



Diversity, Equity and Inclusion Policy

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1. Introduction

1.1 Context

Diversity and inclusion are essential drivers for building fairer and more connected societies, capable of facing future challenges with innovation.

OVS recognizes the fundamental role that companies play in promoting this change and contributes to the fight against all forms of workplace discrimination based on, among other things, gender identity, age, disability, ethnicity, religious belief, sexual and emotional orientation, health condition, political opinions, and social background.

OVS acknowledges the importance of ensuring the effective enjoyment of the right to equal treatment at work, as established by the Italian State, the European Union, and other international organizations.

OVS aligns itself with the principles of the Charter for Equal Opportunities and Equality at Work promoted by Fondazione Sodalitas, AIDAF, AIDDA, Impronta Etica, UCID, and the National Office of the Equality Councillor, under the patronage of the Ministry of Labor and the Ministry for Equal Opportunities. In addition, private sector standards and voluntary initiatives have been taken into consideration, listed in Bibliography of the present document.

This document is drafted in accordance with the OVS Code of Ethics, which recognizes the value of a work environment free from all forms of discrimination or harassment.

1.2 Impacts, Risks and Opportunities

OVS measures its social impacts to inform its corporate strategy and identify initiatives to improve its sustainability profile.

OVS systematically analyzes the risks and opportunities related to these impacts by involving internal and external stakeholders—including top management, employees, suppliers, and customers—to ensure a thorough analysis and an effective response strategy to the priority issues identified.

The analysis highlights that equal treatment and opportunities for all employees are key elements in personnel management.

Risks

The main risks associated with poor management of diversity, equity, and inclusion in the workforce include:

- Potential increase in turnover, reputational damage, discrimination claims, or talent loss due to pay gaps and unequal career opportunities;
- Administrative sanctions for failing to meet hiring obligations for protected categories and potential exclusion from projects requiring compliance with Law 68.

Opportunities

Alongside the risks, proper management of diversity, equity, and inclusion presents opportunities to strengthen the company's resilience and competitiveness:

- Attracting new talent without discrimination (in terms of age, ethnicity, etc.);
- Increasing employee retention rates;
- Attracting diverse skills, valuing multiple perspectives, and improving the workplace climate.

To effectively address the risks and seize the opportunities outlined above, OVS adopts this corporate policy, which defines the principles to be integrated into the company's strategy, decision-making processes, and ongoing monitoring.

2. General Principles

This policy applies to all internal and external collaborators operating under the direction and coordination of OVS S.p.A.

2.1 While the political, economic, social, and cultural conditions of the various countries in which the Group operates may differ, OVS believes that the principles of Diversity, Equity and Inclusion outlined in this document must be considered universal.

For this reason, all OVS collaborators are expected to embrace these principles and promote their application in relationships with customers and suppliers, in line with the OVS Code of Ethics and Supplier Code of Conduct.

2.2 In the development and management of people working with OVS, the Group defines the three key pillars of Diversity, Equity and Inclusion as follows:

Diversity: the contribution of the many dimensions of the individual, including age, gender identity, sexual and emotional orientation, religious and political beliefs, ethnicity and cultural background, physical and intellectual disabilities, psychological and social vulnerabilities;

Equity: fair treatment in access to employment or internal development, addressing systemic inequalities and/or individual circumstances;

Inclusion: the recognition and appreciation of uniqueness as a resource for value creation.

2.3 In line with the Code of Ethics, every person must be treated with respect, free from any form of intimidation and/or harassment.

Harassment is defined as any unwelcome conduct—verbal, physical or sexual—that results in a hostile, offensive or intimidating work environment.

OVS recognizes that any form of harassment or violence in the workplace is a serious violation of human rights and a threat to the development of equal opportunities.

2.4 While acknowledging the importance of all dimensions of diversity, equity and inclusion, OVS prioritizes the following areas of intervention: disability, gender equality, parenthood, and generational differences.

3. Application Methods and Areas

The general principles guide the company's activities in protecting and enhancing diversity. These principles are applied in the following areas and methods, in alignment with the company's organizational structure:

3.1 Compensation Policies

Compensation policies must contribute to eliminating any gender pay gaps, ensuring a merit-based pay system. Any pay disparities are included among the evaluation parameters that guide merit policies.

3.2 Recruitment and Employer Branding

The recruitment strategy must reflect the principles outlined in this policy, ensuring equal opportunity and impartiality in the selection process for all open positions.

OVS also promotes training and employment initiatives for individuals with intellectual and/or physical disabilities within its operations or in collaboration with external partners.

Additionally, OVS is committed to integrating political refugees in partnership with major humanitarian organizations.

Employer branding activities reflect the company's commitment to inclusion and the appreciation of diversity.

