



INTERPUMP GROUP

POLICY

DIVERSITY, EQUITY & INCLUSION

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1. Introduction

1.1. Objectives

Interpump Group supports the moral integrity of its collaborators, guaranteeing the right to working conditions that respect the dignity of the individual and free from any act of violence, attitude or behaviour that is discriminatory or harmful to the individual, their beliefs and preferences.

The purpose of this Policy is to define the principles, objectives and commitments that Interpump Group intends to assume to promote diversity, ensure fairness and foster inclusion both within its organizational structure and externally, supporting the growth of an inclusive society. Furthermore, it aims to promote a corporate culture based on inclusion and mutual respect, in the belief that **diversity, equity and inclusion**, as well as the protection of workers' rights, are essential elements in the performance of Interpump Group's activities.

1.2. Scope of application

This Policy has been approved by the Board of Directors of Interpump Group S.p.A. and its adoption and implementation is mandatory for all Group companies, even in consideration of the cultural, social, economic and regulatory diversity of the various countries in which Interpump Group operates. It is consequently binding for the conduct of all employees, directors and, to the extent applicable, consultants, suppliers, customers and other third parties who deal with Interpump Group companies (hereinafter "**Third Parties**").

It is the duty of each company of the Group: (i) to bring this Policy to the knowledge of Third Parties, even if they have discontinuous or temporary relations with the company; (ii) to require Third Parties, in the performance of their activities, to comply with the principles and obligations established in this Policy; (iii) to take the necessary internal initiatives in the event of failure or partial performance of the commitment undertaken by the Third Parties to comply with the provisions contained in this Policy and referring to them or in the event of refusal to do so, to assess the appropriate actions, including termination of the relationship.

1.3. Method of adoption

Each company must promptly adopt this Policy by a **resolution** of the Board of Directors, or the corresponding body if the company does not have a Board of Directors. The resolution of the Board of Directors, or the corresponding body, approving this Policy must be subsequently forwarded to the Group Internal Audit, Risk & Compliance Department in order to monitor its correct and timely adoption.

1.4. Regulatory references

Interpump Group is committed to respecting and actively promoting the principles set forth in internal regulations, contractual provisions and standards issued by international organisations, including: (i) Agenda 2030 for Sustainable Development and related Sustainable Development Goals; (ii) United Nations Women's Empowerment Principles; (iii) Universal Declaration of Human Rights; (iv) United Nations Conventions on the Rights of Women, Elimination of All Forms of Racial Discrimination, the Rights of the Child, and the Rights of Persons with Disabilities; (v) Declaration on Fundamental Principles and Rights at Work and the eight core Conventions of the International Labour Organisation (ILO); and (vi) ILO Convention on Violence and Harassment.

Furthermore, this Policy is inspired by the **UN Global Compact**, with a commitment to respect and support its ten principles relating to human rights, labour standards, environment, anti-corruption and anti-discrimination.

2. Roles and responsibilities

Each person of Interpump Group is required to commit themselves, consistently and transparently, to putting into practice the values and contents of the Group's Code of Ethics, as well as the principles defined in this Policy, in order to respect, promote and highlight diversity, equity and inclusion. Furthermore, ensuring an inclusive working environment is a **transversal responsibility** shared by all those who contribute to the success of the Interpump Group.

Each person working with or at Interpump Group is required to:

- being knowledgeable of this Policy and to act in accordance with the principles and values contained herein;
- respect the rights and dignity of every person, acting in the forefront to make concrete the ethical principles of fairness, loyalty and integrity;
- recognise, accept, promote and emphasise diversity, fairness and inclusion at all levels and in all contexts, always contributing to establishing a working climate that promotes confrontation, collaboration and participation in the creation of ideas and solutions;
- communicate clearly and consistently, taking care to modulate one's own communication (language, style, vocabulary) according to the other, removing obstacles to the active participation of all people;
- recognise and act on one's own prejudices of which one is aware and less aware, particularly in relations with others;
- report discriminatory and/or potentially discriminatory behaviour, or in any case in violation of this Policy.

2.1. Human Resources Manager

Each **Human Resources Manager** of Interpump Group, or of the corresponding subject if the company does not entail such a role, has the duty to set an example with respect to the principles contained in this Policy and to actively disseminate them both internally and externally.

Each Human Resources Manager, or the corresponding person, also with the participation of the Function Managers concerned, is required to:

- recognise the diversity present within the teams;
- understand the different and specific contribution that each team member can make;
- create the organisational condition so that each team member can express his/her own contribution and potential, also in compliance with personal needs of reconciliation and work-life integration;
- ensure that fair treatment, inclusion and non-discrimination are guaranteed in the workplace at all levels and intervene promptly whenever it becomes aware of conduct that does not guarantee respect for others;
- promote the aforementioned principles and intervene in the event of their violation.

