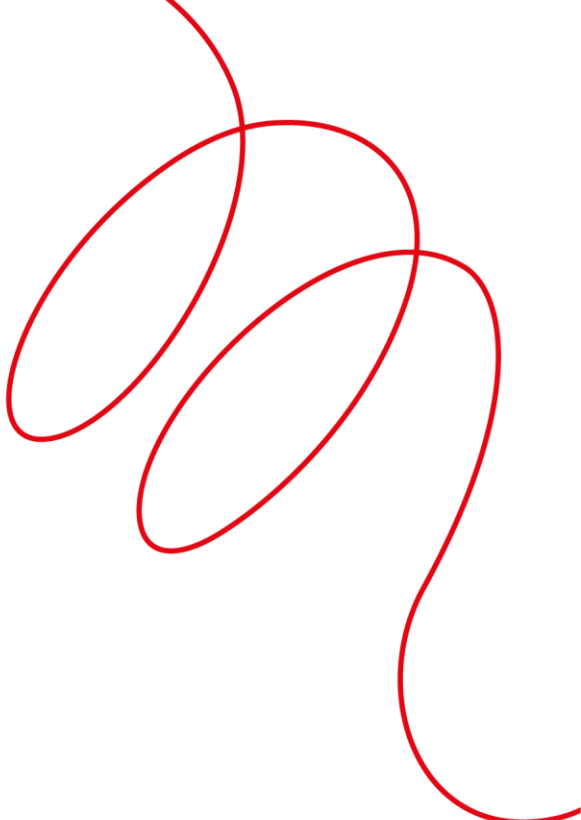
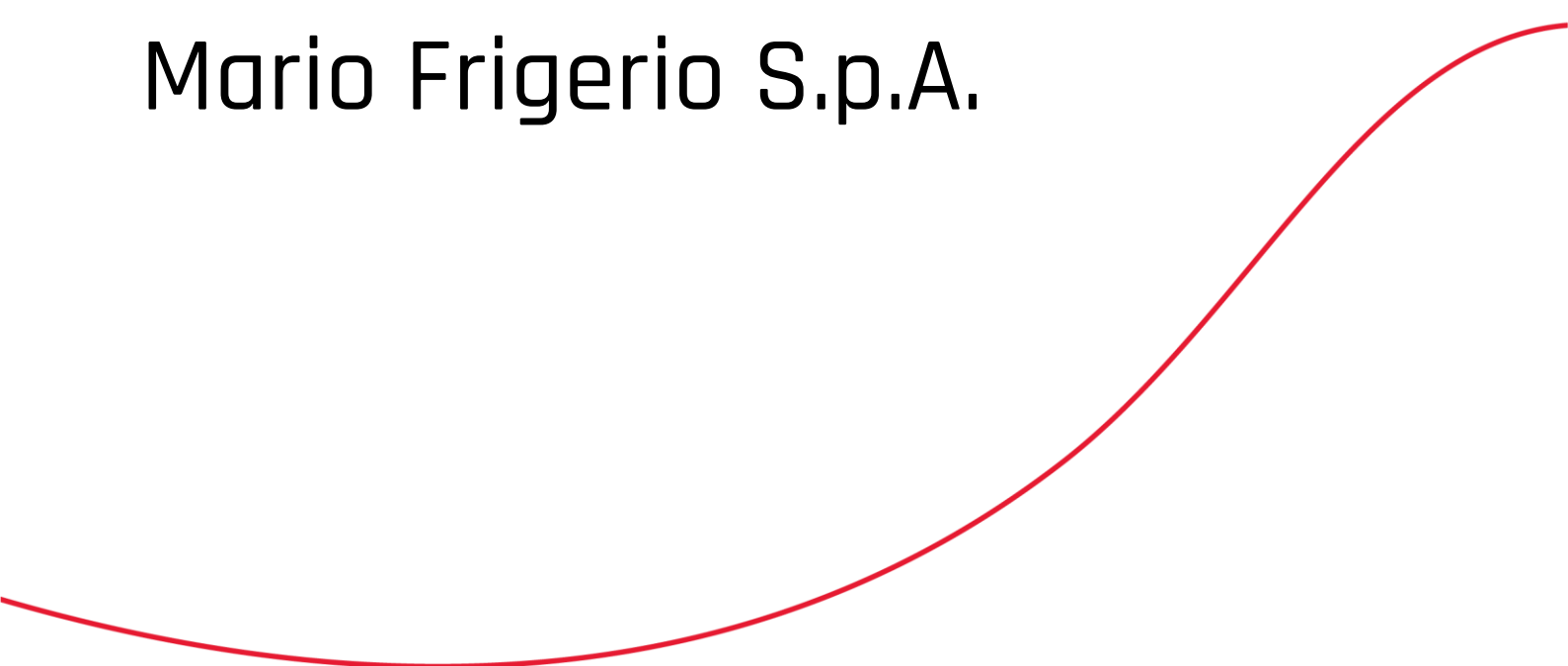




Policy for

**GENDER EQUALITY,
DIVERSITY AND INCLUSION**

Mario Frigerio S.p.A.



