



Alkemy S.p.A.
Diversity & Inclusion Policy

Contents

- 1. PURPOSE..... 3
- 2. RECIPIENTS AND SCOPE OF APPLICATION..... 3
- 3. COMMITMENT..... 4
 - 3.1. INCLUSIVE WORK ENVIRONMENT 4
 - 3.2. EQUAL OPPORTUNITY 4
- 4. PROCESSES IMPACTED 5
 - 4.1 RECRUITMENT & SELECTION 5
 - 4.2 TRAINING..... 5
 - 4.3 CAREER DEVELOPMENT, REWARD & RECOGNITION..... 6
- 5. REPORTING OF VIOLATIONS..... 6
- 6. APPROVAL AND DIFFUSION 7

1. PURPOSE

Alkemy S.p.A. (hereinafter also the “Company” or “Alkemy”) is an international public company and the parent company of the Alkemy Group (hereinafter also the “Group”), that operates in Italy, Spain, Mexico, USA and the Balkans through its 11 offices located in Milan, Turin, Rome, Naples, Potenza, Cagliari, Rende, Madrid, Belgrade, Mexico City and New York. Across geographies, the Group has a strong commitment in creating a fair, diverse and inclusive workplace where everyone's voice is important and contributes towards the achievement of corporate and business objectives - no matter their age, disability, sex, sexual orientation, gender, gender identity, race, colour, nationality, ethnic or national origin, religion or belief, socio-economic context or other status.

Together with its subsidiaries, Alkemy is embarking in an evolutionary path towards responsible management, which is characterized by an increasing degree of understanding with respect to economic, social and environmental issues. This path includes the definition of policies and procedures aimed at structuring the Group's approach to the various areas of sustainability relevant to the organization, among which Diversity & Inclusion (“D&I”) topics are considered as pivotal.

Bringing together people from different backgrounds and giving everyone the opportunity to develop their skills and experience enables Alkemy Group to deliver the best customer experience, shareholder value and to have highly engaged employees.

For these reasons, implementing the values stated in its Code of Ethics and inspired by the provisions of the Universal Declaration of Human Rights of the United Nations, Alkemy has developed this D&I Policy (hereinafter also the “Policy”) aimed at defining guidelines to eliminate and avoid any form of discrimination and improve inclusion within the Group.

All D&I actions are coordinated by People & Culture function.

2. RECIPIENTS AND SCOPE OF APPLICATION

This Policy applies to Alkemy S.p.A. and its subsidiaries and the provisions and commitments are fully supported by the Group's top management.

In particular, the Policy applies to employees, corporate boards, collaborators, job applicants, contractors and suppliers, and all persons who maintain relations with the Group.

3. COMMITMENT

3.1. INCLUSIVE WORK ENVIRONMENT

Alkemy Group recognizes that people are the most valuable resource for the organization and strives to create the best conditions for them to reach their full potential by promoting an inclusive and stimulating work environment where everyone feels accepted and empowered to contribute to the Group's success. In the Alkemy Group, every voice and feedback is encouraged and welcomed, also through workforce and other stakeholder perceptions about the organization's commitment to D&I, such as from focus groups, surveys, interviews and external reviews. This ensures a safe environment for D&I issues, concerns and complaints to be raised, enabling the Group to take the right actions to improve initiatives around D&I and employee experience.

Alkemy Group commits to ensure that all its employees and collaborators treat others with dignity, respect and fairness at all times and that they demonstrate conduct that reflects inclusion and supports the values of the Group.

The Alkemy Group also strives to facilitate work-life balance, providing support to the employees in their choices regarding parenting, caring and work roles and responsibilities, including promoting remote working.

3.2. EQUAL OPPORTUNITY

This D&I Policy strives to guarantee equal opportunity at all stages of the working relationship, including Recruitment & Selection, Training, Career Development, Reward & Recognition for all minority groups, valuing people no matter their:

- **Disability**, by discouraging assumptions made about ability based on an individual's disability whether visible or non-visible;
- **Age**, by promoting Cross-Generational Intelligence, that allows to draw on the experiences and views of individuals of different ages and stages of their careers;
- **Sex and gender**, also by increasing gender balance in managerial positions;
- **Race, colour, nationality, ethnic or national origin**, by supporting multiculturalism as a tool for development and innovation and a leverage for improving the Group's competitiveness;
- **Sexual orientation and gender identity**, by identifying and confronting immediately any forms of sexist and homophobic, biphobic and transphobic attitudes, behaviours and language, whilst respecting individual privacy rights and characteristics;
- **Religion or belief**, by respecting freedom of speech and plurality of beliefs;
- **Socio-economic context**, by guaranteeing equality so that policies, processes and practices are fairly applied, and individual needs recognized.

