

Title: **POLICY DIVERSITY AND INCLUSION**

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A. REGULATORY REFERENCES

Disability

The fundamental connection between disability and work was already enshrined in 2006 in the UN Convention on the Rights of Persons with Disabilities, which is the international framework on the subject. In fact, Article 27 recognises 'the right to work [...], on an equal basis with others, that is, the right to support oneself through freely chosen or accepted employment in an open labour market and work environment conducive to the inclusion and accessibility of persons with disabilities'.

Finally, in the international arena, it is relevant to mention the ILO (International Labour Organisation) Convention 190/2019 on Gender-based Violence and Sexual Harassment in the Workplace, which identifies persons with disabilities as more vulnerable and exposed to the risk of violence and, therefore, entitled to special protection and attention.

The Italian legal system protects the right to work of persons with disabilities through Law 68/1999, which, with subsequent amendments in 2015, regulates compulsory recruitment, incentives for the private sector and penalties for non-compliance.

Genre

Issued by the International Labour Organisation:

Convention on Workers with Family Responsibilities 1981, No. 156;

Violence and Harassment Convention 2019, No. 190 and Recommendation No. 206.

Recently, gender equality has been included in the National Recovery and Resilience Plan (NRP) as one of the priorities in terms of social inclusion, in order to boost national development in the wake of the pandemic. The Five-Year Strategy for Gender Equality 2021-2026 adopted therein has the concrete objective of increasing by at least 5 points, the score of the Gender Equality Index (EIGE) ranking, which currently places Italy 14th at 63.8 points, 4 less than the European average. Confirming this growing attention, the Equal Pay Law (DDL 13 October 2021 No. 2418) was approved in October 2021.

The Equal Pay Act is a regulation that entails a number of amendments and additions to the Code on Equal Opportunities between Men and Women, in particular with reference to employment. This is Legislative Decree no. 198 of 11 April 2006, the so-called 'Equal Opportunities Code', as amended by Law no. 162 of 5 November 2021.

- Regulation (EU) 2020/852 - 'Taxonomy Regulation' (EU taxonomy for sustainable activities | European Commission) - was published in the Official Journal of the European Union on 22 June 2020 and entered into force on 12 July 2020.
- EU Regulation 2016/679 (General Data Protection Regulation) of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC).
- Legislative Decree 196/2003, as amended by Legislative Decree of 10 August 2018, No. 101 "Provisions for the adaptation of national legislation to the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation)".
- Personal Data Processing Regulation adopted at Investire SGR.

B. PURPOSE AND SCOPE

This document (hereinafter the "Policy") defines the principles by which Investire SGR is inspired in order to enhance human capital according to meritocratic criteria, professional skills, correct behaviour, honesty and trust. 4

All the activities carried out for the purposes of applying this Policy, which may have an impact on the processing of personal data of natural persons, are carried out in line with the provisions of the legislation on the protection of personal data and provided by the SGR in the Personal Data Processing Regulation and in the *privacy* procedures (A.34 Management of the rights of the Interested Parties; A.35 Management of personal data "data breach").

CONTENT

1. Foreword

The company recognises the diversity of its employees as a success factor and values their experience, skills and qualities on a daily basis

Diversity, in all its manifestations, is a strategic advantage as it brings cultural enrichment and openness, fostering an inclusive working environment aimed at collaboration and creativity. The value of diversity in the company is realised by encouraging each person to express themselves freely in order to realise their potential and increase their motivation.

2. Our Commitment

Investire Sgr recognises that people are the most important resource for the performance of its activities and is committed to guaranteeing, at every stage of the employment relationship, from the selection process to the assignment of roles, from professional growth to the termination of the relationship, equal opportunities, avoiding any form of discrimination in employment.

In fact, the company operates according to impartiality and does not allow any form of direct or indirect discrimination in relation to gender, age, sexual orientation and identity, disability, state of health, ethnic origin, nationality, political opinion, social category and religious faith.

Investire Sgr preserves the value of its personnel and promotes the protection of their psychophysical, moral and cultural integrity through working conditions that respect individual dignity and rules of conduct.

Within this framework, this document aims to develop a clear approach in terms of mission, strategies and practices in order to stimulate a collaborative, supportive working environment open to contributions from all employees to increase people's confidence.

The aim is to foster diversity in all its dimensions in order to make the most of the resulting opportunities and to generate value within the workplace while also gaining a competitive advantage in business.

