

OMNIA TECHNOLOGIES

Diversity, Equity and Inclusion Policy

Objective	Provide guidance on behaviors to adopt to ensure equal opportunities while respecting diversity, to which all members of the Group must adhere. An additional purpose of this document is to create a corporate culture aimed at recognizing diversity and inclusion and also to prevent any discriminatory acts in the daily practice of the Omnia Technologies Group.		
Scope	The provisions contained in this document apply to all people of the Omnia Technologies Group.		
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We are in harmony with our people, whom we consider our most valuable asset: in this regard, respect, fairness, listening, and merit are the core values of our identity.

In our workplaces, we promote diversity and gender equality, which we cultivate as a management approach and managerial practice, measuring key metrics to ensure concrete results in line with ESG (Environmental, Social, Governance) principles.

Omnia Technologies Group is committed to creating an inclusive work environment that values diversity through equity and to not tolerating any act or behavior of discrimination (such as based on race and ethnic origin, skin color, gender, sexual orientation, gender identity, disability, age, religion, political opinions, national ancestry, or social background, as well as any other form of personal characteristic) against anyone. Any act of discrimination, harassment, or bullying within the workplace or in any of the Group's activities will be subject to management and disciplinary evaluation.

This Policy aims to provide guidance on the behaviors to adopt in order to ensure equal opportunities while respecting diversity, which all members of the Group must adhere to. An additional goal of this document is to foster a company culture focused on the recognition of diversity and inclusion, also with the aim of preventing any discriminatory act in the daily practice of the Omnia Technologies Group.

1. COMMITMENT TO EQUAL OPPORTUNITIES

Omnia Technologies is committed to upholding the principle of equality and equal opportunities in the workplace. At Omnia Technologies, we oppose any form of unfavorable or unequal treatment through direct or indirect discrimination or harassment towards employees or candidates based on race and ethnic origin, skin color, gender, sexual orientation, gender identity, disability, age, religion, political opinions, national ancestry, or social background, as well as any other form of personal characteristic. We also oppose any form of less favorable treatment for these reasons.

2. GUIDING PRINCIPLES, TOOLS, AND INTERNATIONAL AND NATIONAL REGULATIONS

The DE&I Policy is particularly committed to respecting the following related international and national regulations:

- Universal Declaration of Human Rights by the United Nations (1948), which establishes the fundamental principle of equality for all individuals without any form of discrimination.
- 2030 Agenda for Sustainable Development: SDG 5 on gender equality, SDG 8 on decent work, and SDG 10 on reducing inequalities.
- The 10 Principles of the UN Global Compact, particularly Principles 1 to 6, which promote respect for Human Rights and Labor Rights.
- United Nations Guiding Principles on Business and Human Rights (UNGP), the related Gender Dimensions, and the associated manifesto "Business for People and Society."
- 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.
- Declaration on Fundamental Principles and Rights at Work and the ten fundamental conventions of the International Labour Organization (ILO), which promote equal opportunities and fair treatment in the workplace.
- ILO Convention C190/2019 on gender-based violence and harassment in the workplace.
- Italian Constitution, which recognizes and protects the fundamental rights of citizens, including the principle of equality (Article 3), which prohibits discrimination of any kind.
- Law 300/1970 (Workers' Statute), which establishes the fundamental principles of workers' rights and includes provisions on non-discrimination in employment.
- Legislative Decree No. 216/2003 (Code of Equal Opportunities between Men and Women), which also incorporates European directives on gender equality.
- Legislative Decree No. 81/2008 (Consolidated Law on Health and Safety at Work), which regulates health and safety at work in Italy, emphasizing the importance of ensuring an inclusive, safe, and discrimination-free work environment.
- Law 162/2021 on gender equality, which strengthens the protection of gender differences in the workplace, along with the related Reference Practice UNI/PdR 125:2022, which defines the minimum parameters to be met for obtaining gender equality certification.
- ISO 30415:2021 - Human Resource Management – Diversity and Inclusion.

