Policy adopted within the Gender Equality Management System compliant with UNI/PdR 125:2022

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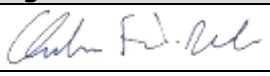
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Forms/Procedures/Documents referenced:

- Diversity, Equity & Inclusion Policy

Function	Name and surname	Signature	Date
Verified and approved by the DE&I Committee	Andrea Favaretto Rubelli		29/10/2026

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0	29/10/2026	First issue

1) PURPOSE AND SCOPE

RUBELLI S.p.A. (hereinafter "**Rubelli**" or the "**Company**"), consistent with its own Diversity, Equity & Inclusion Policy ("**DE&I Policy**") and with UNI/PdR 125:2022, provides a system for reporting facts, conduct, practices or omissions potentially contrary to the principles of gender equality, equity and inclusion.
This Policy governs who may submit reports, the subject matter and channels of reporting, as well as the procedures for receiving, analysing and managing them. It is distinct from the Whistleblowing Policy adopted pursuant to Legislative Decree No. 24/2023.

2) WHO MAY SUBMIT A REPORT

The Reporting Persons may be the following:

- all Recipients, that is to say directors, collaborators, agency workers, interns and consultants;
- persons whose employment relationship has ended at the time the Report is made, where the information was obtained during the employment relationship;
- persons who have applied for a job within Rubelli, where the information was obtained in the course of such application;
- employees and collaborators of Rubelli's suppliers;
- shareholders and persons with administrative, management, control, supervisory or representation functions, even where such functions are exercised on a merely de facto basis.

3) WHAT MAY BE REPORTED

The following may be reported, by way of example:

- direct or indirect discrimination (based on gender, ethnicity, religion, sexual orientation or on any other personal characteristic) or disparities of treatment based on gender, including in access to employment, selection, recruitment or conditions of employment;
- disparities in access to training, professional development paths, internal mobility, promotions, leadership positions or other roles of responsibility;
- pay disparities or discriminatory practices relating to salaries, variable remuneration, awards, bonuses, benefits or welfare measures;
- unfavourable treatment connected with pregnancy, maternity or paternity, the taking of or return from leave, family or caregiving responsibilities and work-life balance needs;
- physical, verbal or digital abuse, mobbing, harassment, violence, intimidation or bullying, sexist or inappropriate attitudes or language, as well as offensive or disrespectful conduct or situations of disrespect liable to cause discomfort, distress or harm to a person's dignity;
- breaches of the DE&I Policy, as well as of company procedures and policies, and non-conformities with the requirements and objectives of the Gender Equality Management System (hereinafter "**GEMS**").

4) REPORTING CHANNELS

A report may be submitted through:

- the Whistleblowing Platform adopted by the Company and available at the link: https://digitalroom.bdo.it/Rubelli;
- written communication to the e-mail address: comitatodei@rubelli.com;
- verbal communication by addressing directly one or more members of the Steering Committee for Diversity, Equity and Inclusion ("**DE&I Committee**") or the Human Resources Manager.

A report may be made either by disclosing one's identity or anonymously. Rubelli ensures the appropriate handling of anonymous reports as well, to the extent that they contain sufficiently detailed information.

Use of the platform does not automatically entail the application of the rules set out in Legislative Decree No. 24/2023, which apply solely where the report falls within its subjective and objective scope.

5) MANAGEMENT OF REPORTS

The receipt and management of reports are entrusted to the Steering Committee for Diversity, Equity and Inclusion, hereinafter the "DE&I Committee", which operates with impartiality, competence and confidentiality (hereinafter the "**Handler**")
In particular, reports received concerning DE&I matters are forwarded to the DE&I Committee, which examines and handles them with the utmost confidentiality, ensuring, in any event, the protection of the reporting person. The DE&I Committee assesses the merits of the reports within the limits of the powers conferred on it by the Gender Equality Management System and by the Company's organisational acts, availing itself, where necessary, of the support of the competent company functions.

6) MANAGEMENT PROCEDURES

The reports received are collected, examined, managed and documented within the Gender Equality Management System, in accordance with the procedures defined by the Company and consistently with UNI/PdR 125:2022.
The Handlers promptly examine the report and, where necessary, carry out the appropriate further investigations in order to verify whether the facts described reveal a situation that does not comply with the DE&I Policy, with company procedures or with the requirements of the GEMS.

Non-compliant situations may emerge, in addition to through the reporting channels, in the course of control activities carried out by the competent bodies or by certification bodies, internal audits, periodic reviews and communications from company functions or external interested parties.

Where a non-compliant situation is established, the DE&I Committee analyses its causes and identifies, with the involvement of the competent functions, the necessary remedial and corrective actions. The GEMS Manager oversees their implementation and ensures the allocation of resources appropriate to the nature and seriousness of the non-conformity identified, informing the Supervisory Body as provided for by the Company's organisational structure.
The reports, the verification activities carried out, the assessments made and any actions taken are documented and tracked in the dedicated register, in compliance with confidentiality requirements. Non-compliant situations and the status of implementation of corrective actions are periodically monitored by the DE&I Committee and examined by Top Management during the periodic review of the system.

The Company promotes the timely reporting of non-compliant situations and undertakes not to adopt disciplinary, discriminatory or otherwise prejudicial measures against anyone who provides, in good faith and on the basis of information they reasonably believe to be reliable, information concerning compliance with the DE&I Policy and the conformity of the GEMS. The application of the further protections provided for by applicable legislation remains unaffected, where the relevant conditions are met.

The Handlers:

- record the report and carry out a preliminary assessment of its relevance and merits;
- where possible, request clarifications or additional information from the reporting person;
- carry out or coordinate the necessary further investigations, involving only competent and authorised persons;
- document the checks carried out and propose to the competent functions any preventive measures, corrective actions or organisational interventions;
- where possible and within the limits allowed by confidentiality requirements, inform the reporting person of the conclusion of the management process, without prejudice to the rights of the persons involved and to the confidentiality of the company's determinations.

The checks are carried out with objectivity, proportionality and respect for the dignity of the persons involved.

7) PROTECTION OF PERSONAL DATA

The personal data collected in connection with the management of reports are processed in compliance with Regulation (EU) 2016/679 (GDPR) and applicable legislation, with the adoption of appropriate technical and organisational measures to protect the confidentiality of the reporting person, the reported person and any

other person involved in or mentioned in the report. Detailed information on the processing of personal data is provided in the dedicated privacy notice made available by the Company.
The reports and related documentation are retained for the time necessary for their management and, in any event, within the retention periods defined by the Gender Equality Management System and by applicable legislation.

8) COMMUNICATION OF THE POLICY

The Human Resources Manager is responsible for the communication and dissemination of this Policy.
The document is also made available on the Company's website, so as to ensure its accessibility to external stakeholders as well.
For any doubts or requests for clarification regarding the Policy, Recipients are invited to contact a member of the DE&I Committee or the Human Resources Manager, who will provide support and operational guidance.

9) TRAINING

The Company ensures information and training activities on this Policy, committing to at least one meeting per year.