

## **Equity, Diversity and Inclusion Procedure (in accordance with ESRS S1-9)**

### **1. Purpose**

This procedure is intended to establish the principles, policies and actions that the company adopts to ensure respect for equity, diversity and inclusion in all aspects of the company's activity, with particular attention to the prevention of discrimination based on gender, race, ethnicity, religion, sex and sexual orientation. This procedure applies to all employees, collaborators and internal and external stakeholders.

### **2. Scope of application**

This procedure applies to:

- All company employees, regardless of level or position.
- All suppliers, customers and external stakeholders who interact with the company.

It covers all stages of the working life cycle, from staff selection to termination of employment, including remuneration policies, training, promotion and working conditions.

### **3. Definitions**

- Equity: Ensuring that all people receive fair treatment and opportunities, taking into account their different individual needs and circumstances.
- Diversity: Value and promote individual differences among people of different gender, ethnicity, religion, sexual orientation, age and ability.
- Inclusion: Creating an environment where all people are accepted, respected and can participate fully, without obstacles or exclusion.
- Discrimination: Unfair or prejudicial treatment of a person on the basis of personal characteristics such as gender, race, sexual orientation, religion, or other protected identities.

### **4. Policies and Principles**

#### *4.1 Commitment to Equity, Diversity and Inclusion*

The company is committed to:

- Promote a work environment that respects and values individual differences.
- Ensure that no employee or collaborator is discriminated against, directly or indirectly, on the basis of gender, race, ethnicity, religion, sex or sexual orientation.
- Offer equal opportunities to all employees, regardless of their personal characteristics.

#### *4.2 Prevention of discrimination*

The company explicitly prohibits any form of discrimination, which includes:

- Direct discrimination: When one person is treated less favorably than another because of their gender, race, ethnicity, religion, sexual orientation, or other protected characteristics.
- Indirect discrimination: When a seemingly neutral policy, practice, or rule disadvantages people with certain protected characteristics.

#### *4.3 Recruitment and selection of personnel*

- Recruitment and selection processes must be transparent and based exclusively on merit and competence criteria.
- Job postings and role descriptions must not include requirements or conditions that could lead to direct or indirect discrimination.

#### *4.4 Training and development*

- All employees must have access to training and development opportunities that are equitably distributed, without discrimination.
- Periodic training courses on diversity and inclusion will be organized to raise employee awareness and foster an inclusive corporate culture.

#### *4.5 Remuneration and promotion*

- Compensation and promotion opportunities will be determined solely on the basis of an employee's skills, performance and experience, without regard to gender, race, religion or sexual orientation.
- Regular checks will be carried out to ensure that there are no unjustified pay disparities .

### **5. Roles and Responsibilities**

- Management: Is responsible for actively promoting equity, diversity and inclusion and ensuring that company policies are respected in all operations.
- Human Resources Manager: Responsible for implementing and monitoring the procedure, as well as ensuring that employees receive ongoing training on these issues.
- Employees: All employees are expected to comply with Company policies on equity, diversity and inclusion, and to report any violations of this procedure.

### **6. Reporting and managing violations**

The Company provides a secure and confidential process for reporting violations or suspected acts of discrimination:

- Employees can report incidents of discrimination or violations of equity, diversity and inclusion policies to their Human Resources manager or through a dedicated reporting channel.
- All reports will be treated confidentially and promptly, with appropriate investigation and corrective action taken where necessary.
- The company assures that no employee will suffer retaliation for reporting a discrimination issue.

## 7. Monitoring and Review

This procedure will be subject to periodic review by Management and the Human Resources Manager to ensure its continued effectiveness and compliance with the regulations and principles of ESRS S1-9. Any regulatory changes or new business needs may lead to changes in the procedure.

## 8. Communication

This procedure will be communicated to all employees through internal channels and made available in the employee handbook. Any updates will be notified promptly.

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