



## **CORPORATE PROCEDURE P&O 008**

*HR Policy for Gender Equality*

**Company:** *OTB Group*

**Issued by:** *People & Organization*

**Approved by:** Governance Committee

**Type:** *Corporate Procedure*

**Effective as from:** *September 2023*

**Recipients:** *OTB Group employees*

**Version No.:** **01**

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## **1. Foreword**

The OTB Group (hereinafter also 'the Group') is committed to promoting a culture of gender equality in all its operations, recognising everyone's value and contribution regardless of their gender, sexual orientation, age, nationality, religion, physical, cognitive or other abilities or health status.

The HR Policy on gender equality, defined by Top Management in collaboration with the Diversity, Equity & Inclusion Committee (hereinafter also 'DEI Committee') aims at ensuring a fair, safe and stimulating environment for all employees, collaborators and partners.

Inclusion is a fundamental principle inspiring the Group, which promotes diversity as a strategic aspect for innovation, creativity and competitiveness, and which is committed to enhancing and protecting it in every area.

The Policy and compliance therewith are the responsibility of the People & Organization Department in collaboration with the DEI Committee and the person responsible for DEI issues for the Group, appointed by the Committee.

### **1.1 Recipients and relevant standards**

This Policy is intended for all OTB Group collaborators and is communicated and disseminated internally to all Group employees, other than being made available on the OTB Group's corporate intranet platform to all stakeholders.

The Parent Company and other Companies subject to the OTB Group's direction and coordination undertake to implement and adopt this Policy, without prejudice to their own specificity and independence.

The Policy refers to and applies along with the following internal documents:

- Code of Ethics;
- DEI Policy;
- Diversity, Equity & Inclusion Plan;
- Diversity, Equity & Inclusion Committee Regulations;

- Procedure for the anonymous reporting of unlawful conduct, regulated in the Code of Ethics.

The relevant external standards are:

- Uni/PdR 125:2022
- ILO (International Labour Organization)
- UNGC (UN Global Compact)
- Law 162/2021 on gender equality within companies

## DEFINITIONS AND REFERENCES

TERM	MEANING
OTB Group	It is the set of legal entities consisting of the OTB Parent Company and the companies controlled thereby, whether directly or indirectly (Global Business Headquarters, Branches, sourcing, manufacturing, business units, financial units, non-profit organizations, etc.).
Diversity, Equity & Inclusion (DEI)	These three terms are the pillars of companies' human rights policies: the first stands for acceptance of all genders, ages, etc., the second means equal treatment for all and the third signifies the involvement of all categories in company dynamics.
Code of Ethics	A document defining the set of principles of conduct to be observed at work.
DEI Policy	A document defining the guidelines that determine the Organization's commitment to issues related to gender equality and the enhancement of diversity, equity and inclusion.
Diversity, Equity & Inclusion Plan	A document that defines the company's short-, medium- or long-term strategy in relation to gender equality, the enhancement of diversity, equity and inclusion.

Diversity, Equity & Inclusion Committee Regulations	A document that defines the guidelines for the monitoring and management of the Diversity, Equity & Inclusion Committee
Diversity, Equity & Inclusion Committee	A body within the Organization that is required to carry out assessments related to the management and monitoring of issues connected with diversity, equity, inclusion and gender equality.
Top Management	This means the Chief Executive Officer of the Parent Company and those reporting directly thereto, as well as the Chief Executive Officers of BWs and Regions
Caregiving	Caregiving and assistance provided to other people

## 2. Principles of conduct

The Group operates in compliance with applicable regulations in connection with diversity, equity and the promotion of inclusion.

In this Policy the OTB Group identifies the principles of conduct to be adopted to ensure respect for gender equality within corporate processes for the management of human resources. The areas that identify these principles are reported and emphasised in this document, and specifically concern:

- Selection and recruitment;
- Performance and Talent Management systems;
- Training and Growth;
- Remuneration;
- Work - life balance;
- Turnover analysis;
- Parenting, Family and Caregiving;

- Preventing and reporting workplace harassment;
- Inclusive language.

## **2.1 Selection and Recruitment**

The OTB Group is committed to attracting and recruiting people from different backgrounds and realities and to ensuring gender-balanced recruitments at all organisational levels. The Group also makes sure that job descriptions are gender-neutral.

During the selection process, practices are adopted to avoid gender discrimination, specifically focusing on eliminating bias and promoting gender balance in candidate short-lists, and on the gender-neutral definition and communication of roles and duties.

The OTB Group assesses candidates on the basis of their professional background, skills, competences and qualifications, without any gender-based discrimination. During interviews, candidates are not asked about potentially discriminatory topics, such as marriage, pregnancy or family care. The company also ensures that those involved in the selection process are adequately trained on gender equality and on any cognitive biases that may negatively influence the assessment of candidates.

## **2.2 Performance and Talent Management systems**

The OTB Group is committed to enhancing people's potential, ensuring equal opportunities for professional growth without any gender distinction. To this end, it adopts transparent and uniform standards in its Performance Management and Talent Management processes.

The Performance Management system fosters dialogue between managers and employees, creating a culture geared towards enhancing people's skills, without any gender distinction. In the final definition of evaluations, the People

& Organization department checks that such evaluations are not influenced by gender bias.