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1. INTRODUCTION

Mario Frigerio S.p.A. recognises gender equality, fair treatment, diversity and inclusion as fundamental principles for creating a collaborative workplace that respects everyone's rights and is free from discrimination. We believe that respecting gender equality and differences is a strategic factor in organisational quality, people's wellbeing, talent development and long-term sustainability.

In line with the Code of Ethics endorsed throughout Mario Frigerio, the company firmly condemns all forms of harassment, abuse and discrimination, whether direct or indirect, based on race, ethnicity, nationality, religion, gender, sexual orientation, age, disability, political or trade union views, or personal or social circumstances. All Recipients must promote and maintain a workplace based on mutual respect, inclusion and appreciation of individual differences, avoiding any behaviour, gesture or language that may be offensive or undermine personal dignity or the right to freedom of opinion and expression (including the right not to be subjected to harassment and/or discrimination for one's opinions), in accordance with the principles established by the International Labour Organization (ILO) and the Universal Declaration of Human Rights. Recruitment, the management of professional relationships and all other business decisions must be based on competence, merit, suitability and alignment with the Group's organisational needs, in compliance with company procedures.

The company also recognises the value of people and their differences, adopting an approach to human resource management that ensures equal opportunities for professional growth. In particular, it actively promotes a culture of gender equality, considered essential to business management, to encourage performance based on talent and focused on long-term sustainability. In this context, the Group undertakes to:

- foster an inclusive workplace through targeted action on corporate culture, promoting staff training, information and awareness initiatives on equal opportunities;
- promote a merit-based culture founded on tangible results and free from discrimination;
- ensure a positive, inclusive environment that supports everyone's professional and personal development, free from discrimination of any kind.

2. PURPOSE

This Policy expresses Mario Frigerio S.p.A.'s commitment to creating a fair, inclusive workplace that respects everyone's rights and is free from discrimination, where all people – employees, associates, suppliers and other stakeholders – are treated with dignity and given equal opportunities, regardless of their individual characteristics or gender. To put this commitment into practice, Mario Frigerio S.p.A. has chosen to adopt a gender equality management system, in line with the principles of UNI/PdR 125:2022, reflecting its intention to embed gender equality, equal opportunities and social inclusion within its organisational culture and to establish operational guidelines to prevent the risk of discrimination, harassment and gender stereotypes.

3. SCOPE

This Policy applies to all stakeholders acting on behalf of Mario Frigerio S.p.A., including employees, associates, suppliers and recruitment agencies working for the company, ensuring fair and inclusive treatment regardless of gender or gender identity, sexual or romantic orientation, age, ethnic or geographical origin, religion or belief, political or trade union affiliation, disability or health conditions, marital or family status, nationality or any other personal characteristic. The Policy covers all aspects of working life, including recruitment, promotion, training, performance appraisal and disciplinary action. It extends to both physical and remote workplaces.

Mario Frigerio S.p.A. also undertakes to raise awareness of this Policy among external stakeholders, so that its principles guide conduct consistent with a business culture inspired by sustainable development.

4. FUNDAMENTAL PRINCIPLES

Mario Frigerio S.p.A.'s commitment to gender equality, diversity and inclusion focuses on the following fundamental principles:

- equality and non-discrimination, ensuring a fair workplace with equal opportunities regardless of gender or other personal characteristics;
- merit and impartiality, ensuring that all HR decisions are based on skills, performance and potential;
- respect for personal dignity, combating stereotypes, prejudice, harassment and harmful behaviour;
- valuing diversity, as a driver of innovation, growth and organisational quality;
- transparency and accountability, in monitoring data and communicating results.

To build a fair, inclusive and sustainable workplace, Mario Frigerio S.p.A. gives priority to:

- equal opportunities for professional growth, ensuring fair access to training, career development and positions of responsibility in every business area, basing decisions solely on skills and potential, and introducing gender mainstreaming concepts;
- pay equity, considered an essential principle to be ensured through transparent, objective, merit-based remuneration policies, regardless of gender. Systematic monitoring of pay data helps prevent and correct disparities, promoting a culture of fairness and accountability;
- valuing differences, promoting an inclusive environment that recognises diversity – in gender, ethnicity, sexual orientation, age, ability, religion and background – as a strategic driver of innovation and success, and encouraging language that supports dialogue and overcomes sexist expressions or behaviour;
- maternity and parenthood protection, supporting work-life balance through specific measures and additional flexibility, where possible beyond the applicable National Collective Labour Agreement (CCNL), for employees with parenting and/or caregiving responsibilities, recognising these experiences as an integral part of personal and professional development.

