

DEXELANCE

POLICY ON DIVERSITY AND INCLUSION

DEXELANCE GROUP

Approved by the Board of Directors on 12 November 2025



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1. Introduction

The Dexelance Group (hereinafter referred to as the "Group" or "Dexelance") considers diversity and inclusion to be fundamental principles for the development of a fair and innovative working environment.

This document, the **Group Policy on Diversity and Inclusion** (hereinafter referred to as the "Policy"), is directly applicable to Dexelance S.p.A. (hereinafter referred to as the "Parent Company") and all subsidiaries of the Group (hereinafter referred to as the "Companies").

2. Definitions and glossary

In addition to the terms defined elsewhere in this Policy, the terms listed below shall have the meanings assigned to them herein:

- **Charter for Equal Opportunities and Equality in the Workplace:** a voluntary initiative signed by organizations to promote diversity, inclusion, and equal opportunities in the workplace, combating all forms of discrimination;
- **CEO:** Chief Executive Officer, the managing director responsible for the operational management of the Parent Company or the Company from time to time;
- **CFO:** Chief Financial Officer, the financial director responsible for the management of financial resources in office at the Parent Company or the Company from time to time;
- **Board of Directors:** the Board of Directors of the Parent Company or the Company in office from time to time;
- **Nomination, HR and Remuneration Committee:** the committee called the "Nomination, HR and Remuneration Committee" of the Parent Company in office from time to time;
- **International Labor Organization (ILO) Conventions:** international treaties adopted by the International Labor Organization (ILO), which establish minimum standards in the field of labor rights and conditions;
- **Control, controlling company or controlled company:** have the meaning given in Article 2359 of the Italian Civil Code and Article 93 of the Consolidated Law on Finance;
- **Universal Declaration of Human Rights:** adopted by the United Nations General Assembly on December 10, 1948, which sets out the fundamental rights and freedoms to which every individual is entitled, without discrimination;
- **Directive 2000/78/EC:** European Union Council Directive establishing a general framework for equal treatment in employment and working conditions;
- **ESG Ambassador:** representatives identified by the Parent Company or the Companies on ESG matters;
- **Organization, Management, and Control Model pursuant to Legislative Decree 231/2001:** the model adopted pursuant to Legislative Decree No. 231 of June 8, 2001, aimed at preventing the commission of predicate offenses and ensuring ethical and responsible management of the activities of the Parent Company or the Companies;
- **OdV 231:** Supervisory Body in office from time to time. External body provided for by Legislative Decree 231/2001 with the task of supervising the functioning and compliance with the organization, management, and control model adopted by the Parent Company or the Company, as well as ensuring its updating;
- **Principles of the United Nations Global Compact:** the ten universal principles developed by the United Nations in the areas of human rights, labor, the environment, and anti-corruption;

- SDG: the 17 United Nations Sustainable Development Goals.

3. Policy Objectives

Dexelance recognizes diversity and inclusion as fundamental elements for the sustainable growth of the Group and for the creation of a fair, innovative, and respectful work environment.

The Group does not tolerate any form of discrimination or harassment, whether direct or indirect, intentional or systemic, in any area of work or at any stage of professional relationships.

All people working in the Group are protected and respected, regardless of gender, sexual identity or orientation, ethnicity, nationality, language, religion or belief, age, disability, health status, family situation, personal opinions, or any other individual characteristic or preference.

Dexelance is committed to ensuring a safe, inclusive, and respectful work environment where every individual can freely express their potential without fear of discrimination, prejudice, or inappropriate behavior.

In this perspective, the Policy sets out clear objectives aimed at consolidating an inclusive organizational culture and preventing any form of discrimination:

- **Ensuring equal opportunities for access, professional growth, and recognition** within the Group;
- **Promoting an inclusive environment**, that allows each person to fully express their potential;
- **Prevent and combat all forms of discrimination**, whether direct or indirect;
- **Valuing** cultural, generational, gender, ability, orientation, and origin **differences**, considering them a strategic resource;
- **Fostering corporate relationships and practices** consistent with the principles of diversity and inclusion in all areas of activity.

