



Diversity, Equity, and Inclusion Policy of Comau

Approved by the CEO

Approval Date: 09.10.2024



Owner of the preparation and updating of this Policy

Head of Diversity, Equity, and Inclusion

Version No.	Approved on	Approved by	Notes
1	09.10.2024	CEO	First Version



Index

1. Objectives of the document and scope of application	4
2. Regulatory and documentary references used	5
3. Definitions	6
4. Principles and commitments	6
5. Reporting mechanisms	9
6. Adoption and dissemination of the document	9
7. Monitoring and updating	10



1. Objectives of the document and scope of application

This Diversity, Equity, and Inclusion Policy (hereinafter also referred to as “DEI Policy” or “Policy”) was **defined by the Head of Diversity, Equity, and Inclusion** (hereinafter also referred to as “DEI Head”) **in collaboration with the Diversity, Equity, and Inclusion Steering Committee** (hereinafter also “DEI Committee”) and **defines** the **principles** that guide the commitment of Comau S.p.A. and its Subsidiaries (hereinafter also “Comau”) with reference to topics related to the enhancement of diversity, equity, and inclusion.

Comau has **always been committed to promoting diversity, equity, and inclusion, by eliminating any form of direct or indirect discrimination** as well as any **cultural, organizational, or material obstacles** that may limit the full development and appreciation of its people.

Creating a **work environment** where **occupational health** is **guaranteed, diversity** is **valued, human rights** and **environmental regulations** are **respected**, it is **essential** for Comau to **attract the best talents, promote innovation** and bring **progress**.

This Policy **applies to all Comau employees**.

The **primary responsibility** for adhering to the DEI Policy indeed lies within the **company population**. It is the duty of each individual **to abide by the principles of behavior** included within it and **actively contribute to creating a climate of mutual respect, by integrating these principles into their work activities**.

This Policy is also directed at all **Stakeholders** with whom Comau **maintains business relationships** during its operations and/or who act in the interest and/or on behalf of the company.



2. Regulatory and documentary references used

In **define its principles** and commitments as well as in **drafting this Policy**, Comau has taken into consideration the **UNI/PdR 125:2022 Practice** “Guidelines on the management system for gender equality, which includes the adoption of specific KPIs (Key Performance Indicators) related to Gender Equality Policies in organizations”.

It has also taken into consideration the principles outlined in the following **documents issued by competent international organizations**:

- Declaration on Fundamental Principles and Rights at Work and Conventions (International Labour Organization);
- Guidelines on Diversity and Inclusion in the Workplace (UN Global Compact);
- Guiding Principles on Business and Human Rights (United Nations);
- International Bill of Human Rights of the United Nations, including the UN Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights;
- 2030 Agenda for Sustainable Development adopted on September 25, 2015, by the United Nations General Assembly and its 17 Sustainable Development Goals (SDGs, particularly Goal No. 5, gender equality).

Finally, Comau also considered the following **internal documents**:

- Code of Conduct;
- DEI Committee Regulation;
- Whistleblowing Policy.



3. Definitions

Diversity: The term “diversity” refers to the acknowledgment and promotion of individual uniqueness and differences (in nationality, ethnicity, sexual orientation, gender, physical and cognitive abilities, or other attributes) of all individuals in a society.

Equity: with the term “equity” it refers to the guarantee that all individuals can have the adequate conditions to be able to participate and contribute effectively to corporate life.

Inclusion: with the term “inclusion” it refers to the stable and functional integration into a system or group to promote equal opportunities and non-discrimination, creating value for people, organizations, and the social context.

4. Principles and commitments

The **diversity**, the **equity** and the **inclusion** are fundamental values for Comau in order to create a **work environment** where **every person** can feel **appreciated** and **valued**. Comau is committed to **recognizing**, **understanding** and **valuing differences**, also promoting a **climate of well-being**.

In carrying out its activities, Comau adopts an approach aimed at **ensuring equal opportunities** at all levels and **rejecting any form of discrimination** so that **every person** can **develop their potential** working in an **environment** based on **meritocracy** and on **active participation**.

Below are the behavior principles defined by Comau for the following thematic areas:

- **Culture and strategy**

Comau is committed to improving the work environment by developing **initiatives** aimed at fostering **dialogue and discussion** as well as **behaviors** aimed at promoting **inclusion**, **equality** and **diversity**. For this reason, Comau implements a **communication strategy** internal and external in the belief that



awareness on the topics of **diversity, equity and inclusion** can be best achieved through periodic awareness activities.

Moreover, Comau is committed – where possible – to ensure that **genders are equally represented among the speakers** on panels, round tables, events, conferences, or other events, even of a scientific nature.

