



Labor and Human Rights Policy



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1. Introduction

1.1. Context

OVS S.p.A. ("OVS") aims to play a significant role in the economic development and well-being of the communities in which it operates. OVS is committed to promoting respect for human rights throughout every phase of its activities, requiring full alignment with this vision from all those who collaborate with the Group—whether employees, partners, shareholders, or any other stakeholders involved in a collaborative relationship.

OVS and its subsidiaries conduct their operations, both in Italy and abroad, in accordance with this policy document, which outlines behavioral guidelines, corporate values, and ethical principles that must be implemented in compliance with the laws of the countries in which each entity operates. In defining this policy, OVS has considered its value chain, focusing on the upstream (suppliers) and direct operations (employees and collaborators), identifying and prioritizing the main impacts, risks, and opportunities involved.

By applying the core values of our corporate culture, we aim to define and pursue continuous improvement goals in our social and environmental impact, seeking the best sustainable alternatives for our products and engaging our customers in choosing inclusive and honest fashion.

This document is inspired by and aligned with the goals described in the United Nations Sustainable Development Goals. These serve as a guide and a clear representation of the commitments that everyone must pursue to establish and strengthen any business or collaborative relationship with OVS.

In defining these policies, OVS intends to establish principles that fully respect the spirit of the law as well as its regulatory provisions, since compliance with the law is a non-negotiable requirement for all Group activities.

1.2 International and European Framework

In developing its corporate policies, OVS has taken into account the following references:

- The United Nations (UN) International Bill of Human Rights:
 - Universal Declaration of Human Rights
 - International Covenant on Civil and Political Rights
 - International Covenant on Economic, Social and Cultural Rights
- The fundamental conventions of the International Labour Organization (ILO) – Nos. 29, 87, 98, 100, 105, 111, 138, 182 – and the Declaration on Fundamental Principles and Rights at Work
- The UN Convention on the Rights of the Child
- ILO Conventions Nos. 107 and 169 on the rights of Indigenous and Tribal Peoples
- The European Convention on Human Rights

Additionally, the following private sector standards and voluntary initiatives, in their most updated versions, have been considered:

- The United Nations Sustainable Development Goals



- The 10 Principles of the UN Global Compact
- The OECD Guidelines for Multinational Enterprises
- The ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy

1.3. Internal and National Framework

OVS's corporate policies are developed in alignment with the following internal regulatory references:

- Code of Ethics
- Model 231 (Organizational and Management Model pursuant to Legislative Decree 8 June 2001, No. 231)
- National Collective Labor Agreement (CCNL) for the Tertiary Sector – Commerce
- National Collective Labor Agreement (CCNL) – DMO Federdistribuzione.

2. Impacts, Risks, and Opportunities

The fashion industry has a responsibility to ensure decent working conditions and protect the people involved throughout the entire production chain. In particular, the textile production phases—including fiber cultivation, spinning, and garment manufacturing—involve millions of workers in contexts where local regulations may not guarantee adequate safety and well-being standards. OVS considers it essential to take an active role in ensuring the respect of the rights of those who contribute to the creation of its products.

For this reason, OVS systematically analyzes the (positive and negative) impacts, risks, and opportunities associated with human rights, 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.

2.1. Impacts

OVS measures its environmental and social impacts using accredited third-party tools to inform its corporate strategy and identify initiatives to mitigate human rights impacts along the value chain.

2.1.1. Negative Impacts

The main negative impacts generated by OVS related to human rights include:

- **Workers in the value chain**
 - The seasonal nature of OVS's business leads to production peaks during the year, which may increase the use of overtime that could potentially occur in unregulated contexts, violating international conventions.
 - Some production areas are located in countries that do not guarantee full freedom of association and effective collective bargaining. Therefore, there is a recognized potential negative impact on fair remuneration due to the political and socio-economic contexts of the production countries, both in terms of alignment with so-called living wages and in terms of gender or other forms of discrimination.
 - The dynamic nature of the business may cause turnover in the supplier base, creating potential instability for workers in the value chain and reducing the ability to protect underrepresented groups.

