

#### **GENDER EQUALITY POLICY**

#### Our company's purpose and efforts

Prolink S.r.I. strives to create and live in an inclusive and diverse environment guided by a deep commitment to safety, ethics, integrity and non-discrimination.

People are placed at the core of our company's business. We have a keen focus on inclusion with a diversified team of visionaries, thinkers and doers. We welcome all perspectives, collaborating to make a positive impact.

We are committed to respect human rights and dignity. We provide training and awarenessraising activities related to Human Rights among employees and to our stakeholders.

Prolink is committed to comply with some key principles, which are also stated in its Code of Conduct and Code of Ethics, therefore it treats people with respect and dignity; it is committed to promote a work environment free of harassment and discrimination; it lives inclusion and promotes diversity in the workplace; it hires in accordance with ethical principles and promotes salary equity; it recognizes the freedom of employees to join or not a union, legally recognized; it promotes occupational health and safety; and it is committed to work striving for improvement including listening to employees' concerns and needs.

At Prolink, we understand that "inclusion" means creating a workplace where our differences are accepted and celebrated in order to bring innovative and remarkable solutions that customers require.

This is where the company's vision and mission on DE&I and Gender Equality issues fit in.

Prolink's mission is to create an environment where employees feel a sense of belonging and can celebrate their uniqueness regardless of gender.

The Company is committed to provide equal opportunity and fair treatment to all individuals on the basis of merit, without discrimination by race, colour, religion, national origin, sex, sexual orientation, age, or disability, as it firmly believes that gender equality is at the core of a project of continuous growth and improvement.

The company believes that through gender equality, collaborative and high-performing teams will be created to deliver breakthrough ideas and results and develop innovative and culturally relevant solutions.



As stated in the management system scope set forth in UNI PdR Policy 125:2022, the intention is to ensure gender equality related to the presence and professional growth of women in the company. In this regard, it is intended to enhance the diversity in roles operating in the company and keep processes enabling the development of women's empowerment in business activities.

Prolink believes that the development of a cultural model promoting gender equality, in addition to create "social value" valued in the European institutional economic context, is a development factor for the company business.

Therefore, Prolink has always been committed to:

- $\Rightarrow$  create an environment in which the uniqueness of each person is celebrated and the contribution of each team member is valued;
- ⇒ ensure that everyone is treated with dignity and respect, to not tolerate any form of intimidation, bullying, harassment, including sexual assault or mistreatment of employees in the workplace or in work-related situations, and to discipline those violating these practices;
- $\Rightarrow$  encourage any person feeling to have been subject to such intimidation, discrimination, harassment, or mistreatment so that they can raise their concerns by feeling protected from any potential form of retaliation;
- $\Rightarrow$  regularly review all practices and procedures in hiring and development so that fairness is preserved at all times.

Accordingly, all decisions related to selection, hiring, promotions, compensation policies, decisions regarding employees' development, such as training, and everything related to working conditions are considered regardless of age, ethnicity, colour, gender, geographic background, religion, disability, sexual orientation, and gender identity. We are against all forms of discrimination.

All employees, regardless of part-time, full-time, or temporary, are treated fairly and with respect. When Prolink selects candidates for hiring, promotions, training or any other benefits, it does so according to their attitude and ability. All are given help and encouragement to develop their full potential and to contribute with their unique talents.

The goal is to create a work environment where women and men, girls and boys, in all their diversity, are free to pursue their professional and life choices, have equal career opportunities and can, equally, participate in and lead our Company.



The main goals are to end gender-based violence, combat sexist stereotypes, fill the gender gap in the labour market, achieve equality in participating to different economic sectors, address the compensation and pension gap and achieve gender balance in decision-making processes. The strategy pursues the dual approach of gender mainstreaming combined with targeted actions, whose implementation relies on the cross-sectional principle of intersectionality. So, in accordance also with the EU's foreign policy on equal opportunities and women's empowerment.

We believe that the creation of a more balanced and heterogeneous 'leadership pipeline' should be achieved, which is why inputs from both genders are fairly valued in the company's internal decision-making processes. Creating a gender equality culture at Prolink underpins the human capital strategy that is fundamental to ensure excellent performance.

This Policy is addressed to all Prolink's employees and shared with all of its key stakeholders, suppliers and customers with the goal of having a greater impact in its value network and being a benchmark for other businesses.

This document, therefore, is subject to disclosure within the company and to third parties by posting it on the company website and it provides the guidelines to be implemented through HR practices and processes for the creation of a work environment with equal gender opportunity throughout the entire cycle of people recruiting, management, development and career advancement.

## Results based on interested parties' satisfaction

The company aims to ensure gender equality through tangible actions that, in addition to complying with the requirements/indicators established in the individual areas set forth in UNI PdR Policy 125:2022, turn out to be of real value for the women of the company, who are the real affected parties of the results that the management system produces.

