



# Corporate Policy on Social Responsibility, Gender Equality, Diversity, and Inclusion



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**Webgenesys** is aware of the social role it plays within its economic and production relationships and, to this end, is committed to directing its efforts toward improving people's working conditions, as well as supporting the values of diversity, inclusion, and gender equality by adopting corporate, organisational, and management mechanisms that respect people's rights, freedoms, and dignity.

In particular, regarding the protection of workers' rights, gender equality, diversity, and inclusion, **Webgenesys** has implemented an integrated management system in compliance with the SA8000:2014 standard, UNI Practice (Prassi) PdR 125:2022, and the guidelines of ISO 30415:2021. These requirements are currently met with an impartiality-based approach that does not permit any form of direct or indirect discrimination — whether multiple or intersectional — on the basis of gender, age, sexual orientation and identity, disability, health status, ethnic origin, geographic background, political opinions, social class, or religious affiliation. Nor does it permit any form of physical, verbal, or digital abuse (harassment) in the workplace.

Moreover, the company promotes conditions aimed at removing cultural, organisational, and material barriers that limit the full expression and complete valorization of individuals within the organisation.

This commitment, through the implementation of positive and proactive actions, is directed not only at the company's internal sphere of influence but also at the entire production chain (including suppliers, subcontractors, and sub-suppliers) and the community in which it operates. We firmly believe that our contractual relationships can thus ensure a progressive spread of ethical and social principles and values to an ever-wider set of stakeholders. **Webgenesys** encourages employees/associates to express their different viewpoints as a key contribution to problem-solving. In this regard, Management fosters dialogue among people to bolster their confidence in their own roles and their sense of responsibility in pursuing company results. **Webgenesys**, in addition to complying with all legal obligations and signed agreements, is committed to ensuring full respect for the following specific commitments regarding the principles and requirements of UNI Practice (Prassi) PdR 125, UNI ISO 30415 Guideline, and the SA8000® standard.

### **Gender Equality, Diversity, and Inclusion (UNI PdR 125, UNI ISO 30415)**

**Webgenesys** safeguards the value of its personnel and promotes the protection of their physical, psychological, moral, and cultural integrity through working conditions that respect individual dignity and established codes of conduct.

Regarding Gender Equality, Diversity, and Inclusion, **Webgenesys** strives to develop a clear approach in terms of mission, strategies, and proactive practices to foster a collaborative, supportive work environment open to the contributions of all employees, in order to enhance the trust of individuals, customers, and society at large.

The objective is to encourage diversity in all its dimensions so as to harness its opportunities and generate value within the workplace, thereby also gaining a competitive advantage for the business.

This policy reaffirms the company's commitment to respecting and actively disseminating the principles stipulated by current legislation, contractual provisions, and standards issued by relevant international organisations:

- The 2030 Agenda for Sustainable Development and its Sustainable Development Goals (SDGs);

- The United Nations Global Compact and the Women's Empowerment Principles;
- The Universal Declaration of Human Rights;
- United Nations Conventions on women's rights, on the elimination of all forms of racial discrimination, on the rights of children, and on the rights of persons with disabilities;
- The ILO Declaration on Fundamental Principles and Rights at Work and the eight Fundamental Conventions;
- The June 2019 ILO Convention on violence and harassment.

Diversity is a value that must be protected and encouraged through concrete actions in all organisational and management processes by understanding, including, and valuing the differences among our people. Diversity enriches and opens the door to new ideas and initiatives, multiplying the potential for innovative solutions: people from different cultures, social and generational backgrounds, abilities, skills, and experiences represent a distinctive resource that enables comparison of multiple perspectives and helps us anticipate the needs of customers and relevant stakeholders.

**Webgenesys** is committed to preserving the value of individuals so that everyone feels included and can give their best, truly feeling part of the organisation. This commitment is embodied in a human resources development and management strategy aimed at promoting an inclusive culture that values each person's uniqueness and ensures equal opportunities for professional growth, regardless of their role within the organisation.

At the level of personnel and career management, specific operating procedures have been adopted that govern these areas from a Diversity & Inclusion and Gender Equality perspective. In terms of communications (marketing and advertising activities), **Webgenesys** transparently states its intent to pursue gender equality, value diversity, and support women's empowerment. With respect to event participation, **Webgenesys** ensures that genders are equally represented among the speakers at roundtables, conferences, or any other kind of event, including scientific events.