4. Scope of application

The Policy applies to all activities carried out by Dexelance, in Italy and abroad. It is therefore implemented within the Group's activities, processes, and offices, with the aim of ensuring consistency and uniformity in the adoption of the principles and commitments on diversity and inclusion defined by the Group.

The Policy is binding for all Group employees, who are required to comply with its contents in all professional interactions, both internal and external to the company, including relationships with customers, stakeholders, business partners, and suppliers.

The scope of the Policy is not limited to activities carried out within Dexelance premises, but also includes customer premises, corporate events, representative occasions, and business trips. All behavior must reflect the values of inclusion, respect, and appreciation of people in any work context.

If local regulations in the countries where the Group operates are more restrictive than those set out in the Policy, the applicable national or local regulations will be applied. In any case, the provisions of the Policy must never be interpreted as authorization to violate applicable laws or regulations in the territories where the Group operates.

5. Fundamental principles and commitments

This Policy is based on a set of principles and standards, recognized on an international, European, and national level which constitute the framework for its application. These principles represent the basis on

which Dexelance builds its concrete commitments, aimed at promoting a fair, inclusive, and diversity-respecting work environment, as well as ensuring equal opportunities and preventing all forms of discrimination. The Group recognizes:

- The Universal Declaration of Human Rights as an essential basis for the recognition of the dignity, rights, and fundamental freedoms of every person;
- The United Nations Guiding Principles on Business and Human Rights, as a reference for ensuring responsible business practices that respect human rights;
- The International Labor Organization (ILO) Standard on equal treatment and non-discrimination in the workplace;
- The Sustainable Development Goals of the 2030 Agenda, with particular attention to SDG 5 (Gender Equality), SDG 8 (Decent Work and Economic Growth) and SDG 10 (Reduced Inequalities);
- Codes of conduct and sectoral policies, including the Charter for Equal Opportunities and Equality at Work, as a voluntary commitment tool;
- National and European Union legislation on gender equality, disability, and inclusion, with specific reference to Directive 2000/78/EC;
- The Code of Ethics, company procedures and policies, including the Organization, Management, and Control Model pursuant to Legislative Decree 231/2001.

6. Roles and responsibilities

Ultimate responsibility for the implementation of this Policy lies with the Board of Directors of the Parent Company, as the highest level of corporate governance.

In this activity, the Board of Directors of the Parent Company is assisted by the Nomination, HR and Remuneration Committee, which supports the Board of Directors' assessments on human resources management, nominations and remuneration with advisory and consultative activities.

Responsibility for communicating and implementing this Policy to all Group companies is assigned to the CEO of the Parent Company.

7. Implementation and dissemination mechanisms

Dexelance intends to adopt and share this Policy so that it constitutes the reference framework for the definition of objectives and improvement programs and represents a tool for transparency and dialogue with all stakeholders.

To this end, the Policy is made available to all Group personnel through official internal communication tools in order to ensure maximum dissemination and transparency, and is published on the Parent Company's and the Companies' websites so that it is available to all interested parties, including customers and suppliers.

In addition, the Policy is provided to each new employee upon hiring to ensure full awareness and promote its proper application.

8. Monitoring, control, and review

Monitoring the effectiveness of the Policy is entrusted to the CEOs and ESG Ambassadors, who periodically evaluate its implementation and the results achieved. The Policy is subject to regular reviews and updates to ensure consistency with the company's strategic objectives, current regulations, and best practices in diversity and inclusion.

Pursuant to Legislative Decree No. 24/2023, reports of any non-compliance relating to discrimination and connected with the implementation of the Policy may be submitted via the whistleblowing portal of the Parent Company or the Company.

As outlined in the current whistleblowing procedure, such reports are received by the Internal Audit function, the Group CFO, and by the Chairman of the 231 Supervisory Board if they relate to the Parent Company, or by the Group CFO, the Company CFO, and the appointed 231 Supervisory Board if they relate to the Companies.

Therefore, these recipients are the people responsible for the collective management of any non-compliance relating to discrimination and connected with the implementation of the Policy.