



DIVERSITY, EQUITY AND INCLUSION

ALPI

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1. Purpose and Scope of Application

This policy applies to all ALPI group locations in Italy and abroad, and includes employees, collaborators, suppliers and business partners.

Its purpose is to promote a fair, safe and inclusive work environment; to strengthen the corporate culture based on respect for human rights and social responsibility; and to ensure consistency and transparency in the management of the people who work in and with the company worldwide.

ALPI S.p.A. considers every person in their entirety, as citizen and worker, to be the holder of rights, interests and contractual obligations.

In line with this approach and with an integrated vision of sustainability and social responsibility, ALPI S.p.A. has adopted the principles of UNI/PdR 125:2022, the gender equality guidelines from the Italian standardisation body Ente Italiano di Normazione.

2. Code of Conduct and Human Rights

ALPI S.p.A. is inspired by and recognises the principles of international conventions: the guidelines of the International Labour Organization, the United Nations Global Compact, and the Forest Stewardship Council® (FSC-Coo4666) Policy for Association. In line with these, the company has adopted a Code of Ethics and a Policy for Fundamental Labour Rights.

ALPI S.p.A. rejects all forms of exploitation, forced labour, child labour and discrimination. Any violation may be reported through anonymous and secure whistle-blowing channels to the company's Ethics Committee, which ensures impartiality and confidentiality.

The company is committed to ensuring that all partners and suppliers comply with its ethical and social standards. In the event of violation of these principles, ALPI S.p.A. takes appropriate corrective measures, which may include termination of the business relationship if deemed necessary.

3. Prohibition of Discrimination, Promotion of Inclusion and Equal Opportunities

ALPI S.p.A. actively promotes equal treatment and inclusion regardless of gender, age, ethnicity, religion, political opinions, trade union membership, geographic origin, sexual orientation and disability. The company avoids all forms of discrimination.

In practice, the company promotes inclusion and non-discrimination in the following ways.

- The recruitment process ensures, at every stage, the elimination of the risk of direct or indirect discrimination through the adoption and use of objective evaluation criteria based on the hard skills and soft skills related to the position, in order to guarantee equal opportunities.
All individuals involved in the recruiting process are prohibited from asking personal or irrelevant questions and must adopt proper behaviour and speech that shows the utmost respect for the dignity of the candidates.
- Onboarding programmes dedicated to newly hired personnel are aimed at facilitating rapid integration, developing professional skills and stimulating career growth – all based on the evaluation of objective criteria.
- A compensation-management process designed to eliminate all forms of pay discrimination through the use of objective criteria ensures fair remuneration for all genders. It adopts a monitoring system to prevent practices that do not comply with non-discrimination criteria and the company's Gender Equality Policies.
- The adoption of internal and external communication practices that ensure the use of language and imagery respectful of all identities, and promote a fair and balanced representation of genders. In the selection of speakers for panels, round tables, events and conferences – including those of a scientific nature – participation is ensured based on competence and professionalism in order to avoid the reproduction of stereotypes and to foster the spread of a culture of inclusion and equality.
- A corporate strategic plan inspired by the principles of equal opportunities involves senior management and a Gender Equality Steering Committee tasked with monitoring results and promoting continuous improvement in diversity, equity and inclusion.
- Strict measures are in place to address any behaviour that undermines inclusion and non-discrimination. These measures may include sanctions proportionate to the seriousness of the conduct and, where necessary, legal action to protect affected rights.

4. Training, Staff Development and Career Growth

Skills development is a strategic pillar for ALPI S.p.A., which is why the company sponsors continuing-education programmes based on the principles of inclusion and gender equality. These programmes are tailored to the company's needs and to the professional aspirations of employees, with a focus on technical skills, soft skills, managerial skills and sustainability- and innovation-related skills.

ALPI S.p.A. has activated and encourages

- performance-evaluation systems based on objective criteria
- performance-based incentive systems that reward both individual achievements and overall company results, supported by transparent and measurable performance indicators
- career paths, job rotation and internal mobility programmes based on skills and potential, in line with the principles of equal opportunity and non-discrimination, and aimed at achieving gender balance in corporate leadership positions, consistent with the specific sector and related roles
- individual development plans, including personalised support initiatives

ALPI S.p.A. ensures non-discrimination in professional development and promotion processes through regular monitoring and review of career progress, to confirm that the principles of fairness and equal opportunities for professional growth are consistently applied.

5. Work-Life Balance and Prevention

Punctuality and regular attendance are essential for the proper functioning of the company. Each employee is required to respect working hours and promptly report any absences or delays.

The company recognises that balancing professional and personal life is fundamental to creating solid and sustainable value – economic, social and environmental – and that this balance allows each individual to thrive. Toward this aim, the company supports family leave, parental leave and medical leave in accordance with applicable laws, internal regulations and supplementary agreements.

In order to promote and support active parenthood for both parents, the company is committed to offering information campaigns for employees whenever new legislation on maternity and paternity rights is introduced, with the aim of increasing the use of paternity and parental leave. In doing so, the company promotes a culture of shared caregiving responsibilities, recognising that women's inclusion and professional growth also depend on a more equitable distribution of family duties.

