

OTB

CORPORATE PROCEDURE P&O 008

HR Policy for Gender Equality

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1. Foreword

The OTB Group (hereinafter also referred to as "the Group") is committed to promoting a culture of gender equality in all its activities, recognizing the value and contribution of every individual, regardless of gender, sexual orientation, age, nationality, religion, physical, cognitive, or any other kind of ability or health status.

The HR Policy on gender equality, defined by Senior Management in coordination with the Diversity, Equity & Inclusion Committee (hereinafter also referred to as the "DEI Committee"), aims to ensure a fair, safe, and stimulating work environment for all employees, collaborators, and partners. Inclusion is a fundamental principle the Group is inspired by, promoting diversity as a strategic aspect for innovation, creativity, and competitiveness, and is committed to enhancing and protecting it in every area. The policy and its enforcement are the responsibility of the People & Organization department, in coordination with the DEI Committee and the person responsible for DEI issues for the Group, appointed by the Committee.

1.1 Recipients and relevant standards

This Policy is addressed to all collaborators of the OTB Group, communicated and disseminated internally to all employees, and made available on the OTB Group's intranet platform to all interested parties.

The parent company and the other companies subject to the direction and coordination of the OTB Group commit to adopting this Policy, respecting their own characteristics of peculiarity and independence.

The Policy is complemented by the following internal documents:

- Ethical Code
- DEI Policy
- Diversity, Equity & Inclusion Plan
- Diversity, Equity & Inclusion Committee Regulation
- Whistleblowing Management Policy

External reference regulations include:

- Uni/PdR 125:2022
- ILO (International Labour Organization)
- UNGC (UN Global Compact)
- Law 162/2021 regarding corporate gender equality

1.2 Definitions and References

TERM	MEANING
OTB Group	The legal entity consisting of the parent company OTB and the companies it directly or indirectly controls (Business World Headquarters, Branches, Sourcing, Manufacturing, Business Units, Financial, ONLUS, etc.).
Diversity, Equity & Inclusion (DEI)	These three terms are the pillars of corporate human rights policies: the first represents the acceptance of all genders, ages, etc., the second equal treatment for all, and the third the involvement of all categories in company dynamics.
OTB Group Ethical Code	A document defining the set of principles and values that all employees of the OTB Group must observe in professional contexts.
DEI Policy	A document defining the guiding principles that determine the Organization's commitment to gender equality, the enhancement of diversity, equity, and inclusion.
Whistleblowing Management Policy	Policy for managing Whistleblowing Reports, defining procedures for receiving, analyzing, and resolving such reports.
Diversity, Equity & Inclusion Plan	A document defining the corporate strategy in the short, medium, or long term regarding gender equality, enhancing diversity, equity, and inclusion.

Diversity, Equity & Inclusion Committee Regulation	A document defining the guidelines for monitoring and managing the Diversity, Equity & Inclusion Committee.
Diversity, Equity & Inclusion Committee	An internal body of the Organization responsible for evaluating and monitoring issues related to diversity, equity, inclusion, and gender equality.
Senior Management	Refers to the CEO of the parent company and their direct reports, as well as the CEOs of BW and Regions.
Caregiving	Care and assistance services for other individuals.

2. Principles of conduct

The Group operates in compliance with applicable laws related to diversity, equity, and the promotion of inclusion.

The OTB Group, within this Policy, identifies the behavioral principles to be adopted in order to ensure respect for gender equality in the company's human resources management processes. The areas that define these principles are outlined and emphasized in this document, specifically concerning:

- Selection and recruitment
- Performance systems and talent management
- Training and development
- Compensation
- Work-life balance
- Turnover analysis
- Parenting, family, and care
- Prevention and reporting of workplace harassment
- Inclusive language

2.1 Selection and Recruitment

OTB Group is committed to attracting and hiring people from diverse backgrounds and ensuring gender-balanced hiring at all organizational levels. Furthermore, the Group ensures that job descriptions are gender-neutral.

Throughout the selection process, practices are adopted to avoid gender discrimination, particularly focusing on eliminating biases, promoting gender balance in candidate short-lists, and ensuring a neutral definition and communication of the role and responsibilities. OTB Group evaluates candidates based on their professional background, skills, competencies, and qualifications, without gender discrimination. During interviews, questions regarding potentially discriminatory topics, such as marriage, pregnancy, or family caregiving, are not asked. Additionally, the company ensures that those involved in the selection process are adequately trained on gender equality and cognitive biases that could negatively influence the evaluation of candidates.

2.2 Performance Systems and Talent Management Systems

OTB Group is committed to enhancing people's potential by ensuring equal opportunities for professional growth, regardless of gender. To this end, transparent and consistent criteria are adopted in Performance Management and Talent Management processes.

The Performance Management system promotes dialogue between managers and employees, creating a culture focused on valuing individuals' skills, without any gender distinction. During the final review phase of evaluations, the People & Organization department ensures that assessments are not influenced by gender biases.

Furthermore, OTB Group will integrate Diversity, Equity, and Inclusion (DEI) into its leadership competency model, which will serve as one of the performance evaluation criteria.