3.3 Career Development

Career development policies must ensure equal access without discrimination for disadvantaged groups, supporting a merit-based process. Career paths should be shared and defined in alignment with each individual's uniqueness.

3.4 Training

Training programs are developed in accordance with this policy, with the goal of promoting a culture that values and manages diversity. Participation in training opportunities must be monitored to ensure representation across the company population.

3.5 Welfare Programs

Corporate welfare programs are designed to ensure equal opportunities and wellbeing, especially for those with more complex or harder-to-meet needs.

They may also be used to support work-life balance for disadvantaged worker groups and to assist lower-income employees.

3.6 Leadership and Team Management

In managing team resources, all company functions must ensure a work environment based on transparency, inclusion, and equal opportunity for all individuals.

3.7 Engagement with Affected Communities

When developing projects and activities that impact external stakeholders (such as communities and consumers)—including marketing campaigns or collaborative projects—the company must adhere to the principles of this policy, promoting an inclusive culture and the appreciation of diversity.

4. Roles and Responsibilities

4.1 A Corporate Committee for Diversity, Equity & Inclusion (D,E&I) has been established, composed of a representative from the Human Resources and Organization Department, a representative from the Corporate Sustainability function, and other members selected based on their representation of gender, roles, and business functions. The Committee is appointed by the Chief Executive Officer, who also promotes and sponsors its initiatives.

4.2 The Committee is responsible for updating the policy, defining a strategic plan for Diversity, Equity & Inclusion, monitoring key KPIs, and overseeing the reporting system for policy violations.

The Committee is allocated a dedicated budget to fulfill its responsibilities.

4.3 The Human Resources and Organization Department acts as a facilitator in integrating the principles of this policy into company procedures and processes, supporting other involved functions.

It is responsible for preparing the main KPIs of the management system and for promoting initiatives and improvement processes within the relevant business functions. It also supports the Committee by serving as its technical secretariat.

4.4 The Corporate Sustainability function ensures that measurable Diversity, Equity & Inclusion objectives are properly identified in the strategic sustainability plan. It collaborates with the Human Resources and Organization Department in implementing actions, overseeing the management system, and reporting key KPIs.

4.5 All business functions acknowledge this policy and commit to integrating its principles into their resource management and team activities. They also collaborate with the Committee

to achieve the objectives set out in the Strategic Plan.

Each function implements risk mitigation measures related to discrimination and lack of diversity protection and actively seeks to leverage the opportunities presented by these themes.

5. Monitoring and Transparency

5.1 OVS monitors the effectiveness of its Diversity, Equity & Inclusion actions primarily through:

- Procedures for identifying and periodically assessing internal and external risks;
- Periodic reporting of management system indicators and benchmarking against national and international best practices;
- A reporting system for violations through internal complaints, with designated individuals responsible for the integrity and functioning of the system;
- An internal disciplinary system;
- A continuous dialogue model with stakeholders.

The results are included in the mandatory reports required by law, ensuring transparency and a concrete commitment to the continuous improvement of diversity and inclusion policies.

5.2 Non-Compliance Reporting

In addition to the whistleblowing system, non-compliance with this policy can be reported via the email address: sustainability@ovs.it.

This channel is specifically dedicated to reporting direct or indirect cases of non-compliance with inclusivity criteria and/or forms of discrimination.

The management process ensures confidentiality, prompt verification, and the involvement of the appropriate corporate bodies, without discrimination based on the identity of the whistleblower.

The D,E&I Committee conducts periodic reviews of the status of received reports, examining response times and the effectiveness of the actions taken to resolve them, to ensure continuous improvement.

6. Policy Approval and Updates

6.1 This policy is communicated to all OVS People, as defined in the Code of Ethics, and made available on both the company intranet and the corporate website.

The topics covered must be integrated into the mandatory training programs for all employees in managerial and leadership roles.

6.2 The Human Resources and Organization Department and the Corporate Sustainability function will periodically collect suggestions and analyze market best practices for the proper implementation of this policy. These will be submitted to the Committee for potential updates.

6.3 This policy was drafted by the Human Resources and Organization Department in collaboration with the Corporate Sustainability function and approved by the Chief Executive Officer of OVS S.p.A. on September 17, 2025.

7. Bibliography

Charter for Equal Opportunities and Equality at Work promoted by Fondazione Sodalitas, AIDAF, AIDDA, Impronta Etica, UCID, and the National Office of the Equality Councillor, under the patronage of the Ministry of Labor and the Ministry for Equal Opportunities;

United Nations Sustainable Development Goals;

The 10 Principles of the UN Global Compact;

OECD Guidelines for Multinational Enterprises;

ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;

Guidelines of the D&I Observatory of the UN Global Compact Network Italy.