2.1.2. Positive Impacts

The main positive impacts generated by OVS related to human rights include:

- **Own workforce**

- Offering stable, fair employment opportunities (with low levels of gender pay gap) and a diverse range of roles and responsibilities across various business functions.
- **Workers in the value chain**
 - Through stable and long-term relationships and open dialogue with social partners, OVS contributes to building more favorable working conditions for workers, also acting as a driver of change in raising awareness on issues such as workplace violence and harassment, as well as workers' rights like freedom of association in factories.
 - By participating in multi-stakeholder initiatives, OVS contributes to improving health and safety conditions in workplaces.

2.2. Risks

The main economic and financial risks associated with human rights, considering national and international commitments and regulations, include:

- **Own workforce**
 - Situations of discrimination or gaps in health and safety management in the workplace may lead to sanctions and reputational damage, as well as contribute to negative turnover.
 - A job offer that is not aligned with market trends, lacks inclusivity and flexibility, or includes working hours incompatible with work-life balance may increase turnover and result in the loss of key skills.
- **Workers in the value chain**
 - Wage adjustments due to inflation or alignment with living wages, if not properly planned and managed and not supported by improved productivity, may lead to increased production costs and reduced margins.
 - The lack of tools to improve work-life balance and to adequately train supplier and franchise store staff may increase turnover and negatively affect product and service quality.
 - Workplace accidents, tensions with suppliers, and potential strikes due to poorly managed social dialogue may impact the continuity of production operations.
 - Inadequate attention to workers' rights may lead to increased workforce turnover, affecting product/service quality and causing potential reputational damage.

2.3. Opportunities



Alongside risks, important opportunities arise to strengthen the company's competitiveness and active role:

- **Own workforce**
 - Attracting and retaining talent by offering an inclusive and fair work environment that ensures opportunities and growth for all.
- **Workers in the value chain**
 - Supporting projects to improve working conditions, through monitoring compliance with the Code of Conduct, can contribute to greater job stability in the supply chain, resulting in a more specialized workforce and returns in terms of quality and efficiency.

To effectively address the risks and opportunities outlined above, OVS adopts this corporate Human Rights Policy with the aim of establishing guidelines for integrating corporate strategy, decision-making processes, and continuous monitoring. The policy also aims to engage the entire value chain, define concrete objectives, and promote the protection of human rights through an approach based on due diligence, transparency, and stakeholder collaboration.

3 Corporate Policy on Labor and Human Rights

3.1. Labor Practices

3.1.1. Employment Contracts and Terms

Compliance with applicable laws is a non-negotiable requirement for all OVS activities. Every employment contract must strictly adhere to the law, the collective agreement (where applicable), and any additions defined by the company agreement, ensuring alignment with the spirit of the law.

Each worker must have free access to a written employment contract in their own language, clearly outlining all employment conditions.

Employment must be voluntary and free; no fees or payments of any kind may be required to secure a job contract.

At the time of hiring and during employment, it is not permitted to request the signing of a resignation letter or any other prejudicial document that could be used against the employee.

3.1.2 Working Hours, Rest Breaks, Annual Leave, and Public Holidays

OVS recognizes every worker's right to a defined work schedule, weekly rest, paid annual leave, and the ability to observe public holidays. The company promotes a healthy work-life balance to support physical and mental well-being.

If a public holiday cannot be taken, compensatory leave must be granted within the calendar year or the day must be paid.

Regarding weekly working hours and overtime, OVS adheres to ILO Conventions 001, 014, 106, and 030, and collective agreements, applying the most protective measures for workers.

OVS does not allow:

- More than 48 regular working hours and 12 overtime hours per week, in compliance with local laws.
- More than 40 hours per week or 8 hours per day for workers between the legal minimum age and 18 years old.

To ensure health and safety, OVS guarantees:

- A minimum of 11 consecutive hours of rest between shifts, unless otherwise provided by law or contract.
- A minimum of 24 consecutive hours of rest within seven consecutive days, unless otherwise provided by law or contract.

Overtime must be agreed upon voluntarily and paid at a higher rate than regular hours, as defined by law and contract.

OVS recognizes the right to paid annual leave, as outlined in collective agreements and at least in accordance with ILO Convention No. 132.

Employees with less than one year of service but at least six months are entitled to a proportional amount of paid leave.

3.1.3. Maternity and Parental Leave

OVS places significant emphasis on parental leave policies to support better work-life balance.

Maternity is considered a fundamental right to health and safety for both working women and their children.

In line with legal requirements, maternity leave must always be granted to protect mothers before and after childbirth.

