

**Aquafil S.p.A.**

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Registered in the Trento Business

Register under No. 228169

Tax Code and Vat number 09652170961

# Diversity, Equality & Inclusion Policy

Approved by the ESG Committee on February 22, 2024



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## 1. OBJECTIVES

The Aquafil Group (hereinafter “Aquafil”) recognizes and promotes the value of human resources and the intrinsic diversity they represent.

In particular, Aquafil aims to ensure fairness and equal treatment for all its internal and external stakeholders, with the goal of fostering an inclusive environment that supports individual well-being, personal development, and professional satisfaction.

As the main driver and key contributor to the Group’s present and future achievements, Aquafil places human capital at the core of its strategy and is therefore committed to managing it in accordance with the principles outlined in its Code of Ethics.

This Diversity, Equality & Inclusion Policy (hereinafter also referred to as the “Policy”) is intended to promote inclusion and respect for diversity, which are considered essential and fundamental elements for any activity carried out within the Group, composed of Aquafil S.p.A. and its subsidiaries.

The Policy serves as a testament to Aquafil’s commitment to valuing and safeguarding diversity, as well as to preventing and addressing any form of discrimination or harassment based on gender, age, sexual orientation, nationality, disability, political opinions, religious beliefs, or any other personal characteristic of its stakeholders.

In addition, the company’s strategy is guided by a regularly conducted double materiality assessment. With regard to the topics addressed in this Policy, Aquafil adopts an approach focused on mitigating impacts, preventing risks, and identifying potential opportunities.

## 2. REFERENCE FRAMEWORK

In developing its corporate policies, Aquafil has taken into account the following regulatory references:

- United Nations (UN) International Charter of Human Rights:
  - Universal Declaration of Human Rights, 1948;
  - International Covenant on Civil and Political Rights, 1976;
  - International Covenant on Economic, Social and Cultural Rights, 1976.
- European Convention on Human Rights, 1950;
- UN Convention on the Rights of the Child, 1989;
- Fundamental Conventions of the International Labour Organization (ILO), including but not limited to: No. 29/1930, 87/1948, 98/1949, 100/1951, 105/1957, 111/1958, 135/1971, 138/1973, 182/1999;
- ILO Declaration on Fundamental Principles and Rights at Work, 1998;
- European Parliament Resolution of March 10, 2021, containing recommendations to the European Commission on corporate due diligence and accountability.

Aquafil's corporate policies comply with Italian legislation and the laws of the countries in which it operates, and are developed in alignment with the following internal regulatory references:

- Legislative Decree 231/2001 on corporate administrative liability;
- Anti-corruption laws;
- Legislation on freedom of association and trade union activity in the workplace;
- Occupational health and safety regulations;
- Working time regulations;
- Environmental laws;
- Data protection and privacy laws.

Aquafil has also adopted several internal regulatory instruments to ensure that its operations are managed effectively, efficiently, transparently, and in line with the principles and values outlined in this Policy. Key internal references include:

- Code of Ethics;
- Organization, Management and Control Model pursuant to Legislative Decree 231/2001 of Aquafil S.p.A.;
- Quality, Environment and Safety Policy (QAS);
- ESG Policy;
- Human Rights Policy;

- Anti-Corruption Policy;
- Whistleblowing Policy;
- Group Enterprise Risk Management System;
- Aquafil Group Privacy Governance and Management Model;
- Other relevant internal regulatory documents governing the company’s operational activities (e.g., Health, Safety and Environment, Supply Chain, Recruitment and Human Resources Management, Social Responsibility, and Privacy);

### 3. SCOPE OF APPLICATION

The set of ethical principles, values, and behavioral rules outlined in this Policy must guide the actions of all those who operate within or outside Aquafil’s sphere of activity (hereinafter the “Recipients”).

The dissemination of this Policy also serves as an opportunity to raise awareness among all stakeholders (shareholders, employees, clients, suppliers, investors, etc.) and to meet their expectations regarding diversity and inclusion.

The main initiatives related to Equity, Diversity & Inclusion and Human Rights in general are defined by the Chief Executive Officer and the ESG Committee of Aquafil, which approves this Policy and its subsequent revisions.

Specifically, the Recipients of the Policy include, by way of example:

- **Members of the Board of Directors**, who are guided by the principles of this document in setting corporate objectives;
- **Members of oversight and supervisory bodies**, who ensure compliance with and enforcement of the Policy within the scope of their functions;
- **Managers**, who give concrete expression to the values and principles set forth in the Policy, assuming responsibility both internally and externally;
- **Employees**, who, in accordance with applicable law, align their actions and conduct with the principles, objectives, and commitments established in the Policy;
- **Collaborators**, who work on an ongoing basis (e.g., consultants, agents), and align their behavior with the inspiring principles of the Policy;
- **Suppliers**;
- **Clients** with an active contract.

All Recipients are responsible, within the scope of their respective roles, for complying with this Equity, Diversity & Inclusion Policy. In particular, all actions, operations, negotiations, and, more generally, behaviors carried out by the Recipients in the performance of their work must reflect the principles and values expressed in this Policy and be subject to verification and controls in accordance with applicable laws and internal procedures.

