



Diversity, Equity & Inclusion (DE&I) Policy

[Group Guidelines]

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Goal and Scope of Application

This document defines Growens' values and principles regarding Diversity, Equity, and Inclusion (DE&I), aimed at fostering a fair, supportive, multicultural, respectful, inclusive, authentic, and diverse work environment. It seeks to build a cohesive, safe, and inclusive corporate community where everyone can express their uniqueness and grow in a stimulating context, sharing experiences and responsibilities, and seeking dialogue with colleagues as a moment of personal and collective development, considered a heritage to protect and enhance.

Growens promotes equal opportunities and rejects all forms of discrimination, ensuring that every individual can develop their human and professional potential in an open and inclusive environment based on meritocracy and active participation. It is an environment made up of people who believe in competence, sustainability, progress, innovation, and the creation of social and economic value in the regions where the organization operates. The Diversity, Equity, and Inclusion Policy is integrated and consistent with the Growens Code of Ethics.

Definitions of DE&I Principles

Diversity, equity, and inclusion are fundamental pillars for Growens, essential to creating a fair, respectful, and productive work environment. Diversity embraces differences among people, such as race and ethnicity, skin color, gender, sexual orientation, gender identity, disability, age, religion, political opinions, national ancestry, or social background, as well as any other form of personal characteristic. Inclusion, on the other hand, refers to creating a corporate culture that allows everyone to feel welcomed, respected, and valued, ensuring equal opportunities for participation and contribution. Finally, equity is a process aimed at ensuring that processes and programs are impartial and provide equal outcomes for everyone, considering individual peculiarities and differences.

Growens promotes an inclusive environment by offering equal opportunities without discrimination and encouraging mutual respect. This commitment is reflected in training, awareness, and support policies, including mentorship programs for underrepresented groups. The company constantly monitors its progress in equality and commits to continuously improving its practices. Equality is essential for employee well-being and the company's success, fostering innovation and creativity through diverse perspectives and experiences. An equitable environment attracts and retains talent, enhancing business performance and contributing to a positive climate that increases productivity and efficiency.

Guiding Principles, Tools, and International and National Regulations

The DE&I policy is committed to adhering to the following related international and national regulations:

- United Nations Universal Declaration of Human Rights (1948): which establishes the fundamental principle of equality for all individuals without any discrimination.
- 2030 Agenda for Sustainable Development: specifically SDG 5 on gender equality, SDG 8 on decent work, and SDG 10 on reducing inequalities.
- The 10 Principles of the UN Global Compact: with particular reference to Principles 1 to 6, promoting respect for human rights and labor rights.
- United Nations Guiding Principles on Business & Human Rights (UNGPs): including related Gender Dimensions and the "Businesses for People and Society" Manifesto.
- UN Conventions: concerning women's rights, the elimination of all forms of racial discrimination, children's rights, and the rights of people with disabilities.
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the ten key conventions promoting equal opportunities and fair treatment in the workplace.
- ILO Convention C190/2019: concerning gender-based violence and harassment in the workplace.
- Italian Constitution: which recognizes and protects the fundamental rights of citizens, including the principle of equality (Article 3) that prohibits any kind of discrimination.
- Law 300/1970 (Workers' Statute): which establishes the fundamental principles of workers' rights, including provisions on non-discrimination in employment.
- Legislative Decree 216/2003 (Equal Opportunities Code between Men and Women): which also incorporates European directives on gender equality.
- Legislative Decree 81/2008 (Unified Health and Safety at Work Act): which regulates health and safety in the workplace in Italy, emphasizing the importance of ensuring an inclusive, safe, and non-discriminatory work environment.
- Law 162/2021 on Gender Equality: which strengthens the protection of gender differences in the workplace, along with the associated UNI/PdR 125:2022 Reference Practice, defining the minimum standards required for obtaining gender equality certification.