Maternity leave must be guaranteed for a minimum of 12 weeks, including:

- Two months before the expected due date;
- The period between the expected and actual birth date, and three months after birth;
- The option to work until the ninth month of pregnancy, provided that both a national health service specialist and the company's occupational physician confirm it poses no risk to the mother or child. In this case, the five months of maternity leave may be taken entirely after childbirth.

An additional parental leave of up to 10 months (consecutively or not) must be granted to either parent, to be used within the first 12 years of the child's life.

OVS always guarantees reinstatement to the same position after maternity leave, unless incompatible with the child's care needs.

OVS continuously works to reduce the risk of employment interruptions due to difficulties in balancing work and family. Therefore, both women and men may reduce their working hours through part-time arrangements, as provided by the national contract.

3.1.4. Fair Remuneration

OVS operates in full compliance with both the letter and spirit of the law, always promoting decent working conditions for all.

All workers must receive fair pay and a clear payslip, in line with collective agreements and local laws.

Fair pay is only possible in the absence of structural gender pay gaps. OVS is committed to ensuring equal pay and rejects any form of wage discrimination for equal roles and seniority. Wages must meet at least the national legal minimum or the minimum set by collective



agreements, whichever is higher.

Where a recognized standard for a living wage exists and exceeds these thresholds, OVS commits to using it as the minimum wage benchmark.

3.1.5. Freedom of Association, Right to Organize, and Collective Bargaining

OVS values collective bargaining as a key tool for defining employment conditions and regulating relations between management and unions.

The company believes that a responsible employer must foster constructive workplace dialogue based on communication, trust, and respect.

Through the exchange of ideas and information, good working conditions can be created for the benefit of both workers and the business.

OVS respects the principles of freedom of association and the right to collective bargaining, in accordance with local laws and practices.

Where local laws limit these rights, OVS still ensures its people can exercise them.

The company condemns any discrimination against workers exercising these rights and respects freedom of opinion and expression for all parties involved.

3.1.6. Corporate Welfare Plan

To support the well-being of its workforce, OVS offers a corporate welfare plan in addition to legal and contractual provisions.

Benefits include (in addition to leave, parental leave, and sick/injury absences):

- **Health and pension:** supplementary health fund, supplementary pension plan for severance pay, health insurance, on-site medical clinic, medical leave, smoke-free workplace.
- **Personal services:** company cafeteria (70% subsidized), take-away dinner service, discounts via partner companies for health & wellness, culture and leisure, shopping and gym memberships, tax assistance, installment purchase of OVS products, "OVS baby shower" for new parents, on-site bank counter, mail/package pickup, free parking.

3.1.7. Notice Period, Probation, Dismissal, and Disciplinary Actions

In full compliance with legal and ethical standards, OVS ensures the following:

Notice Period

Part-time employees have the same notice period as full-time employees, calculated in calendar days regardless of work schedule. Notice periods begin on the 1st or 16th of each month, as per the collective agreement.

Probation and Dismissal

The probation period is defined by the collective agreement. For managerial levels, it is calculated in calendar days; for other levels, in actual working days.

During probation, pay must not be below the contractual minimum for the assigned role.

The employment relationship may be terminated at any time during probation by either party, without notice, with entitlement to severance pay and accrued benefits.

In case of dismissal or resignation, the employee is entitled to a proportional share of annual leave based on months worked.

Disciplinary Actions

OVS may apply the following disciplinary measures based on the severity of misconduct:

- Verbal warning for minor infractions;
- Written warning for repeated minor infractions;
- Fine not exceeding four hours of regular pay;
- Suspension from pay and duties for up to 10 days;
- Dismissal without notice and with all applicable legal consequences.

OVS is required to inform all employees of disciplinary rules through accessible postings in the workplace.

3.2 Human Rights

3.2.1. Diversity and Inclusion

OVS values and appreciates cultural and background diversity, recognizing its growing importance in the context of the Group's ongoing internationalization process. OVS acknowledges the value of every individual and is committed to offering equal employment opportunities without any form of discrimination based on ethnicity, religion, beliefs, nationality, gender, physical condition, age, or social status. In addition to condemning and sanctioning behaviors contrary to these principles, OVS is committed to creating and maintaining an inclusive work environment where respect for human rights is a priority and where there is no room for discrimination. In line with this, OVS promotes an inclusive environment tailored to individual needs, where everyone can express their full potential, recognizing diverse perspectives and personal contributions as sources of enrichment and development.