The company, willing to pay attention to such satisfaction at any time and in any circumstance of women's working life in the company, looks at this "life cycle" through the following aspects:

- a. Selection and recruitment
- b. Career management
- c. Salary equity
- d. Parenting, care
- e. Work-life balance
- f. Abuse and harassment prevention

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For each of these aspects, the company has established more specific policies that are summarized below and are subject to periodic analysis and review, including for the purpose of revising related procedures. Prolink has associated with each policy, expressing its guiding principles, verified and verifiable processes as well as equal, attainable, specific and measurable objectives set out in the strategic plan drawn up jointly by the Members' Assembly and the Steering Committee.

In order to ensure the implementation of necessary actions to pursue the objectives of ongoing improvement that the Company has set for itself and, before that, for the effective application of this gender equality policy, it has appointed a person responsible for the correct execution of this (and related) policy who coordinates it and represents a point of reference for all employees.

The Policy will be monitored and reviewed on a regular basis to ensure that equality and diversity are continuously promoted in the workplace. We are aware that gender equality is a journey and each of us from now on will help guide for the journey.

The company's focus, as part of the journey that ensures the achievement and maintenance of aforementioned goals, focuses its efforts in the following areas set forth by UNI 125:2022 Policy.

- 1. Culture and strategy
- 2. Governance
- 3. HR processes
- 4. Opportunities
- 5. Compensation equity
- 6. Parenting

The company, in connection with the analysis of its business processes, has understood and established the principles to comply with in reference to each of the above areas.

These principles constitute the guiding criteria of processes aimed at addressing:

- Present gaps with reference to the indicators established by UNI PdR 125:2022 procedure, removing any biases;
- Women's needs in the company, seen as the main interested parties to the actual results of the system.





#### **SPECIFIC POLICIES on gender equality**

These are more specific policies that must necessarily relate to gender equality topics and provide the necessary inputs to:

- Develop the gender equality strategic plan;
- Identify, develop and implement "operational" procedures specifically focusing on gender equality, according to the company's context.

The gender equality policies/procedures, developed in relation to the policy, are:

- 1. Selection and recruitment
- 2. Career management
- 3. Salary equity
- 4. Parenting, care
- 5. Work-life balance
- 6. Abuse and harassment prevention

These policies are developed to achieve tangible benefits and results in line with the purpose of the management system. They are designed in light of the regulatory references given in the management manual.

The following is a summary of policies contents:

- 1. Selection and recruitment, is a policy stating to adopt recruiting practices ensuring that all candidates are assessed according to their abilities and skills, regardless of their gender;
- 2. **Career management,** states to ensure that opportunities of professional growth and development are equally shared among employees of both genders;
- 3. **Salary equity** aims, on the other hand, to adopt fair compensation practices to ensure that employees of both genders receive fair salaries for their work;
- 4. **Parenting** aims to ensure that employees of both sexes have access to parental leave and childcare and caregiver options;



- 5. Work-life balance states to ensure that employees of both sexes have the opportunity to balance their work and family responsibilities by applying flexible work organization rules;
- 6. Abuse and Harassment Prevention is developed to prevent and manage gender abuse and harassment within the company and provides training for employees on how to acknowledge and manage gender abuse and harassment;

Specifically, Prolink's commitments to these policies are as outlined below.

## **1. SELECTION AND RECRUITING PROCESS**

Prolink is committed to attract and hire people with different backgrounds and skills, pursuing gender equality in selection and recruitment stage by targeting a shortlist of candidates tending to be equal among men-women.

Likewise, the Company is committed to stress the importance of meritocracy:

- experience, skills and competencies guide the selection of best candidates. The selection process is strengthened by adopting a standardized methodology to ensure equal opportunity at every stage.

The job posting policy is designed to promote transparency in hiring procedures, support our business choices with efficient and effective processes promoting flexibility and agility, meet the career development needs of our employees and strengthen our commitment to equal employment opportunities for everyone.

We insert a Statement at the bottom of job openings

## EQUAL OPPORTUNITY

Prolink is an equal opportunity employer: we believe that all forms of diversity are a source of mutual enrichment. We are committed to ensure an inclusive work environment in which each and every individual can bring unique value to our company. This position is open to candidates of both sexes, in accordance with Laws 903/77 and 125/91, and to people of all ages and nationalities, in accordance with Legislative Decree No. 215/03 and 216/03. as well as disability, sexual orientation, religion or marital status.

Screening of each application will be based on minimum requirements stated in the job description, overall experience, previous experiences, skills, competencies and general good standing for the current position. Prolink interviews candidates who most closely match the



requirements, as defined in its job opening, as well as the minimum and ideal qualifications outlined in the same. Candidates will be notified if they do not get an interview or if they move on in the selection process after an interview.

