

**Aquafil S.p.A.**

Via Linfano No. 9, 38062 – Arco (TN)  
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") recognises and promotes the value of human resources and their diversity. Aquafil seeks in particular to ensure fairness and equal treatment for all its internal and external stakeholders, thereby creating an inclusive environment that fosters the well-being, personal development and job satisfaction of every individual.

As the main driver and protagonist of the Group's present and future results, Aquafil considers its human capital key to its operations. It is therefore committed to ensuring management based on the principles set out in the Code of Conduct.

The purpose of this Diversity, Equality & Inclusion Policy (hereinafter also "Policy") is to promote inclusion and respect for diversity, seeing this as an indispensable and fundamental prerogative for any activity that is carried out within the Group comprising Aquafil S.p.A. and its subsidiaries.

Specifically, this Policy was created as testament to Aquafil's commitment to valuing and protecting diversity and to preventing and sanctioning any discrimination and harassment perpetrated on the basis of gender, age, sexual orientation, nationality, disability, political opinions, religious denomination and any other personal characteristic of the individuals with whom Aquafil interacts.

## 2. BACKGROUND

In developing its corporate policies, Aquafil considered the following regulatory frameworks:

- The United Nations' (UN) Universal Declaration of Human Rights;
  - Universal Declaration of Human Rights, 1948;
  - The International Convention on Civil and Political Rights, 1976;
  - The International Convention on Economic, Social and Cultural Rights, 1976;
- The European Convention on Human Rights, 1950;
- The UN Convention on the Rights of the Child, 1989;
- The Fundamental Conventions of the International Labour Organization (ILO): e.g. No. 29/1930, 87/1948, 98/1949, 100/1951, 105/1957, 111/1958, 135/1971, 138/1973, 182/1999;
- The Declaration on Fundamental Principles and Rights at work, 1998;
- European Parliament resolution of March 10, 2021, with recommendations to the Commission on corporate due diligence and corporate accountability.

Aquafil's corporate policies comply with Italian regulations and those of the countries in which it operates. They are developed in accordance with the following internal regulatory references:

- Legislative Decree No. 231/2001 on entities' criminal liability;
- Anti-corruption laws;
- Laws on union freedom and activity in the workplace;
- Occupational health and safety laws;
- Laws on working hours;
- Environmental laws;
- Privacy and data protection laws;

Aquafil has also adopted a number of internal regulatory frameworks to ensure effective, efficient and transparent management of its activities while also complying with the principles and values set out in this Policy. Of these internal frameworks, we note in particular:

- The Code of Conduct;
- Aquafil S.p.A.'s Organisation, Management and Control Model pursuant to Legislative Decree No. 231/2001;
- The Quality, Environment and Safety Policy (QAS);
- The ESG Policy;
- The Human Rights Policy;
- The Anti-Corruption Policy;
- The Whistleblowing Policy;

- The Group’s Enterprise Risk Management Policy;
- The Aquafil Group’s Organisation and Privacy Management Model;
- Additional relevant internal regulatory documents governing the Company’s operational activities (e.g. on Health, Safety and the Environment, the Supply Chain, Selection, Recruitment and Management of Human Resources, Social Responsibility, Privacy).

### 3. SCOPE OF APPLICATION

The set of ethical principles, values and rules of conduct set out in this Policy must form the basis of the activities carried out by all those who operate within Aquafil’s scope of activities, whether internally or externally (hereinafter the “Addressees”).

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

The main initiatives on Equity, Diversity & Inclusion - and on Human Rights generally - are established by Aquafil’s Chief Executive Officer and the ESG Committee, which approve this Policy and updates to it.

By way of example, the following are considered Addressees of this Policy:

- **the members of the Board of Directors**, who are guided by the principles of this document when setting business objectives;
- **the members of the Control and Supervisory Boards**, who ensure that the contents of the Policy are respected and complied with in the performance of their duties;
- **company executives**, who give concrete form to the values and principles contained in the Policy, assuming responsibility both internally and externally;
- **employees**, who, in compliance with applicable regulations, adapt their actions and conduct to the principles, objectives and commitments set out in the Policy;
- **contractors**, (i.e. consultants, agents) who conform their conduct on an ongoing basis to the principles underlying the Policy;
- **suppliers**;
- **customers** with an active contract.

All Addressees are responsible for complying with this Equity, Diversity & Inclusion Policy to the extent within their remit. Specifically, all actions, transactions and negotiations carried out by Addressees in the performance of their work activities and their conduct more generally must be guided by the principles and values set out in this Policy, and they must be open to verification and control in compliance with current regulations and internal procedures.

Individuals with supervisory and co-ordination responsibilities are also required to oversee their employees’ compliance with the Policy and to take appropriate measures to prevent, identify and report potential violations.