- **Recruitment and selection:** OVS ensures equal treatment of all candidates in line with this policy.
- **Performance evaluation:** Managers assess performance objectively, excluding any factors related to family responsibilities, gender, sexual orientation, race, color, age,

pregnancy, marital status, religion, political opinions, nationality, ethnicity, caste, illness, or disability—focusing solely on job performance.

- **Managerial responsibility:** Managers must consider the needs and strengths of their team members, encouraging development through targeted training plans.
- **Internal promotions and compensation policies:** The HR and Organization department ensures gender representation in MBO incentive plans and stock option programs.
- **Internal organization:** Committees and working groups must ensure diversity in gender, experience, etc.
- **Subsidiaries:** While respecting local cultural specificities, OVS ensures equal opportunities.
- **Workforce representation:** OVS aims to reflect the social context in which it operates, ensuring proportional representation of all social groups.

OVS prioritizes equal opportunities for women in its extensive supply chain, especially in regions where discriminatory cultures are more prevalent. Its mission is to foster improvement and growth in the communities it operates in, with a focus on empowering women through training and professional development programs equal to those offered to men.

3.2.2 Harassment and Violence

OVS operates in full compliance with the spirit and letter of the law, as well as internal policies and procedures.

In line with ILO Convention 190, OVS recognizes that any form of harassment or violence in the workplace is a serious violation of human rights and a threat to equal opportunity. It therefore condemns all forms of abuse or violence within its sphere of influence. Everyone at OVS must treat colleagues and partners with the utmost respect, avoiding any intimidating or harassing behavior. To address gender-based violence, OVS guarantees free legal advice and support to women employees who experience violence or harassment.

3.2.3 Child Labor

OVS condemns all forms of child labor exploitation. Only individuals who have reached the legal minimum working age, in accordance with local laws and ILO Conventions 138 and 142, may be employed directly or indirectly by OVS. For young workers between the legal minimum age and 18 years, OVS ensures that they:

- Are registered in a dedicated log;
- Are not assigned hazardous tasks, overtime, or night shifts;
- Are not exposed to work that compromises their education, health, or development;



- Are easily identifiable through uniforms, badges, or other appropriate means.

OVS requires its suppliers to implement systems that prevent child labor and ensures compliance throughout the supply chain. In case of violations, OVS acts in the best interest of the child, involving the family and/or specialized organizations. It commits to removing the child from work, maintaining family income, and supporting educational programs to prepare the child for future employment upon reaching legal age.

3.2.4 Forced, Bonded, Prison, and Undeclared Labor

OVS does not accept any form of forced or coerced labor, including the use of prison labor outside of social reintegration programs, whether directly or through contractors or other arrangements.

Coercive practices such as threats, document withholding, or schemes resembling forced labor (e.g., Sumangali) are strictly prohibited. Except as provided by law, employees must be free to leave the workplace or resign without coercion.

OVS prohibits unlawful financial penalties or disciplinary measures that undermine human dignity.

No form of human rights violation is tolerated within OVS's global organization or supply chain.

3.3 Health and Safety

3.3.1 Workplace Health and Safety

OVS ensures strict compliance with all local health and safety laws.

It has established a Prevention and Protection Service (PPS) and appointed a qualified Health and Safety Officer (RSPP) as required by law.

The RSPP is responsible for:

- Identifying and assessing risks and proposing safety measures;
- Developing preventive and protective measures and control systems;
- Drafting safety procedures for company activities;
- Proposing training and information programs;
- Participating in health and safety consultations and annual meetings;
- Informing workers about:
 - General health and safety risks;
 - First aid, fire prevention, and evacuation procedures;
 - Names of first aiders, fire wardens, and the company doctor.



These procedures also apply to subsidiaries, adapted to local regulations.

3.3.2. Occupational Safety Management System

In line with Legislative Decree 81/2008, OVS has implemented a safety management system that includes legal compliance, coordination meetings, and regular monitoring of workplace safety.

It follows UNI-INAIL guidelines for its procedures.

3.3.3 Risk Assessment and Protective Measures

Employers, in collaboration with the RSPP and company doctor, and after consulting the safety representative (if present), conduct risk assessments and prepare Risk Assessment Documents (DVRs).

These documents are prepared for both headquarters and each store or warehouse and include:

- Risk analysis and adopted safety measures;
- Use of personal protective equipment;
- Improvement plans;
- Implementation procedures and responsible roles;
- Names of the RSPP, safety representative, and company doctor;
- Identification of roles requiring specific skills and training.