2.2. Group Internal Audit, Risk & Compliance Function

The **Group Internal Audit, Risk & Compliance Function** ensures the updating and effectiveness of this Policy, i.e:

- monitors the correct adoption of this Policy by the companies of the Group;
- supports the management/corporate functions of the Group companies in the adoption of safeguards and tools to prevent the risk of practices or conduct detrimental to the dignity, fairness and inclusion of the person;
- carries out, on the basis of an annual audit plan with a risk-based approach or in relation to events of particular importance, checks on compliance with this Policy by Group companies;
- supports training initiatives for the management/corporate functions of Group companies;
- draws up a six-monthly report on the results of its monitoring and audit activities to be submitted to the Control and Risk Committee, the Supervisory Board and the Board of Auditors of Interpump Group S.p.A.

2.3. Control and Risks Committee of Interpump Group S.p.A.

The **Control and Risks Committee of Interpump Group S.p.A.** supports the Board of Directors' evaluations and decisions relating to diversity and inclusion issues or relating to serious violations of this Policy.

2.4. Sustainability Committee of Interpump Group S.p.A.

The **Sustainability Committee of Interpump Group S.p.A.** has inquiry, proposal and advisory functions to the Board of Directors in evaluating and making decisions in the field of sustainability, including issues related to diversity and inclusion, meaning the objectives, processes, initiatives and activities aimed at overseeing the Company's commitment to the pursuit of sustainable success, including ESG (environmental, social and governance).

3. Group Code of Ethics

The **Code of Ethics** is a set of principles the observance of which is of fundamental importance for the smooth running, the reliability of management and the image of Interpump Group. These principles inspire both the internal and external operations, behaviours and relations pertaining to the companies of the Interpump Group. The Code of Ethics is valid both in Italy and abroad, even in consideration of the cultural, social and economic differences of the various countries in which the Group operates.

4. Three-year ESG Strategic Plan 2023 - 2025

Interpump Group's commitment to sustainable economic growth goes through the adoption of an integrated strategy capable of combining the success of its business with the principles of sustainability and the creation of long-term value for stakeholders. The Board of Directors of Interpump Group S.p.A. has approved the **three-year ESG Strategic Plan 2023 - 2025** (hereinafter the "ESG Plan"), which defines the Group's strategic vision of sustainability and corporate social responsibility.

5. Principles of Conduct

In compliance with the relevant legislation and consistent with best practices and the contents of the Code of Ethics, the Interpump Group recognises the following **principles**, defining the objectives and commitments aimed at promoting diversity, equity and inclusion. In order to make its commitment concrete, the Group considers and implements the principles contained in this Policy as criteria that contribute to the definition of strategic, business and internal organisation decisions.

5.1. Diversity

Diversity is a value that enhances innovation, productivity and idea creation, improving the working climate and fostering a diverse cultural environment.

Diversity is protected in all its forms, including:

- **gender** - Interpump Group values gender balance and the overcoming of any stereotype, discrimination or prejudice, in order to create the best conditions in which each person can best express him/herself; in addition, it promotes gender equality at all levels, committing itself to implementing processes and systems suitable for reducing the gender gap.
- **age and generation** - Interpump Group recognises as a priority the integration of work in a multigenerational context in which the development of each person occurs through dialogue and the exchange of knowledge between individuals of different ages; moreover, it enhances integrated strategies for the development and management of the needs of the different generations living together within the organisation, considering demographic perspectives and their effects on turnover, as well as promoting the contamination of different social, cultural and professional experiences, as well as the different skills, knowledge and competencies typical of each generation.
- **culture** - Interpump Group supports openness to confrontation, integration and multiculturalism, both internally and externally, and has designed initiatives for the dissemination of knowledge in organisational and managerial environments, with the aim of promoting an intercultural vision that is open to confrontation at multiple levels and marked by organisational and social cooperation.

- *ability and vulnerability* –Interpump Group promotes work spaces free of any barriers that can guarantee adequate accessibility to all differently-abled persons, facilitating their access to physical locations, work tools and training activities, thus guaranteeing conditions so that everyone can contribute to the growth and development of company processes; furthermore, it has undertaken awareness-raising initiatives at a collective level to recognise situations of vulnerability in advance and facilitate work integration and quality of work for all differently-abled persons.
- *gender identity and sexual orientation* –Interpump Group promotes the creation of an inclusive working environment where everyone feels respected and appreciated, regardless of their identity, gender expression and/or sexual orientation; therefore, the Group strives to ensure each person's individual freedom, within the framework of respect for the freedoms of others, welcoming and valuing everyone's contribution and rejecting any form of discrimination based on sexual identity or gender.
- *religious orientation* –Interpump Group promotes respect for all religions and the freedom to profess one's faith.
- *Other diversity* –Interpump Group respects diversity in all its forms and does not tolerate any form of discrimination.

5.2. Equity

Interpump Group ensures **equity** of access, treatment, opportunity and professional development in the workplace and the removal of any barriers not related to merit that may preclude full participation. Each individual is unique in terms of age, ancestry, beliefs, country of origin, culture, education, ethnicity, gender identity, marital status, minority status, mental or physical ability, nationality, parenthood, personality, political opinions, pregnancy status, religion, sexual orientation and identity, skin colour, socioeconomic background and any other characteristic or condition.

