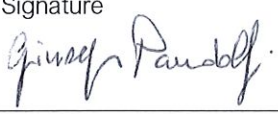
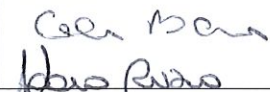



DESCRIPTION AND APPROVAL OF REVISIONS

Rev.	Date	Description of modifications
0	3.11.2023	First issue

Prepared by Quality Assurance	Verified by Personnel and Corporate & Legal Affairs	Approved by the General Manager
Signature 	Signature 	Signature 

**PURPOSE OF THE PROCEDURE**

The purpose of the following procedure is to define the operational methods to facilitate communication of findings and suggestions by all employees and stakeholders on aspects of UNI/PdR 125:2022 Gender Equality. To this end, Allegrini S.p.A. has set up a system for forwarding communications in anonymous form.

**APPLICABILITY OF THE PROCEDURE**

This procedure applies whenever there is a need to report any deviation from the requirements of UNI/PdR 125:2022 on gender equality, including any forms of physical, verbal or digital abuse in the workplace, as well as to communicate any opinions or suggestions for change/improvement within the organisation with regards to gender equality.

Stakeholders are those who collaborate with Allegrini S.p.A. on a professional level, in any capacity and under any form of contract. These include clients and suppliers, as well as employees and collaborators.

**WORKING METHODS**

Any Stakeholder (current and potential customers, partners, suppliers, professionals, public bodies and their consultants, representatives, officers, employees, etc.) may report, also anonymously, any discrepancies with the requirements of the UNI/PdR 125:2022 standards, as well as any opinions or suggestions for change/improvement in the organisation with regards to gender equality.

The report can be made using the following specially prepared forms available from the company's head office or on the company website at [www.allegrini.com](http://www.allegrini.com).

- Mod. PPDG 01\_01 "Reporting opinions and suggestions"
- Mod. PPDG 01\_02 "Reporting gender-based violence in the workplace"

These forms can be delivered through the following channels:

- Special reporting boxes within the company.
- Email segnalazioni@allegrini.com (viewed exclusively by the Steering Committee)
- Post (ordinary or registered mail addressed to Allegrini S.p.A., Vicolo Salvo d'Acquisto,2, Grassobbio (BG) - for the attention of the Steering Committee.

The report may concern the following aspects:

- Physical abuse
- Verbal abuse
- Digital abuse (Harassment)
- Use of inappropriate language
- Mobbing
- Non-inclusive conditions
- Discrimination (gender, race, religion, sexual orientation, etc.)
- Unequal pay conditions
- Conduct contrary to the Company Policy and Principles
  1. Sexual harassment:
    - Unwanted behaviour of a sexual nature, such as offensive comments, unsolicited advances or intrusive glancing/staring.
    - Sexual demands in exchange for job opportunities, promotion or other professional concessions.
    - Distribution of pornographic or offensive material.
  2. Harassment based on discrimination:
    - Insults, comments or discriminatory behaviour based on race, ethnicity, religion, sexual orientation, gender, age or other personal characteristics.
    - Unfair or differential treatment of an employee due to a personal characteristic protected by law.
  3. Verbal or behavioural harassment:
    - Insults, derision or abusive language directed at an employee.

- Humiliation, taunts or other forms of verbal or behavioural abuse.
- 4. Digital or online harassment:
  - Harassment that takes place through digital means, such as emails, text messages, corporate chats or corporate social media.
  - Spreading false or embarrassing information about an employee online.
- 5. Harassment based on age:
  - Discrimination or derision based on an employee's age, above all discrimination against older employees.
- 6. Maternity-related harassment:
  - Unfavourable treatment or discrimination against pregnant women or new mothers.
  - Offensive or insensitive comments about motherhood or family planning.
- 7. Harassment based on religion or beliefs:
  - Insults or discriminatory behaviour based on an employee's religion or personal beliefs.
- 8. Harassment based on disability:
  - Discrimination or offensive comments directed at employees with disabilities.
  - Failure to make reasonable efforts to enable an employee with a disability to perform their job.
- 9. Harassment based on sexual orientation:
  - Insults, comments or discrimination based on an employee's sexual orientation.
- 10. Harassment based on gender:
  - Discriminatory comments or behaviour based on an employee's gender, whatever this may be.

