GENDER EQUALITY, DIVERSITY AND INCLUSION POLICY

English translation of the formally approved Italian version

Purpose

This Gender Equality Policy sets out the commitment of **Fine Foods & Pharmaceuticals NTM S.p.A.** (hereinafter referred to as "Fine Foods") to fostering a fair, inclusive, and respectful working environment for all individuals, free from any form of discrimination, particularly gender-based discrimination.

To fulfil this commitment, Fine Foods has adopted a **Gender Equality Management System**, in accordance with the principles of **UNI/PdR 125:2022**, reflecting its intention to embedding gender equality, equal opportunities, and social inclusion into its organizational culture.

In particular, the system promotes transparent, merit-based criteria at every stage of the professional journey, from recruitment and training to career development and compensation progression, adopting criteria based exclusively on merit and individual commitment, irrespective of gender.

As stated in its Code of Ethics, Fine Foods recognises respect for the law and for people as core values and rejects all forms of discrimination and harassment. The Company believes in teamwork and recognizes diversity within the Group as an added value. Fine Foods is committed to safeguarding the physical, cultural, and moral integrity of individuals by ensuring a healthy, safe, positive, motivating, and inclusive working environment. To this end, the Company adopts measures aimed at increasing women's participation in the labour market and reducing the gender gap through a system designed to improve women's working conditions in terms of quality, remuneration, and role, while promoting transparency in work processes. Internal reporting and listening mechanisms are also in place, ensuring confidentiality and protection, to collect any reports concerning discrimination or violations of gender equality principles.

This Policy is subject to periodic review in light of the data collected, KPIs results and the outcomes of implemented actions, in order to identify further areas for improvement and strengthen existing measures.

In particular, Fine Foods focuses on four strategic areas for building a fair, inclusive, and sustainable workplace:

- **Pay equity**, ensuring fair remuneration through transparent, objective and merit-based compensation policies, irrespective of gender. Systematic monitoring of compensation data helps prevent and correct any disparities, fostering a culture of fairness and accountability.
- **Equal opportunities for professional growth**, ensuring fair access to training, career development, and positions of responsibility across all business areas and granting access to leadership roles solely on the basis of competence and potential.
- **Recognition and enhancement of diversity**, promoting an inclusive environment that values diversity and encourages reports of discrimination based on gender, ethnicity, sexual orientation, age, disability, religion, or background, considering diversity a strategic driver of innovation and success.

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- **Protection of maternity, paternity, and parenthood**, supporting work-life balance and recognizing these life stages as an integral part of personal and professional development.

This Policy is aligned with the United Nations Sustainable Development Goals (SDGs), particularly Goal 5 (Gender Equality), Goal 8 (Decent Work and Economic Growth), and Goal 10 (Reduced Inequalities), which represent the core pillars of this Policy.

Scope

Fine Foods is committed to implementing this Policy across all its locations and promoting awareness of its principles among all individuals operating within the organization and all stakeholders. The aim is to ensure that the principles and behaviours described herein become cornerstones of a Corporate culture inspired by sustainable development and guide day-to-day business conduct.

Commitment to Gender Equality, Diversity and Inclusion

Fine Foods has implemented a management system in accordance with UNI/PdR 125:2022 to continuously monitor the Company's direction, measure progress over time, and promote continuous improvement through specific Key Performance Indicators (KPIs) across six dimensions:

1. Culture and strategy;
2. Governance;
3. HR processes;
4. Gender-neutral career growth opportunities;
5. Gender pay equity;
6. Parenthood protection and work-life balance.

To promote a genuine and robust culture of gender equality, Senior Management defines the following strategic objectives:

- Ensure a **working environment free from discrimination, harassment, and prejudice** of any kind, firmly opposing any **discriminatory behaviour or language** based on personal characteristics and encouraging reporting.
- Foster a **fairer workplace** in terms of equal career opportunities, competitiveness, and flexibility.
- Ensure that **recruitment, hiring, promotion, training, and compensation policies** are based exclusively on competencies, performance, and individual potential, eliminating discrimination related to gender, ethnicity, or any other characteristic.
- Raise awareness of diversity and inclusion through **continuous training**, workshops, and seminars for all employees, aimed at fostering and disseminating an organizational culture based on fairness, respect, and appreciation of differences.
- Support the **growth of female employment and leadership**, facilitating women's participation and retention in the workplace, enhancing their skills, and supporting the reconciliation of work and caregiving responsibilities.