DVRs are updated whenever there are significant changes in work activities.

3.3.4 Emergency and First Aid Management

Given OVS's low-risk profile, emergency procedures focus on prevention, rapid response, and evacuation.

Emergencies covered include: power outages, fire alarms, sprinkler activation, earthquakes, and HVAC failures.

The technical services manager reviews procedures annually and reports to the Supervisory Body.

Safety signage, sound systems for evacuation, and first aid kits are present in all locations.

3.3.5 Periodic Safety Meetings

An annual safety meeting is held with the employer, RSPP, company doctor, and safety representative (if present). The Supervisory Body is also invited or informed.

The meeting reviews the DVR, accident trends, training programs, and planned safety interventions.

3.3.6 Health Surveillance



Health surveillance is conducted by the company doctor, who maintains a medical file for each monitored employee.

Medical exams are conducted:

- Before employment;
- Periodically during employment;
- Upon job changes;
- At the end of employment (where required by law).

Exams are company-funded and include clinical and diagnostic tests.

The company doctor visits the workplace at least twice a year with the RSPP.

3.3.7 Training and Information

In accordance with Articles 36 and 37 of the Consolidated Safety Act, OVS provides training and information on:

- Compliance with safety policies;
- Expected behaviors and consequences of non-compliance.

Training is managed by HR in collaboration with the RSPP and sales management.

Store-level training is overseen by store managers; safety team training is coordinated by technical services.

Headquarters training is provided upon hiring.

Additional voluntary programs cover first aid, healthy lifestyles, nutrition, smoking cessation, and more.

A free on-site medical clinic is available to staff.

3.3.8 Coordination and Control of Outsourced Work

In compliance with Legislative Decree 81/2008, when outsourcing work, technical staff (with legal support if needed):

- Verify the technical-professional suitability of contractors;
- Provide detailed information on workplace risks and safety measures;
- Cooperate on accident prevention;
- Coordinate safety measures to avoid interference between contractors.

The integrated DVR is attached to all contracts.

Contractor staff must wear ID badges with photo, name, and employer.

Badges must be visibly worn.

OVS enforces strict safety and hygiene standards:



- Workplaces must be safe and healthy;
- Temperature and ventilation must be adequate year-round;
- Lighting must be sufficient for all tasks;
- Sanitary facilities must be clean, adequate, and gender-separated;
- Workers must have unrestricted access to restrooms.

OVS directly monitors production sites and collaborates with independent suppliers to improve health and safety standards, preferably through multi-stakeholder programs aligned with the above policies.

4. Roles and Responsibilities

Achieving the sustainability goals of the OVS Group, as outlined in this document, requires a collaborative approach and a clear definition of roles and responsibilities within the organization.

Departments work together to make sustainability objectives concrete and generate a positive global impact, following the principle of shared responsibility.

The Chief Executive Officer is responsible for approving this policy and the related action plans.

The Operations, Sourcing, Buying & Merchandising Department is specifically tasked with:

- **Planning and Control:** Defining sustainability plans, setting objectives, and periodically evaluating progress through data analysis and key performance indicators;
- **Activating Internal Functions:** Engaging and coordinating various departments to ensure strategic alignment and implementation of necessary actions;
- **Promoting Awareness:** Fostering a culture of sustainability within the company by supporting employee training and awareness.

All departments involved in the decarbonization plan (Product, Sourcing, Logistics, etc.) are responsible for translating objectives into concrete actions, integrating sustainability principles into daily operations:

- **Operational Responsibility:** Operational functions must identify and implement solutions to reduce their impacts in line with this policy;
- **Innovation and Development:** Operational functions must seek innovative solutions in all areas to support the transition to a more sustainable model, coordinating with the Corporate Sustainability function for adoption;
- **Performance Management:** Each function, directly or indirectly involved, contributes to achieving objectives by measuring results and ensuring transparency and accuracy in reporting.

A long-term incentive system for top management and annual MBO targets for the most involved functions are linked to the achievement of the objectives set out in this policy.

Acceptance of the OVS Labor and Human Rights Policy by suppliers commits them to comply with its provisions and to inform their subcontractors, ensuring compliance.

