

<b>Newlat Food Group</b>	<b>Diversity and Inclusion Policy</b>	<b>Rev.1 Page 1/6</b>
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# **DIVERSITY & INCLUSION POLICY**

<b>Approved on:</b>	<b>09/09/2022</b>	<b>Approved by:</b>	<b>BoD of the parent Company Newlat Food S.p.A.</b>	<b>Effective date:</b>	<b>09/09/2022</b>
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## Introduction

### Foreword

For Newlat Food Group (hereinafter also referred to as "Newlat Food" or the "Group" or the "Company"), diversity is a strategic element for the Company's competitiveness and the development of its people: different experiences, skills and backgrounds enrich the work environment and stimulate creativity, fostering more effective leadership and promoting an increasingly open corporate culture. The enhancement of diversity and inclusion are, therefore, a priority commitment of the Group to promote a work environment that is stimulating, inclusive and respectful of all forms of diversity, inspired by principles of fairness, freedom and dignity in professional relations and free from discriminatory behaviour.

Therefore, the Group is committed to ensuring respect for the Universal Declaration of Human Rights and combating discrimination based on gender, age, disability, ethnic, social or geographic origin, trade union membership, language, religion, political or sexual orientation, nationality and marital status, within recruitment, hiring, training, remuneration, reward and dismissal procedures, thus preserving the value of its personnel and promoting the protection of their psychophysical, moral and cultural integrity through working conditions that respect individual dignity and behavioural rules.

In this direction, in line with the principles contained in the Group's Code of Ethics and Conduct and in accordance with the declared commitment to the Sustainable Development Goal (SDG) Reducing Inequalities as defined by the United Nations 2030 Agenda, the Diversity & Inclusion Policy intends to evolve the way in which diversity issues are dealt with, moving from an approach aimed at protecting and integrating 'diversity' to a proactive strategy for overcoming all intolerance and identifying and resolving the factors that prevent people from being included in the workplace.

### Purpose

The Diversity & Inclusion Policy was created with the aim of formalising Newlat Food's commitment to valuing and protecting diversity, preventing and sanctioning all forms of discrimination and harassment.

Specifically, through this Policy, the Group is committed to pursuing the following objectives:

- promotion of an inclusive work environment that guarantees respect, integrity, equal opportunities and personal and professional growth to all employees;
- increase employees' awareness of diversity and equal opportunities, also through the development of training programmes and specific projects;
- compliance with laws and regulations on equal opportunities, with reference to the regulatory framework of the countries in which the Group operates and to identified best practices;
- foster the commitment of all Group employees to act with respect and integrity in all relations with colleagues, customers, suppliers and all other actors with whom they interact
- raise suppliers' awareness of respect for human dignity and diversity protection.

### Background Reference

Below are the external and internal regulatory references and standards considered in defining the Group Diversity and Inclusion Policy.

#### External legislation and standards

- Charter of Fundamental Rights of the European Union;
- United Nations (UN) Universal Declaration of Human Rights;
- Fundamental Conventions of the International Labour Organisation (ILO);
- Guidelines "Diversity & Inclusion in Azienda" drawn up by the D&I Observatory of the UN Global Compact Network Italy;
- OECD Guidelines for Multinational Enterprises.

#### Internal legislation and standards

- Group Code of Ethics and Conduct;

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- Organisation, Management and Control Models adopted pursuant to Italian Legislative Decree 231/2001 by the main Group Companies;
- Human Rights Policy;
- Integrated Management System Policy.

### Group objectives and commitments for diversity and inclusion

The Group's commitment on diversity and inclusion focuses on four main areas, as proposed by the UN Global Compact Network Italy's 'Diversity & Inclusion In Azienda', in the awareness that environmental, socio-cultural and market evolution can always lead to forms of exclusion that must be identified, prevented and countered as far as possible.

### Gender diversity

The company values gender balance and the overcoming of any stereotypes, discrimination or prejudice, in order to create the conditions in which each person can best express themselves.

Considering the prevalence of male employees over female employees in the workforce, especially within the production departments, which has historically resulted from socio-cultural reasons and is inherent to the sector in which the Group operates, Newlat Food is committed to monitoring and encouraging gender equality with actions on various fronts, for example:

- adopting selection, recruitment, evaluation, professional growth and development procedures and practices that are neutral and focused on the recognition of personal characteristics and professional skills, according to the company's needs;
- adopting remuneration policies based on equity and performance and committing to the removal of potential obstacles to equal pay;
- activating training and information paths geared to providing equal opportunities for development in every professional field;
- ensuring support for parenthood through strict compliance with regulations, laws and international standards protecting maternity and paternity, and avoiding any kind of discrimination on the basis of employees' parenthood;
- promoting respect for workers' personal space and allowing work-life balance.

Finally, the Group strongly condemns and is committed to combating gender-based violence in all its forms through awareness-raising actions and the implementation of specific channels (whistleblowing) through which reports of misconduct can be addressed, guaranteeing those who report the utmost protection of confidentiality and the absence of retaliatory acts.

### Generation diversity

Newlat Food considers the coexistence of different generations to be a value that offers the opportunity to be open to change, to face the challenges related to the evolution of society and the market and to lead innovation thanks to the different knowledge and skills, both soft and hard (such as, for example, digital skills), typical of each generation.