Vision, Mission and Goals

Growens envisions being a global leader in technological innovation, with a constant focus on local communities and a steadfast commitment to diversity, equity, and inclusion. The mission of Growens

is to create cutting-edge technologies for content creation and mobile messaging, offering solutions that allow organizations to communicate effectively with their clients worldwide. The company is committed to promoting diversity through an inclusive work environment where everyone's voice is heard and respected. Growens aims to reflect the richness of the society in which it operates, valuing differences in background, experience, and perspective.

Equity is at the core of Growens' operations, ensuring equal opportunities for growth and development for all team members. The company's objectives in diversity, equity, and inclusion include implementing policies and procedures that promote team diversity, offering training and awareness programs to foster understanding and respect for differences, and collaborating with organizations and institutions that share these values. In line with Growens' Italian design and global vision, the company is committed to standing out for the passion and expertise of its people. Growens' corporate culture promotes creativity, innovation, and collaboration, allowing employees to fully realize their potential and contribute to the company's success.

The goals also include ensuring scalability and profitability to meet investor expectations while guaranteeing sustainable growth over time. Growens seeks to be recognized not only for its ability to generate value for investors but also for its commitment to creating a positive impact in the communities where it operates.

In summary, Growens' vision, mission, and objectives in terms of diversity, equity, and inclusion are integral to its corporate identity. The company is determined to be a model of excellence in this field, contributing to building a more inclusive and respectful world.

Dimensions of Diversity

Gender

Growens believes in a corporate culture that promotes gender balance, where everyone at all levels contributes to overcoming stereotypes, discrimination, and prejudice. The goal is to create the best conditions for each person to express themselves fully. To achieve this, Growens is committed to systematically raising awareness among all employees to recognize and overcome unconscious biases, particularly those related to gender stereotypes. Growens acknowledges and supports the right of all employees to become parents, regardless of their gender. Additionally, the company promotes policies and actions aimed at equal opportunities, female empowerment, work-life balance, shared family responsibilities, and the removal of potential barriers, including those related to parenthood.

Growens is dedicated to combating gender-based violence and has adopted a Policy for the Prevention of Harassment, Discrimination, and Bullying in the Workplace. A system is also in place to encourage employees to report any instances of violence through appropriate reporting channels.

Generations

Growens values generational diversity and adopts strategies for managing the needs of different generations within the organization. The focus is not only on age and professional seniority but also on finding effective ways to foster the development of workers from various generations, encouraging the exchange of social, cultural, and work-related experiences. This includes sharing diverse perspectives, abilities, knowledge, and skills typical of each generation for an effective intergenerational dialogue.

Sexual and Affective Orientation and Gender Identity

Growens aims to promote policies and measures that improve working conditions through inclusive processes for all individuals. The company is committed to preventing and combating any form of direct or indirect discrimination related to sexual or affective orientation. The goal is to make equal opportunities a reality by:

- Protecting fundamental freedoms and the unique characteristics of individuals at every stage of employment.
- Promoting both formal and substantive equality through solutions and preventive mechanisms against prejudicial treatment unrelated to the job's required skills.
- Actively engaging the company in internal and external efforts to participate in cultural awareness initiatives, listening, and communication in line with social sustainability strategies.

Disability

Growens ensures equal opportunities for all employees, regardless of sensory, cognitive, or motor disabilities. In this context, the company is committed to implementing concrete measures to promote the inclusion of people with disabilities, fully recognizing their talents and skills within the organization. By doing so, Growens contributes to the removal of cultural, sensory, and physical barriers. The company's actions are oriented towards providing reasonable accommodations to enable employees with disabilities to perform their duties effectively, ensuring that all employees receive the necessary support to address their individual challenges and feel valued within the organization.

Multiculturalism and interculturalism

Growens is an international company that embraces a variety of cultures and promotes the inclusion of employees from different ethnicities and countries. It recognizes, celebrates, and values the diversity of cultural traditions, beliefs, and experiences of its personnel, creating a rich and inclusive working environment. This commitment not only enhances the company's fabric with new perspectives but also fosters intercultural understanding and collaboration among colleagues from different backgrounds, as well as with external stakeholders (partners, customers, suppliers).

