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Issue 2024

**Diversity,
Equity,
Inclusion (DEI)**







Global Policy (GPL)

Diversity, Equity, Inclusion (DEI)

Code: GPL.116.24	Issue: 01 (July 2024)
Purpose	State the De Nora commitment and approach on DEI principles.
What I have to do	Read the policy, promote DEI and consult your local P.Or.SC.H. to learn more about DEI initiatives

Sponsor	Chief P.Or.SC.H. Officer
Key Content Owner	P.Or.SC.H.
Other impacted functions	<ul style="list-style-type: none"> All
References	<ul style="list-style-type: none"> DN Documents: DN Code of Ethics
Superseded Docs	None
Applicability	All De Nora Legal Entities
Distribution	All De Nora Personnel
Approver	<p>Paolo Dellachà DN Chief Executive Officer</p>  <hr/> <p>Graziano Marcuccio DN Chief P.Or.SC.H. Officer</p>  <hr/>

Contents

1. Key Principles	2
2. DEI @ De Nora	2
3. Implementation	3
4. Change Log	3

Acronyms and definitions

LP = Local Policy

DN = De Nora Group

P.Or.S.C.H. = People, Organization, Social Communication, Happiness

LE = Legal Entity, i.e. a specific local De Nora company

Distribution: All personnel

1. Key Principles

DN Code of Ethics stands for mutual respect and value of diversity, which are embedded in the pillar “Wellbeing, inclusion & belonging” of our SUPERIOR People Strategy.

Diversity, Equity and Inclusion (DEI) for us means:

- **Diversity:** recognize the differences and uniqueness of each individual
- **Equity:** ensure tailored resources and opportunities for everyone
- **Inclusion:** create an environment where everyone feels appreciated, empowered and supported.

Pursuing our value of “making a difference”, DEI for De Nora is about taking concrete actions to create a thriving, dynamic, and resilient organization that leverages the strengths of a diverse and inclusive workforce to achieve sustainable business success, beyond simply meeting obligations/ laws.

These actions are mainly defined through tangible targets within our:

- **SU.P.E.R.IO.R.** (*Sustainable, Productive, Engaging, Reputational, Intelligence Oriented, Remunerative*) **People Strategy**, i.e. the list of projects and actions the Company puts in place for her People
- **ESG roadmap**, i.e. all the actions aimed at having a positive impact to the Sustainable Development Goals adopted by DN
- **Each For Equal Committee**, a cross-country/cross-functional team of volunteers promoting and executing related initiatives.

We believe that DEI can create and enhance the value of the Company impacting:

- **Employer branding and reputation, engagement, retention:** increasing talent attraction & retention by creating a "protected" space where people can express themselves and feel valued
- **Collaboration:** fostering a more cohesive work environment through acceptance and inclusion
- **Identity:** enhancing sense of belonging to the company when diversity is valued
- **Sustainability:** enhancing Group ESG profile and creating value for all stakeholder
- **Innovation:** highly diverse teams have better problem-solving skills and perform better.

2. DEI @ De Nora

DN promotes a culture of inclusion that values diverse perspectives and an inclusive and respectful environment where everyone feels valued, empowered and supported.

The company believes in a culture based on respect and appreciation of diversity in every possible aspect. Therefore, it prohibits behaviours that harm individual dignity or engage in discriminations including but not limited to age, gender, sexual orientation, gender identity, physical appearance, health status, disabilities, social and economic conditions and background, ethnicity, nationality, citizenship, political and union opinions and memberships, religious beliefs, job tasks and organizational positions, without exceptions.

This commitment extends to freedom from all forms of discriminatory behaviours, including harassment and physical, verbal, and written aggression, bullying. The Company is also against any unjustified changes in compensation, career path, dismissals, and any other unwarranted employment measures.

DN promotes a zero-tolerance approach to these behaviours and is committed to preventing and fighting them if they occur. DEI principles are so important to DN that are part of our leadership training as well.

Distribution: All personnel

DN is committed to safeguarding DEI by pursuing a culture of fairness and transparency in all people management processes and to proactively developing actions in favour of the equal opportunities. The Company provides equal opportunities across all aspects of employment, encompassing all the stages of the employee lifecycle: starting from recruiting processes, target assignment, performance and competence evaluation, compensation, development and training opportunities and career advancement as well as the offboarding. The processes are detailed in the specific Policies and will be outlined according to the broader principle of DEI.

Specifically, DN adheres to the principle of equal pay for work of equal value, for instance, between women and men, and proactively commits to enhancing gender balance. These determinations are exclusively based on individuals' performances and values. Gender balance is also pursued in representation among speakers at panel discussions, events, conferences, including scientific ones (e.g. STEM).

Moreover, DN stands for the creation of an environment that promotes well-being and “work-life blending” as well as equal opportunities. These principles are also stated in other Global Policies, such as Flexibility and Parental Leaves.

3. Implementation

This Policy is applicable in all DN group to each person cooperating with any kind of contract with DN. In cases where DN does not have direct operational control, it is expected that all business partners will adhere to the principles outlined in this Policy.

The implementation and application of what is defined in this Policy will be the responsibility of each employee and fostered by DN through training initiatives.

The Company is in charge of managing and monitoring the company's performance to establish specific Key Performance Indicators (KPIs) and collect documentation of the results achieved, which will be periodically submitted to the Management for verification, including the one of the Survey.

Breaches to what stated in the Policy can be reported by each employee through the Line Manager, Local P.OR.SC.H. or through the anonymous channels that grants anonymity in the Whistleblowing Policy.

4. Change Log

Issue	Change description / reason for Change	Interested Chapters
1 (07.2024)	First Issue	All

Distribution: All personnel