Diversity and Inclusion Policy

Revision Matrix

SAFO UK Limited (company number 06478031)

Version: [2]. Prepared by: [Legal Department / A.C.T. London Limited]. Approved by: [Claudia Barbotto, Managing Director], [07 October 2026]. Policy owner: [Claudia Barbotto, Managing Director]. Next review: [October 2027]. Definitions: in this document, "the Company" means SAFO UK Limited. "SAFO GROUP S.p.A." is the Italian head company of the Group, and "the Group" or "SAFO Group" means SAFO GROUP S.p.A. together with the companies it controls and the Company. This document applies to the Company in the United Kingdom, its directors, employees and all persons acting on its behalf. References to the Group apply to other Group companies only to the extent of their activities in or connected with the United Kingdom.

Version	Date	Subject	Prepared by	Approved By
1.1	20.03.24	1st Issue	Legal Department	RD
2	17.07.26	Review against UK legal requirements	A.C.T. London Limited / Legal Department	CB
2.1	07.10.26	Changed to Group Logo	Managing Director	CB

1. Purpose

To define SAFO Group's general principles and rules aimed at promoting integration and a respectful and inclusive approach in all activities and processes.
To promote awareness and knowledge of human rights and to support their protection within SAFO Group's sphere of influence.

2. Scope of application

All SAFO Group staff and all third parties who have business relationships or operate for or with the Group's companies are responsible for adhering to the principles of this policy.

3. Legal framework (United Kingdom)

This Policy applies to SAFO Group's operations in the United Kingdom and reflects the requirements of the Equality Act 2010 and related UK employment legislation.
Under the Equality Act 2010 it is unlawful to discriminate against, harass or victimise any person because of a protected characteristic. The protected characteristics are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. The Group's commitment to equal opportunities extends beyond these characteristics and also prohibits less favourable treatment on grounds such as political or trade union opinion, nationality and social background.
The Group does not tolerate any form of unlawful discrimination, whether direct or indirect, nor any harassment or victimisation, in any aspect of employment. The Group complies with its duty under the Equality Act 2010 to make reasonable adjustments for disabled employees, workers and job applicants.
The Group is committed to equal pay for equal work in accordance with the equality of terms (equal pay) provisions of the Equality Act 2010, and complies with its gender pay gap reporting obligations under the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017 where applicable (employers with 250 or more employees). The Group supports the anticipated introduction of mandatory ethnicity and disability pay gap reporting for large employers.
The Group establishes and manages employment relationships in compliance with the Employment Rights Act 1996 and other applicable UK employment legislation. It does not use child labour or any form of forced or compulsory labour, and is committed to preventing modern slavery and human trafficking in its operations and supply chains, consistent with the Modern Slavery Act 2015. It respects workers' freedom of association and the right to collective bargaining, consistent with the Trade Union and Labour Relations (Consolidation) Act 1992.

4. General principles and rules

We promote the principles of diversity, equity and inclusion within the organisation by fostering a respectful and inclusive work environment that values diversity at all levels and in all contexts and encourages discussion, collaboration and participation to generate ideas and solutions.
We value diversity, ensure fairness through impartial decisions and create the conditions necessary for everyone to freely express their value.
We encourage a culture of solidarity and inclusion, and respect for equal opportunities in all areas without unlawful distinction based on any protected characteristic under the Equality Act 2010, including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation, and we extend the same commitment to matters such as marital status, gender identity, health status, political and trade union opinions, ethnic origin and nationality.

Human resources

We promote a culture that recognises and values differences, facilitating integration and acceptance, and we are committed to recognising and overcoming any stereotypes and prejudices.
We act with fairness, courtesy and professionalism in our relationships with colleagues, using language and behaviour appropriate to the working environment.
We do not allow behaviour that could be construed as harassment of any kind.

We guarantee equal opportunities at all stages of a person's working life, from recruitment to termination of employment, ensuring fairness in terms of gender balance at all organisational levels, remuneration and skills development, as well as transparent career paths and diversification of the workforce in all areas of the organisation.
We adopt fair, neutral and impartial selection, contracting and development processes based on skills and abilities, promoting inclusion, gender equality and integration and avoiding any form of discrimination.
We do not employ children below the compulsory school leaving age and we comply with the statutory restrictions on the employment of young people. We establish working relationships in compliance with applicable UK employment legislation and any relevant collective agreements.
We support workers' freedom of association and recognise the right to collective bargaining.
We are committed to ensuring fairness and equal pay by basing the remuneration process on the principles of transparency and equality and on objective criteria such as merit, skills, competences and individual performance, also taking into consideration the organisational role held.
We take into account the different organisational and personal needs of our employees, acting to meet their requirements and recognising the importance of work-life balance, so as not to penalise the most vulnerable groups, to guarantee fair employment opportunities for all, and to allow everyone to fulfil their personal and professional ambitions and aspirations.
We are committed to offering training programmes and development paths geared towards the professional growth of all individuals without distinction, so that everyone can reach their full potential through opportunities based exclusively on their skills, experience and potential.

Infrastructure

We are committed to providing a suitable working environment that takes into account different needs and requirements, including reasonable adjustments for disabled persons.
We are committed to providing devices and applications that are suitable in terms of accessibility.

Internal communication

We use internal communication channels, means and tools that are accessible in physical, linguistic and cultural terms.
We adopt a systematic process of communicating the principles of equality, respect and non-discrimination, as well as this policy, in order to develop our corporate culture.

External communication

In our external communication processes, we promote a culture that is non-standardised and oriented towards inclusion, highlighting the added value brought by diversity.
We use external communication channels, means and tools that are accessible in physical, linguistic and cultural terms.

Third parties

In the process of selecting suppliers of goods, services and works, we include evaluation criteria aimed at promoting equal opportunities, as well as promoting workplace inclusion and non-discrimination.
Compliance with this policy is included as a contractual requirement.

5. Reporting

Anyone who has questions about this policy, becomes aware of a potential violation, or has other concerns, may submit a report, anonymously if desired, through the platform provided by the company, which is structured to ensure the anonymity of the report. Alternatively, you can contact your manager or the Human Resources Department. It is everyone's responsibility to report alleged or potential violations. The reporting procedure is detailed in the Group's Whistleblowing Procedure.
Reports will be investigated by qualified personnel or experts in specific areas, using methods that maximise confidentiality.
All reported cases will be tracked until their complete conclusion. If a violation is confirmed, we will take appropriate action. Individuals who raise a genuine concern in good faith in the public interest are protected from detriment and dismissal under the Public Interest Disclosure Act 1998. We do not tolerate any retaliation against those who report in good faith and cooperate with investigations, and anyone who retaliates against

such a person will be subject to disciplinary action.

6. References

SAFO Group Code of Ethics and Conduct
Equality Act 2010
Equality Act 2010 (Gender Pay Gap Information) Regulations 2017
Employment Rights Act 1996
Modern Slavery Act 2015
Trade Union and Labour Relations (Consolidation) Act 1992
Public Interest Disclosure Act 1998
Universal Declaration of Human Rights
UN Global Compact Principles
UN 2030 Agenda – Sustainable Development Goals