5. COMMITMENT TO EQUALITY, DIVERSITY AND INCLUSION

To promote an authentic and firmly established culture of gender equality, Mario Frigerio S.p.A. actively undertakes to:

- ensure a workplace free from discrimination, harassment or prejudice of any kind, firmly opposing discriminatory behaviour or language based on any personal characteristic;
- promote awareness of diversity and inclusion, through ongoing training, workshops and seminars for all staff, to raise awareness and spread an organisational culture based on fairness, respect and appreciation of differences;
- encourage a fairer world of work in terms of equal career opportunities, competitiveness and flexibility;
- ensure that recruitment, hiring, promotion, training and compensation policies are based solely on individual skills, performance and potential, eliminating discrimination based on gender, ethnicity or other factors;
- support growth in women's employment and leadership, facilitating women's participation and retention in the workplace, valuing their skills and helping them balance work and caregiving responsibilities;
- ensure gender pay equity, providing fair remuneration for work of equal socioeconomic value and promoting economic independence for all, in accordance with the principle of equal pay for work of equal value;
- ensure that any gender-based pay inequalities are identified and corrected during the salary review process;
- offer equal opportunities to develop and nurture talent, ensuring fair access to training, including leadership and professional development programmes;
- adopt internal mobility and succession policies for managerial positions that reflect the principles of an inclusive organisation committed to gender equality;
- adopt voluntary measures to support parenthood, including measures beyond the applicable CCNL, to protect maternity/paternity and promote work-life balance;
- value the experience of parenthood as an opportunity for growth and the acquisition of new skills, ensuring continuity in the relationship with the company before, during and

after maternity/paternity leave, while maintaining the associated benefits and protections;

- ensure balanced gender representation among speakers at panels, conferences, events and public initiatives organised by or involving the company.

As provided for in the UNI PdR 125:2022 guidelines, Mario Frigerio S.p.A. undertakes to continually monitor its approach, measure progress over time and promote continuous improvement through specific KPIs (Key Performance Indicators) across six dimensions:

- culture and strategy;
- governance;
- HR processes;
- gender-neutral career growth opportunities within the company;
- gender pay equity;
- parenthood protection and work-life balance.

6. TYPES OF DISCRIMINATION

The main forms of discrimination recognised and prohibited include:

- Direct discrimination: unfavourable treatment based on a personal characteristic.
- Indirect discrimination: apparently neutral policies or practices that disadvantage particular groups.
- Harassment: unwanted conduct related to personal characteristics that causes offence or creates a hostile environment.
- Victimisation: unfavourable treatment of people who have reported discrimination.
- Discrimination by association: discrimination due to links with people who have protected characteristics.
- Discrimination by perception: unfair treatment based on presumed personal characteristics.
- Failure to make reasonable adjustments to the workplace or duties to accommodate specific needs.

7. RESPONSIBILITIES

The Management of Mario Frigerio S.p.A. undertakes to:

- ensure that no acts of discrimination occur;
- identify cultural, organisational or interpersonal barriers to full workplace inclusion and work to overcome them;
- create an environment that encourages open expression;
- ensure strategic oversight of the Gender Equality Management System by establishing a Steering Committee;
- raise teams' awareness of the need to respect the principles set out in this Policy.

The Steering Committee is responsible for:

- integrating gender equality principles into company strategies and policies;
- defining objectives, KPIs and the action plan;
- monitoring results and the continuous improvement of the Management System;
- receiving and handling reports of abuse and harassment;
- promoting a culture of gender equality.

Employees: all employees are expected to actively help create and maintain an inclusive environment by respecting and promoting this Policy. Everyone is also encouraged to act responsibly when faced with non-compliant situations affecting themselves or others, and to report them through the designated channels, rather than standing by or tolerating conduct contrary to the principles of inclusion and respect.

8. REPORTING AND MONITORING

Mario Frigerio S.p.A. monitors the implementation of this Policy and promotes the use of dedicated channels to report violations or suspected violations, while protecting those who make reports.

Reports may be submitted in writing through the online Whistleblowing channel at <https://www.mflgroup.com/whistleblowing/>, which protects the confidentiality of the person reported and safeguards the identity of the reporting person, as well as the content of the report and supporting documentation.

Reports will be handled by the Steering Committee in accordance with applicable legislation and internal policies, ensuring confidentiality and protection for the reporting person. No retaliation against reporting persons or other individuals involved will be tolerated. Breaches of this Policy will be subject to disciplinary action, ranging from a formal warning to dismissal in the most serious cases.

9. COMMUNICATION AND DISSEMINATION

This Policy is communicated and disseminated within the organisation through the company intranet and dedicated communications. In the interests of transparency and cooperation, it is also shared with all stakeholders through communications and publication on the website.

10. MONITORING AND REVIEW

This Policy is validated annually to assess its effectiveness and suitability during the review of the Company Gender Equality Management System, and whenever significant regulatory amendments and/or other relevant changes occur, also taking account of feedback received and data analysis.

Responsibility for implementing this Policy lies with the Gender Equality Steering Committee.

Molteno, 09/04/2026

The Employer

Emilia Tentori



www.mflgroup.com

