



POLICY ON DIVERSITY & INCLUSION

Approved by the Board of Directors on 1 July 2021

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1. INTRODUCTION

INWIT is formally committed to the protection and spread of the values of diversity and inclusion by promoting corporate and organisational initiatives intended to support respect for the rights and dignity of individuals.

By establishing the Diversity & Inclusion Team within the Company, INWIT has embarked upon a proactive path towards overcoming any type of gender, cultural, religious and professional discrimination and encouraging professional and personal inclusion by implementing specific rules of conduct and actions intended to promote a fair, inclusive working environment.

The company operates according to impartiality and does not allow any form of direct or indirect, multiple or individual discrimination, and is respectful towards the individual dignity and psychophysical, moral and social integrity of its employees.

For INWIT, the engagement, well-being and development of individuals represents one of the pillars of the sustainability strategy, since it is aware that a corporate culture aimed at including and giving value to all types of diversity will have positive effects both within and outside of the company organisation, also generating a positive impact on society.

As for the central role held by individuals within the organisation, INWIT intends to valorise all differences while reducing distances and removing cultural, material and organisational obstacles, including geographic distance, which might compromise the respect for and inclusion of disabilities, gender equality, race, sex and religion, the ideas of others and generational differences.

2. RECIPIENTS AND SCOPE OF APPLICATION

The policy will be applied in real terms in the company policies and processes. This document is addressed to the entire company population and applies indiscriminately to all employees in the workforce, of any pay grade, to Management personnel, Customers and Suppliers.

As regards members of the company bodies, the rules apply to the balance of the composition of the various company bodies in order to protect the requirements of diversity, including gender diversity.

3. PURPOSE

The Purpose of this document is to develop a corporate culture aimed at overcoming any type of discrimination and historic or cultural prejudice, creating an inclusive and diverse workplace where the contributions of everyone are welcome and the voices of diversity can be heard.

The aim of the Policy is therefore to encourage different ideas and sensibilities to meet and blend so that such exchange generates value in the workplace, acknowledges the talent and aptitude of each person and offers them the same opportunities for professional growth and remuneration dynamics.

These objectives are:

- considered of primary importance for the business since a collaborative working environment that focuses on teamwork and that is open to contributions from all, will successfully seize the opportunities arising from the ongoing changes, while identifying innovative and valuable solutions;
- aimed at favouring more efficient and risk-aware decision-making processes;
- important in the development of the brand reputation, with the effect of creating higher retention among its employees and attracting new talent on the job market;
- key elements in the creation of value for all stakeholders.

This Policy therefore reiterates the Company's commitment to respect and actively disclose the principles envisaged by the internal regulations, contractual provisions and principles and standards issued by the international organisations of reference (e.g. UN Agenda 2030 - Sustainable Development Goals (SDGs); UN Global Compact and Women's Empowerment Principles; Universal Declaration of Human Rights; International Convention on the Elimination of All Forms of Discrimination Against Women; International Convention on the Elimination of All Forms of Racial Discrimination; Convention on the Rights of the Child; Convention on the Rights of Persons with Disabilities; Declaration on Fundamental Principles and Rights at Work and the Eight Fundamental Conventions of the International Labour Organization (ILO)).

4. REFERENCES

1. Knowledge Management Framework
2. Organisational Model 231 (including the Code of Ethics and Conduct)
3. New Corporate Governance Code
4. Whistleblowing Procedure
5. Sustainability Plan
6. Global Reporting Initiative Sustainability Reporting Standards

5. GUIDING PRINCIPLES

Without prejudice to the information in the internal Code of Ethics and Conduct, in this section INWIT sets out the corpus of principles that must guide the actions and conduct of employees, management and members of the company bodies, in addition to Customers and Suppliers.

Consequently, with the specific objective of ensuring the psychophysical, moral and cultural integrity of individuals and guaranteeing working conditions that are respectful of individual dignity, alongside a working environment based on respect and mutual trust, INWIT has identified the principles that should guide the company's operations:

- combat all forms of discrimination related to gender, identity and/or gender expression, sexual or emotional orientation, marital status and family situation, age, ethnicity, religious beliefs, political views and trade union membership, socio-economic situation, nationality, language;
- combat all forms of harassment, offence and inappropriate conduct;
- respect all individuals in the expression of their identity and diversity;
- promote equal opportunities;
- support shared parenthood;
- develop talent.

In line with these principles, INWIT undertakes to:

- create an environment characterised by plurality and a multicultural nature in which each individual can be their authentic self without any kind of difficulty, through awareness-raising campaigns and general initiatives intended to overcome “unconscious bias”;
- promote equal opportunities, the balance of work and personal life, the sharing of family responsibilities, by expanding the welfare services and providing specific support for caregivers or those living in vulnerable or disadvantaged situations;
- encourage an open environment, removing all types of obstacles, including those connected to sexual orientation;
- aim for gender balance during the selection/hiring stages, implementing managerial development plans for female staff and a greater balance in the allocation of roles of responsibility at all organisational levels;
- allow everyone accessibility to workplaces by removing physical and intangible barriers and providing all workers with the tools and support equipment that improve working conditions, including agile working;
- encourage mingling between the various professional generations for a rich and successful exchange of knowledge and sensibilities, including by providing refresher courses on digitisation and the advancement of technology;
- recognise and develop the talent of each individual by ensuring the implementation of remuneration policies aimed at recognising merit and performance based on principles of gender equality;
- promote a language that overcomes old cultural stereotypes and clichés and that is inclusive and welcoming;
- promote the proactive participation in associations already combating all types of discrimination and strengthen partnerships with other companies and academia, in order to contribute more effectively to Italy’s cultural change as a whole.