4. PROCESSES IMPACTED

In order to create an inclusive working environment and guarantee equal opportunity to all, Alkemy defined some principles to be followed in each step of the human resources process.

4.1 RECRUITMENT & SELECTION

Within the Alkemy Group, recruitment and selection processes are drafted and monitored to ensure equality of opportunity and all the necessary steps are taken to eradicate any discriminatory practice. The Group undertakes to:

- develop and use transparent, fair and non-discriminatory practices and tools in recruitment processes, recognizing the potential for conscious and unconscious bias in people and automated systems;
- use outreach activities and diverse and accessible recruitment channels to encourage interest from the broadest pool of people;
- use positive images of people from diverse backgrounds and inclusive language in job promotion and advertising communications;
- specify the Group's D&I principles and objectives in contractual relationships with recruitment organizations and other suppliers;
- provide opportunities for candidates to demonstrate the knowledge, skills and abilities they have and their potential to meet job requirements using valid, reliable and fair selection and assessment methods, which include adjustments that accommodate specific individual needs;
- collect data on each stage of the recruitment process, including outreach and outsourced activities, to identify which sources and channels provide the broadest pool of people to fill positions;
- collect data on the numbers and diversity of people progressing through each stage of the recruitment process, to identify progress made against the objectives.

4.2 TRAINING

Alkemy and its subsidiaries consider training to be the main tool for the enhancement and development of their people and commit to ensure equal access to and participation in all company-supported education and training programmes.

The Group's approach has always promoted continuous learning, which consists in encouraging the continuous growth of employees' knowledge and skills, allowing adaptation to the rapid evolution of the digital and technological frameworks.

To promote Diversity & Inclusion values, the Group commits to:

- analyse individual and organizational learning and development needs;
- establish programmes that address individual development needs, such as coaching and mentoring;

- design learning and development activities to increase awareness of D&I principles and foster insight into the benefits of having a range of perspectives, abilities, values and beliefs, and understand the importance of behaving inclusively and respectfully;
- use inclusive imagery, phrasing and avoid stereotypical language, cultural presumptions and references in learning content and its delivery.

4.3 CAREER DEVELOPMENT, REWARD & RECOGNITION

The Alkemy Group believes in equal pay for equal jobs and in creating an inclusive environment in which each employee is able to fulfil their full potential and maximise their contribution, thus boosting organizational performance.

The Group is committed to:

- establish performance management criteria to minimize bias in evaluations;
- define performance management objectives for individuals, teams, managers that are aligned with D&I principles and objectives; review performance management processes to ensure that Alkemy's D&I principles and objectives are embedded, and are fair, impartial, constructive and inclusive;
- identify areas for improvement and behaviour that contravenes the D&I principles and objectives and, if necessary, implement progressive and proportionate disciplinary action;
- identify D&I risks in succession planning processes and practices, such as the potential for bias when identifying and considering individuals for development;
- make pay and benefits decisions in a fair, inclusive, equitable and transparent manner;
- align benefits with D&I principles and objectives to foster an inclusive workplace;
- communicate information about pay and benefits in an accessible, inclusive and transparent manner;
- collect data on the outcomes of remuneration policies, processes, and practices to identify gender and other diversity-related anomalies and differentials, in and across job families, geographic locations and pay structure.

5. REPORTING OF VIOLATIONS

All recipients are required to report any conduct that does not comply with the principles and rules set forth in the Policy by using the whistleblowing channel available at www.alkemy.integrity.complylog.com. For reporting any alleged breach with reference to the Group Spanish subsidiaries, a dedicated channel has been set up and is available at <https://www.alkemy.es/canal-denuncias/>.

Alkemy and its subsidiaries undertake to treat each report with confidentiality and to protect the anonymity of the informants, ensuring that they will not be subject to any form of retaliation, in accordance with the legislation in force.

Breaches of this Policy make applicable disciplinary sanctions or measures modulated in relation to their seriousness.

6. APPROVAL AND DIFFUSION

Alkemy and its subsidiaries promote the adoption and the diffusion of this Policy to all addressees and to all persons who maintain relations with the Group, also through specific training and induction sessions which may involve the Board of Directors.

These Guidelines are also made available on the corporate website, with a view to spreading and promoting further Alkemy's culture of diversity and inclusion, and will be the subject of periodic updating, also on the basis of the results of internal assessments and monitoring actions undertaken.