



CORPORATE PROCEDURE P&O 007

Diversity, Equity & Inclusion

Company: *OTB Group*

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1. FOREWORD

This Diversity, Equity & Inclusion Policy (hereinafter also 'the Policy') defined by the OTB Group's Top Management in collaboration with the Diversity, Equity & Inclusion Committee (hereinafter also 'DEI Committee' or 'Committee'), sets out the principles, objectives, guidelines that define the Group's commitment to enhancing Diversity, Equity and Inclusion.

1.1 RECIPIENTS AND RELEVANT STANDARDS

This Policy applies to the Group's internal staff as well as to external staff collaborating therewith on an ongoing basis.

The relevant external standards on which this Policy is based are:

- UNI/PdR 125:2022 Practice

The relevant internal documents for this Policy are:

- Code of Ethics;
- Diversity, Equity & Inclusion Plan;
- DEI Committee Regulations;
- HR Policy for Gender Equality.

2. COMMITMENT OF THE OTB GROUP

The OTB Group (hereinafter also 'the Group') has always been actively committed to promoting and respecting the principles of Diversity, Equity and Inclusion with respect to all its staff and anyone working in the name and/or on behalf and/or in the interest of the same, or anyone having business relations or collaborating therewith in any other way.

Diversity, Equity and Inclusion are at the heart of the values of the OTB Group: they are essential levers to ensure the Group's success and to make its people capable of reflecting, understanding and enhancing the diversity of the customers they serve, to promote well-being and social progress, and to ensure a fair working environment.

The OTB Group has thus embarked on a path made up of great commitment and concrete actions to eliminate all forms of direct or indirect discrimination and any cultural, organisational or material barrier that may limit individuals' full expression and their full enhancement within the organization.

3. KEY PRINCIPLES FOR THE OTB GROUP

The OTB Group pays particular attention to people. Therefore, it promotes messages, actions and behaviours that create a sense of belonging and a working environment in which everyone can feel welcome, free to fully express their identity, ideas and skills.

Hence, the principles of Diversity, Equity and Inclusion are fundamental in the management of the Group's activities; these principles represent the ethical standard for all Group companies and are specified as follows:

1. Diversity: 'diversity' means observing and promoting the personal uniqueness and differences (in terms of nationality, ethnicity, sexual orientation, gender, physical, cognitive or any other abilities or health status) of all individuals in a society.

Equity: 'equity' means guaranteeing equal opportunities and justice through policies and processes that enable everyone to have the right conditions to contribute effectively to company life. Inclusion: 'inclusion' means creating a context that promotes culture and conducts through which everyone can feel welcome, safe and free to express themselves.

4. OBJECTIVES OF THE OTB GROUP

All diversity characteristics are equally important for the Group, which therefore promotes their respect and enhancement within its business practices so as to develop an inclusive culture, identifying them as follows:

- gender;
- age;
- disability;
- sexual orientation;
- religion;
- nationality.

The OTB Group has also identified the issues (as indicated in the UNI/PdR 125:2022 Practice) for which gender equality objectives have been defined, detailed in the Diversity, Equity & Inclusion Plan (hereinafter also the 'DEI Plan'), and for which Performance Indicators (KPIs) have been identified for the purpose of measuring and monitoring them:

- Culture and strategy: improvement of the organization's working environment by promoting and supporting inclusion, gender equality and enhancing gender diversity;
- Governance: implementation of a governance model within the organization that defines the appropriate organisational safeguards and the presence of the minority gender in the organization's governance and control bodies, as well as processes for identifying and remedying any case of non-inclusion;
- HR processes: implementation of HR processes relating to different stages of a resource's life cycle within the organization, based on the principles of inclusion and respect for diversity;

- Opportunity for the growth and inclusion of women in the company: improvement of the organization's ability to ensure gender-neutral access to and acceleration of internal career and growth paths;
- Gender pay equity: implementation of processes for the balancing of remuneration;
- Parental and family protection and work-life balance: implementation of policies to support staff in their parental care activities.

5. IMPLEMENTATION

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.

Each Company ensures the correct and constant application of what is set out herein and its widest possible dissemination within the company and to stakeholders, in compliance with its confidentiality obligations, its autonomy and independence.

6. COMMUNICATION AND DISSEMINATION

The OTB Group undertakes to communicate and disseminate the principles laid down in this Policy within the organization and to all its stakeholders, through identified internal and external communication processes.

Internal communication processes

Internal communication processes, such as the company newsletter, feedback procedures, physical or digital communications to employees, must ensure the achievement of the objectives identified by the Group:

- use procedures and tools that are fully accessible in physical, linguistic and cultural terms;
- ensure the dissemination of inclusive strategies to strengthen an organisational model among people that is aimed at respecting and enhancing diversity and gender equality;

- train and raise awareness among employees at all levels, including management, with regard to the issues covered by this Policy.

External communication processes

External communication processes, namely all those activities aimed at communicating with the public, through physical or digital channels, must ensure the achievement of the following objectives:

- ensure the propagation of a language geared towards inclusion and gender equality, highlighting its added value;
- ensure equal gender representation among speakers at all panels, workshops, conferences or other events, including scientific ones, in which the Group takes part;
- use external communication tools that can be easily accessed and used by stakeholders.

This Policy is also communicated to all employees and is made available to all stakeholders on the OTB Group's corporate intranet and website.

7. MONITORING AND REVIEW

This Policy is regularly monitored and updated by the DEI Committee with the coordination of the DEI manager appointed by the Committee.

The members, roles and methods for such monitoring and review are described in the DEI Committee Regulations.

In relation to this Policy, the DEI Committee:

- defines, assesses and monitors the effectiveness of the Diversity, Equity and Inclusion Policy, making proposals for updates where necessary;
- reviews and modifies/confirms the effectiveness of the approach adopted on the basis of events, changes and the results of monitoring and audits.

The OTB Group encourages all recipients of this Policy to report, in accordance with corporate procedures, any conduct that is not in line with the principles set out herein and any alleged or certain violation of the same.