Any innovation or environmental performance improvement program must strictly comply with the Labor and Human Rights Policy. In particular, the use of forced labor or any unlawful practices identified by OVS's Policy, Code of Conduct, local laws, or international labor conventions is explicitly prohibited in the installation of renewable energy systems or other environmental impact reduction systems.



By accepting the OVS Labor and Human Rights Policy and Code of Conduct, OVS reserves the right to:

- Inspect and test any product at any stage of production and/or packaging, using appropriate methods, at any time upon request;
- Cancel the order or return delivered products if they do not comply with OVS's Policy principles and provisions;
- Require the supplier to make necessary changes, using a Remediation Action Plan to help them comply with OVS's Policy.

To implement and monitor the commitments expressed in this document, OVS has adopted a Due Diligence policy and specific action plans derived from the Group Sustainability Plan.

5. Non-Compliance Management

In case of non-compliance with this policy, a Remediation Action Plan is defined, outlining responsibilities and criteria for resolving the identified issues.

Non-compliance may be identified through:

- Operational activities;
- Negative outcomes from quality inspections, internal or third-party audits;
- Interviews or discussions with staff or suppliers;
- Internal or external reports, including anonymous ones.

OVS's approach includes:

- Identifying the root cause;
- Classifying the issue by severity:
 - Critical
 - Major
 - Minor
 - Opportunity for improvement

An Escalation Plan is defined, indicating corrective solutions or stages, with deadlines for implementation. A Follow-up Plan is activated with periodic checks on the progress of corrective actions. If delays occur, a warning is issued to the supplier.

If non-compliance is found in production processes, OVS may involve other brands working with the same supplier to increase pressure for resolution.

If the issue is not resolved within the set timeframe or recurs, OVS will initiate an exit strategy from the supplier relationship, aiming to minimize difficulties for factory workers. The supplier will be notified that no new orders will be placed, but existing contractual commitments will be honored, and the situation will continue to be monitored until the relationship ends—unless improvements are made.

6. Incentive System

OVS offers incentive mechanisms that suppliers can access once full compliance with the Code of Conduct is ensured.

These incentives are based on supplier performance in social and environmental initiatives that go beyond mere compliance and are assessed through the HIGG platform.

Incentives include:

- Increased order volumes;
- Multi-season supply continuity;
- Support for organizing training and workshops for supplier employees;
- Involvement in internationally relevant special projects.

7. Monitoring and Transparency

Effective management of the initiatives and objectives outlined in this Policy requires continuous monitoring and a strong commitment to transparency.

Through a systematic approach, OVS ensures internal performance control and clear communication of results to all stakeholders using the most appropriate tools.

The Corporate Sustainability function is responsible for measuring and monitoring climate and energy-related performance through:

- **Data Collection and Analysis:** Ongoing monitoring of key indicators;
- **Goal Review:** Updating progress on Labor and Human Rights objectives, identifying deviations, and defining corrective action plans;
- **Support Platforms:** Using advanced tools (Worldly, Workiva) to obtain reliable supplier performance data and ensure full value chain visibility;
- **Internal Reporting:** Preparing periodic reports for Management and departments, ensuring constant updates on strategic initiatives.

Transparency is a core value of OVS's sustainability approach and is essential for building and maintaining stakeholder trust.



In collaboration with Corporate Communication, OVS implements various communication initiatives to share progress, challenges, and future goals:

- **External Communication:** Publishing annual sustainability reports in compliance with the Corporate Sustainability Reporting Directive (CSRD), reviewed by third parties to ensure transparency and reliability;
- **Stakeholder Engagement:** Open dialogue with suppliers, customers, investors, NGOs, and other stakeholders;
- **Digital Updates:** Sharing key initiatives and achievements in real time via the website and digital channels.

Operational actions and KPIs are the sole responsibility of each department. Significant changes in metrics or other relevant topics must be discussed in the CCRS (Control, Risk, and Sustainability Committee) and in the Board of Directors' dedicated sustainability sections.

8. Communication and Training

OVS Policies are made available to internal and external stakeholders through publication on the corporate website.

To ensure proper understanding of the Policy by all employees, OVS also provides a training plan to promote awareness of its principles.

The Corporate Sustainability function will periodically collect feedback and suggestions regarding the implementation of this Policy and propose updates as needed.

This Policy was drafted by the Corporate Sustainability function and approved by the CEO of OVS S.p.A. on 31/03/2025.

Any future amendments will be submitted to the CEO for approval.