



2022

Policy Diversity
& Inclusion



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Introduction

The Retelit Group considers Diversity Management as a key element of its strategy. Retelit believes that promoting an inclusive environment and encouraging diversity within its teams, in addition to meeting fundamental rights, brings major benefits for the business.

Retelit in fact is firmly of the view that encouraging diversity and inclusion supports the attracting and retaining of the best talent, the promotion of innovation, entrepreneurship, creativity and improves the performance of its personnel and the company itself.

This Diversity & Inclusion Policy (also referred to as the "Policy") sets out how diversity, gender equality, inclusion and the principle of non-discrimination are part of the Retelit Group's core values and an integral part of our business strategy.

The standards and practices outlined in this Policy complement our Group Ethics Code and our Anti-Discrimination and Anti-Harassment Policy. The Group's commitment to Diversity and Inclusion is also enshrined in the Group's "Manifesto on Inclusion and Diversity".

This document is divided into the following sections:

♦ **Objectives of this Policy (Chapter 1);**

♦ **Addressees of the document (Chapter 2);**

♦ **Background, which outlines the main regulatory sources and principles on which the Policy is based (Chapter 3);**

♦ **Retelit Group's values in the area of Diversity & Inclusion (Chapter 4);**

♦ **Implementation guidelines, presenting information on the adoption and implementation of the Policy, how to report non-compliant conduct, and disciplinary measures (Chapter 5).**

The Policy will be periodically reviewed and updated as necessary to ensure alignment with other Group Policies and key industry standards and best practices. In the event of changes and revisions, Retelit undertakes to promptly share the updated document with its addressees.

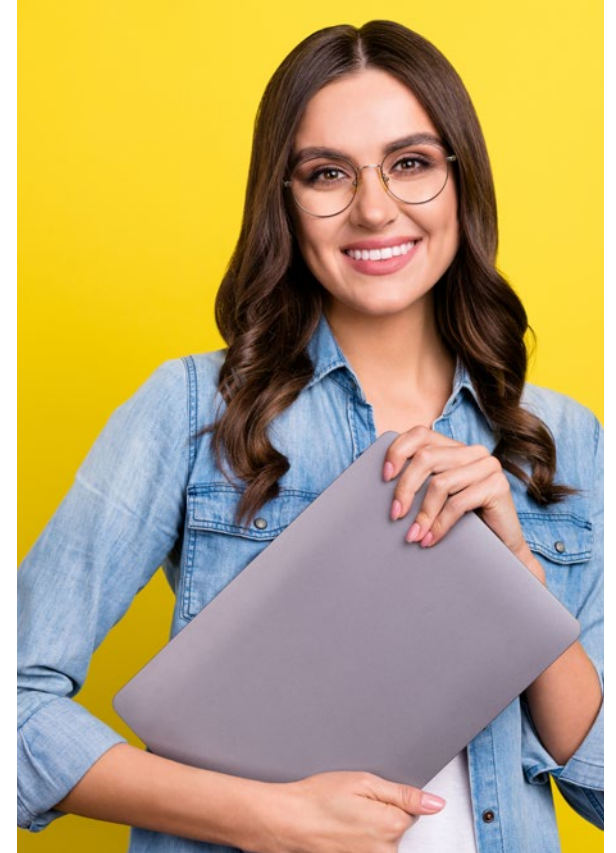
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Diversity & Inclusion Policy Objectives

This document has the following main objectives:

- ◆ **To define the Group's fundamental values and principles on Diversity & Inclusion and the conduct standards to which the Addressees of this Policy are required to comply in conducting and managing their activities;**
- ◆ **To define responsibilities within the company for diversity and inclusion management and monitoring;**
- ◆ **To share information on how to report potentially non-compliant conduct and any disciplinary measures that the Retelit Group may take in the event of non-compliance.**

By sharing this document, the Retelit Group expects all Addressees of the Policy to share and apply the principles presented therein.



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Diversity & Inclusion Policy Addressees

This Policy is addressed to the members of the company's corporate boards, the employees of Retelit and of all its subsidiaries and the Group's collaborators (hereinafter also referred to collectively as the "personnel").

It is the responsibility of all personnel to observe and enforce, without exception, the principles detailed in this document, within the scope of their responsibilities.

In fact, there is no justification for conduct that is not in line with this document, even when there is the conviction of acting to the benefit of the Group.

Any conduct contrary to this Policy will be handled in accordance with the provisions of Section 5 hereof.

Furthermore, the Retelit Group, in compliance with the Suppliers' Code of Conduct and the Group's Ethics Code, extends to suppliers the duty to respect the principle of non-discrimination and invites all suppliers to consider any form of diversity as positive and to ensure a fair and inclusive working environment.