Each individual's background and personal opinions represent a unique and valuable resource both with specific reference to the work performed and for society in general.

5.3. Inclusion

For Interpump Group, it is a priority to create and preserve an **inclusive**, safe and collaborative working environment where uniqueness and diversity are recognised as added values and strengths for the development, growth and strengthening of business processes. Interpump Group also creates working environments where any person or group can be and feel listened to, respected and considered so that they can actively participate in the life of the organisation.

6. Risk Areas

6.1. Personnel recruitment and selection

Interpump Group is committed to attracting and hiring people with different talents, backgrounds and skills. In view of the prevalence of the male gender in the workforce, historically due to the type of business activity that is operational and technical in nature, in order to attract more female candidates, the Interpump Group promotes the **role of women** through participation in initiatives and events (open days at universities, mentor courses, school training and partnership development,..).

In the **personnel selection process**, the Interpump Group adopts assessment criteria aimed at reducing discrimination related to the gender of candidates at all stages of the process. Personnel selection is based on impartial and transparent criteria that take into account objective elements, such as experience, behaviour, skills and potential in relation to the role to be filled and are independent of evaluations relating to elements of diversity or conditioning deriving from stereotypes. Interpump Group ensures that the people involved in the selection processes receive adequate training on gender equality and cognitive biases that may negatively impact the selection processes.

6.2. Training

For Interpump Group, **training**, whether it is compulsory, continuous or inherent to soft skills, represents one of the essential tools for the professional and personal growth of its employees and constitutes an element for promoting a cultural change relative to the integration of the principles defined in this Policy. Furthermore, the Group promotes diversity and inclusion when designing and delivering technical, managerial and leadership training, offering all personnel professional training courses, without any discrimination based on diversity or stereotypes.

Training is provided to all personnel on this Policy and, in general, on issues of inclusion and enhancement of diversity, gender equality and the company's policies of rejection of any form of discrimination, harassment and gender-based violence.

6.3. Professional development

Interpump Group promotes **professional development** and the enhancement of individual talent by means of personal growth paths that respect diversity and inclusion. Furthermore, it makes professional growth paths and positions of responsibility accessible to all people, according to meritocratic logic and taking into account the role held, the relative responsibilities, the results of performance evaluation processes, the potential and aptitudes of people, consistently with the company's needs.

6.4. Remuneration and incentive policies

Interpump Group adopts gender-neutral **remuneration and incentive policies** based on fairness and the enhancement of merit. The Group monitors the gender neutrality of its remuneration policies and the gender pay gap in order to take any necessary corrective action.

6.5. Work-life balance

Interpump Group evaluates initiatives aimed at promoting **individual wellbeing and work-life balance**, in order to protect the most vulnerable categories and guarantee fair employment opportunities. Furthermore, the Group believes that the valorisation of diversity and the creation of an Inclusive context are favoured by the recognition of flexible forms of work organisation, taking into account organisational needs and the tasks performed; therefore, the Group is attentive to the principle of work-life integration of each person, considering the different individual work methods and times.

6.6. Health and safety in the workplace

Interpump Group rejects any form of discrimination, harassment and violence in the workplace by applying the "zero tolerance" rule for these cases, and has assessed among the risks present within its working environment those arising from discrimination, physical, verbal and digital abuse.

Moreover, Interpump Group, attentive to the **health and safety** of all workers, works to safeguard its own pregnant workers and the unborn child, assessing, on the basis of the risks per task to which she is exposed, whether additional prevention and protection measures should be applied.

6.7. Communication

In its internal, external and institutional **communications**, Interpump Group uses content that respects diversity and is committed to raising awareness among all personnel on issues related to unconscious bias and the ability to communicate in an inclusive manner.

7. Reporting and whistleblowing

Any violation, whether suspected or known, and any conduct in breach of the provisions contained in this Policy, must be **reported** immediately to the relevant corporate officers and/or through the appropriate channels and reported in the Group Whistleblowing procedure.

8. Disciplinary measures and contractual remedies

Interpump Group is committed to preventing conduct that violates the provisions contained in this Policy. The Group shall take appropriate **disciplinary measures** against employees and contractors of Group companies, in accordance with applicable collective bargaining agreements or applicable national laws, whose conduct (i) violates the provisions contained in this Policy, and/or (ii) unreasonably fails to detect or report such violations or who threatens or retaliates against others who report such violations.

The Interpump Group will take appropriate action, including but not limited to **disciplinary action against employees or** termination of the contract and claims for damages against contracting parties whose conduct violates the above regulations or this Policy.

9. Staff training

The employees and collaborators of Interpump Group must be **informed and trained** on the importance of compliance with the rules contained in this Policy. In particular, employees and collaborators most exposed to activities at risk shall receive a copy of this Policy; in addition, the Group Internal Audit, Risk & Compliance Department shall set up periodic training sessions in relation to the principles and measures contained in this Policy.

Fabio Marasi
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