Intersectionality

Growens is aware that different characteristics can coexist within a single individual and that these contribute to the development of personal identity, formed by the intersection of multiple social identities. The company recognizes that any attempt to classify or limit human diversity into homogeneous categories is an oversimplification and an undue generalization.

In its efforts to address people's expectations and remove personal barriers to inclusion, Growens adopts an intersectional approach that considers the specific needs of each individual.

DE&I Principles in Business Processes

In its operations, Growens is committed to:

- Ensuring that recruitment and selection decisions are transparent and objective, based on the value, qualifications, skills, and potential of candidates.
- Expanding the pool of individuals interested in working for the company through dedicated activities in collaboration with schools and employer branding initiatives. This includes creating synergies with universities to spread Growens' approach to diversity and inclusion.
- Implementing a people management and development strategy aimed at promoting the uniqueness of each individual, guaranteeing equal opportunities for professional growth, including career advancement, horizontal development, and training initiatives.
- Developing inclusive leadership and management, promoting specific training and coaching programs designed to strengthen the necessary skills and ensure greater gender balance and diversity in leadership roles.
- Ensuring that compensation policies are inspired by principles of equity and the recognition of knowledge, skills, professionalism, attitudes, behavior, results, and contributions of each individual to the organization.
- Defining an action plan to manage and prevent the gender pay gap, systematically communicating the company's performance on this matter.

- Promoting a culture of inclusion through dedicated training programs aimed at overcoming stereotypes and highlighting the added value brought by diversity.
- Raising awareness about using respectful, polite, and appropriate language among and towards employees to avoid any confrontational or judgmental approach.
- Improving organizational well-being and employee motivation by strengthening the offer of corporate welfare services and tools, and promoting work-life balance across all stages of personal and professional life.
- Basing internal and external communication on responsibility, ensuring that images and content shared respect diversity.
- Promoting the values of diversity and equal opportunities within the communities where it operates, actively contributing to creating an open culture through communication and initiatives that support the full realization of every individual's potential.
- Encouraging opportunities for dialogue and listening to employees and collaborators to better understand their legitimate expectations on diversity, equity, and inclusion.

Governance and Monitoring

The policy is defined by the Board of Directors in coordination with the Grow@Growens Committee, which identifies DE&I objectives and indicators to be achieved at the Group level. The committee monitors progress with the support of relevant departments and data owners. It directs individual processes regarding the need for specific actions and/or improvements to ensure full respect for and enhancement of DE&I principles within the Group and in the external context of Social Corporate Responsibility.

Growens commits to disclosing its DE&I actions and strategies annually through its sustainability report.

Dissemination and Updating

This policy is communicated to all employees through dedicated training sessions, depending on their role and responsibilities. It is also available on the company's website for all stakeholders, including collaborators, suppliers, and partners, to ensure full awareness and further promote DE&I as an integral part of Growens' value system.

The DE&I policy is published on the company's intranet and website for transparency and collaboration. It will be reviewed annually based on the outcomes of assessments and monitoring of national and international trends.

Reporting Tools

Behaviors, language, and overall non-compliance with DE&I principles affect the general atmosphere in the workplace, influencing motivation, trust, morale, and health, and consequently, work performance and Growens' reputation. Therefore, inappropriate behaviors must be reported, with the assurance that Growens protects and supports any victims and/or witnesses.

To file a report, employees can:

- Contact the People & Culture team. Employees may approach their designated People Business Partner or anyone else from the team.
- Submit an anonymous report via this [link](#) using the available form.

Training and Awareness

We emphasize the importance of regular training programs to educate employees on this policy, its purpose, and their responsibilities. Employees are encouraged to participate in learning activities to fully understand the principles of diversity, equity, and inclusion as outlined in this policy. You can find updated learning resources in the [Grow Initiatives section](#).

Review and Compliance

These Guidelines will be periodically reviewed to ensure their effectiveness and compliance with applicable laws. Growens commits to revising its DE&I policy as needed to reflect new insights or changes in legislation, ensuring the continued promotion of an inclusive, respectful, and equitable work environment.

Nazzareno Gorni, CEO



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