- UNI PDR 159:2024 Inclusive Work for Persons with Disabilities - Operational Guidelines.
- Omnia Technologies Ethical Code.
- Applicable National Collective Labor Agreements (CCNL).
- Constitution of the Italian Republic.
- Fundamental Principles, Articles 2 and 3.
- CEE Recommendation 92/131.
- Protection of the Dignity of Women and Men at Work.
- Directive 97/80/CE.
- Burden of Proof in Cases of Sex-Based Discrimination.
- Directive 2002/73/CE.
- Directive 2002/73/CE of the European Parliament and of the Council of September 23, 2002, which amends Council Directive 76/207/EEC regarding the implementation of the principle of equal treatment between men and women in relation to access to work, vocational training, and career advancement, as well as working conditions.
- Legislative Decree 198/2006 (Code of Equal Opportunities).
- ILO Recommendation No. 206 on the elimination of violence and harassment in the world of work.
- Framework Agreement on Harassment and Violence in the Workplace (April 26, 2007).
- Law 38/2009 - Conversion Law of April 23, 2009, No. 38, containing urgent measures regarding public safety and combating sexual violence, as well as regarding stalking.
- Law 119/2013 - Conversion Law of October 15, 2013, No. 119, containing urgent provisions on security and combating gender violence.
- Legislative Decree 80/2015 - Legislative Decree of June 15, 2015, No. 80 - Measures for reconciling caregiving, life, and work needs (includes paid leave for women victims of violence).
- Law No. 179 of November 30, 2017.
- Law No. 205 of December 27, 2017 – amendment of Article 26 of the Code of Equal Opportunities referred to in Legislative Decree 198/2006.
- Directive (EU) 2019/1937 of the European Parliament and Council of October 23, 2019.

- Law No. 4 of January 15, 2021 - Ratification and execution of ILO Convention No. 190.
- UNI ISO 30415:2021.
- Law No. 127 of August 4, 2022.
- Legislative Decree No. 24 of March 10, 2023, regarding the protection of persons reporting violations of Union law and containing provisions regarding the protection of persons reporting violations of national regulatory provisions.
- EU Regulation 2016/679 (GDPR).

3. DEFINITIONS

- Diversity: Characteristics of differences and similarities among people.
- Equality: The state of being equal, particularly regarding social status, rights, opportunities, or outcomes.
- Equity: The principle that policies, processes, and practices should be applied impartially and that individual needs should be recognized.
- Inclusion: The practice of including all stakeholders in organizational contexts. Inclusion may involve stakeholders from different groups who are accepted, welcomed, and enabled to have a voice and develop a sense of belonging. Inclusion may also entail offering opportunities to individuals based on their knowledge, skills, and abilities, as well as access to resources that enable their participation.
- Workplace Harassment: Unwanted behaviors, conducted for reasons connected to sex, which have the purpose or effect of violating the dignity of a worker and creating an intimidating, hostile, degrading, humiliating, or offensive environment (Legislative Decree 198/2006, Article 26, Paragraph 1). The presence of implicit or explicit threats or blackmail by hierarchical superiors or others who can influence the establishment, continuation, and termination of the employment relationship constitutes an aggravating circumstance in cases of sexual harassment.
- Workplace Violence: Refers to "incidents" in which staff are abused, threatened, or assaulted in work-related circumstances, including commuting to and from

work, with explicit or implicit consequences on health, safety, and well-being (World Health Organization).

- **Direct Discrimination:** Occurs when a worker is treated less favorably than another in a comparable situation due to gender, nationality, ethnicity, language, age, disability, sexual orientation, political beliefs, union activities, religion, type of contract, or flexible organizational work arrangements. Specifically, using sexist criteria in interpersonal relationships in work activities constitutes gender discrimination.
- **Indirect Discrimination:** Refers to a situation in which a provision, practice, criterion, act, agreement, or behavior that appears neutral places or could place a worker at a particular disadvantage due to gender, nationality, ethnicity, language, age, disability, sexual orientation, political beliefs, union activities, religion, type of contract, or flexible organizational work arrangements.

4. HUMAN RESOURCES LIFE CYCLE

In the context of the human resources life cycle processes, Omnia Technologies is committed to:

- Ensuring that decisions regarding recruitment and selection are transparent and objective, based on the value, qualifications, skills, and potential of candidates.
- Expanding the pool of individuals potentially interested in working at the company through dedicated activities in collaboration with schools and employer branding initiatives, creating synergies with universities to contribute to spreading Omnia Technologies' approach to people, which is attentive and sensitive to diversity and inclusion.
- Implementing a people management and development strategy aimed at promoting the uniqueness of each individual, ensuring equal opportunities for professional growth, including career opportunities, professional advancement, horizontal growth, and training initiatives.
- Developing managerial skills and inclusive leadership by promoting specific training and coaching programs focused on strengthening the required competencies and aimed at increasingly ensuring gender balance and diversity in positions of responsibility.

