

DIVERSITY, EQUITY & INCLUSION POLICY

	Name and Function	Signature
Created by	External Consultant	
Approved	Board of Directors	

	DEI POLICY	Rev. 00 - 14/11/2023
PRD-1411		Page 3 of 7

1. Purpose of the DEI Policy

Diversity is the range of human difference, including but not limited to race, ethnicity, gender, gender identity, sexual orientation, age, social class, physical ability or attributes, religious or ethical values system, national origin and political beliefs.

De Wave is committed to promoting a work environment in which diversity, equity and inclusion are guiding principles in all aspects of its operations. The DEI policy establishes the principles by which De Wave will operate in order to promote Diversity, Equity, and Inclusion throughout the organization. The policy applies, but is not limited to, recruitment and selection practices and policies, compensation and benefits, professional development and training, promotions, transfers, social and recreational programs, layoffs, terminations, and the continued development of a work environment built on the premise of gender equity and diversity. This policy applies to all employees and anyone carrying out work on behalf of De Wave and/or one of its operating companies.

2. Introduction

Each individual in an organization brings with him or her a diverse set of perspectives, work and life experiences, as well as religious and cultural beliefs and practices. Workplace diversity represents a work environment composed of employees with different characteristics such as gender, race, ethnicity, sexual orientation.

A truly diverse organization enables people to perform at their best, by respecting, valuing, and appreciating what makes them different. At the same time, it ensures that those differences are recognized and celebrated in a safe and positive environment.

There are many types of diversity in the workplace, including:

- Race
- Ethnicity
- Gender
- Age
- Sexual orientation
- Physical ability or disability
- Religion
- Political beliefs
- Education level
- Social class
- Country of origin
- Language
- Culture
- Military Service

	<h2>DEI POLICY</h2>	Rev. 00 - 14/11/2023
PRD-1411		Page 4 of 7

Our global DEI strategy enables us to foster a culture of inclusion and belonging and to build a workforce that reflects the diverse communities we serve. Infusing the DEI principles into all areas of our business will drive innovation and growth, as well as transform individual talents and actions into equitable access and outcomes for all.

3. Guidelines for the Policy

De Wave and all of its operating companies are committed to workforce diversity, creating equity across our systems, and promoting a culture of inclusion. Our culture of belonging serves to unite diverse backgrounds, beliefs, and experiences in an environment where everyone feels valued and works together to achieve positive results. Our values outline our responsibility to create an inclusive environment and respect the dignity and diversity of all people. How we engage with each other guides and inspires us to take purposeful action to support the customers, partners, supply chains, employees and communities we serve. We believe that diversity, equity and inclusion is the responsibility of every one of our employees, regardless of where they operate in the world.

This policy is applicable to De Wave S.r.l and all of its subsidiaries, divisions, joint ventures, and other operating units worldwide. Paragraph 11 specifically lists all of the companies to which the policy applies.

The Group HR Department, in coordination with Company Management, is responsible for defining the guidelines, strategies, and actions aimed at achieving the DEI objectives in the Group.

3.1. Employee Responsibilities

DEI is the responsibility of everyone at De Wave. It requires focused action every day. Each employee is responsible for:

- Respecting the dignity and diversity of all people
- Creating an inclusive environment that is free from discrimination, harassment and bullying
- Improving awareness of potential unconscious biases and how these may hinder the ability to be more inclusive and collaborative with one another
- Focusing on conscious inclusion to take action to promote diversity, equity, and belonging
- Making individual commitments to the policy as part of the larger group, and helping to identify goals to help De Wave meet its DEI responsibilities

3.2. Management Responsibilities

Managers also have specific DEI responsibilities and are as part of their job performance.

These responsibilities include, but are not limited to:

- Ensuring that employment decisions are made free from discrimination.
- Engaging in conscious inclusion and other behaviors that promote equity, to advance diverse

	<h1>DEI POLICY</h1>	Rev. 00 - 14/11/2023
PRD-1411		Page 5 of 7

representation and inclusive environments within their teams.

