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learning solutions

GENDER EQUALITY, DIVERSITY, AND INCLUSION PLAN

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1 Introduction

1.1 Context of reference

Gender equality, diversity, and inclusion are core values for creating an open, respectful, and plural work environment where everyone can fulfill their potential.

For this reason, ELS recognizes and intends to ensure the value of the principles of gender equality, diversity and inclusion as an integral part of its culture and actions, in line with what is expressed in the Code of Ethics and the 2030 Agenda for Sustainable Development Goals No. 5 (Gender Equality) and No. 10 (Reducing Inequality).

Main related internal regulations	□ Code of Ethics
Main related external legislation	□ Civil Code □ D. Lgs. 231/2001 □ L. 18/2009 (ratification of the UN Convention on the Rights of Persons with Disabilities) □ National Recovery and Resilience Plan (so-called NRP) □ D. Lgs. 198/2006, as amended. □ L. 162/2021 □ D. Lgs. 80/2015 □ L. 300/1970, as amended. □ L. 53/2000, as amended. □ L. 68/1999 □ D.Lgs. 62/2024, as amended □ Universal Declaration of Human Rights; □ International Labor Organization (ILO) conventions on fundamental human rights □ United Nations Global Compact; □ UN 2030 Agenda for Sustainable Development and related goals (SDGs); □ Women's Empowerment Principles of the United Nations; □ European Data Protection Regulation (EU) 2016/679 - (General Data Protection Regulation - "GDPR"). □ UNI/PdR 125:2022 □ SA8000®:2014
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1.2 Perimeter of application

This document is addressed to all individuals working within eXact learning solutions - hereafter ELS - (Shareholders, Management, Employees, Collaborators).

1.3 Objectives of the document

With this document, ELS defines the principles, tools, and procedures it has adopted and intends to adopt to promote respect for gender equality, diversity, and inclusion both within its organization and externally to its stakeholders, sustaining attention to these principles.

2 General principles

ELS considers equal treatment, respect for diversity and inclusion to be founding principles of its organization and is committed to ensuring fairness through impartial decision-making and creating the conditions necessary for everyone to freely express their value.

To ensure these principles, ELS protects and encourages a culture of solidarity and inclusiveness, and respect for equal opportunity in all its meanings, regardless of gender, marital status, gender identity and affective-sexual orientation, health status, religious faith, political and trade union views, ethnic origin, nationality, age, and disability status.

These principles reflect the Company's approach to creating a work environment that fosters the overcoming of any bias and the appreciation of diversity that fuels innovation, productivity, and the generation of ideas to meet daily professional challenges.

Specifically:

- **Gender**

  The Company promotes an environment that fosters gender equality at all levels and the overcoming of stereotypes. It engages in policies and actions aimed at promoting gender equality, eliminating the gender gap, and strengthening and supporting the presence of women in key roles and in awareness-raising initiatives and training activities aimed at spreading a culture of gender balance.

- **Age**

  The Company promotes labor integration and the development of a multigenerational context in which to enhance and promote the development of individual professionals by facilitating dialogue and knowledge transmission between people of different ages.

- **Skills**

  The Company ensures full accessibility to all employees and stakeholders with disabilities in order to facilitate their active participation in the life of the company by empowering everyone to contribute to the best of the company's processes.

- **Culture**

  The Company fosters, supports and encourages openness to dialogue, integration and multiculturalism both internally and externally, viewing it as a source of knowledge, innovation and creativity.

- **Gender identity and affective-sexual orientation**

The Company promotes the creation of inclusive environments where everyone feels respected and valued, regardless of their gender identity and/or expression or affective-sexual orientation, rejecting and committing to eliminating all discrimination.

3 Enforcement of policy on gender equality, diversity and inclusion

In applying the principles described above, ELS aims to work toward its employees and all stakeholders with the goal of:

- breaking down all kinds of stereotypes and prejudices, and proactively identifying the elements that constitute an obstacle to the objective elimination of discrimination and penalization, including with reference to even unconscious *cognitive biases;*
- to create relationships based on trust and mutual respect in order to enable people to express themselves to the fullest without the fear of being judged in relation to their gender, marital status, gender identity and affective-sexual orientation, health status, religious faith, political and trade union views, ethnic origin, nationality, age, and disability status;
- promote dignity and respect for each individual, not tolerating any form of intimidation, bullying or harassment;
- use a communication style that is mindful of respect and inclusion;
- promote equal opportunities throughout working life by (i) providing opportunities for growth and development based on merit and potential, regardless of age and prior background, and (ii) recognizing adequate opportunities for professional fulfillment for both young and older age groups consistent with each person's combination of experience/motivation/adaptability;
- promote work-life balance.