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Retelit is committed to operating in compliance with the fundamental principles concerning ethics, human rights, employment, non-discrimination, equality and inclusion.

With this objective, the Group's commitment stems from its knowledge of the following regulations that enjoy global acceptance and consensus:

◆ **The Universal Declaration of Human Rights;**

◆ **The United Nations Guiding Principles on Business and Human Rights;**

◆ **The International Convention on Civil and Political Rights;**

◆ **The International Convention on Economic, Social and Cultural Rights;**

◆ **The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and its subsequent editions;**

◆ **The International Labour Organisation's (ILO) Tripartite Declaration on Multinational Enterprises and Social Policy;**

◆ **The United Nations Convention on the Rights of Persons with Disabilities;**

◆ **The United Nations Convention on the Elimination of All Forms of Discrimination against Women.**

In addition, Retelit is committed to contributing to the Sustainable Development Goals of the United Nations 2030 Agenda (SDGs).

With regard to diversity and inclusion, in particular, the Group pursues the following objectives:

◆ **Objective 5: Achieve gender equality and emancipate all women and girls;**

◆ **Objective 10: Reduce inequalities.**



Background

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Our values

4.1. Respect for diversity and integration without discrimination

The Retelit Group requires all personnel to respect the principles of equality and non-discrimination and a commitment to welcoming diversity and encouraging inclusion in every area of our business.

NON-DISCRIMINATION

The Retelit Group is committed to providing all its employees and collaborators with a workplace that is respectful and free from any form of discrimination or harassment. The Group does not tolerate any form of discrimination or harassment against personnel on the basis of ethnicity, nationality, gender, sexual orientation and gender identity, age, physical characteristics, state of health, disability, personal and social conditions, trade union membership, political opinions, religion, marital status, pregnancy status, or on any other basis that could be considered illegal under applicable law.

VALUING AND RESPECTING DIFFERENCES

Diversity and inclusion are very important to Retelit and all employees are expected to create and maintain a respectful, inclusive and welcoming work environment where the differences and experiences of others are valued. The Group respects and welcomes diversity in all its forms, including: cultural, ethnic, generational, gender, religious, sexual, social, political, physical or mental.

ELIMINATION OF BARRIERS

The Group ensures that everyone, including people with disabilities, can enjoy the same benefits without any impediment. Retelit is committed to ensuring the effective integration of persons with disabilities in the workplace by eliminating any type of obstacle that could impede the performance of an activity (for example, eliminating architectural barriers or providing tools or solutions to support the performance of work activities).

4.2 Meritocracy and equal opportunities

The Retelit Group strives to guarantee its personnel the opportunity to develop their skills and contribute to the Group's performance.

To achieve this objective, Retelit believes it is vital to prevent discrimination permeating recruitment activities or the daily management of company activities.

In particular, the Group is committed to ensuring that its recruitment, hiring, promotion, professional training, performance assessment and remuneration practices are based exclusively on merit.

The selection of the best candidate or most suitable employee for a position with the Group should be based primarily on an assessment of qualifications and job performance. Consideration of a person's characteristics unrelated to ability and merit is not permitted.

The Group undertakes, beginning from the recruitment phase, to identify a range of candidates from both genders, monitor female presence in the organisation and encourage women to take on management roles, with the aim of improving the gender balance and particularly in leadership positions.

4.3 Inclusive communication and language

The Retelit Group is committed to promoting the use of language and forms of communication that are free from discriminatory elements, both in internal and external communication activities. In addition, the Group does not tolerate the use of offensive, hostile or discriminatory language by personnel.

With regard to online communication, Retelit subscribes to the "Parole O_Stili" Manifesto of non-hostile communication for companies, involving itself in a project to raise awareness against the violence of words. The manifesto sets a few simple rules for a transparent and sincere dialogue between companies, customers and stakeholders and for the use of respectful language and conduct on the web and in everyday relationships.



4.4 Work-life balance

The Retelit Group believes it is essential that its employees balance their working and private lives in accordance with their needs. Retelit believes that the well-being of employees is a fundamental element in retaining and attracting talent, guaranteeing a high level of performance and ensuring fair opportunities for all employees to undertake their duties while being able to fulfil the demands of their private lives.

For these reasons, the Group is committed to introducing welfare policies that benefit all employees and ensure flexible work options. In addition, the Group invites the employees themselves - and in particular management - to pay adequate attention to and promote the well-being of the people within their work teams.

4.5 Maternity and paternity protection

The Retelit Group is committed to protecting maternity and paternity leave and to exploring the most appropriate ways to support its employees during and after their leave period, so as to support the integration and balancing of work and family commitments and encourage a smoother return to work.

Retelit welcomes the commitment of both parents to the care of their children and requires all personnel to adopt attitudes and actions that protect employees who look after wider families.