Moreover, individuals with supervisory and coordination responsibilities must oversee compliance with the Policy by their teams and implement appropriate measures to prevent, identify, and report any potential violations.

### 4. DIVERSITY AND INCLUSION

At Aquafil, the term “diversity” refers to all the differences among people in terms of age, ethnicity, sex, gender, sexual orientation, physical appearance, disability, religion, socioeconomic status, political beliefs, educational background, and ways of living and thinking.

While diversity should be seen as a valuable resource, it is often the source of stereotypes that create barriers between individuals and hinder the development of a more balanced society.

### 5. AQUAFIL’S CORE PRINCIPLES AND COMMITMENT

The core principles of Equality, Diversity & Inclusion outlined below, inspired by the standards set by the International Labour Organization (ILO), reflect the values in which Aquafil believes and upon which its corporate culture is founded. These values define the behavioral standards expected of all Aquafil employees and collaborators.

### **Gender**

Aquafil fosters an environment that promotes gender equality at all levels and seeks to overcome stereotypes. The company is committed to implementing policies and actions aimed at closing the gender gap, strengthening and supporting the presence of women in key roles, and promoting awareness initiatives and training programs to encourage a culture of gender balance.

### **Age**

Aquafil is committed to encouraging dialogue, coexistence, and knowledge sharing among individuals of different ages, promoting workplace integration and the development of a multigenerational environment in which everyone can grow and thrive.

### **Abilities**

Aquafil is committed to designing inclusive tools and workspaces that are free of barriers, ensuring full accessibility for all employees and stakeholders with disabilities. This includes access to physical spaces, information systems (e.g., corporate applications), and training activities—enabling everyone to contribute effectively to the company's processes.

### **Gender Identity and Sexual Orientation**

Aquafil promotes inclusive environments where everyone feels respected and valued, regardless of their gender identity or expression or their sexual or romantic orientation. The company firmly rejects and actively works to eliminate all forms of discrimination.

## **6. IMPLEMENTATION**

Aquafil has identified the following intervention methods to foster a diverse, equitable, and inclusive working environment.

### **6.1 Recruitment and Hiring Process**

Aquafil operates with impartiality, believing that skills and talent are the key criteria for evaluating candidates. It ensures non-discrimination and full respect for equal opportunities.

The company promotes transparent and objective recruitment and hiring processes aligned with its organizational values and its commitment to diversity, equity, and inclusion.

Candidate selection is carried out from a pool that ensures non-discrimination and promotes gender equality, with final decisions based on objective criteria and alignment with the job requirements.

Furthermore, all human resources professionals—from junior roles to senior managers—are involved in training initiatives on gender equality, diversity appreciation, and inclusion.

### **6.2 Training**

Aquafil is committed to creating a dynamic work environment by providing people with tools and learning opportunities that encourage creativity, innovation, collaboration, and the full expression of each individual's uniqueness.

All employees have equal access to resources, training, and development opportunities.

Training programs are designed and delivered with the goal of advancing people's skills while ensuring participation without distinction (e.g., gender, age, part-time or full-time status).

To further embed a culture of non-discrimination within the company, Aquafil is committed to developing training initiatives that help recognize and eliminate all types of stereotypes.

These objectives are included in the company's sustainability strategy, and progress is periodically monitored and communicated in Aquafil's Consolidated Sustainability Report.

### 6.3 Pay Equity

Compensation policies are aligned with Aquafil’s core principles, implemented in a fair and transparent manner, and aimed at recognizing responsibilities and rewarding merit and talent.

The evaluation process considers, with neutrality, autonomy, and independence of judgment, criteria such as the role held, competencies, merit, abilities, and individual performance.

These objectives may also be pursued through specific compensation policies and incentive programs designed to reduce pay gaps, particularly among population groups where wage disparities are most significant.

Recognizing the importance of the issue, the company has included actions and objectives on pay equity in its sustainability plan.

### 6.4 Communication

Aquafil is committed to promoting and disseminating the principles set out in this Policy throughout the organization and among all stakeholders, through clearly defined internal and external communication processes.

## 7. REPORTING

Aquafil is continuously committed to identifying, assessing, preventing, and mitigating risks related to Human Rights violations, and to promptly implementing appropriate remedial actions should such events occur.

A dedicated reporting channel is available to stakeholders (the “Whistleblowing / Reporting” procedure published on Aquafil’s website: <https://digitalplatform.unionefiduciaria.it/whistleblowing/>), allowing for the submission of reports— including anonymous ones— concerning any situation that, in breach of this Policy, constitutes or may constitute a risk of Human Rights violation, a breach of applicable laws, or of internal procedures.

Aquafil ensures that all reports are handled confidentially in order to guarantee full protection of the whistleblower.

## 8. REPORTING

This Policy is shared with all stakeholders through targeted communications. Aquafil also commits to promoting its contents through specifically planned training activities and to monitoring its effective implementation.

## 9. POLICY APPROVAL AND REVIEW

This Policy will be subject to periodic review to assess its adequacy and the effectiveness of its implementation.

Review	Description	Date	Approved by
1.0	Reference to double materiality	10/07/2025	ESG Committee

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