

Somec S.p.A.

**Workforce Diversity
& Inclusion Policy**

Somec S.p.A. (hereinafter also “The Company”) is one of the world’s leading experts in the construction of complex turnkey projects.

Since 2013, under the leadership of the current Shareholders and Management, Somec S.p.A. has evolved from a specialist in marine glazing to a Group of specialist companies, including cruise liners galley systems and the furnishings of public areas aboard.

Somec Group has further evolved into a universe of 30+ companies active in three main segments of projects for the naval and civil construction sectors – engineered glazing and façade systems, professional kitchen systems and products and the design and creation of custom interiors.

SCOPE OF THIS POLICY

This Policy applies to Somec S.p.A., its subsidiaries, the entities in which it holds a majority interest, and the facilities that it manages. We are committed to working with and encouraging our business partners to uphold the principles in this Policy and to adopt similar policies within their businesses.

Locally each company should adopt more stringent rules and procedures, as needed and in accordance with local laws and regulations. While conducting its management, coordination and supervision activities, Somec S.p.A. respects management autonomy of each affiliate within its Group, managing and controlling the overall business, as per legitimate interests of majority and minority shareholders, considering confidentiality requirements and local applicable laws.

Business integrity and regulatory compliance are core aim of our strategy: to operate in compliance with the applicable rules of the countries where we operate, distinguishing ourselves as an enterprise committed to ESG responsibility.

The purpose of this Policy is to provide guidance to Somec Group's directors, officers, employees, agents, consultants, intermediaries, controlled joint ventures, and other third-party representatives to ensure compliance with applicable regulation and our Values and Policies.

The Somec Group is committed to a continuous improvement of its policies and its programs, facilitating the adoption at local level of all procedures, rules, and instructions needed to have the principles set in this Policy applicable and monitored, in order to make an impact. By adopting this Policy, we believe to contribute to a better condition of existing and of next generations, providing tools for a better quality of work.

OUR APPROACH TO WORKFORCE DIVERSITY & INCLUSION

We are committed to a responsible behavior towards all our relevant stakeholders in operating business, combining respect of people, natural environment, and communities, and sustainability is therefore embedded in our Ethics Code, and day-to-day operations.

This policy, together with our Ethic Code, is made available to all Group companies and form part of the Organization, Management and Control Model, in accordance with the principles and objectives of the Organization, Management and Control Model as per Italian Legislative Decree 231/2001.

All employees at Somec Group contribute to the company’s success. Somec Group recognizes its talented and diverse workforce as a key competitive advantage. Our business success is a reflection of the quality and skill of our people. Somec Group is committed to seeking out and retaining the finest human talent to ensure top business growth and performance.

The diversity of the workforce in terms of age, gender and ethnicity, for example, is an asset to the Company and the Group. We therefore strive for diversity at all job levels and at all Somec Group's workplaces.

For us workplace diversity means to the variety of differences between people in an organization. Diversity encompasses acceptance and respect. It is an understanding that each individual is unique,

and a recognition of our individual differences. These differences can include gender, ethnicity, sexual orientation, age, physical and mental abilities, family status, religious beliefs, perspective, experience, or other ideologies, thinking styles, experience, and education.

We believe that the wide array of perspectives that results from such diversity promotes innovation and business success. Managing diversity makes us more creative, flexible, productive and competitive. We recognize that our people need to reflect our customers and local communities and that building a diverse and inclusive workforce will result in improved service for our customers and return for our shareholders. Additionally, research shows that the most engaged employees are those working in an open, fair and diverse environment.

We are committed to maintaining the highest possible ethical standards and to complying with all applicable laws in all countries in which we do business. We firmly believe to have the responsibility to operate in compliance with the rules of the countries where we have a presence, distinguishing ourselves as an enterprise capable of exporting the values that permeate our actions, by promoting them in the communities where we operate.

Somec S.p.A. adopted and complies with the Corporate Governance Code since 2021. This requires, among other things, to provide in its Corporate Governance Report and Proprietary Shareholdings information on Board of Directors' composition and evaluation of the performance of the Board and its committees, taking into account the professional competence, experience, gender of its members and number of years as directors. Somec S.p.A. Board of Directors' composition complies with applicable legislation and with the Corporate Governance Code requirements.

GENERAL PRINCIPLES

Somec Group is committed to fostering, cultivating and preserving a culture of diversity and inclusion in its Workforce.

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievement as well.

We embrace and encourage our employees' differences in gender, age, race, disability, ethnicity, family or marital status, language, national origin, physical ability, political affiliation, religion, sexual orientation, socio-economic status, and other characteristics that make our employees unique.

All employees of Somec Group have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events.

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action. Specifically, in case of violation of this policy, of the internal procedure referred to herein and/or of the applicable law, sanctions are imposed against the responsible in accordance with the provisions by law, collective agreements and contracts.

Employees who believe they have been subjected to any kind of discrimination that conflicts with the company's diversity policy should seek assistance from a supervisor or an HR representative.

Our Workforce Diversity & Inclusion Policy is based on the following key elements:

- diversity and equal opportunities
- non-discrimination
- meritocracy.

Diversity and Equal opportunities

We recognize that sexism, racism, ageism, and other forms of discrimination are potential problems both for our organization and society as a whole.

Somec Group is committed to tackling cultural stereotypes both within and outside our organization. We strictly condemn any kind of discrimination or harassment to prevent any future incidents.

We are committed to eliminating all forms of unlawful discrimination, unlawful harassment, bullying and victimization of persons in the workplace. For us it is important to maintain a workplace where all employees can work without fear of unacceptable workplace conduct impacting them.

Non-discrimination

In keeping with our fundamental Values, we are committed to social justice in the elimination of organizational structures and actions that oppress, exclude, limit or discriminate on the basis of gender, race, ethnicity, financial ability, sexual orientation, religion, disability or age.

We will endeavor to ensure that the workplace, all policies, procedures and practices are free of deliberate or unintentional (systemic) barriers so that no one is disadvantaged.

Meritocracy

We reward excellence and all people are promoted on the basis of their performance. All managers are asked to ensure that all employees are treated fairly and evaluated objectively.

To achieve our business objectives through our commitment to a merit-based appointment process, it is essential that capable and diverse people are attracted, retained and deployed in roles that maximize their contribution and potential. A fair and effective process for appointment to roles is essential to ensure we can access the broadest pool of diverse candidates, in keeping with our commitment to merit-based appointment.

Somec Group Management has a strategic role in the full implementation of this Policy ensuring the involvement of all personnel and of those who collaborate with the Group and the consistency of their behavior with the values embodied in this Policy.

This Policy is communicated within the organization and made available online to all stakeholders on the web site www.somecgruppo.com.

Somec Group encourages anyone who becomes aware of facts or behaviors contrary to the Company's Code of Ethics, policies and internal rules, laws or regulations, to make a report in the utmost confidentiality. Assuring confidentiality of the whistleblower's identity, Somec offers the following channels to file a report:

E-mail: odv@somecgroup.com

Traditional mail: OdV c/o Somec S.p.A. Via Palù, 30 I-31020 San Vendemiano (TV).

2023, 13 February



SOME C S.p.A.

Chairman