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- Ensure **gender pay equity**, guaranteeing fair remuneration for work of equal socioeconomic value and promoting economic independence for everyone, in accordance with the principle of ***equal pay for work of equal value.***
- Offer **equal opportunities for talent development and enhancement**, ensuring fair access to training, including leadership and professional growth programmes.
- Adopt **voluntary measures supporting parenthood**, protecting **maternity and paternity** and **promoting work-life balance**.
- Recognise **parenthood experience** as an opportunity for personal growth and acquisition of new skills, ensuring continuity in the relationship with the Company before, during, and after **maternity or paternity leave**, while maintaining related benefits and protections.
- Adopt **internal mobility and succession policies** for managerial positions consistent with the principles of an inclusive organization that respects gender equality.
- Ensure **balanced gender representation among speakers at panels, conferences, events, and public initiatives** promoted by or attended by the Company.

To achieve these objectives, Fine Foods commits to:

- Implementing governance and monitoring systems for diversity and gender equality within the Company.
- Providing people with ongoing training, information, and updates, disseminating the Gender Equality, Diversity & Inclusion Policy and related information within the organization, while promoting an open, inclusive, and fair culture through the website, internal platforms, and social media.
- Providing, where possible, additional flexibility beyond the provisions of the applicable National Collective Labour Agreement (CCNL) for employees with parenting and/or caregiving responsibilities.
- Supporting working mothers and fathers through policies and benefits that, where possible, go beyond the provisions of the applicable CCNL, protecting maternity and paternity and facilitating work-life balance.
- Promoting gender equality across all contractual classification levels.
- Encouraging the use of inclusive language that fosters dialogue and avoid sexist expressions and behaviours.
- Ensuring pay transparency in compliance with Legislative Decree No. 104/2022 (the “Transparency Decree”), making all relevant documents (pay slips, annual tax certifications, etc.) available to employees through the Zucchetti portal.
- Welcoming employees’ voices and perspectives through an open and inclusive approach, encouraging the reporting of concerns and sharing ideas, with particular attention to discrimination, harassment, and abuse.
- Encouraging the use of available reporting channels, including the anonymous Whistleblowing system and the dedicated Steering Committee e-mail address.

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Finally, Fine Foods prepares and disseminates to stakeholders a communication plan outlining its commitment to gender equality. Fine Foods ensures that communications are consistent with the principles of this Policy and with the objectives established and implemented through the strategic plan. The strategic plan clearly identifies the objectives pursued by Management and the Human Resources Department, with the support of the Gender Equality Steering Committee.

Zero Tolerance

Fine Foods does not tolerate any form of discrimination and identifies the risk of any type of physical, verbal, or digital abuse and harassment within its management system. Offensive language, gender bias, and derogatory attitudes are considered unacceptable. Therefore, all employees are expected to behave appropriately and respectfully, in line with these principles.

In its communication activities, Fine Foods pays particular attention to avoiding gender stereotypes in advertising and promotional actions, ensuring periodic review of materials and marketing strategies. The Company is committed to promoting a positive image of women and girls and using language that respects gender differences.

Responsibilities

Senior Management ensures the strategic oversight of the Gender Equality Management System through the establishment of a Gender Equality Steering Committee, and the allocation of a dedicated budget to implement actions necessary for:

- Integrating gender equality principles into corporate strategies and policies;
- Defining objectives, KPIs, and action plans;
- Monitoring results and the continuous improvement of the Management System;
- Promoting and spreading a culture of gender equality.

All organizational levels are expected to contribute actively to the implementation of this Policy by adopting consistent behaviours and promoting a culture of respect in their daily activities.

Communication and Review

This Policy:

- Is communicated and disseminated within the organization and to relevant stakeholders;
- Is subject to training and awareness activities addressed to employees and management;
- Is published on the Company's website.

The adequacy and effectiveness of this Policy is reviewed annually as part of the Management System review process.

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Responsibility for its implementation is assigned to the Gender Equality Steering Committee, in collaboration with the Human Resources Department, which, where possible, strives to promote gender equality and pay equity in coordination with Management.

In pursuing its Corporate mission, Fine Foods recognizes the central role of stakeholders and the mutual benefits arising from understanding their needs and expectations. For this reason, this Policy is communicated to all stakeholders and displayed prominently at Company's premises.

Zingonia-Verdellino, 09/10/2026

Signature of the Legal Representative

Pietro Oriani, CEO

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