The Talent Management system is based on evaluating employees' competencies, performance, and growth potential, without any discrimination or disparity based on gender, to guarantee opportunities for professional growth and promote the best talent.

Through gender-balanced succession planning and career advancement activities, OTB Group supports women's career development, aiming to increase their presence in positions of responsibility and leadership and achieve gender balance in managerial roles.

2.3 Training and Development

The design and assignment of training and development programs at all levels follow principles of inclusion and equality to avoid biases and gender stereotypes.

Furthermore, training processes and opportunities must ensure equal participation of both genders.

There are training sessions aimed at all employees to raise awareness of the importance of valuing differences, gender equality, inclusion, and the impact these topics have on business. Specifically, the entire workforce participates in training sessions focused on unconscious bias and the ability to communicate inclusively.

2.4 Remuneration

OTB Group recognizes that fair and transparent compensation is essential for ensuring an inclusive and meritocratic work environment, as well as for attracting, motivating, and retaining the best talent.

OTB Group believes that all employees should be compensated based on their skills and qualifications and evaluated according to their contribution and potential, without gender discrimination or any other discriminatory factors. To ensure pay equity, transparent and objective criteria are applied in the annual salary review process, performance systems, and talent management. OTB Group monitors salary and benefits data, committing to progressively correct any unjustified wage disparities for equivalent roles or positions that may be due to gender biases.

Finally, the Group is committed to periodically informing employees about the compensation policies adopted within the company, including benefits, bonuses, and welfare programs. Therefore, welfare initiatives take into account the needs of individuals of all genders and ages.

2.5 Work-Life Balance

OTB Group is committed to implementing measures to ensure work-life balance for all employees, including through specific agreements to allow, where applicable and in line with organizational needs and the relevant legal framework, part-time work for those who request it, and offering flexible working hours with clear and accessible rules and procedures.

The Group is also responsible for periodically reviewing employees' flexibility

needs, offering the possibility of smart working or other forms of flexible work. Where possible and based on the employee's role within the organization, the Group promotes holding meetings at times compatible with balancing family and personal life.

2.6 Turnover Analysis

The Group regularly monitors turnover data by gender to analyze trends, identify unusual terminations, and ensure timely corrective and preventive actions. Particular attention is given to cases of termination that may be linked to gender-related issues (such as failure to return from maternity leave, difficulty balancing family commitments with professional life, etc.), to monitor and prevent potentially discriminatory behavior. Therefore, OTB Group has defined an Exit Interview process to quickly identify cases where employment termination may be linked to behaviors not in line with the principles outlined in this Policy and the Diversity, Equity & Inclusion Policy.

2.7 Parenthood, caregiving

OTB Group adopts a flexible work policy (e.g., smart working, flexible hours) aimed at supporting the well-being of its employees in all areas and stages of their lives, while ensuring the achievement of work and professional growth objectives. OTB Group also promotes parenthood as a valuable element and a source of new skills acquisition, encouraging the sharing of family responsibilities. The Group is committed to implementing initiatives and training to support maternity, paternity, and caregiving, assisting both new parents and people managers during different stages of parental leave, including back-to-work meetings for parents returning to work.

2.8 Prevention and Reporting Workplace Harassment

OTB Group aims to combat workplace harassment through a monitoring, prevention, and training plan to promote a culture of respect and responsibility among employees and educate the workforce, at all levels, on the inadmissibility of any form of violence.

The Group guarantees its employees the opportunity to report any form of non-inclusivity or behavior that does not comply with the Code of Ethics through a dedicated Group channel for reporting. Reports can be made either in writing or orally. In both cases, the channel ensures the confidentiality of sources and

information and guarantees anonymity of the report, as outlined in the Whistleblowing Policy. The reporting procedures are also described in the Group's Code of Ethics.

Reports regarding violations of gender equality or non-compliance with the gender equality management system, if substantiated, are brought to the DEI Committee to identify corrective actions.

2.9 Language

To communicate effectively and respectfully, both internally and externally, OTB Group requires the adoption of an inclusive language in all forms (written, spoken, and non-verbal) that considers the perspective and sensitivity of each individual as well as their personal and identity characteristics, avoiding the use of non-inclusive or potentially offensive expressions. Where possible, the use of neutral language is recommended. The Group promotes training initiatives to spread the culture of inclusive language among employees.

3. Responsibilities and Monitoring

This Policy aims to evolve the corporate culture to promote gender equality across the organization. All employees are, therefore, involved and play an active role in achieving these objectives.

The People & Organization department, the Group's Senior Management, and the Diversity, Equity & Inclusion (DEI) Committee are responsible for disseminating and implementing this Policy, which is integrated into the broader Diversity, Equity & Inclusion strategy, as well as the Group's Sustainability strategy. The People & Organization department, in collaboration with the DEI Committee, monitors and verifies the annual adherence to the Gender Equality Policy of the processes outlined in the previous sections, using specific indicators and periodic monitoring. Additionally, action plans will be defined for realignment if any distortions or issues are identified to ensure continuous improvement.