- **Governance**

The Board of Directors emphasizes the topics of **diversity, equity and inclusion**. To this end, it has established a dedicated **DEI Committee** and a **DEI Manager**, both tasked with **developing strategic plans** on these topics and **monitoring their progress and performance**.

Top Management and – in particular – the CEO, also play a fundamental role in providing a **strong support and leadership in promoting the principles of diversity, equity, and inclusion** within the Organization.

- **Human Resources Processes**

Comau is committed – through rigorous and transparent evaluation criteria – to managing its **HR processes** related to the various stages that characterize the life cycle of a resource within the Organization (selection, hiring, termination, etc.) according to the principles of **merit recognition** and respect for **equal opportunities**,, **avoiding** any form of **discrimination**.

- **Growth opportunities including women in the company**

Comau firmly believes that **training** is a **key element** for **promoting cultural change** with a view to **diversity, equity and inclusion**. For this reason, it is committed to **developing** a series of **training activities aimed at fostering neutral participation** of both genders as well as **promoting equality in learning**. Furthermore, Comau encourages – through the development of school projects aimed at bringing girls closer to scientific subjects from an early age – **the presence**



of women within its organizational context in order to break the belief that the industrial automation and robotics sectors are predominantly male.

Finally, Comau **promotes and encourages professional development** by committing to adopting **objective, neutral, and inclusive evaluation criteria** that take into account skills, professional profile, organizational role, and potential, **fully respecting personal peculiarities as well as gender equality, fostering growth based on meritocracy.**

- **Pay Equity**

Comau adopts **compensation and incentive processes** based on **equity, impartiality, and transparency.**

Comau **guarantees salaries and benefits equal to or greater than the minimum requirements** established by laws, applicable regulations, and collective labor agreements, and that they are **in line with market practices and consistent with skills, experience, and results.** Furthermore, Comau is committed to **correcting any unjustified** pay disparities for the same job or equivalent roles **that may appear unjustified** or potentially due to gender biases. It also commits to **periodically communicating** to its employees the compensation policies adopted, including benefits, bonuses, and welfare programs that consider the needs of people of all genders and ages.

- **Parenthood and Care**

Parenthood, understood as the parents' duty to take care of their children in all their needs and necessities, is a concept that falls within the broader scope of caregiving. **Comau is committed to developing initiatives**

and implementing policies **aimed at** protecting maternity/paternity **as well as putting in place** measures to support employees **in their parenting activities.**



- **Work-life balance**

Comau implements initiatives and measures to promote the **balance between personal and work life**. In particular, Comau **is committed** to ensuring, in line with work requirements, **smart working** and **part-time work** for those who request it, as well as offering forms of **flexible work and flexible hours**.

- **Prevention of workplace harassment**

Comau is committed to implementing **processes for the prevention and reporting of any form of harassment and/or abuse** (whether physical, verbal, or digital) in the workplace. Furthermore, it **ensures that such reports** can also be made **anonymously** and that the person making such reports **in good faith is protected from any form of retaliation**.

Finally, Comau is committed to **providing specific training** at all levels on “zero tolerance” towards any form of violence and ensuring constant **attention to the language used**, promoting communication that is as kind and neutral as possible.

5. Reporting mechanisms

Comau encourages all recipients of this Policy to report any behavior contrary to the principles outlined herein, as well as any actual or suspected violation of the same, in accordance with internal regulations on Whistleblowing.

6. Adoption and dissemination of the document

This Policy, as well as any amendments and/or additions, is approved by the CEO of Comau.

Comau is committed to communicating and disseminating to all its stakeholders the principles and commitments expressed within this Policy through **internal**



communication tools (company intranet) **and external communication tools** (website) **that are fully accessible** in physical, linguistic, and cultural terms.

The communication processes implemented by Comau must ensure the achievement of the objectives identified by the company:

- **ensuring the dissemination of inclusive strategies** to strengthen – among people – an organizational model aimed at respecting and valuing diversity and gender equality;
- **to train and raise awareness** among all **employees** on the topics covered by this Policy;
- **to ensure the adoption** of a **language** that promotes **inclusion** and **gender equality**, highlighting its added value.

7. Monitoring and updating

The DEI Committee periodically (at least annually) monitors the effective implementation of this Policy and the adherence to its principles and commitments.

Additionally, Comau has established the periodic implementation of a system of internal audits aimed at verifying the effective application of this Policy.

The DEI Manager is responsible for modifying and/or integrating this Policy in response to significant changes in the relevant regulations or Comau's organizational structures.