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	DI_6.1_ DE&I POLICY	Rev. 0
	Drafted by: RDE&I Reviewed by: BoD Approved by: BoD	01/09/2024

Rev.	Date	Paragraph	Description of change	Drafted by	Sharing	Approval
0	01/09/2024	All	Issuance	Head of DE&I	All employees	Board of Directors

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1. DIVERSITY, EQUITY, AND INCLUSION: FOR US AND THE WORLD

Diversity is the **fundamental reality** from which we start. It encompasses the full spectrum of similarities and differences that define us as human beings, celebrating our uniqueness and individuality, which are constant sources of richness, energy, and innovation.


Equity is both **our guiding principle and our ultimate goal**. It is the objective we strive toward to ensure **fair treatment and equal opportunities for all**.

Inclusion is our **strategic priority**. We see it as the process of embracing the value of each individual's uniqueness and shared traits, so we can all work together to reach common goals.

Building on this strategic decision, we have chosen to implement a Diversity, Equity, and Inclusion Policy. Our goal is twofold: first, to more systematically elevate the strategic importance of equity and equal opportunity in managing our people, and second, to clearly define **LEVONI's** mission, strategies, and active efforts in cultivating a collaborative, inclusive, and respectful workplace.

This commitment aligns with our corporate regulations and national and corporate collective bargaining agreements, and complies with national, European, and international industry regulations. It also reflects the principles of international organizations that address these issues across sectors, such as the United Nations, which in the framework of the 2030 Agenda and its Sustainable Development Goals, identified "decent work" as a direct tool for reducing substantial inequalities and promoting inclusion through the celebration of diversity. Similarly, the International Labour Organization (ILO) has published practical guidelines on promoting diversity and inclusion through "workplace adjustments."



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2. DIMENSIONS OF DIVERSITY

While it is difficult to create an exhaustive list of all possible dimensions and facets of diversity, a framework that can help our organization and our people navigate and classify these different dimensions and their characteristics is the “four-layer model” developed in 1994 by diversity, equity, and inclusion experts Lee Gardenswartz and Anita Rowe.

With this model in mind, Levoni S.p.A. is committed to respecting all dimensions of diversity, fostering the sharing of differences, both in our increasingly diverse business activities, which emphasize international exchange, and within our workforce. At the same time, we encourage our people to adopt a broader perspective, open to multi-level dialogue, proactivity, and organizational and social cooperation.




2.1. PERSONALITY

The personality dimension, understood as the set of traits that form and define each individual’s identity, is a consistent focus for the Organization throughout the employment relationship.

Our goal is to foster the full development of employees, both as individuals and within the social contexts (such as the workplace) where their personalities unfold, all while ensuring the utmost respect for their fundamental rights.

2.2. INTERNAL DIMENSION

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A person's internal traits – such as age, gender, physical abilities, ethnicity, and sexual orientation – shape their behavior and are often beyond their conscious control. These factors can lead to the formation of stereotypes and prejudices, whether consciously or subconsciously. The organization is committed to addressing and addressing these biases, primarily through training and cultural initiatives.

While not exhaustive, given the ongoing evolution and focus in this area both inside and outside the Organization, the following are the key areas where the company's commitment to the "**Internal Dimension**" of diversity is actively developed:

a) GENDER

The organization has always positioned itself in the market as a vehicle and promoter of gender equality in the workplace, both internally and externally, by implementing activities and initiatives aimed at achieving the following objectives: equal opportunities, work-life balance, shared family responsibilities, removal of potential barriers, stereotypes, discrimination, and/or prejudices, including those related to sexual orientation, and the fight against any form of violence, including gender-based violence.


These general objectives will be integrated into every phase of the employment relationship, from recruitment and career development to training programs and compensation policies. They will also extend to all aspects of company life, including shared participation events and corporate activities. The company will actively promote balanced and diverse employee involvement, striving to create panels with equitable gender representation wherever possible, aligned with the required skills for each role.

To further strengthen Levoni S.p.A.'s commitment to gender equality, we have implemented a Gender Equality Management System in line with the national UNI/PDR 125:2022 guidelines. This system begins with the strategic planning of all relevant activities, enabling effective management and continuous improvement over time.