- Ensuring that compensation policies are inspired by principles of equity and recognition of knowledge, skills, competencies, professionalism, attitudes and behaviors, results, and each individual's contribution to the organization.
- Defining an action plan to manage and prevent the gender pay gap, systematically communicating its performance on the gender pay gap externally.
- Promoting a non-conformist culture oriented towards the inclusion of diversity in all its forms through dedicated training plans, overcoming stereotypes to highlight the added value brought by diversity.
- Raising awareness among employees about the use of respectful, polite, and correct language to avoid any polemical or judgmental approach.
- Improving organizational well-being and motivation by strengthening the offering of corporate welfare services and tools and promoting actions for work-life balance in all stages of work and personal life.
- Encouraging opportunities for dialogue and listening to staff and collaborators for a better understanding of their legitimate expectations regarding diversity, equity, and inclusion issues.

5. COMMUNICATION

In its communication activities, Omnia Technologies is committed to:

- Basing its internal and external communication on responsibility, striving to disseminate images and content that respect diversity.
- Promoting the values of diversity and equal opportunities within its operational context, actively contributing—through communication and initiatives in the community—to create a culture that is open to the full realization of individuals in all their dimensions, valuing and respecting each person's uniqueness.

6. RELATIONS WITH SUPPLIERS, CUSTOMERS, AND THIRD PARTIES

In its relationships with suppliers, customers, and third parties, Omnia Technologies is committed to communicating the principles, objectives, and expectations of Diversity, Equity, and Inclusion (DE&I) at each stage of its relationship with stakeholders and promoting awareness of these issues. Specifically, in its relationship with suppliers, Omnia is committed to simplifying procurement processes and making qualification systems

accessible and inclusive, valuating how the personnel management practices of partners align with DE&I principles, including contractual clauses that require partners to provide decent work, safe and secure working conditions, and fair and respectful treatment of individuals, pursuing a strategy of supplier differentiation.

7. WORKPLACE HARASSMENT

Omnia Technologies Group is committed to ensuring that no harassment in the workplace, regardless of the motivation, is overlooked. Such behaviors can range from extreme forms like violence or bullying to less obvious actions such as ridicule or inappropriate comments toward colleagues.

Any form of harassment will be subject to management and disciplinary evaluation.

8. HARASSMENT IN THE WORKPLACE BY THIRD PARTIES

Harassment by third parties occurs when an employee experiences behaviors similar to those mentioned in the previous section at the workplace or in any other location where work activities are carried out (such as a supplier's or client's premises, at a trade fair, etc.) by individuals not associated with the Group.

Anyone who experiences harassment from third parties while performing their work activities is strongly encouraged to promptly inform their supervisor. The Omnia Technologies Group will take all reasonable measures to manage the incident and prevent the recurrence of such behaviors.

9. SEXUAL HARASSMENT IN THE WORKPLACE

Sexual harassment is defined as inappropriate or unwanted behavior of a sexual nature or based on a person's gender that is considered unwelcome or offensive to the recipient. The following examples illustrate the types of conduct that are considered sexual harassment in the workplace:

1. Unwanted physical contact, groping, or unwanted physical or verbal intimidation (sometimes such behaviors manifest in non-verbal ways, such as looks or gestures).
2. Proposals, approaches, or pressures for sexual favors, often accompanied by the promise of advantages and/or the threat of disadvantages (for example, to promote a person's career or, in the event of refusal, to hinder it).
3. Sexual advances, proposals, suggestions, or pressures to engage in sexual relations.

4. Derogatory or humiliating comments based on gender or showing, exposing, making available, and sending pornographic or sexually explicit material (including electronically).
5. Suggestive comments and sexist jokes.
6. Harassment/stalking/persecution, both physical and online.
7. Dissemination of intimate images.
8. Sexually suggestive staring or making inappropriate sexual gestures.
9. Using anecdotes, jokes, or stories with sexual or lewd undertones that make the interlocutor uncomfortable.
10. Expressing judgments about a person's sexuality or physical attraction, or making sexual comments about their appearance, clothing, or body parts.
11. Making derogatory or degrading comments about a person's sexual orientation or gender identity, or using insults with a gender/sexual connotation.
12. Repeatedly contacting a person (e.g., persistent phone calls or messaging) or repeatedly asking them out.
13. Making unwanted sexual advances.
14. Sending sexually suggestive communications in any format, or sharing or showing sexually inappropriate images or videos in any format.