4.6 Youth education and STEM subjects

The Retelit Group is committed to the education and inclusion in the workforce of young people. In addition, in order to improve the gender balance in the technology and IT sector, Retelit is committed to combating gender stereotypes and raising awareness of this issue among staff, and to assessing support for initiatives to promote female access to the STEM (Science, Technology, Engineering and Mathematics) subjects.



4.7 Digital Inclusion

The Group is committed to supporting initiatives and activities to bridge the digital divide and to boost awareness and the knowledgeable use of information technology, the network, data and devices.

At the same time, the Retelit Group facilitates the digital inclusion of its employees by supporting ongoing digital training and promoting the exchange of skills and expertise.

4.8 Diversity on the corporate boards

Retelit, in line with regulations and best practices, ensures a broad-ranging make-up of the corporate boards in terms of aspects such as age, gender and educational and professional background.

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Diversity & Inclusion Policy Implementation Guidelines

5.1 Adoption and implementation by the Group companies

This Policy comes into force from its formal publication on the company intranet and on the Group's website.

All Group personnel are responsible for complying with this Policy and ensuring that it is correctly applied in relation to the performance of their duties and in accordance with their responsibilities.



MANAGEMENT

All Retelit Group managers, as the point of reference for their work teams, are responsible for observing and promoting compliance with and application of this Policy.

The Group requires that managers welcome all types of profiles within their teams, promptly report any non-compliance with this document, and strive to create an inclusive environment where everyone feels free to express their opinions, also in order to foster entrepreneurship, creativity and innovation within the Group.

HUMAN RESOURCES

As part of its duties, the Retelit Group's Human Resources function is responsible for:

- ◆ **promoting the knowledge and circulation of this Policy, in the manner deemed appropriate and in particular through training and educational activities;**
- ◆ **encouraging and planning appropriate activities and initiatives to ensure the effective and concrete application of the Policy within the Group, and assess the effectiveness of such initiatives and programmes;**
- ◆ **monitoring the implementation of this Policy;**
- ◆ **ensuring that all processes involving human resources, in particular the recruiting and performance appraisal process, comply with this Policy, are based exclusively on assessments of merit and are in no way discriminatory.**

PROCUREMENT & COMPLIANCE

The Procurement function is responsible for promoting awareness of this Policy throughout the supply chain.

COMMUNICATION AND EXTERNAL RELATIONS

The Group, and in particular the Marketing Communication Department, ensures that the Group's language and messages are free from discrimination and respect the Group's values of Diversity & Inclusion.



5.2 Complaints and reporting of non-compliant conduct

All personnel are required to report any alleged or actual violations of this Policy. The Retelit Group strongly encourages you to report or file a complaint as soon as possible.

The formal procedure is intended to supplement, but not replace, other procedures available to employees under any applicable collective bargaining agreement.

The Group has provided, in accordance with Law No. 179 of November 30, 2017 on "Provisions for the protection of reporters of crimes or irregularities of which they have become aware in the context of a public or private employment relationship" ("Whistleblowing Law"), a procedure called the "Internal system for reporting violations (whistleblowing)" to make available to all an anonymous communication channel, which can be reached at the address: <https://retelitwb.azurewebsites.net>.

The Retelit Group assures that there will be no retaliation or other adverse action against any individual who makes a complaint, reports an incident (even apparent) of discrimination or harassment or provides information in the course of an investigation: any such retaliation may also be the subject of a complaint under this procedure.

If retaliation has indeed occurred, you are required to report it promptly so that timely and appropriate corrective action can be taken.

It is specified that, in this document, the term "retaliation" is intended to mean any unfair treatment, or any threat of such unfair treatment, of whatever nature, resulting from the good faith reporting of an incident or concern.

5.3 Disciplinary measures

If, upon investigation of complaints and reports, it is determined that conduct or actions contrary to this Policy have occurred, prompt and appropriate action will be taken by Senior Management, through the HR Department.

This may include corrective actions designed to terminate and remedy conduct or actions deemed inappropriate and to prevent them from recurring in the future; actions may include disciplinary action against responsible individuals, ranging from verbal reprimand to resignation if the individual found at fault is an employee.

If the offender is an employee or internal collaborator of an affiliate, the Retelit Group may inform the affiliate, including international affiliates (if applicable) of the results of the investigation, and request further disciplinary action to be taken by those entities. If the offender is an employee or collaborator of a supplier, a consultant or any other physical

entity related to any legal entity, the Retelit Group may inform the external entity of the incident and the results and request further disciplinary action against the harasser. The Retelit Group will take all possible measures to ensure that the injured party is no longer subjected to discrimination or conduct deemed to be in conflict with this Policy.



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