This plan, backed by a concrete financial commitment, will prioritize the following areas: a) recruitment and hiring; b) career development; c) equal pay; d) parenting and caregiving; e) work-life balance; and f) prevention of all forms of abuse – physical, verbal, or digital (harassment) – in the workplace.

b) GENERATIONS

Levoni S.p.A. recognizes and values integrated strategies for the development and management of the needs of different generations collaborating within the organization, with the goal of fostering intergenerational dialogue and exchange.

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Levoni S.p.A.'s attention focuses not only on the age and professional background of its employees but also on finding effective ways to support their development. This includes encouraging the exchange of diverse social, cultural, and work experiences, as well as different soft and hard skills, knowledge, and competencies (such as digital skills) across generations.

c) DISABILITY

Levoni S.p.A. believes in equal opportunities for all its people, regardless of any sensory, cognitive, and/or motor disabilities, and is committed to taking concrete steps to promote the integration and inclusion of persons with disabilities. The aim is to fully develop their talents and abilities by removing cultural, sensory, and physical barriers. This includes adapting work environments to make them accessible to everyone and adopting suitable initiatives, tools, and supports (so-called "reasonable accommodations").

d) CULTURAL DIVERSITY

In line with its principles, the Company is consistently committed to promoting the exchange between different cultures, both in its business – which is increasingly focused on sharing best practices across diverse environments and on internationalization – and within its workforce, fostering an intercultural vision that is open to dialogue at multiple levels and based on organizational and social cooperation.

This approach helps foster both competitive solutions for improving the group's positioning in the market and interactions between people from different cultures, stimulating exchange, innovation, and individual growth.

2.3. EXTERNAL DIMENSION


The third dimension of diversity is characterized by so-called "**secondary**" factors, over which individuals typically have greater control and freedom of choice. Some of these dimensions include leisure activities, education, marital status, work experience, and place of residence. These dimensions also influence behaviors, perceptions, and individual attitudes. Levoni S.p.A. commits to paying particular attention to these aspects, while respecting the dignity and privacy of each individual.

2.4. ORGANIZATIONAL DIMENSION

The fourth level of diversity concerns organizational dimensions such as the work environment, company tenure, and place of work.

Levoni S.p.A.'s commitment to valuing individuals, ensuring that everyone feels included and can perform at their best, is reflected in a human resources strategy aimed at promoting an inclusive culture. This strategy values the individuality of employees and provides equal opportunities for professional growth for everyone.

3. OUR CONCRETE COMMITMENT

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3.1. GOVERNANCE

Governance on the topic has been entrusted to the Executive Committee (or Steering Committee), which includes the Gender Equality Officer.

The composition, skills, and functioning of the Executive Committee, as well as the DE&I Officer, are outlined in the relevant DI_6.1.1_Regulations for the DE&I Committee and Gender Equality Officer, available within the Integrated Organizational Model.

3.2. COMPANY CULTURE ON DE&I

3.2.1. INCLUSIVE COMMUNICATION

We believe in the importance of communication and ask all our employees to use language that is as inclusive and respectful of everyone's differences as possible.

Levoni S.p.A. is committed to promoting informational initiatives aimed at fostering a culture of mutual respect through knowledge and dialogue, with the goal of maintaining an effective stance against gender discrimination. This commitment is outlined in the document DI_6.3.2.6.1_Regulation against Discrimination, Harassment, and Gender-Based Violence in the Workplace, signed jointly with the Trade Unions.

CONTINUOUS TRAINING

We are committed to promoting annual training on diversity, equity, and inclusion topics for our employees.

3.2.2. CONTINUOUS LISTENING

Understanding the importance of addressing employees' needs, Levoni has introduced regular surveys to assess employee engagement and well-being, allowing for timely and targeted interventions.

In addition, Levoni S.p.A. has implemented a secure platform to protect the confidentiality of whistleblowers, any third parties mentioned, as well as the report's content and related documentation, using encryption tools.

The platform is accessible at: **wb.levoni.it**.


OTHER ACTIVITIES

Additional concrete actions we take to address DE&I issues include:

- Hosting regular company events to engage employees during key moments in the company's journey
- Launching an app providing psychological support.

