

# EQUAL OPPORTUNITY, DIVERSITY & INCLUSION POLICY

## Introduction

Our company is committed to promoting an inclusive and respectful work environment based on the principles of equal opportunity, diversity and inclusion (D&I). This policy sets out clear guidelines to ensure that all individuals involved in our activities – employees, collaborators and stakeholders – contribute to building a fair, respectful and inclusive corporate culture.

Working on these issues means responding to the "Leave No One Behind" call of the 2030 Agenda and the principles of the United Nations Global Compact, particularly those related to human rights and workers' rights.

This policy contains information on regulatory references, core principles, areas of application, communication and monitoring of policy effectiveness, as well as practical guidelines in case of violations.

This policy will be reviewed annually in conjunction with Management Review.

## Regulatory References

This policy is based on the following legal frameworks:

- The Italian Constitution, which under Article 3 establishes the principle of equality and prohibits discrimination based on sex, race, language, religion, political opinions, etc.
- Law 300/1970 (Workers' Statute), which sets out fundamental principles of workers' rights and includes provisions on non-discrimination in the workplace.
- Law 162/2021 on gender equality and the related UNI/PdR 125:2022 Reference Practice, which defines the minimum parameters for obtaining gender equality certification.
- Legislative Decree No. 198/2006 (Equal Opportunities Code), which promotes equal treatment and non-discrimination between men and women.
- Legislative Decree No. 216/2003 (Implementation of Directive 2000/78/EC), concerning the prohibition of discrimination in the workplace based on age, sexual orientation, disability, religion or personal beliefs.
- Legislative Decree No. 81/2008 (Consolidated Law on Health and Safety at Work), emphasizing the importance of a safe and healthy work environment free from discrimination.
- EU Regulation No. 2016/679 (GDPR), which protects the privacy and personal data of all employees.

- The company supports the Sustainable Development Goals – as specified in our Purpose Mapping report created through stakeholder engagement, the priority goals for CFS Europe are SDG 3, SDG 8, SDG 9, and SDG 12.
- The company adheres to the EFRAG standards of the CSRD for sustainability reporting.

## Core Principles

1. Equal Opportunity: All employees, regardless of gender, age, ethnicity, religion, disability, sexual orientation or other personal characteristics, must have equal access to opportunities for growth, training and professional development.
2. Diversity: Diversity is considered a strategic asset. The company recognizes that a variety of experiences, perspectives and skills contributes to innovation and success.
3. Inclusion: We foster an environment where everyone feels welcome, respected and valued, promoting dialogue and interaction among individuals from different backgrounds.

## Scope of Application, Communication and Effectiveness Monitoring

This policy adopts a cross-functional approach that impacts various areas of our organization to ensure the integration of inclusive and equitable practices in all aspects of work. The application areas and effectiveness monitoring are illustrated below. For specific targets and objectives related to diversity and inclusion within the company, refer to the "CFS Europe ESG Policy" document.

- **Recruitment, Selection and Hiring:**
  - Drafting job postings that include the core principles of this policy
  - Adopting neutral and fair selection practices based on merit
  - Sharing the policy with new hires
  - Annual monitoring of the number of men and women hired
- **HR Processes:**
  - Sharing the policy with all personnel
  - Monitoring the application of the core principles of this policy in training processes, in particular by measuring the percentage of male and female employees receiving training (beyond mandatory courses) and the average number of training hours by gender
  - Monitoring perceptions of diversity and inclusion levels at CFS Europe via an annual employee survey

- **Career Paths and Professional Development:**
  - Developing career paths that consider the core principles of this policy
  - Monitoring the number of promotions and career advancements by gender as a percentage of the total number of employees in each gender group
- **Compensation and Remuneration:**
  - Annual analysis and monitoring of the gender pay gap
  - Promoting transparency and pay equity among employees in equal roles
- **Promotion of Inclusive Language:**
  - Monitoring incidents of discrimination (refer to the Whistleblowing Policy)
  - Posting signage promoting respectful and inclusive communication among colleagues, managers, clients, suppliers, and communities
- **Supply Chain:**
  - Monitoring the promotion of inclusive practices and respect for human rights in the supply chain through the ESG rating questionnaire for suppliers

Internal and external communication of this policy is key to ensuring that all employees, clients, suppliers, and partners are aware of its objectives, principles and expectations. This policy is shared with all employees during the annual meeting and is available on the company website and on internal noticeboards.

The company is committed to periodically monitoring the effectiveness of D&I initiatives, gathering feedback from employees, and updating the policy based on regulatory and organizational developments.

Aware of the challenge in measuring diversity and inclusion aspects, CFS Europe commits to implementing a system to evaluate and monitor the effectiveness of this policy and the initiatives undertaken. The results are shared through annual sustainability-related reporting, as specified in our ESG policy, available at the network location Y:\Policy ESG and on the website [www.cfseuropespa.com](http://www.cfseuropespa.com)

### **Practical Guidelines in Case of Violations**

Reporting and remediation mechanisms are essential tools to ensure the effective implementation of this policy and to address any violations or disputes.

Reports and related management are covered by our "Whistleblowing Policy" (available at the network path Y:\Modello 231\Whistleblowing) and through the WallBreakers portal accessible at <https://cfseurope.wallbreakers.it/#/>. The "Whistleblowing Policy" explains in detail:

- Purposes

- Recipients
- Reports
- Anonymous reporting
- Confidentiality
- Prohibition of retaliation and reporting of retaliatory actions
- Report management
- External disclosures
- Privacy

For any doubts or questions regarding the practical guidelines in case of violations of this policy, you can contact the Supervisory Body at the following email address: [organismo.vigilanza.cfse@gmail.com](mailto:organismo.vigilanza.cfse@gmail.com)

To prevent non-compliant or discriminatory behaviours and promote a transparent and responsible corporate culture that respects legality, people and inclusion, in addition to this policy, CFS Europe has adopted a Code of Ethics, outlining standards of conduct for all stakeholders, and the 231 Model (available at <Y:\Modello 231\Documenti approvati> and on [www.cfseuropespa.com](http://www.cfseuropespa.com)), which is fundamental in promoting a culture of ethics and legality.

## Conclusion

Our company firmly believes that respecting the principles of equal opportunity, diversity and inclusion is essential to people's well-being and business success. We encourage everyone to actively contribute to creating a positive and inclusive work environment.

*Ravenna, 30/07/2025*