10. RESPONSIBILITY

Omnia Technologies Group actively promotes equal opportunities in its activities to ensure that all individuals receive fair, just, and consistent treatment based on their aptitudes, abilities, and potential.

Executives, managers, and responsible functions foster an inclusive organizational culture by demonstrating their commitment and creating role models for inclusive behavior.

Every employee has a personal responsibility to adhere to the principles of equality and equal opportunities and to maintain an attitude and language oriented towards inclusion and recognition of diversity, combating inappropriate behavior.

Omnia Technologies reports on its performance and progress in DE&I through its annual sustainability reporting.

11. GOVERNANCE AND MONITORING

The policy is defined by the Board of Directors in coordination with the DE&I Committee, which identifies DEI objectives and indicators to be achieved at the Group level and for each individual legal entity of the Group. With the support of the relevant data owner structures, it monitors trends. It directs the individual processes regarding the need to activate specific actions and/or improvement interventions, useful for ensuring full compliance with and the enhancement of DEI principles within the Group and in the external context.

12. DISSEMINATION AND UPDATING

This policy is communicated to all employees, also through specific training sessions based on the areas of operation, roles, and responsibilities, and is made available on the company website to all stakeholders, including collaborators, suppliers, and partners, so that there is full awareness and further impetus for the promotion of DE&I as an integral part of the value system of Omnia Technologies.

The DE&I policy is published on the company intranet and on the website with a view to transparency and collaboration.

This policy will be evaluated for updates at least once a year in light of the evidence emerging from assessments and monitoring of national and international trends.

13. REPORTING

As part of the Omnia Technologies Group, all employees and collaborators of the Company are required to act in good faith and are encouraged to intervene promptly against anyone who has had and/or is exhibiting irregular behavior concerning the contents of this policy in order to stop it by reporting any problems regarding actual or suspected violations within the Omnia Technologies Group.

Mere rumors or hearsay, personal grievances, requests, claims, disputes, and requests related to the personal interest of the whistleblower are not worthy of reporting and will not be subject to the related verification process.

The ordinary procedure requires that the employee and/or collaborator report to their superior and/or the People & Organization function; in this case, the report will be forwarded, ensuring confidentiality, to the DE&I Committee or one of its members to resolve the issue through appropriate initiatives. If the need arises, the People & Organization Management will take appropriate managerial measures according to the seriousness of the facts.

However, if an employee, based on the circumstances, deems this course of action inappropriate, inapplicable, or believes that the issue has not been adequately addressed by their superior, they may make a report via:

- The Integrity Line platform by connecting to the link <https://omniatechnologiesgroup.integrityline.com/>, according to the following methods:
 - In written form, through guided completion of fields within the application;
 - Orally, through the recorded voicemail messaging system;
 - Orally, at the request of the whistleblower, through a direct meeting with the reporting channel manager in a location suitable to ensure confidentiality;
- Sending a written report to the following address: Compliance Corporate Management – Omnia Technologies Group, via Feltrina 72 – 31040 Signoressa di Trevignano (TV).

Regardless of the chosen method, the confidentiality of the whistleblower's identity, the content of the report, and the related documentation is guaranteed in any case (for more details see the Whistleblowing Policy).

14. REPORTING TO THE EQUALITY COUNSELOR

In the event that the report regarding gender discrimination, violence, and harassment at work is not addressed, the whistleblower has the option to contact the Equality Counselor in their area, whose details can be found online or by following this link: www.lavoro.gov.it/temi-e-priorita/parita-e-pari-opportunita/focus-on/consigliera-nazionale-parita/pagine/default

Within the functions of promoting and monitoring the implementation of equal opportunity policies by all public and private entities operating in the labor market, provincial and regional Equality Counselors have the authority to undertake any useful initiative within the competencies of the State and are authorized to act before the Court in the capacity of Labor Judge on behalf of the person who has an interest, or to intervene in proceedings brought by workers who claim to have suffered gender discrimination (art. 36 D.lgs. 198/2006).