The report may also concern the following aspects:

- Expression of opinions/suggestions for change in the organisation aimed at improvement and at fostering dialogue and exchange.

### EFFECTS

Reports and complaints regarding gender equality are handled by the Steering Committee.

On receipt of a report, the Steering Committee will initiate an impartial and confidential internal enquiry and will work to ensure that:

- those involved act with the necessary discretion to protect the dignity and confidentiality of each individual.
- no information is disclosed to persons not involved in the case.
- reported cases are examined and handled without undue delay.
- all parties involved are heard and treated fairly and impartially.
- detailed information is collected.
- if appropriate, the need for external assistance is assessed.

If it is established that gender discrimination or gender-based harassment/violence has occurred in the workplace, Management and the Gender Equality Steering Committee meet to objectively assess the incident and decide what action to take or measures to implement.

The Management intervenes directly, in the manner it deems most appropriate, in order to interrupt the detrimental behaviour and to restore a safe working environment, adopting, if necessary, the Allegrini disciplinary code amended with the current legislation to protect gender equality. If appropriate, the episodes found will be reported to the competent authorities, with reference to the civil and criminal procedures dictated by current legislation, and, if necessary, the provincial Equality Advisor for the activation of projects and positive actions will be involved.

Allegrini will ensure that there are no repercussions for the complainant(s) and will supervise the effective cessation of the harmful conduct by ensuring that victims are protected from further abuse and discrimination.

Victims will receive support and, if necessary, be assisted in the process of returning to work. It should be noted that any reports that are totally unsubstantiated may result in action being taken against those responsible for making the report.



On the basis of the conclusions of the investigation, the Steering Committee will take appropriate corrective action, such as training, disciplinary sanctions or other measures aimed at resolving the problem. The Gender Equality Steering Committee guarantees that when defining corrective and preventive actions to remedy a reported issue, it will undertake, through training and awareness-raising of staff and all stakeholders, to render the reporting of issues a positive and active means by which the organisation aims to improve its Gender Equality Management System.

The reports received will be recorded in the Report Register, showing their outcome and what action was subsequently taken, and will serve as input for the Periodic Review of the Gender Equality Management System.

#### CONFIDENTIALITY

All Reports are handled with the utmost confidentiality concerning the identity of the Reporting Party and of all the subjects and facts reported. Suitable communication methods will be adopted and used to protect the identity of the persons mentioned in the reports, as well as the confidentiality of the identifying data of the reporting persons, ensuring in any case that the data acquired is not communicated to anyone not connected with the reporting management process described in this Procedure.

#### PROTECTION OF THE REPORTING PARTY AGAINST RETALIATORY AND/OR DISCRIMINATORY ACTS

Forms of retaliation or discrimination against reporting parties (e.g., dismissal, changes in position, etc.) are not allowed. In the event of disputes relating to the imposition of disciplinary sanctions, or to changes in position, dismissal, transfer, or any other organisational measures with either direct or indirect negative effects on working conditions, following the submitting of the Report, the onus is on the employer to prove that such measures are based on reasons unrelated to the report itself.

#### PROTECTION OF PERSONAL DATA

The management of Reports may involve the processing of the personal data of the reporting party, the subject reported and any third parties, as well as any further information collected as part of the enquiry aimed at ascertaining and verifying the veracity or otherwise of the Report. The processing of personal data in relation to the Reports is carried out pursuant to Regulation (EU) 2016/679 on the protection of personal data of natural persons (GDPR), as well as any other applicable laws and/or regulations.

#### ANNEXES

Mod\_PPdG 03\_01\_Opinions and suggestions  
Mod\_PPdG 03\_02\_Gender-based violence in the workplace  
Mod\_PPdG 03\_03\_Register of reports