Employees on maternity leave are guaranteed the opportunity to participate actively – on a voluntary and flexible basis, and in compliance with applicable laws and internal company policies – in all development processes, talent assessments and performance evaluations. They also have access to continuing-education and professional development programmes. After maternity leave, employees are guaranteed the right to return to their position or an equivalent role with the same level of compensation. The return is further supported through individualised support programmes and flexible working hours.

Recognising the importance of health care and prevention, the company has adopted a supplementary regulation that guarantees all employees the right to additional leave for consultations with medical specialists and diagnostic tests. Paid and unpaid leave is provided for managing personal and family emergencies.

6. Health, Safety and Work Environment

Workplace safety and the health of all employees are top priorities.

ALPI S.p.A. adopts a policy aimed at achieving the Zero Accidents objective, based on an Integrated Management System compliant with Legislative Decree 81/08 and key international standards. The company is committed to ensuring safe, healthy and sustainable work environments through structural interventions, plant modifications, procedural and organisational measures, and by continuously updating its Risk Assessment Document (Documento di Valutazione dei Rischi) and emergency plans in response to changing working conditions.

All employees receive ongoing training on health and safety for the prevention of workplace accidents, with particular emphasis on safe practices and behaviour to be adopted in every situation, as well as the correct use of personal protective equipment.

Regular on-site audits are conducted to monitor behaviour and activities, with the aim of continuously improving the culture of prevention and safety practices.

7. Relations with Trade Unions

ALPI S.p.A. guarantees the freedom of trade union membership and the right of every individual to freely join a union. The trade union activity of employee representatives ensures the effective exercise of collective bargaining and promotes it as a tool for participation and shared growth. The company also guarantees good faith in the implementation of the provisions of applicable collective agreements.

ALPI S.p.A. recognises the importance of maintaining a constructive social dialogue with employees and their union representatives, and is committed to ensuring transparent and open communication with all.

The company maintains transparent relationships, in full compliance with regulations, with all institutions with which it interacts, for the proper management of employment relations and the work environment, as well as for the protection of the economic and social community in which it operates.

8. Harassment, Discrimination and Bullying

ALPI S.p.A. enforces a zero-tolerance policy toward any form of harassment, discrimination or behaviour that undermines personal dignity.

The prevention and sanctioning of workplace harassment are ensured through the adoption of the Code of Ethics and this Policy for People, Equal Opportunities, Gender Equality and Fundamental Labour Rights, both of which are shared with all employees, who are required to review them. The Code of Ethics specifies the procedures and methods for handling reports, as well as the protective measures for the reporting party.

9. Child Labour

In compliance with national legislation and international conventions (for instance Conventions 138 and 182 of the International Labour Organization), ALPI S.p.A. strictly prohibits all forms of child labour. Age verification is required at the time of the initial interview by requesting a valid identity document, in accordance with privacy regulations (General Data Protection Regulation).

All hiring managers are expressly prohibited from circumventing this requirement through the use of project-based contracts, internships or traineeships that do not comply with current legislation.

10. Forced Labour

ALPI S.p.A. does not permit any form of forced or compulsory labour. It engages only in employment relationships that are voluntary and based on mutual consent, does not allow any form of coercion or undue pressure to work, and guarantees the protection of employees in the event of disputes concerning work performance.

11. Working Conditions and Living Wage

ALPI S.p.A. recognises that a fair wage is an essential condition for ensuring decent living standards. All ALPI S.p.A. employees receive a wage above the subsistence level, in accordance with collective bargaining agreements. Through the company's supplementary agreement, additional benefits are provided, particularly in relation to meal vouchers, canteen services, supplementary health care, pension schemes, welfare programmes, and bonuses linked to individual and collective performance.

The company ensures transparency and monitors gender pay gaps.

12. Personal Data Protection

ALPI S.p.A. ensures the protection of employees' personal data in compliance with EU Regulation 2016/679 (General Data Protection Regulation).

Data processing is carried out lawfully, for authorised purposes only, using appropriate measures to guarantee confidentiality, integrity and availability, with particular attention to sensitive data. Processing is performed both on paper and through information and/or automated systems.

Each individual receives information regarding the processing of their personal data, their rights, and the possibility to access, review, modify or delete their personal information.

13. Whistle-blowing, Reporting Channels and Sanctions

Confidential and anonymised reporting channels (whistle-blowing) have been established in accordance with Legislative Decree 231/01, to ensure the prompt and effective handling of any reports, following the procedures outlined in the Code of Ethics.

In the case of reports concerning gender-based discrimination, as defined by UNI/PdR 125:2022, responsibility for managing the report lies with the Gender Equality Steering Committee.

In the event that violations of the described anti-discrimination policies or of proper conduct as required by laws, collective labour agreements, and regulations are found, disciplinary sanctions proportionate to the severity of the offense will be applied, in accordance with the procedures established by law and the applicable collective agreement, without prejudice to any potential criminal or civil implications.

14. Monitoring, Communication and Updates

Within their own relational networks, each person is both a witness to and a promoter of the values of ALPI S.p.A.. The present Policy for People is shared with all personnel, stakeholders, suppliers and the company network so that everyone, through their talents, skills and roles, can consciously contribute to achieving common goals.

The present Policy for People is subject to periodic review by the human resources department to ensure its consistency and alignment with regulations and best practices; any changes are communicated through the company portal.

ALPI

Human Resources and Organization
Department