**Webgenesys** implements a policy aimed at promoting Diversity, Inclusion, and Gender Equality not only internally but, above all, by giving priority to commercial relationships and partnerships with companies that are similarly committed to Diversity, Inclusion, and Gender Equality. The President of the Board of Directors has appointed a qualified individual as Diversity Manager to run the Management System for Gender Equality, Diversity & Inclusion.

Additionally, to maintain active oversight of Gender Equality, Diversity, and Inclusion, a Guidance Committee on Gender Equality, Diversity, and Inclusion has been established, consisting of the RSGRS/RSGPO, HR, and RUPP.

Finally, **Webgenesys** is committed to publishing on its corporate website's page dedicated to Equal Opportunities information on its general KPIs and the strategic Gender Equality Plan with specific KPIs, so as to illustrate how the organisation is progressing toward its established objectives on Gender Equality, Diversity, and Inclusion.

## Social Responsibility (SA8000®)

### 1. CHILD LABOUR

A PRIMARY COMMITMENT IS TO NEITHER USE NOR SUPPORT THE USE OF CHILD LABOUR, while at the same time rejecting any form of collaboration with individuals, companies, entities, or organisations (including the entire supply chain) that fail to exclude the employment of personnel who have not fulfilled compulsory education requirements. Should any instance of child labour be discovered, **Webgenesys** is committed to reporting it to the competent authorities in any situation within its sphere of influence and adopting every possible means of support and protection for the safety, health, and training of minors involved. For any potential employment of underage personnel (in any case aged over 16), **Webgenesys** undertakes to ensure all necessary measures to safeguard their health and safety, to promote their human and professional development through suitable training plans, and to provide all study allowances established by applicable legislation and collective bargaining agreements.

### 2. FORCED AND COMPULSORY LABOUR

IT IS CRUCIAL TO ENSURE THERE IS NO RESORT TO (NOR SUPPORT FOR) FORCED OR COMPULSORY LABOUR, rejecting any form of collaboration with individuals, companies, entities, or organisations (including the entire supply chain) that use labour under threats of penalties or reprisals, for which employees have not offered themselves voluntarily, in accordance with the rights and obligations under the applicable legislation and freely signed agreements. To this end, employees are not required to deposit any money or original identity documents. The personnel selection system follows traditional channels, and no one acting on behalf of **Webgenesys** is permitted to employ staff who have been recruited, transferred, housed, or harboured through the use of threats, force, deceit, or other forms of coercion for the purpose of exploitation.

### 3. HEALTH AND SAFETY

ENSURING A SAFE AND HEALTHY WORK ENVIRONMENT IS CONSIDERED PARAMOUNT to protecting workers' psychosocial well-being. This goal is pursued by complying with health and safety regulations, providing and using adequate resources and expertise, offering ongoing training, and carrying out thorough and timely risk assessments. Internal procedures are put in place to prevent potential workplace accidents or injuries, and to mitigate and/or minimize as far as reasonably possible any hazards related to the work environment and production activities.

Within its senior management, **Webgenesys** has identified the functions responsible for ensuring that these commitments are met, and it maintains a close form of collaboration between management representatives and employees. As part of the Management System, **Webgenesys** is committed to establishing a Company Health and Safety Committee in which both worker representatives and company management are fairly represented.

#### 4. FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

**WEBGENESYS** NOT ONLY UPHOLDS WORKERS' RIGHT TO FORM, JOIN, AND ORGANISE UNIONS; IT ALSO ENCOURAGES AND FACILITATES DIALOGUE WITH ALL TRADE UNION ORGANISATIONS. In compliance with current legislation and collective agreements, the company provides all the information and resources needed for proper trade union activities within the organisation, making a concrete effort not only to avoid any form of discrimination, harassment, intimidation, or retaliation against worker representatives or employees who participate or wish to participate in trade union activities, but also to protect their freedom of action and thought.

#### 5. DISCRIMINATION

THE PRIMARY COMMITMENT IS TO EMPLOY HUMAN RESOURCES BASED ON THEIR SKILLS AND ABILITIES, WHILE AVOIDING ALL FORMS OF DISCRIMINATION and ensuring equal opportunities beyond the requirements of current legislation, thus preventing any differential treatment of people of different races, national, territorial, or social origins, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinions, age, or any other condition that could lead to discrimination. These guarantees apply throughout the employee's work path—from recruitment, hiring, and access to training, to promotions, terminations, or retirement. **Webgenesys** ensures and enforces behavioural rules to promote respectful behaviour and language toward each individual's dignity.