3.3. HR AND DE&I PROCESSES

3.3.1. RECRUITMENT

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From the very beginning of the recruiting process, we are dedicated to ensuring that job postings – typically shared via our company website and social media channels – utilize neutral language in both title and description. These postings will accurately reflect the role, responsibilities, and tasks involved.

We also ensure that our recruitment service providers, such as headhunters and employment agencies, are aligned with the Group’s Diversity, Equity, and Inclusion policies

3.3.2. SELECTION

Similarly, we uphold the principles of diversity, equity, and inclusion during the selection and interview phases. To this end, all questions and information requests during interviews will be strictly related to the qualifications specified in the job title and description, as well as the requirements of the position.

The assessment of potential hires will focus exclusively on candidates' alignment with the criteria specified by the Company in the job title and job description. This evaluation will be conducted through a thorough review of submitted resumes and interviews, ensuring equal opportunity for all applicants.

To support this process, Levoni S.p.A. has established the procedure DI_6.3.2.1.1_Research and Selection, along with the accompanying annex DI_6.3.2.1_A002_Questions Not to Ask During Selection.

3.3.3. ONBOARDING

The onboarding process will be managed by the HR department and will aim to be standardized and consistent for all involved parties, while also considering the specific needs of each individual.


The onboarding process is outlined in the procedure DI_6.3.2.1.4_Onboarding.

3.3.4. MANAGEMENT OF THE EMPLOYMENT RELATIONSHIP


The management and professional development of our employees will be conducted with a focus on avoiding any behavior that could harm their rights and dignity. Career advancements and access to higher-level roles and responsibilities will be determined based on the skills and abilities of the individuals involved, assessed through objectively measurable criteria rather than subjective or arbitrary evaluations.

4. MONITORING AND DURATION


This Diversity, Equity, and Inclusion Policy will take effect on September 1, 2024. Data gathered through the company’s quantitative and qualitative monitoring tools will provide insights into the organization’s status concerning diversity, equity, and inclusion. This information will guide any decisions regarding potential modifications, renewals, or extensions of the policy.

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0	01/09/2024	All	Issuance	Head of DE&I	All employees	Board of Directors

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This commitment aligns with our corporate regulations and national and corporate collective bargaining agreements, and complies with national, European, and international industry regulations. It also reflects the principles of international organizations that address these issues across sectors, such as the United Nations, which in the framework of the 2030 Agenda and its Sustainable Development Goals, identified "decent work" as a direct tool for reducing substantial inequalities and promoting inclusion through the celebration of diversity. Similarly, the International Labour Organization (ILO) has published practical guidelines on promoting diversity and inclusion through "workplace adjustments."



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3. OUR CONCRETE COMMITMENT

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3.1. GOVERNANCE

Governance on the topic has been entrusted to the Board of Directors and the DE&I Officer (Steering Committee).

The composition, skills, and functioning of the Steering Committee, as well as the DE&I Officer, are outlined in the relevant DI_6.1.1_Regulations for the DE&I Committee and Gender Equality Officer, available within the Integrated Organizational Model.

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OTHER ACTIVITIES


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3.3.1. RECRUITMENT

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We also ensure that our recruitment service providers, such as headhunters and employment agencies, are aligned with the company’s Diversity, Equity, and Inclusion policies

3.3.2. SELECTION

Similarly, we uphold the principles of diversity, equity, and inclusion during the selection and interview phases. To this end, all questions and information requests during interviews will be strictly related to the qualifications specified in the job title and description, as well as the requirements of the position.

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3.3.3. ONBOARDING

The onboarding process will be managed by the HR department and will aim to be standardized and consistent for all involved parties, while also considering the specific needs of each individual.

The onboarding process is outlined in the procedure DI_6.3.2.1.4_Onboarding.

3.3.4. MANAGEMENT OF THE EMPLOYMENT RELATIONSHIP

The management and professional development of our employees will be conducted with a focus on avoiding any behavior that could harm their rights and dignity. Career advancements and access to higher-level roles and responsibilities will be determined based on the skills and abilities of the individuals involved, assessed through objectively measurable criteria rather than subjective or arbitrary evaluations.

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Mec Carni S.p.A.