3. Policy Actors and Target Audiences

The Policy on Diversity and Inclusion, in line with what is defined in the Code of Ethics, applies to the members of the corporate bodies, employees, external collaborators, consultants, suppliers of goods and services and all so-called "third parties" who receive mandates from the SGR or who establish contractual relationships with it, even if of a temporary nature. These subjects undertake to comply with all applicable laws and regulations.

Furthermore, all personnel are required to comply with the principles contained in this policy in all dealings with colleagues, customers, suppliers and all those with whom they come into contact in the course of their work.

A particular responsibility for the application, dissemination and implementation of the diversity and inclusion policy is attributed to all those who manage employees on a daily basis. Within this framework, management plays a crucial role in ensuring fairness, inclusion and non-discrimination, intervening whenever it is aware of behaviour not inspired by respect for others.

Managerial behaviour must be oriented towards creating the conditions in which each team member can fully express his or her contribution and potential, even while respecting any personal needs. 5

Managers must also strive to create a climate open to the expression of all in order to foster innovation and the generation of new ideas and projects.

The role of the HR function is equally crucial in ensuring the long-term valorisation of diversity at all levels and in the implementation phases of company policies. In particular, it has the task of managing the corporate life cycle of people from entry and monitoring their growth, evaluation and development, ensuring maximum equity and inclusion.

4. Implementation of Diversity and Inclusion policies

Investire favours the dissemination of a corporate culture aimed at the inclusion and enhancement of diversity in the workplace implemented through the design, development and promotion of future people care and diversity management initiatives. Based on the principles stated above, specific actions to promote inclusion will be favoured, putting in place a corporate plan operating as a priority in the relationship models and processes that have a direct impact on the development and management of people:

- ✓ spread managerial and leadership styles at all levels of the organisation that make inclusion the cultural paradigm of reference, also through responsible management of work teams, for a growing sensitivity and awareness of the value of differences;
- ✓ define a system of rules aimed at ensuring a working environment inspired by transparent, inclusive and equal opportunities behaviour towards people;
- ✓ integrate the contributions of the different corporate functions in order to adopt models and actions to support the defined policies;
- ✓ Identifying cultural, organisational and relational obstacles that hinder full labour inclusion, as well as favouring the emergence of internal and external opportunities, also in terms of labour policies;
- ✓ create working relationships characterised, at all levels of the organisation, by mutual respect and trust;
- ✓ promote awareness-raising campaigns on Diversity and Inclusion issues.

5. Applying gender equality in remuneration policies

Investire SGR's remuneration policies are aimed at attracting, motivating and valuing people according to principles of fairness, transparency, fairness and equal opportunities and non-discrimination. In particular:

- ✓ fairness is understood as the principle of consistency of remuneration between comparable roles and responsibilities;
- ✓ Equal opportunities and non-discrimination means ensuring equal treatment in terms of remuneration and benefits, regardless of age, race, culture, gender, disability, sexual orientation, religion, political affiliation and marital status.

To this end, Investire SGR conducts an annual audit to confirm compliance with pay parity and to highlight any situations requiring correction.

The results of the audit and any corrective measures are set out in a specific document to be submitted for approval to the Board of Directors (together with the remuneration policies), subject to the opinion of the Remuneration Committee.

Regarding how the remuneration policy ensures neutrality, the Board of Directors annually provides adequate information to the Shareholders' Meeting.

6. Regular staff situation report

As Investire Sgr has more than 50 employees, it is required to draw up a report on the situation of male and female employees every two years (Article 46 of Legislative Decree no. 198 of 11 April 2006, the so-called "Equal Opportunities Code", as amended by Law no. 162 of 5 November 2021).

7. Generational equity

The company recognises and values the development and management of the needs of the different generations living within the organisation. With this in mind, in view of the demographic outlook and its impact on company turnover, policies aim at fostering intergenerational dialogue and confrontation. Attention is not only focused on the age and professional status of workers, but also on the search for effective ways for their development, which favour the contamination of different social, cultural and work experiences, as well as the different skills, knowledge and competences, both soft and hard (such as digital), typical of each generation.

8. Interculturality

The company is committed to fostering an environment characterised by different cultures, promoting a vision open to confrontation with the aim of bringing together people with different cultural and social backgrounds, in the belief that differences are a useful factor for growth and innovation.

9. Approval and updating of the Policy

Investire SGR approves this Diversity and Inclusion Policy by resolution of the Board of Directors. This Policy is subject to periodic review in the event that national and international regulations, which are referred to as best practice, are subject to change or interpretation by case law, or where the need arises.