- Mitigating potential unconscious bias in the decision making process, including in hiring, performance review, and professional development.
- Drawing from a broad talent pool in order to be more inclusive, creating diverse rosters and ultimately forming a workforce that reflects the full complexity of the communities served by De Wave.
- Providing reasonable accommodations for persons with disabilities and those who have needs related to religious observances. What constitutes a reasonable accommodation depends on the circumstances and is addressed on a case-by-case basis.
- Ensuring a work environment that is free from discrimination, harassment and bullying.
- Exhibiting inclusive leadership behaviors consistently, valuing all perspectives and listening to diverse points of view.
- Encouraging employees to collaborate, make suggestions, respect and listen to different opinions.
- Cultivating a culture of respect for all employees, customers, suppliers, contractors, and others in the workplace.
- Contacting Human Resources (HR) when they become aware (either directly or indirectly) of an employee who may be subject to discrimination, harassment or bullying.
- Addressing appropriately any other conduct that is inconsistent with this policy or pertinent laws regarding equal opportunity, diversity, equity and inclusion.

4. De Wave is an Equal Opportunity Employer

We base employment decisions on individual merit. We consider qualifications, skills, performance and achievement, and do not tolerate discrimination against any employee or applicant based on non-job-related personal characteristics, such as race, ethnicity, religious beliefs, pregnancy (including childbirth or related medical conditions such as breastfeeding), gender, sexual orientation, gender identity or expression, transgender status, ethnic or national origin, family or marital status, age, physical or mental disability, medical condition, union membership, or veteran status.

We provide reasonable accommodations to individuals with disabilities and to individuals with needs related to religious observance and practice.

5. Discrimination, Harassment, and Bullying

We all have the right to work in an environment free from the demoralizing effects of harassment and unwanted, offensive, or inappropriate behavior. Our company does not tolerate harassment, bullying, or inappropriate behavior towards employees by managers, supervisors or co-workers. We will also actively seek to protect employees from harassment or bullying by non-employees in the workplace. Moreover, De Wave will not tolerate harassment or bullying by its employees towards non-employees with whom there is a business, service, or professional relationship. This also extends to conduct that takes place outside of the Company’s premises (including on social media), which could reasonably be expected to impact employees or others in the workplace.

	DEI POLICY	Rev. 00 - 14/11/2023
PRD-1411		Page 6 of 7

6. Reporting of Inappropriate Behavior

If an employee believes that he/she or another individual has been subjected to conduct prohibited by this policy, the employee is required to promptly report the relevant facts. The preferred channel for reporting is the online portal “My Governance”, accessible 24/7 at the following addresses:

- For **De Wave Srl**: <https://areariservata.mygovernance.it/#!/WB/de-wave>
- For **Affiliated Companies**: <https://areariservata.mygovernance.it/#!/WB/controllate-de-wave>

It is a secure and confidential channel, offering a mechanism for anonymous reporting (where permitted by local law) of concerns or potential violations of our policies or Italian law.

Alternatively, an employee may make a report, either verbally or in writing, to the group HR Department.

We take allegations of discrimination, harassment and bullying seriously and ensure that they are properly investigated. All reported incidents will be investigated, taking care to keep the source of the report confidential, with disclosure only of appropriate information to facilitate the investigation or resolution to the matter.

De Wave encourages employees to report, in good faith, any possible violation of this policy.

7. Anti-Retaliation

De Wave does not tolerate threats or retaliation of any kind against any individual who reports conduct that violates this policy, or who in good faith provides information in connection with a report or investigation of such conduct.

8. Consequences

Employees who do not comply with this policy and/or who are involved in discrimination, harassment or bullying will be subject to appropriate disciplinary action, up to and including termination of employment.

9. Considerations

In line with the Business Code of Conduct, the De Wave Group of companies complies with the laws of each country in which its companies operate. It is the responsibility of each company’s management and employees to be familiar with and comply with local Equal Opportunity laws and regulations which govern the business activities in which they engage. Accordingly, to the extent that compliance with local law conflicts with this policy, employees must comply with local law.

10. Right to Terminate or Modify the Policy

The Company reserves the right to modify, suspend, change or terminate this policy at any time in accordance

 DE WAVE GROUP	DEI POLICY	Rev. 00 - 14/11/2023
PRD-1411		Page 7 of 7

with local law. This policy does not create any contractual rights or obligations, expressly or implied. Subject to local law, the English language version of the policy will prevail.

11. Società del Gruppo

The Companies to which this policy applies are:

- De Wave Srl
- Precetti Srl
- PM 4.0 Srl
- PM 5 Srl
- Tecnavi Srl
- Palamar Srl
- Wingeco Srl

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