#### 6. DISCIPLINARY PROCEDURES

GUARANTEEING THE DIGNITY AND RESPECT OF WORKERS IS **WEBGENESYS'S** PRIMARY OBJECTIVE, achieved through adherence to behavioural rules that prohibit all forms of physical and mental coercion, including corporal punishment and harsh or inhumane treatment such as verbal abuse. Disciplinary measures are initiated and implemented in accordance with current legislation and the collective agreements in force.

#### 7. WORKING HOURS

REGARDING WORKING HOURS, VACATION, REST BREAKS, AND OVERTIME, **WEBGENESYS** ENSURES EXTENSIVE APPLICATION OF THE PRINCIPLES SET FORTH BY THE APPLICABLE LEGISLATION or an even more protective approach in favour of workers. The standard workweek, excluding overtime, does not exceed 40 hours, and employees receive at least one day off after six consecutive workdays. Overtime work is requested and paid in accordance with wage policies, as regulated by signed collective agreements, and does not exceed 8 hours per week.

#### 8. REMUNERATION

**WEBGENESYS** SUPPORTS THE APPROPRIATE REMUNERATION OF ITS HUMAN RESOURCES in accordance with the laws governing corporate bargaining, such as national labour contracts, second-level company bargaining, and labour union agreements. Wages and any related al-

lowances and contributions are clearly and regularly detailed for each pay period. All overtime work must be compensated at a higher rate, as defined by national law or collective bargaining agreements. Any tasks contracted out do not solely involve labour and are awarded to companies and organisations that ensure they meet all legal obligations toward their personnel.

## 9. MANAGEMENT SYSTEM

ALL THE COMMITMENTS OUTLINED IN THIS POLICY HAVE LED **WEBGENESYS** TO IMPLEMENT A MANAGEMENT SYSTEM. Through constant monitoring, conducted with the essential support and contribution of worker representatives (ensuring that employees have the freedom to elect their representatives independently), the company can continuously review its performance in social responsibility matters and act in the spirit of ongoing improvement aimed at developing workplace conditions and increasing employee satisfaction. All personnel are regularly updated on results and developments related to the social responsibility management system and working conditions.

With regard to suppliers, **Webgenesys** reaffirms its intention and conviction to qualify all suppliers in line with the SA8000® principles; it also intends to encourage suppliers, to the extent permitted by commercial leverage, to promote and invest in the same direction that **Webgenesys** is taking, sharing the conviction that this is the right path to follow. A direct communication channel with senior management is dedicated and guaranteed for all employees.

As part of its Management System, **Webgenesys** is committed to establishing a Social Performance Team made up in balanced measure of employee representatives and company management. The company will conduct a risk analysis of the management system and facilitate the Social Performance Team's activities by providing appropriate resources.



This Policy is available on the company's website, presented and disseminated to all personnel (including new hires), and posted on company bulletin boards. It is also available on the company's intranet. **Webgenesys** is committed to promoting these principles among Group companies, suppliers, subcontractors, and sub-suppliers, giving preference to those who demonstrate the willingness and ability to uphold them.

In order to prevent and counter all forms of direct or indirect, multiple, and intersectional discrimination against workers, as well as any physical, verbal, or digital abuse (harassment) in the workplace, **Webgenesys** has implemented a reporting system on its corporate website (<https://www.webgenesys.it/whistleblowing/>) that protects the whistleblower's confidentiality, without prejudice to legal obligations. **Webgenesys** employees and other interested parties may submit suggestions and/or complaints about the proper application of the requirements set forth by the standards, formally using the following methods:

### SA 8000 Suggestions and/or Complaints:

<p><b>Webgenesys SpA</b> Complaints and Reports on Gender Equality, Diversity, and Inclusion e-mail SM-RSGRS/DM-RSGPO i.cefala@webgenesys.it</p> <p>e-mail RL SA8000: f.barone@webgenesys.it; u.bernardi@webgenesys.it; r.borgonzola@webgenesys.it; a.cappellaro@webgenesys.it; p.virga@webgenesys.it; c.lupo@webgenesys.it</p>	<p><b>RINA Services</b> Via Corsica, 12 16128 Genova T.+39 010 5385683 F.+39 010 5351237 e-mail: sa8000@rina.org</p>	<p><b>S.A.I. – Social Accountability International</b> 15 West 44th Street 6th Floor New York, NY 10036 USA +1-212-684-1414 +1-212-684-1515 (facsimile) e-mail: sa8000@sa-intl.org www.sa-intl.org</p>
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### Complaints and reports on Gender Equality, Diversity and Inclusion

<b>Manager of the Management System for Equal Opportunities – Diversity Manager</b>	<b>Guidance Committee on Equal Opportunities, Gender Diversity, and Inclusion</b>
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