Prolink promotes a culture based on meritocracy and respect for people regardless of gender.

The company also ensures that people involved in hiring processes receive appropriate training on gender equality that can negatively impact selection processes.

Prolink does not allow questions/requests related to marriage, pregnancy, or care responsibilities during interviews.

It ensures that a proper candidates selection of the least represented gender occurs, aiming to achieve gender balance in managerial positions.

The Company also strives to ensure that women and men, in equal measure, are represented in internal appointment processes and, therefore, that candidates' short lists for managerial positions are equally represented by both genders.

Direct training sessions are provided for all employees aimed at raising awareness in the organization on valuing differences, gender equality, inclusion, and the impact on business that these issues have. Specifically, all managers are trained on topics related to listening and inclusive communication skills.

## 2. CAREER MANAGEMENT AND PERFORMANCE ASSESSMENT SYSTEM

The Performance Assessment System encourages a permanent dialogue between Managers and Employees, reinforcing everyone's commitment to the company's goals and challenges.

Prolink is committed to include Diversity and Inclusion within the Leadership Model; to offer equal opportunities in professional development and promotions, basing them purely on skills and professional levels; and to address career opportunities and professional development programs to all its employees indistinctly without any gender disparity.

A culture based on meritocracy and respect for people regardless of gender is promoted.



#### **3. REMUNERATION EQUITY**

Prolink's remuneration policy contributes to achieving the company's mission, values and strategies, by promoting actions and behaviours that respond to the Company's culture, in compliance with the principles of plurality, equal opportunity, enhancement of people's knowledge and professionalism, fairness and non-discrimination set forth in the Code of Conduct.

Recurring remuneration actions, processes and incentive systems are anchored on principles of acknowledgement of assigned responsibilities, achieved results and the quality of the professional contribution, taking into account the context and market references applicable for similar positions or for roles of similar level in terms of responsibility and complexity.

The company is committed to ensure fairness and access opportunities to the same remuneration for all its employees, regardless of gender and according to their contribution to the achievement of the company's objectives.

## 4. PARENTING AND CARE

Our company does not intend to pose any obstacle to parenting by supporting motherhood and fatherhood through activities aimed at meeting the needs of those who, because of their status related to parenthood, must balance their commitments between work and newly emerged occurrences.

Maternity is assisted before, during, and after birth, and paternity leave should be promoted so that all potential beneficiaries benefit from it for the entire period provided by law.

#### 5. WORK-LIFE BALANCE

Our company aims to provide its personnel the opportunity to manage their time between work and personal life, taking into account both the company's business objectives and the employee's psychological and physical well-being resulting from a greater freedom of selfdetermination.

The principles behind work-life balance are the following:

- Work-life balance measures are addressed to all employees regardless of gender;
- The company adopts part-time, flexible working hours and remote work ;
- The company is mindful of maternity/paternity and personal care management;

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• The company allows online connection with all employees working externally (regardless of contract), for work operations and meetings.

Training and briefing meetings are provided regarding: employees' operation methods, health and safety in the workplace and risks related to the use of IT devices, as well as safety measures including behavioural ones on the proper use of assigned work tools even for the purpose of security of information assets and safeguarding services.

In order to safeguard all employees, taking part to the specific information/training initiatives regarding remote work is an essential condition to be allowed to it.

The employee working remotely is guaranteed rest time, as well as the "disconnection right" from IT devices during rest periods, according to terms set out in the individual Remote Work Agreement.

Prolink focuses on people because human capital is the true value of the company.

# 6. PREVENTION ACTIONS OF ALL FORMS OF PHYSICAL, VERBAL, DIGITAL ABUSE (HARASSMENT) IN THE WORKPLACE

Prolink is committed to prevent sexual harassment in the workplace through a dedicated gender harassment awareness program creating awareness in people and guiding them in daily behaviours.

All employees should feel safe and free from violence when at work. Violence can range from actual physical assault to assets damage, threats and verbal abuse. It can occur in the workplace or elsewhere and can occur person-to-person or through multiple communication channels, including social media, emails, text messages, or instant messaging.

Employees are required to report all cases or threats of violence at work.

Any conduct of violence and harassment at work is not tolerated as it is contrary to the company's values and commitment.

This policy is deeply linked to Prolink's key values as stated in its Code of Conduct and Harassment Reporting Procedure.

It is a topic related to the broader concept of occupational health and safety, and at Prolink, a passion for safety and the willingness to care for one another and our environment inspire mutual respect.



