

Policy on Diversity, Inclusion and Equal Opportunities

1. Introduction and Scope of Application

Within the manufacturing sector, as in many others, diversity and inclusion are receiving increasing attention from numerous stakeholders, who are increasingly expressing the need and willingness to support and promote cultural change aimed at ensuring equal opportunities at all levels, reducing talent loss and improving business performance.

Given the importance of this topic, TECNIWELL has decided to adopt a Policy focused on diversity and inclusion, aimed at valuing people in accordance with the principles of inclusion, diversity and equal opportunities.

Management ensures, within the scope of its responsibilities, compliance with these principles within TECNIWELL, particularly with regard to the various areas of human resources management, from recruitment to the definition of remuneration and employee welfare arrangements, from opportunities for professional growth through to the termination of employment relationships.

This Policy reinforces the principles already set out in the Code of Ethics and represents the Company's commitment to promoting the values of Diversity, Inclusion and Equal Opportunities among all people working for TECNIWELL. Commitments relating to suppliers and subcontractors are limited to those set out in Section 3 below.

It is the responsibility of everyone working at TECNIWELL to observe the principles contained in this Policy in all activities they perform.

2. Guiding Principles

TECNIWELL firmly rejects all forms of prejudice and does not tolerate discriminatory conduct. Human resources are TECNIWELL's most valuable asset, and creating a working environment free from discriminatory conduct based on strictly personal characteristics and choices is a fundamental element of the Company's success.

TECNIWELL employees use their judgement, creativity and critical-thinking skills to generate value for the Company and its stakeholders, particularly customers and the community in which TECNIWELL operates.

In order to enhance these resources, TECNIWELL is committed to promoting the uniqueness and dignity of individuals, supporting their well-being at work and thereby strengthening personal self-esteem and resilience and contributing to the creation of a rewarding working environment. TECNIWELL's human resources management is based on the following principles:

- Non-discrimination: within TECNIWELL, employees are considered on the basis of their professional skills and competencies, and all forms of discrimination are prohibited;



- Equal opportunities and equal dignity: TECNIWELL respects diversity and regards it as a value, committing to ensuring equal opportunities throughout the various stages of working life;

- Creation of an inclusive working environment: TECNIWELL encourages an inclusive culture capable of enabling individuals to express their potential, recognising it as a strategic lever for achieving organisational objectives;

- Work-life balance: TECNIWELL recognises the value of balancing professional and private life and is committed to respecting each individual's personal needs throughout their working life;

- Team diversification: TECNIWELL regards diversity as a strategic value capable of strengthening team competencies and creating a competitive advantage for the Company.

In particular, TECNIWELL takes all necessary actions to prevent episodes of discrimination based on Age, Gender, Identity and sexual orientation, Ethnic origin, Nationality, Language, Religious orientation, Personal beliefs, Political and trade union orientation, Disability, Health conditions, Marital status, Pregnancy, Maternity, Paternity, Family responsibilities, Contract type, with particular regard to fixed-term, part-time and temporary agency employment relationships. The prohibition of discrimination neither entails nor authorises any collection of the factors listed above: the measurement methods are governed by Section 6.

3. Management Procedures

The principles adopted in this Policy are implemented by TECNIWELL through concrete actions, which may consist of organisational and procedural measures or specific activities aimed at:

- promoting balanced gender representation within governing and supervisory bodies;
- strengthening employees' awareness and sensitivity regarding diversity and inclusion through communication and awareness-raising campaigns;
- promoting an appropriate balance in workforce composition across the various organisational and contractual levels;
- ensuring equal opportunities for all staff during recruitment, hiring and career development, based solely on objective assessments of the quality of work, without any discrimination;
- collaborating with organisations that promote diversity and inclusion within the manufacturing sector, including local trade associations;
- monitoring the consistency of Company rules, processes and practices with the contents of this Policy and the Code of Ethics.
- determining remuneration on the basis of objective and gender-neutral criteria relating to job content, required skills, responsibility and working conditions, and making the criteria used for pay progression accessible to staff;
- stating the initial salary level or relevant pay range in job advertisements and not asking candidates for their current remuneration or remuneration received in previous employment relationships, while contractually extending this prohibition to third parties engaged in recruitment;
- adopting the reasonable accommodations necessary to ensure that persons with disabilities can access employment, perform their work and progress professionally, provided that this does not impose a disproportionate burden, and monitoring compliance with targeted employment placement obligations.

4. Harassment, Violence and Abusive Conduct

TECNIWELL does not tolerate harassment, including sexual harassment, acts of physical or verbal violence, repeated abusive conduct, or any conduct having the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading or offensive environment.

The prohibition applies in any context connected with the employment relationship, including business trips, Company events and communications made through Company channels. Anyone holding a position of hierarchical responsibility is required to take action upon becoming aware of conduct falling within the scope of this Section, even in the absence of a formal report.

5. Reporting, Whistleblower Protection and Disciplinary Consequences

Violations of this Policy may be reported through the channels established pursuant to Italian Legislative Decree No. 24/2023, in accordance with the methods set out in the relevant procedure.

Where a violation is established, the measures provided for by the disciplinary code posted pursuant to Article 7 of Italian Law No. 300/1970 shall be applied in proportion to the seriousness of the conduct; for persons not employed under a subordinate employment relationship, the applicable contractual measures shall apply.

6. Processing of Personal Data and Measurement

The measurement of the objectives of this Policy is carried out in compliance with Regulation (EU) 2016/679 and according to the following rules:

- the indicators are constructed exclusively using data already held by the Company due to a legal obligation or for the management of the employment relationship;
- no data relating to ethnic origin, religious beliefs, sexual orientation or health conditions are collected for monitoring purposes. Any surveys concerning these aspects are conducted anonymously and in aggregate form, using a minimum aggregation threshold that prevents re-identification, and participation is voluntary and entails no consequences for those who do not participate;
- under no circumstances are data relating to political, religious or trade union opinions collected.

7. Indicators and Objectives

The following indicators are measured annually, compared with the value for the previous financial year and reported to Management and the Board of Directors during the review. Target values are defined by Management upon first implementation.

- workforce composition by gender and age group, by job classification;
- percentage of women in positions of hierarchical responsibility;
- average gender pay gap, by category of workers performing work of equal value;
- average per-capita training hours, broken down by gender and job classification;
- return-to-work and retention rate twelve months after parental leave;
- number of reports received, handled and closed, by outcome;
- fulfilment of targeted employment placement obligations pursuant to Italian Law No. 68/1999.

8. Responsibilities and Monitoring

This Policy is approved by Management and the Board of Directors, which are responsible for promoting, disseminating and ensuring compliance with the principles contained herein.



The Human Resources Department manages recruitment, remuneration, training and evaluation processes in accordance with this Policy, measures the indicators referred to in Section 7 and proposes the objectives. Functional managers ensure its application in decisions within their respective areas of responsibility.

9. Diffusion, Review and Updating

The Policy is published on the Company intranet and corporate website, posted on Company notice boards, provided to newly hired staff and attached to supply contracts with respect to the provisions applicable to them.

Podenzano (PC), 28/09/2026

Management