In addition, the OTB Group will include Diversity, Equity and Inclusion issues within its leadership skills model, which is one of the performance system evaluation standards.

The Talent Management system is based on assessing the skills, performance and growth potential of employees, without any gender-based discrimination or unequal treatment so as to ensure opportunities for professional growth and promote the best talent.

By pursuing gender-balanced succession planning and career advancement activities, the OTB Group supports the career development of women so as to foster their presence in responsibility and leadership roles and achieve gender balance in executive positions.

## **2.3 Training and Development**

The design and assignment of training and development programmes, at all levels, follows principles of inclusion and equality so as to avoid these being affected by gender bias and stereotypes. Moreover, training processes and opportunities must ensure fair and equal participation of both genders.

Training is planned for all employees, aimed at raising awareness in the organization on the enhancement of differences, gender equality, inclusion and the impact of these issues on business. Specifically, everyone within the company participates in training sessions focused on issues related to unconscious bias and the ability to communicate in an inclusive manner.

## **2.4 Remuneration**

The OTB Group acknowledges that fair and transparent remuneration is essential to ensure an inclusive and merit-based working environment as well as to attract, motivate and retain the best talent.

The OTB Group believes that all employees should be paid according to their skills and qualifications and should be evaluated according to their contribution and potential, without any gender-based discrimination or any other discriminating factor.

To ensure pay equity, transparent and objective standards are applied in annual remuneration review processes and in performance and talent management systems.

The OTB Group monitors data on employees' remuneration and benefits, progressively correcting any pay inequalities for equal work or equivalent roles that appear unjustified or potentially due to gender bias.

Lastly, the Group is committed to periodically informing employees about the company's remuneration policies, also with respect to benefits, bonuses and welfare programmes. Therefore, welfare initiatives take into account the needs of people of all kinds and ages.

## **2.5 Work - life balance**

The OTB Group is committed to adopting measures ensuring work-life balance for all employees, also through specific agreements which, where applicable and in compliance with organisational needs and possibilities and the relevant regulatory framework, allow for part-time work for those requesting it; it also offers flexible working hours by communicating simple and accessible rules and procedures to use this option.

The Group periodically reviews the flexibility needs of employees, offering smart working options or other forms of flexible working, and promoting, where possible and on the basis of the employee's role within the organization, the possibility of holding work meetings at times that are compatible with work-life balance.

## **2.6 Turnover analysis**

The Group regularly monitors Turnover data by gender in order to analyse trends, check for irregular terminations of employment and promptly ensure actions for improvement and prevention. Particular attention is paid to terminations of employment for reasons that might be gender-related, (e.g. employees not returning to work after maternity leave, difficulties in ensuring work-life balance, etc.), so as to monitor and prevent potentially discriminatory conduct. The OTB Group has thus defined an Exit Interview process that ensures the prompt detection of terminations of employment for conduct not in accordance with the principles included in this Policy and in the Diversity, Equity & Inclusion Policy.

## **2.7 Parenting, Caregiving**

The OTB Group adopts a flexible working policy (e.g. smart working, flexible working hours) that is designed to promote the well-being of its employees in every area and stage of their lives, whilst ensuring the achievement of their work and professional growth goals.

The OTB Group also promotes parenting as a value and source for the acquisition of new skills and encourages the sharing of family responsibilities. The OTB Group is thus committed to implementing initiatives and training that support motherhood, fatherhood and, more generally, caregiving, assisting both new parents and people managers in the various stages of parental leave and arranging for back-to-work meetings for new parents.

## **2.8 Preventing and reporting workplace harassment**

The OTB Group combats harassment in the workplace with a monitoring, prevention and training plan, in order to promote a culture of respect and responsibility among employees and to educate staff, at all levels, on the inadmissibility of any form of violence.

The OTB Group guarantees the possibility for employees to report any form of non-inclusiveness and behaviour that does not comply with the Code of Ethics by sending an anonymous report to the mailbox (codeofethics@otb.net) as indicated in Article 5 of the Code of Ethics. Reports, where grounded, are submitted to the DEI Committee to identify any remedies.

## **2.9 Language**

To communicate in an effective and respectful manner, both inside and outside the organization, the OTB Group requires the adoption, in all forms of language (whether written, oral or non-verbal), of an inclusive language which takes into account everyone's point of view and sensitivity, different identity and personal characteristics, avoiding non-inclusive and potentially offensive expressions. Where possible, a neutral language should be used. The Group fosters initiatives to spread the culture of inclusive language among employees.

## **3. Responsibility and Monitoring**

This Policy is designed to promote the evolution of corporate culture in order to foster gender equality throughout the organization. Hence all employees are involved and play an active part in achieving their goals.

The People & Organization department, the Group's Top Management and the Diversity, Equity & Inclusion Committee (DEI) are responsible for the dissemination and implementation of this Policy, which is fully incorporated into the broader Diversity, Equity & Inclusion strategy and the OTB Group's Sustainability strategy. The People & Organization department, in collaboration with the DEI Committee, monitors and checks every year whether the processes listed in the previous paragraphs are consistent with the Policy for Gender Equality, also by using specific indicators and monitoring the same. Action plans for realignment to established practices and objectives are also defined in case of distortions or critical issues in order to ensure continuous improvement.