All employees have a role to play in making sure that everyone is physically and mentally healthy, safe and secure at work, and that our environment is protected. This means following applicable and established Company health, safety, and environment (HSE&S) policies, procedures, and instructions; completing assigned training; keeping workplaces safe and secure; promoting healthy, safe, and environmentally responsible work practices with our partners; promptly reporting hazards, environmental impacts, accidents and violations (including minor accidents and "near misses"); taking responsibility for one's own well-being and being empathetic with others, including one's family and co-workers.

In this context, the Company forbids harassment based on race, colour, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status or other features protected by law in any form, whether physical or verbal and whether committed by supervisors, non-supervisory employees or non-employees.

Harassment may include, but is not limited to, offensive sexual winks, unwelcome sexual advances or proposals, verbal abuse, sexually or racially demeaning words or showing sexually allusive or racially demeaning objects or images in the workplace as well as digital abuse.

This policy finds Prolink committed to:

- identify any type of risk of physical, verbal, moral abuse (harassment) also in light of the provisions of the Consolidated Occupational Safety Act (TU 81 recalls the last point below for DVR);
- o adopt a prevention plan and subsequent harassment management;
- o provide specific training at all levels;
- ensure an anonymous reporting channel;
- o identify a contact person for any reported incidents and their management;
- check with employees whether disturbing or discomforting incidents and, in any case, harassing attitudes have occurred such as those defined specifically and extensively by Convention 190;
- o assess the same work environments from a gender perspective;
- provide for an assessment of reported adverse risks and, before that, a prior assessment of them to be reported in the DVR.

Any employee who believes that an employee has been subject to harassment or discrimination or receives a report of alleged harassment or discrimination is required to report it immediately to his/her supervisor.

The same also applies in case of complaints.



All reports and complaints will be handled with sensitivity and discretion as well as confidentiality as far as possible, in accordance with the law and the Company's need to investigate the report. If our investigation discloses harassment or discrimination, we will promptly take a corrective action, which may include a disciplinary action by the Company, up to and including dismissal. The Company strictly forbids retaliation against an employee who, in good faith, files a report or complaint.

The Gender Equality Policy and related, including the attached Manifesto (ALL.A), are disclosed internally and externally to the company, which openly declares its willingness to pursue gender equality, value diversity and support women's empowerment.

The correct and complete understanding and implementation of the gender equality policy and related is systematically checked as part of internal training activities.

In order to ensure the proper implementation of the Equality Management System, the Shareholders' Meeting is committed to provide the necessary resources to sensitize all employees toward absolute compliance with the requirements of the Gender Equality Manual and other Management System documents and to ensure the functioning and upkeep of the System itself.

The Gender Equality Policy (and related), within the broader framework of the overall Corporate Policy, provides, for the purpose of assessing its suitability and the need to make changes or additions, jointly with the members and the Steering Committee, for the definition and periodic Review of Equality Objectives, pre-identified and measurable, monitored in their pursuit during the course of the activity and managed in the final balance through appropriate Indicators.

The Prolink's Shareholders Meeting takes principal responsibility for the implementation of the previously stated goals and any corrective actions that may be necessary to fully achieve them.

In order to achieve these objectives, the Shareholders' Meeting has established a Steering Committee under its direct reports and appointed a person responsible for coordinating the implementation of the Gender Equality Policy and Management System and also assigns and delegates to this function obligations and powers related to the role of Shareholders' Meeting Representative.

The coordinating officer for the implementation of the Gender Equality Policy is in charge of organizing actions necessary for the development of the Equality Management System, carrying out specific actions with special reference to those of equality guarantee and control, verifying the management system's effectiveness, proposing improvement actions and providing support for their implementation.

Within the framework of the Gender Equality System, the Shareholders' Meeting supervises and supports activities jointly with the Coordinating Officer, who has full responsibility and authority to ensure compliance with the procedures set forth in the System.



The Steering Committee is given adequate tools, authority and organizational freedom to identify, propose and manage with relevant functions, the upkeep of the Gender Equality Management System and solutions aimed at correcting problems related to non-equality.

Each individual identified in the Gender Equality Handbook is responsible, within the scope of its duties, the implementation of requirements and procedures defined therein.

Any essential changes to the Gender Equality System must be subject to the approval of the Shareholders' Meeting.

They are Appendixes clarifying and complementing the Gender Equality Policy and related, the adoption and implementation of which is in accordance with UNI/PdR Practice 125:2022 and related regulations of the Equal Opportunity Code (selection and recruitment; career management; salary equity; parenting, care; work-life balance; abuse and harassment prevention):

- the Gender Equality Policy Manifesto and related;
- the action plan for its implementation;
- policies, gender equality requirements;
- management system procedures providing for the setting up and adoption of KpIs related to the gender equality policy and linked to measure progress and results achieved in a vision of continuous improvement (§5 UNI PdR 125:2022);
- the management system manual.

Approved by the Shareholders' Meeting on the 22<sup>nd</sup> of November 2023

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