

GENDER EQUALITY POLICY

1. THE PATH TOWARDS GENDER EQUALITY

In line with the values set out in *the Care Manifesto* and the company's strategic vision, and with the aim of fulfilling its mission to the best of its ability, Malvestio S.P.A. has adopted this Gender Equality Policy and launched a Gender Equality Management System (GEMS) in accordance with UNI/PdR125:2022, with the aim of developing an organisational model that promotes equity and inclusivity.

For Malvestio S.P.A., achieving certification was merely the first step in a process of implementing gender equality policies – a tool for promoting an inclusive culture, ensuring gender equality in terms of the representation, wellbeing and professional development of women, and valuing diversity as a driver of innovation and change.

Indeed, the certification has guided the organisation in adopting and maintaining appropriate policies and in reducing the gender gap, with consequent benefits for staff wellbeing, as well as ethical and reputational impacts.

2. THE GUIDING PRINCIPLES

The fundamental principles underpinning the Gender Equality Policy of Malvestio S.P.A. are:

- IMPARTIALITY AND INCLUSIVITY
- FAIRNESS AND TRANSPARENCY
- EMPLOYEE DEVELOPMENT
- PROTECTION OF INDIVIDUALS
- COMBATING ALL FORMS OF VIOLENCE AND DISCRIMINATION

The focus with which Malvestio S.P.A. directs its efforts to ensure that its Gender Equality Management System (SGPG) meets the requirements specified in UNI/PdR 125:2022 – in line with the European Union's Gender Equality Strategy – is inspired by the pursuit of the following objectives:

- ✓ increasing women's participation in the labour market;
- ✓ reducing the pay and pension gap between men and women, including to combat female poverty;
- ✓ promoting equality between men and women in decision-making;
- ✓ combating stereotypes and gender-based violence, and protecting and supporting victims.

3. THE COMPANY'S COMMITMENT

To help achieve the principles and objectives set out above, the Management of Malvestio S.P.A. undertakes, in particular, to:

- ✓ to adopt measures to prevent all forms of gender discrimination and to combat any act that undermines the dignity of staff, regardless of their role or level of responsibility;

- ✓ to promote diversity in all business processes: from recruitment and selection to access to training, from the setting of remuneration policies to performance and assessment and the allocation of reward schemes, from the selection of suppliers to the provision of services and products;
- ✓ to promote a model of shared care and parenting responsibilities between men and women, supporting the family welfare of its employees through working arrangements (remote working, flexible working hours) designed to facilitate a work-life balance;
- ✓ to promote initiatives aimed at informing, raising awareness and engaging staff on issues of equal opportunities and women's empowerment, combating stereotypes and promoting the visibility of women's contributions;
- ✓ to promote communication – including through marketing and advertising – that transparently declares its commitment to achieving gender equality, valuing diversity and supporting women's empowerment.

In particular, Malvestio S.P.A. takes action and is committed to continuous improvement in the following areas:

3.1. Gender culture

The Company is committed to launching awareness-raising initiatives relating to equal opportunities.

3.2. Selection and recruitment

The Company is committed to conducting the selection and recruitment process for new staff in accordance with the principles of fairness and non-discrimination.

3.3. Career management

In order to promote a balance between the proportion of male and female employees and to facilitate career progression, the Company is committed to:

- remove any organisational practices that may prevent female staff from being promoted to senior roles;
- consider organisational changes aimed at meeting needs related to family care responsibilities;
- provide professional development training equally to both male and female staff, thereby promoting equal opportunities.

3.4. Pay equity

In order to promote pay equity between genders, the company is committed to monitoring the pay gap at the same job level, and to ensuring and maintaining pay equity.

3.5. Parenting and care

The company is committed to supporting parental responsibilities and caregiving duties and, to this end, has drawn up a specific Parenting Policy shared with the entire workforce.

3.6. Work-life balance

The Company is committed to promoting a better balance between work and family life by implementing measures to support flexible and agile working arrangements.

3.7. Prevention of all forms of physical, verbal and digital abuse (harassment) in the workplace

In accordance with the provisions of Legislative Decree No. 198/2006, Malvestio S.P.A. promotes initiatives aimed at identifying and removing any unjustified barriers, whether subjective or objective, that prevent effective equal opportunities at work between men and women.

The company is committed to ensuring compliance with all applicable regulations prohibiting any form of direct or indirect discrimination in the workplace on the grounds of gender, as well as gender-based violence and harassment.

Behaviour constituting discrimination or harassment/violence on the grounds of gender entails civil and criminal liability, but also has disciplinary implications; it is therefore punishable in accordance with the forms and procedures laid down by current legislation.

Should such situations arise in the workplace, the Company, following verification that the reported behaviour has taken place, will assess the appropriate actions and take suitable measures against the person or persons responsible, in accordance with the Plan for the Prevention and Management of Harassment in the Workplace.

Victims will receive support and, if necessary, will be assisted in the process of returning to work.

It should be noted that any reports found to be entirely without objective basis may result in action being taken against those responsible for making the report.

Malvestio S.P.A. is also committed to establishing a management model that ensures the long-term maintenance of the defined and implemented requirements, to assessing the progress made by measuring the progress of results through the establishment of specific KPIs, and to ensuring appropriate reporting and monitoring systems to identify and eliminate any possible discrepancies.

4. **GENDER ISSUES HELPLINE – DIVERSITY MANAGER**

The Company designates the HUMAN RESOURCES DEPARTMENT as the support service responsible for welcoming, supporting, guiding and informing all company staff on gender-related issues. The Head of Human Resources is appointed as the *Diversity Manager* of Malvestio S.P.A..

5. **PERIODIC SURVEY**

The Company undertakes to carry out a periodic internal survey aimed at understanding the corporate climate regarding gender-related issues, drawing useful insights from it to inform actions and initiatives.

6. **AMENDMENT TO THE DISCIPLINARY CODE**

The Company amends the disciplinary code by adding the following provision:

“In the context of employment relationships, employees are required to comply with current legislation safeguarding gender equality and to refrain from any direct or indirect breach thereof. In particular, the following constitute disciplinary offences:

- *discrimination on the grounds of gender or sexual orientation;*
- *gender-based violence or harassment, or harassment based on sexual orientation;*
- *proposals for private interpersonal relationships in the workplace;*
- *retaliatory behaviour against anyone who reports discrimination and/or violence/harassment or who intends to give or gives evidence;*
- *insults, slander, intimidation, the disclosure of personal information or any other action intended to discredit a person on the grounds of gender or sexual orientation.*

The penalties provided for are fines, suspension from work and termination of employment, proportionate to the seriousness of the offence, within the limits prescribed by the current National Collective Labour Agreement (CCNL) on disciplinary measures.”

7. REPORT ON THE SITUATION OF STAFF, pursuant to Article 46 of Legislative Decree 198/2006

Pursuant to the provisions of Article 46 of Legislative Decree 198/2006 (the so-called Equal Opportunities Code, as amended by Law No. 162 of 5 November 2021), Malvestio S.P.A. undertakes to draw up a report every two years on the situation of male and female staff.

8. MONITORING AND IMPLEMENTATION OF THE POLICY

The General Policy on Gender Equality and related policies, within the broader framework of the organisation’s strategic guidelines, provide for the definition and periodic review of gender equality objectives, in conjunction with the Gender Equality Steering Committee, in order to assess their suitability and the need for any amendments or additions.

9. DISSEMINATION OF THE POLICY

The Gender Equality Policy is communicated and disseminated to all staff and stakeholders through internal communications and publication on the organisation’s website.

Villanova 27 January 2026

Legal Representative/Steering Committee

Malvestio Marino