This approach, already part of the corporate culture, is evidenced by:

- references in the company's Code of Ethics to the principles of equal treatment, diversity and inclusion;
- setting social responsibility policies to value and protect all personnel falling within an organization's sphere of control and influence;
- establishment of a Social performance team/steering committee to ensure ongoing oversight and monitoring of compliance with principles and behaviors on equal treatment, diversity and inclusion;

The main areas on which the gender equality, diversity and inclusion policy focuses are identified below.

3.1 Recruiting

ELS relies exclusively on criteria of objectivity, competence and professionalism in its personnel selection activities so as to ensure a fair and impartial process without any kind of discrimination and with full respect for equal opportunities.

In particular, the Company adopts a procedure aimed at ensuring transparency and impartiality based on:

- introductory interviews with the HR department;
- tests and assessment tools selected according to the profile sought;
- evaluative interviews by Managers;
- recruitment, following the evaluation process, by management.

3.2 Remuneration

The determination of compensation is based on the principles of transparency and equality and takes into consideration, with unconditional neutrality, autonomy and independence of judgment, criteria such as merit, skills, competencies and performance of individuals, also taking into account the organizational role held.

In order to actively promote the achievement of pay equity, ELS periodically undertakes to monitor pay trends and develop strategies and initiatives to close any pay gap detected.

3.3 Training

ELS ensures that all staff have the opportunity to increase their skills and knowledge on topics pertaining to both business activities and the cross-cutting issues inherent in the company's operations. The goal is to facilitate inclusion and integration within the company and eliminate any possible obstacles to the individual's growth resulting from training and information gaps.

ELS provides all staff with mandatory basic training on some key topics for carrying out the company's activities (e.g., Workplace Safety, Privacy).

Constant **on-the-job shadowing is** provided for each new resource at the time of induction and in the case of changes in business area or field of expertise, to facilitate taking charge of assigned tasks and knowledge of business processes so that the learning and growth process is constantly monitored and adapted to the tasks at hand.

The presence, moreover, of training initiatives that can also be carried out remotely, constitutes an additional element of inclusion and makes it possible to enhance the experience of parenthood and smartworking, as a moment of acquiring new skills for the benefit of the person and the organization, as well as allow the relationship between the person and the company to be protected also in the sense of ensuring constant updates on current initiatives and reducing the information gap when returning from parental leave.

With this in mind, even upon return from parental leave, mentoring sessions are provided to support employees to ensure alignment on the progress of business activities and scenarios in order to avoid any kind of knowledge gap that could result in an unwarranted slowdown in career progression.

ELS invests resources on the development of activities and training paths on the subject of **gender equality, diversity and inclusion** with the aim of maintaining high awareness both through in-depth studies on the context and on more specific aspects, e.g. stereotypes and *unconscious bias.* With specific reference to the issue of gender equality and the culture of non-discrimination, training courses will be conducted on the principles of promoting equal opportunities and on the relevant legislation to increase the culture internally and foster greater awareness of the issue.

3.4 Staff evaluation

ELS uses a performance appraisal process and career processes in accordance with the principles of impartiality, proportionality and competence, taking into account the organizational role held, in full compliance with the principles of equal opportunity, inclusion and non-discrimination.

The objective of this process is to ensure alignment between individual and corporate goals by promoting listening and discussion.

3.5 Work-life balance

ELS recognizes the importance of work-life balance, with a view to enabling each individual to fulfill his or her personal and professional ambitions and aspirations and not to penalize the most vulnerable groups.

With this in mind, ELS implements:

- flexible entry and exit times as attested by the standard working time disclosure;
- telecommuting and/or smartworking. The Company adopts more flexible measures with human resources returning from maternity leave, including ad hoc arrangements to encourage a better work/life balance option.
- part time and leave for personal reasons or study/research.

ELS provides staff as a benefit with meal vouchers.