Training and mentoring are the main tools to promote communication and exchange of experiences between the different generations, fostering a productive exchange and transfer of knowledge and skills so that differences are valued.

As proof of the importance that intergenerational comparison represents for the Company, the composition of the workforce shows how, in recent years, a generational turnaround process has been underway between older and younger workers: a result that represents an important driver for the Group's future growth.

### Disabilities

The Group recognises equal opportunities for all its people regardless of sensory, cognitive and motor impairment.

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Understanding "disability" to mean any situation of psycho-physical discomfort, such as to give rise to the risk of exclusion, the Group is committed to implementing concrete measures to foster a work environment designed to improve accessibility and to implement good practices aimed at the socialisation, integration and well-being of the individual.

Newlat Food also supports the need to value each individual by seeking to break down all types of cultural, sensory or physical barriers that limit inalienable rights and by implementing the changes necessary to improve the living conditions of people with disabilities.

Therefore, the Group aims at accommodating the needs of people in situations of discomfort and supporting their autonomous development both through appropriate tools and aids (such as reasonable accommodation) and through training sessions, programmes and initiatives capable of increasingly including people with disabilities in the corporate working context, with a view to reducing unintentional discrimination as well.

### Interculturality

In line with the principles of the Code of Ethics and Conduct, Newlat Food considers the promotion of the cultural diversities in the Company one of its fundamental objectives and is committed to fostering the integration of all existing cultures, through the enhancement of their peculiarities, in an inclusive and open Group culture.

International synergies represent a competitive advantage for the Group. On the path of internationalisation and expansion, in fact, Newlat Food's workforce has not only expanded in terms of headcount, but has also been enriched in terms of nationality, culture and expertise. In the light of the Company's strategy, which is based on external growth through a path of internationalisation and the acquisition of companies that are complementary to those already in place, an increase in the cultural diversity is expected: these diversities, the different ethnic origins, nationalities and religious faiths and the different idioms can only make a positive contribution to the Company's growth.

### Enforcement, monitoring and responsibilities

#### Enforcement, communication and updating

This Policy was formally approved by the Board of Directors of the Parent Company Newlat Food S.p.A. on 09/09/2022 and applies to the employees, corporate bodies, partner and suppliers of all Newlat Food Group Companies falling within the scope of consolidation, together with the laws and regulations in force in the countries where the Group operates, permeating the corporate culture on the basis of the principles of conduct already defined in the Code of Ethics and Conduct and other corporate policies, strategies and external regulations.

Newlat Food promotes the adoption of the contents of the Policy by all Group companies, including those abroad, communicating it to all personnel and making it available to interested Stakeholders through appropriate communication channels in addition to the corporate website. The Group is also committed to keeping this document and the diversity and inclusion programmes active and systematically updated in the light of evidence emerging from internal assessments and the monitoring of national and international trends.

### Monitoring and reporting

Newlat Food adopts a monitoring system that ensures annual verification and reporting of the results and progress achieved in diversity management. The Group also monitors the effectiveness of the approach adopted through dedicated tools, including procedures for the periodic identification and assessment of risks inside and outside the Group, a system for reporting violations, a sanctions system and dialogue activities with stakeholders.

All recipients are required to report any conduct that does not comply with the principles contained in this Policy, including harassment or any form of physical and/or psychological violence, by referring to the channel that can be accessed from the "Whistleblowing" section of the website <https://www.newlat.it/>, or by inserting written communication in the mailboxes provided within the company areas.

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Newlat Food guarantees whistleblowers the utmost protection of confidentiality; it does not tolerate acts of retaliation and sanctions those who commit them. Violations of this Policy will result in the application of disciplinary sanctions or measures based on their seriousness: if violations of the principles stated in this document are ascertained, the sanctions provided for under the Model pursuant to Italian Legislative Decree 231/2001 will be applied, as well as those relating to the contractual regimes applicable to those responsible.

## Responsibilities

Diversity and inclusion strategies and policies imply the involvement of all corporate functions with responsibilities towards diversity.

On the one hand, the Board of Directors is responsible for the promotion of and compliance with the principles contained in this Policy.

On the other hand, the management plays a crucial role in ensuring fairness, inclusion and non-discrimination by intervening whenever it is aware of behaviour not based on respect for others. Managers, in turn, must adopt behaviours oriented towards creating the conditions for each team member to fully express his or her potential, also respecting any personal needs, working to create a climate that is open to the expression of all and encouraging innovation and the generation of new ideas.

In addition to that, the Group Sustainability function is responsible for defining and periodically updating the contents of this Policy, for the systematic monitoring of relevant indicators and for reporting on them within the Consolidated Non-Financial Statement, contained within the Annual Financial Report and drawn up according to the international standard 'GRI Sustainability Reporting Standards'.

The role of the Human Resources function is equally crucial in ensuring the long-term valorisation of diversity at all levels and in the implementation phases of company policies. In particular, at both central and territorial level, the Human Resources function has the task of managing the corporate life cycle of people from the moment they enter the company by monitoring their growth, assessment and development.

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