

open fiber

Policy

Diversity, Equity & Inclusion

This Policy was approved by the CEO of Open Fiber S.p.A.
on 26/10/2022.

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1. Goals of the document

Being a company means be attentive to the people who are part of it, respecting their uniqueness and investing in their value. For this reason, at Open Fiber we are constantly committed in promoting and supporting the principles of diversity, equity and inclusion through the adoption and implementation of organizational and management practices that promote and ensure respect for each individual, the strengthening sense of belonging to the business community, dialogue, trust and participation.

Following these values, Open Fiber operates with impartiality and does not allow any form of discrimination in relation to gender, age, sexual orientation and gender identity, disability, health, nationality, political opinion, social category and religious faith. In this sense, Open Fiber is committed on creating and maintaining an inclusive working environment based on respect for everyone, guaranteeing maximum confidentiality of information relating to the private sphere of each individual.

Open Fiber is inspired by the following values:

- **Anti-discrimination:** everyone must and deserve to be treated with dignity and respect on the basis of their professional skills and competences; therefore, no form of discrimination is tolerated in relation to gender, age, sexual orientation and gender identity, disability, health status, nationality, political opinion, social category and religious faith.
- **Anti-violence and anti-harassment:** any act that constitutes harassment (abuse, threats, humiliation, pressure, coercion, etc.) or violence (whether physical, verbal or psychological) is unacceptable and must be prevented and condemned.
- **Diversity and equal opportunities:** diversity is one of our core values and should be valued such as ensuring equal treatment and opportunities for everyone.

- **Inclusion and work-life balance:** an inclusive environment improves people working life quality and encourages the working goals. We promote initiatives to support the people in order to ensure their organizational and personal well-being.

With the aim of promoting diversity in all its dimensions and enhancing it as an advantage for the Company, with this Policy Open Fiber is committed to:

- Spread a diversity and equal opportunities culture both to the people and among the stakeholders, ensuring that it is shared by all, not only by incentivizing behaviour that promotes inclusion, but also by adopting, where necessary, instruments aimed to sanctioning contrary behavior.
- Raise people awareness to the diversity culture and ensure that each individual is aware of his or her responsibility in order to respect and defend the human rights, whether internal or external to the company.
- Promoting an inclusive working environment, in which the individual feels valued, without discrimination and/or conduct detrimental to diversity - be it: gender, age, disability, social and geographical affiliation, trade union membership, language, religious faith, political and/or sexual orientation, gender identity, nationality, marital status, health status - during selection, recruitment, training, remuneration, rewards, access to benefits and termination of employment.

Apply HR policies and metrics to ensure equality at all stages of the employment relationship: from selection to professional development, pay and termination.

2. Dimensions and related action plans

The following are some of the diversity dimensions attended by Open Fiber:

Gender Equality

In order to build and promote a working environment in which gender equality is fully achieved, Open Fiber pays special attention to gender equality and the implemented policies in order to eliminate any gender gap.

In accordance with current legislation, OF associates the gender gap with any behavior, action, reward and/or punishment for differentiating on the basis of subjective perceptions and/or be-

liefs that result in disadvantages for a person, in the workplace, only because they belong to a certain gender. Behavior that compromises Gender Equality includes, but is not limited to:

- Rejecting applications and/or considering them less useful than others because they are sent by candidates belonging to a particular gender.
- Obstruct, oppose or prohibit the employment of candidates because they belong to a certain gender.
- Any unequal treatment (physical, verbal, salary, career advancement, assignments attributed, etc.) done against an opposite individual gender compared to the colleagues' ones.

Eliminating stereotypes and policies of inclusiveness are applied at Open Fiber people's working life.

Open Fiber offers the same opportunities for every aspect of working life: from selection to decisions regarding remuneration, professional grading, training and career development. These decisions are made exclusively on the basis of people's skills, experience, professional potential and achievements without any gender distinction.

Sexual orientation and gender identity

In order to remove all prejudice and safeguarding the well-being of the people, in Open Fiber we categorically reject any discriminating, humiliating and/or offensive act aimed at denigrating the sexual orientation and/or gender identity of others.

According to current legislation, **sexual orientation** is to be understood sexual attraction or affective towards people of the opposite sex, same sex or both sexes. **Gender identity** means the identification of oneself in relation to gender even if it does not correspond to the sex, regardless of having or less a transition path.

Are to be considered discriminating, humiliating and/or offensive of the individual all acts in the written, physical or verbal, explicit or implicit form attributable to the choices, perceptions or affections of an individual.

Sexual harassment

With the aim of creating a safe and secure working environment, in Open Fiber we categorically condemn any act that may be perceived as sexual harassment, be it physical, verbal or psychological.

Sexual harassment considered to be all unwanted conduct occurring and/or received in the

workplace that is related to the sexual sphere. Sexual harassment are all those undesirable behaviors and/or received at the workplace in the sexual sphere. Such behaviors may occur in physical, verbal or non-verbal form, with the purpose and/or effect of violating person's dignity. Sexual harassment can be committed and/or experienced by anyone, regardless of sexual preference, gender identity, job role and/or position, and may take place verbally, in writing, in electronic format, by simple actions, facial expression or any other way.

Their effects are the creation of an intimidating, offensive and degrading working environment, characterized by the establishment of relationships that subordinate the professional growth of the individual to the fulfilment of sexual demands or their disregard, thus establishing a system based on rewards (promotions, positions of responsibility, benefits, etc.) and/or punishments (dismissals, humiliation, threats, etc.).

In Open Fiber we are committed to a constant monitoring and prevention of any harassment in the workplace, raising awareness and training our people to identify and prevent it.

Open Fiber encourages the people to report in good faith, even anonymously, any omission or commission behavior, by anyone placed in the company, in relations with it or on its behalf, that constitutes or may constitute a breach, or inducement to violate the principles contained in this Policy (<https://openfiber.it/en/corporate/company/reporting-irregularities/>). If the report is grounded, Open Fiber will adopt the sanctions provided for in the applicable regulatory, contractual and disciplinary system.

Family Care

Regarding the reconciliation of work and personal needs, in Open Fiber we promote projects aimed to support parenthood in all its forms and the individual well-being (both physical and psychological).

They include, but are not limited to:

- Initiatives to ensure greater working flexibility (e.g. smart working), including the Family support and/or personal conditions.
- Training courses and personal skills improvement (with the possibility of extension to family members) such as language courses, technical courses, etc.
- Personal health insurance and/or extended to family members.
- Parental leave.

- Permits (for illness, paternity, personal and/or family needs).
- Easily accessible personal and/or family support programs (mental health, legal, fiscal, social welfare, etc.).

Disadvantages Areas & Multiculturalism

Valuing people and their talents is one of the principles that Open Fiber follows in each of its dimensions. In Open Fiber we work constantly to break down any social barriers, activating projects and policies ranging from recruitment and constant training to the promotion of multiculturalism, developing training programs between senior and junior employees, as well as external collaborations to help talent emerge from less favored (geographical and/or social) contexts.

Disability Confidence

Open Fiber is attentive to all disabilities and the needs of its people. For this reason, we are committed to valuing diversity, improving the working environment, and making it more inclusive and accessible to all, removing social and physical barriers and fighting prejudice.

Useful links related to this policy

- <https://openfiber.it/en/corporate/company/code-ethics/>
- <https://openfiber.it/en/sustainability/sustainable-development-goals/>
- <https://openfiber.it/en/sustainability/quality-health-safety/>
- <https://openfiber.it/en/corporate/company/reporting-irregularities/>