3.6 Communication and outreach

ELS promotes within its organization the use of respectful language and behaviors toward all to avoid any discriminatory and offensive approaches and uses gender equality and diversity-conscious vocabulary in its own deliverables and external communications.

ELS is committed to wide internal dissemination of the plan on gender equality diversity and inclusion and the tools put in place to enable employees to actively participate in the company's policies on the subject, including through observations, complaints, or reports of abuse. To this end, ELS is committed to periodically disseminate information on the status of the implementation of the initiatives in place through the presentation of the progress of human resources indicators.

ELS ensures adequate representation of women in business meetings, conferences, and institutional appointments promoted by both the company and external parties.

3.7 Choice of suppliers

In its supplier selection activities, ELS relies exclusively on criteria of objectivity, competence and professionalism so as to ensure a fair and impartial process without any kind of discrimination in full compliance with the principle of equal opportunity and non-discrimination.

In addition, ELS is committed within the contract standards to include express termination clauses in the event of behavior in violation of the principles of gender equality, diversity and inclusion.

4 Monitoring and control

4.1 The Steering Committee

The Steering Committee, appointed by the Governing Body, is responsible for monitoring the progress and implementation of policy and strategies related to gender equality, diversity and inclusion.

It consists of a management representative, responsible for human resources, and an employee representative (elected under the SA8000 standard).

The Steering Committee coincides with the Social Performance Team appointed for SA8000.

The functions of the Steering Committee include:

- risk mapping related to areas of potential criticality regarding gender equality, diversity, and inclusion
- identification of corporate policy improvement actions;
- monitoring the status of implementation of gender equality, diversity and inclusion policies and related key indicators by highlighting any deviations from what was planned
- conducting periodic audits of performance on planned policy matters and areas for improvement;
- processing of observations, reports and complaints by informing the Management and coordinating the resolution of problems with a view to giving support and concrete contribution to the interested party who is a victim or witness of forms of abuse, offense or phenomena of impropriety or illegality.

With a view to ensuring control over conduct within the company, as provided for in the Code of Ethics, any employee and/or interested party may file a complaint in relation to facts and/or occurrences having the nature of abuse, offense, or illegality occurring in or related to the work environment and contrary to the principles of gender equality and social responsibility. The complaint may be in an anonymous form. The Company guarantees the utmost confidentiality on the facts reported or highlighted, within the limits of freedom of investigation, undertaking to investigate even in the case of anonymous reports.

Complaint reports concerning issues of social responsibility, gender equality and non-discrimination can be sent to the **dedicated non-discrimination and equal opportunity desk** at csr@exactls.com or addressed to the SA8000 Workers' Representative.

4.2 Corporate compliance

To provide greater transparency to the entire process, the Group Compliance Team will be able to operate independently of the Steering Committee and verify through periodic audits compliance with procedures regarding policy monitoring and processing of reports on behalf of stakeholders. The Group Compliance Team will also be able to provide support to the Certifying Body in the quality standards compliance audit processes.

4.3 Periodic surveys

In order to amplify the effectiveness of the company's gender equality, diversity and inclusion policies, it is also planned to conduct annual internal surveys to observe employees' knowledge and awareness of the procedures and tools put in place by the company and their propensity to use them.

4.4 Roles and responsibilities

As part of the establishment and implementation of the policy on gender equality, diversity and inclusion below are the main management bodies as per the approved corporate organizational chart:

- the Administrative Body
  - approves the plan on gender equality, diversity and inclusion;
  - is briefed periodically on the progress of policies and the performance of indicators, to verify compliance with policies and implementation of strategies and take action on any reports on non-compliant behavior;
- the Steering committee
  - formulates proposals for corporate strategy on gender equality, diversity and inclusion, defining initiatives, targets and action plans;
  - monitors the implementation of the policy, relevant processes and key indicators, implementing any corrective actions;
  - captures any reports of behavior that does not comply with the policy and manages follow-ups;
  - provides input for the dissemination, management and application of the activities in the above points at the group level as well.
- the Group Compliance Team
  - ensures the correct application of procedures and verifies the evolution of the scenario in line with the standards set by company policy and quality certification, including by performing periodic internal audits;
  - supports the certifying body in the planned audit and control activities
- the Communication Team
  - takes care of the promotion activities of the policy and related initiatives to external and internal stakeholders ("stakeholders"), strengthening its positioning, including through the care of communication activities aimed both internally and externally.