### 4. DIVERSITY AND INCLUSION

By 'diversity' Aquafil refers to any differences between individuals in terms of age, ethnicity, sex, gender, sexual orientation, physical appearance, disability, religion, socioeconomic status, political beliefs, education, ways of living and thinking. Diversity should be a resource, but it often leads to stereotypes, which are a barrier between people and an hindrance to a balanced society.

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

The fundamental principles of Equality, Diversity & Inclusion are set out below. They are inspired by the standards set by the International Labour Organization (ILO), and represent the values in which Aquafil believes and which form the basis of its corporate culture. These values express the standard of behaviour expected of all Aquafil employees and contractors.

#### Gender

Aquafil promotes an environment that fosters gender equality at all levels and overcomes stereotypes. It engages in policies and actions to promote gender equality, eliminate the gender gap, strengthen and support the presence of women in key roles, and

promote awareness-raising initiatives and educational activities designed to spread a culture of gender balance.

### **Age**

Aquafil is committed to facilitating dialogue, coexistence and the transmission of knowledge between people of various ages, thus promoting working integration and the development of a multigenerational environment where development is valued and promoted.

### **Ability**

Aquafil promotes the use of barrier-free tools and work spaces that ensure total accessibility to all employees and stakeholders with disabilities and facilitate their access to physical locations, IT tools (e.g. corporate applications) and training activities, putting everyone in a position to contribute to business processes to the best of their ability.

### **Gender identity and affective-sexual orientation**

Aquafil fosters the creation of inclusive environments where every individual feels respected and valued, regardless of their gender identity and/or expression or affective-sexual orientation, rejecting and striving to eliminate all types of discrimination.

## **6. IMPLEMENTATION**

Aquafil has identified the action described below to promote a plural, fair and inclusive work environment.

### **6.1 Staff recruitment and hiring process**

Aquafil adopts an impartial approach, believing that skills and talent are the key criteria for assessing candidates. It ensures that discrimination is prevented and that equal opportunity is fully respected.

Aquafil promotes transparent and objective recruitment and selection processes, in line with the organisation's values and its commitment to diversity, equality and inclusion.

Staff recruitment is carried out using a shortlist of candidates that prevents discrimination and promotes gender equality, selecting future employees on objective criteria and in line with the requirements of recruitment process.

In addition, all HR professionals, from the most junior roles to executives, are involved in training initiatives on issues of gender equality, valuing diversity and inclusion.

### **6.2 Training**

Aquafil is committed to fostering a dynamic work environment. As such it provides its staff with tools and training opportunities that foster creativity, innovation and collaboration, and which make the most of every individual's uniqueness.

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

In terms of training, programmes are designed and offered in order to develop staff skills, ensuring participation without distinction (e.g. on the basis of gender, age, part-time, full-time employment, etc.).

In the interests of continuously developing a culture of non-discrimination within the company, Aquafil is committed to structuring training to help recognise and eliminate stereotypes of all kinds.

### **6.3 Fair remuneration**

Remuneration policies are based on the principles promoted by Aquafil and applied in a fair and transparent manner. They seek to reward responsibility and value merit and talent. The process considers criteria such as the organisational role performed, skills, merit, abilities and individual performance, with neutrality, autonomy and independence of judgement.

These goals can also be achieved by applying specific pay policies and incentive programmes designed to reduce the wage gap, with particular reference to the population groups in which the most significant wage gaps occur.

## 6.4 Communication

Aquafil is committed to communicating and disseminating the principles contained in this Policy throughout the organisation and to all stakeholders, using predetermined internal and external communication processes.

## 7. REPORTING

Aquafil is constantly engaged in the identification, assessment, prevention and mitigation of risks of Human Rights violations, immediately taking the necessary remedial actions should such violations occur.

A whistleblowing channel (the "Whistleblowing / Reporting" procedure published on the Aquafil website <https://digitalplatform.unio-nefiduciaria.it/whistleblowing/>) is available to stakeholders. This is dedicated to reporting - including anonymously - any situations that, in violation of this Policy, constitute or could constitute a risk of violation of Human Rights, current regulations or internal procedures.

Aquafil ensures that every report is handled confidentially so as to ensure full protection for the reporter.

## 8. DISCLOSURE, TRAINING AND MONITORING

This Policy is distributed to all stakeholders through dedicated communications; furthermore, Aquafil also undertakes to disseminate its contents through specially scheduled training activities and is committed to monitoring its effective implementation.

## 9. APPROVAL AND REVISION OF THE POLICY

This Policy will be periodically reviewed to assess its adequacy and the effectiveness of its implementation.

Review	Description	Date

**Aquafil S.p.A.**

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