Gender Equality and Integrity Protection Policy

(Drafted in accordance with the requirements of UNI/PdR 125:2022)

1. Scope and Commitment of the Management Team (Culture and Strategy)

Wirutex S.r.l. considers gender equality, diversity and inclusion as fundamental pillars of its corporate culture and strategic factors for ensuring innovation and competitiveness. The Management Team (DG) is committed not only to respecting legality, but to **actively promoting a working organisation that values the skills of each individual**, removing any obstacles that prevent full gender equality.

This policy serves to formalise Wirutex's commitment to establishing, implementing and continuously improving a Management System for Gender Equality, in compliance with UNI/PdR 125:2022.

We operate a **zero-tolerance** policy toward any form of discrimination, harassment or violence. We have also established the reporting procedures and **disciplinary measures** that will be **implemented** and **communicated** in the event of a violation (in order to resolve the detected episode of non-compliance).

2. Field of application

This policy applies to all recipients as defined in the Code of Ethics. This includes **Corporate Bodies (AMM)**, the **Management Team and Employees** (beginning with the General Management (DG) and including all functions and departments, as set out in the company's organisational chart: Staff, Central Functions, Technical Area (RTEC), Production Area (RPROD), Logistics and Commercial Area (RCOM)), as well as **External Collaborators** (consultants, agents, interns and anyone who works within Wirutex environments).

3. Governance and Accountability

To ensure the effectiveness of the Management System, Wirutex sets out the following responsibilities:

- The **Senior Management Team (AMM/DG)** has the ultimate responsibility for implementing the policy, ensuring the availability of the necessary resources (economic, human, technological).
- A **Steering Committee for Gender Equality** (composed of members of the DG, RAMM and/or RGA/RIQ) is established, which has the task of:
  - Overseeing the implementation of the policy.
  - Monitoring the indicators (KPIs) provided for by the UNI/PdR 125.
  - Analysing the reports received.
  - Proposing plans for improvement and corrective actions.
- All **Function Managers** (RCOM, RACQ, RLOG, RPROD, RTEC) are responsible for applying this policy across the areas for which they are responsible.

4. Key References and Definitions

This policy is based on a number of key reference documents, such as the Code of Ethics - Wirutex S.r.l., the PROREC1 Procedure: Recruiting, the **Uni/PdR 125:2022**, the Italian Legislative Decree 198/2006 (Code of Equal Opportunities, Art. 25-26) and Law 300/1970 (Workers' Statute, Art. 7).

For the purposes of this policy, the relevant legal definitions are as follows:

- **Direct Discrimination (Art. 25, Para. 1):** Any provision, criterion, practice, act, pact or behaviour that produces a detrimental effect, discriminating against workers on the basis of their gender or any other protected characteristic (age, ethnicity, religion, state of pregnancy, maternity/paternity, care needs, personal opinions).
- **Indirect Discrimination (Art. 25, Co. 2):** Any "apparently neutral" provision, criterion, practice, act, pact or behaviour that could place workers of a certain gender (or other category) at a particular disadvantage.
- **Harassment (Art. 26, Co. 1):** Undesirable behaviours carried out for reasons related to gender (or other categories), with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive climate.
- **Sexual Harassment (Art. 26, Co. 2):** Undesirable behaviours with a sexual connotation (expressed in physical, verbal or non-verbal form) with the same purpose or effect as mentioned above.

5. Principles of Equal Treatment (HR Processes)

Wirutex guarantees that every decision relating to an employee's progression within the company is based exclusively on objective criteria pertaining to merit, competence, professionalism and experience.

This principle applies to all phases: from **selection** (as per PROREC1), to **recruitment**, to **career management** (where promotions are based solely on performance and potential), to access to training.

Wirutex is also committed to:

- **Equal Pay:** Ensuring equal pay for equal tasks and responsibilities, actively monitoring any pay gaps and implementing corrective measures.
- **Inclusive Language:** Adopt a language that respects gender identity, that is neutral, and that does not perpetuate stereotypes, in all corporate communications, both internal (policy, intranet) and external (job advertisements, marketing).

6. Parenting Support and Work-Life Balance

Wirutex recognises that a fair balance between professional and private life is essential for the well-being of employees, as well as for overcoming indirect discrimination. The company is committed to:

- Promoting a culture that encourages the use **of paternity and parental** leave by both parents, without affecting their careers.
- Offering **flexible working** methods (e.g. smart working, flexible hours), compatible with technical-productive (RPROD, RTEC) and organisational needs.
- Respecting the right to disconnect and promoting work management based on objectives rather than physical presence.

7. Harassment Prevention Policy

Wirutex does not tolerate any behaviour that falls under the definitions of sexual harassment or harassment above. Behaviours such as unwanted physical contact, verbal appreciation, offensive jokes or innuendos, the exposure of pornographic or offensive material (including digital), pressure to obtain sexual favours and any other action aimed at creating a hostile or intimidating "climate" are strictly prohibited.

Every employee has a duty to refrain from such behaviour, and to actively contribute to a respectful and collaborative working environment.

8. Reporting and Protection Procedures

Anyone who believes that they are a victim of or witness to a violation of this policy (discrimination or harassment) is encouraged to report it. All reports are handled with the **utmost confidentiality** and **without any fear of** retaliation.

Reporting channels include your function manager, the General Management Team (DG), the Board of Directors (RAMM) or the **Steering Committee**. Official **whistleblowing** channels (Legislative Decree 24/2023) are also provided, which ensure anonymity.

Wirutex undertakes to analyse each report impartially, to provide support to the victim and to take the necessary corrective measures.

9. Disciplinary System (Implementation and Communication)

(Specific section for resolving episodes of non-compliance)

The violation of the principles and rules contained in this Policy constitutes a disciplinary offense and damages the relationship of trust with the company.

9.1 Disciplinary System: Communication
Wirutex undertakes to communicate the rules of this Policy and the related sanctions to all its workers. This is done by displaying the relevant documents in an accessible place (as per Art. 7 of the Workers' Statute), publishing these on the company intranet, and delivering periodic and mandatory training sessions.
9.2 Implementation of Disciplinary Measures
Any conformed violations will be pursued promptly and impartially. The process of implementing the sanctions ensures proportionality (the sanctions are commensurate with the seriousness of the facts, and applied in accordance with the law and the CCNL) and full respect for the counterparty (right of defence). Penalties may include reprimand, fine, suspension and, in the most serious cases, dismissal.

10. Self-training and Continuous Improvement

Wirutex periodically undertakes to internally provide all staff with documents on issues of gender equality, the prevention of discrimination and the content of this policy. The Steering Committee will periodically (at least annually) review the effectiveness of the policy and the KPIs, establishing continuous plans for improvement as required by the UNI/PdR 125.

Date
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The Management
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