6. DESCRIPTION OF THE PROCESS AND RESPONSIBILITIES

All personnel in the workforce, including members of the company bodies, have a responsibility to adopt behaviours in line with that which is established by this Policy, adopting an appropriate language and method of work organisation that guarantee an inclusive and collaborative working environment based on mutual respect and the acknowledgement of each individual’s identity and value.

Such behaviours must be observed in all contexts in which work activities attributable to the professional world are carried out, including outside of classic workplaces (e.g. conventions, forums, video calls, etc.).

Behaviours that might offend, abuse or cause harm to individual dignity are not permitted. This includes discrimination, sexual and non-sexual harassment, bullying, mobbing and defamation, attributable to issues of diversity.

On the basis of the aforementioned principles, and with the aim of developing full awareness across the organisation of the value of individuals and their uniqueness, INWIT undertakes to develop a strategy to develop and manage human resources by promoting the following actions:

- awareness-raising campaigns on the issues of Diversity & Inclusion aimed at employees, with the involvement of endorsers within and outside the Company, dissemination and learning of best practice and case studies from other companies;
- training initiatives aimed at all employees;
- specific training initiatives for managers, with the objective of developing leadership styles that make inclusion the cultural paradigm of reference, including through a responsible management of work teams, for a growing awareness and knowledge of the value of difference. The objective is to adopt behaviours that facilitate collaboration and dialogue between individuals with different view points and approaches in order to generate an atmosphere of trust and engagement and to promote commitment and the drive for innovation;
- provision of initiatives intended to promote and guarantee a working environment based on transparent and inclusive behaviours, with equal opportunities with regard to individuals;
- removal of cultural, organisational and relationship obstacles that prevent full professional inclusion;
- encouragement to create opportunities within and outside the company, including in terms of employment policies.

In this context, each Manager and coordinator of resources, in order to develop diversity and allow all team members to make a contribution without the fear of being judged or ridiculed, is tasked with taking proactive action to create the best working conditions and atmosphere so that ideas and innovative projects useful for the business or the achievement of company targets can be generated.

Consequently, the definition of the content of an integrated system of rules and actions, implies the involvement of all those who have a responsibility towards diversity.

7. MONITORING AND CONTROL

From this perspective, in order to encourage diversity and oversee the correct adoption of company behaviours, the Human Resources department (hereinafter also referred to as “HR”), according to the lines of action of the Sustainability Plan, in synergy with the other company departments, is tasked with promoting cultural change within the organisation, developing diversity and

monitoring the correct implementation of the Diversity & Inclusion policies within all the company's organisational departments.

Any conduct that goes against the aim of this Policy will be assessed by the internal control and risk management departments, with particular reference to the "Inclusivity of workplaces" and "Development and enhancement of employees", with the objective of ensuring the highest level of this Policy's implementation.

Additionally, failure to observe the required behaviours can be promptly reported, by anyone who sees fit, in order to initiate the process to analyse the conduct and assess any disciplinary actions, with the awareness that INWIT aims to protect and support those who have been affected by conduct that undermines the principles defined in this document, or witnesses of specific facts or events.

Reports can be sent to:

- HR Department;
- Whistleblowing portal (according to the methods indicated in the company Whistleblowing procedure).

Anyone who sends a report will be safe from any form of retaliation, discrimination or penalisation, ensuring maximum confidentiality, without prejudice to the obligations of the law.

If the behaviours that go against the principles do not constitute a violation of specific legal, contractual or regulatory rules or the Internal Code of Conduct, INWIT will adopt constructive measures to strengthen the awareness and attention of individuals around respect for the values and principles outlined herein, including through listening initiatives, discussion and training.

Specifically, with the objective of measuring the Company's real cultural change in its approach to the issues of diversity and inclusion, the Diversity & Inclusion Team has been established, made up of people from different company departments. Its aim is to promote specific initiatives in support of an increasingly more inclusive culture within the company to combat all forms of discrimination, mitigate any "discomfort" and encourage inclusive and collaborative company well-being.

8. INDICATORS

To check the effectiveness of the actions undertaken, indicators of a quantitative nature are used, in addition to qualitative data from surveys about the internal atmosphere.

In terms of the quantitative data, the main indicators collected are:

- indicators on the heterogeneity of the workforce population and on the gender balance (within teams, in the various flows of individuals joining/leaving, in career progressions);
- hours of training by gender and position;
- indicators on generations (presence of individuals belonging to different age groups and generations);
- pay gap indicators (salary difference between men and women);
- percentage of people belonging to protected categories.

9. DISSEMINATION AND UPDATING

All initiatives undertaken in relation to diversity and inclusion will be communicated to all workforce personnel through internal communication channels. The results and progress achieved will be evaluated by the Diversity & Inclusion Team and examined at the same time by the Human Resources and External Relations, Communication and & Sustainability departments with periodic progress and update reports. The contents of this Policy will be also monitored and updated by the HR department in light of any changes or integrations related to best practices and related legislative changes, as well as internal requirements.

This Policy is available on the INWIT institutional website in order to make all stakeholders aware of the principles and fundamental values that define the INWIT business, and which form the basis of the Company's sustainability strategy.