

KPI: *Key Performance Indicator*. An index of the performance of a business process, measurable, expressed numerically and usually accompanied by a unit of measurement (page 5).

Marketing: marketing is a broad concept that covers all the activities related to the promotion and sale of products or services. It can be defined as a set of activities and strategies aimed at maximising sales, launching or advertising a brand, customer satisfaction and loyalty (page 8).

Strategic Plan: a document drawn up by the management team which contains an action plan aimed at sustainable development involving ESG aspects (page 3).

Recruiter & Recruitment: a recruiter is the professional who is appointed by a company to find personnel to fill vacant positions. Their task is to find all potentially suitable candidates for such positions and assess whether their skills best suits the needs of the company (page 6). Recruitment is the activity of hiring, recruiting or selecting workers (page 6).

Stakeholder: a natural or legal person who interacts directly or indirectly with the organisation. Employees, customers, suppliers, etc. are Stakeholders (pages 4 and 9).

National strategy for gender equality: a document drafted in July 2021 by the Italian Minister for Equal Opportunities. The vision is to make Italy a country in which people of all genders, ages and backgrounds have the same opportunities for development and growth, personal and professional, the same access to education and work, without disparities in economic treatment or dignity, and can realise their potential with the awareness of guaranteed and uncompromising equality in a modern country prepared to face the challenges of the future. As a five-year project, the goal is to gain 5 points in the EIGE Gender Equality Index ranking by 2026, to be placed above the European average, with the aim of returning to the top 10 European countries in 10 years' time (page 3).

UNI/PdR 125:2022: "Guidelines on the management system for gender equality" which provide for the adoption of specific KPIs (*Key Performance Indicators*) inherent to policies on gender equality in organisations (pages 3 and 5).

UNI ISO 30415:2021: "ISO 30415:2021 - Human Resources Management - Diversity, Equity and Inclusion" is the reference guideline that supports organisations in integrating the principles of enhancing diversity and their ability to be an inclusive company into their management systems (page 3).

Welfare: the set of all goods and services provided by the employer on the basis of a collective agreement or by a unilateral choice in favour of its employees (page 5).

Whistleblowing: these are reports made by a worker who, in carrying out their duties, notices a situation, a fact or circumstances which, reasonably, could lead one to conclude that an irregular or an unlawful act has occurred. The Whistleblowing channel is the reporting method used by the METLAC Group and aimed at all direct and indirect personnel; consequently, the Whistleblowing Policy is the document that governs the management of these practices and safeguards the parties involved (whistleblowers) (page 8).

The United Nations' *Women Empowerment Principles (WEPs)*: the set of principles established to provide guidance to companies on how to promote gender equality and female empowerment in the workplace, in business practices and in the community (page 3).

