

# Policy

## Non-discrimination and Gender Equality

## SUMMARY

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## 1 PURPOSE

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This Policy defines the values and principles that inspire all Aruba Group companies in terms of non-discrimination and gender equality, consolidating their commitment to ensuring a professional environment based on fairness, inclusion, and respect for the dignity of all people, proposing actions aimed at promoting gender equality and implementing measures to prevent all forms of discrimination.

## 2 SCOPE OF APPLICATION

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The Policy applies to all Italian companies in the Aruba Group, involving all business processes affecting staff, customers, suppliers, partners, and any other stakeholders with whom the Group comes into contact.

## 3 DEFINITIONS

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**Service Charter:** a tool for transparency and protection that the Aruba Group companies make available to their customers, based on current laws and regulations. The Service Charter aims to inform customers about their rights and the quality commitments undertaken by the companies of the Aruba Group in relation to its provision of the Service.

**Discrimination:** behaviour that occurs when an individual is disadvantaged in some way on the basis of one or more prohibited grounds.

**Direct discrimination:** discrimination that occurs when a person receives unfavourable treatment compared to that received or that would be received by other people in a similar situation due to one of the protected grounds for discrimination.

**Indirect discrimination:** discrimination that occurs when an apparently neutral provision disadvantages a person or group of persons who share the same characteristics of discrimination that are protected;

**Multiple discrimination:** discrimination that occurs on the basis of different grounds acting separately;

**Intersectional discrimination:** a situation in which several grounds act and interact simultaneously with each other in a way that does not allow them to be separated, producing specific types of discrimination;

**Gender identity:** an intimate and individual experience, felt by any person, with regard to their own gender, which may or may not correspond to the sex assigned at birth, and includes the perception of one's own body and other expressions of gender, including the way one dresses, speaks, and behaves;

**Sexual orientation:** a person's capacity to feel deep emotional, affective, and sexual attraction to individuals of a different gender, the same gender, or more than one gender.

**Gender equality:** a principle, recognised and protected by national and European law, according to which women and men must enjoy the same rights, opportunities, and treatment in all areas of social, economic, political, and working life, without direct or indirect discrimination based on sex, gender, or related conditions.

## 4 INTRODUCTION

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The Aruba Group conducts its business in compliance with all principles and regulatory provisions concerning impartiality, honesty, transparency, fairness, equal treatment, and good faith toward internal and external parties with whom the Group comes into contact in the course of its activities.

Aruba rejects any discrimination based on age, gender identity, sexual orientation, health status, race, nationality, political opinions, religious beliefs or other personal convictions, social origin, language or other criteria that interfere with the fundamental rights and freedoms of individuals, as detailed below. Furthermore, *the "order to discriminate"* is itself considered a form of discrimination and includes not only mandatory orders, but also situations in which a preference or encouragement is expressed to treat certain people less favourably for one of the reasons covered by the prohibition of discrimination in this Policy.

As an ICT operator, Aruba is committed to making the digital ecosystem increasingly inclusive and accessible, designing and delivering its services in accordance with the principles of fairness, equal opportunity, and non-discrimination.

## 5 PRINCIPLES AND OBJECTIVES

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The values of inclusion, fairness, and respect for diversity are at the heart of Aruba's corporate culture. In this regard, we are committed to:

- Promoting diversity and inclusion as guiding values, recognising the richness and opportunities that come from differences
- Applying a gender perspective in all our policies, HR processes, and communications
- Measuring and monitoring progress periodically by means of clear and transparent indicators

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### 5.1 NON-DISCRIMINATION OF STAFF AND GENDER EQUALITY

#### 5.1.1 Direct and indirect discrimination, working conditions and hours

##### 5.1.1.1 *Direct discrimination*

In the context of the employment relationship, direct discrimination constitutes any provision, criterion, practice, act, agreement, or behaviour, as well as the order to engage in an act or behaviour which produces a prejudicial effect by discriminating against candidates during the recruitment process, or against employees on the basis of their age, gender identity, sexual orientation, health status, race, nationality, political opinions, religious beliefs or other personal beliefs, social origin, language or other criteria interfering with fundamental rights and freedoms and, in any case, treatment less favourable than that of another worker in a similar situation.

##### 5.1.1.2 *Indirect discrimination*

Indirect discrimination occurs when an apparently neutral provision, criterion, practice, act, agreement, or behaviour, including those of an organisational nature or affecting working hours, places or may place persons of a certain age, gender identity, sexual orientation, health status, race, nationality, political opinion, religious belief, or other personal conviction, social origin, language, or other criteria interfering with fundamental rights and freedoms, at a particular disadvantage compared to other workers, unless they are essential requirements for the job. health status, race, nationality, political opinion, religious belief or other personal beliefs, social origin, language or other criteria interfering with fundamental rights and freedoms, unless they relate to requirements essential to the performance of the job, provided that the objective is legitimate and the means used to achieve it are appropriate and necessary.

### 5.1.2 Organisation of working conditions and hours

Discrimination also includes any treatment or change in the organisation of working conditions and hours which, on the basis of sex, age, personal or family care needs, pregnancy, maternity or paternity, including adoption, or on the basis of the ownership and exercise of related rights, places or may place the worker in at least one of the following conditions:

- a) a position of disadvantage compared to other workers in general;
- b) limited opportunities to participate in company life or decisions;
- c) limited access to mechanisms for advancement and career progression.

### 5.1.3 Selection

Personnel selection is carried out exclusively on the basis of candidates' professional skills and abilities, taking into account the roles that, depending on Aruba's needs, require suitable coverage. With this in mind, Aruba selects personnel in full compliance with the principle of equal opportunities, without direct or indirect discrimination based on age, gender identity, sexual orientation, health status, race, nationality, political opinions, religious beliefs or other personal convictions, social origin, language or other criteria that interfere with the fundamental rights and freedoms of individuals, and avoiding any form of favouritism or clientelism.

### 5.1.4 Work performance and working environment

Human resources are essential to Aruba's existence. The dedication and professionalism of our staff are values and conditions that are crucial to achieving Aruba's objectives.

To this end, Aruba guarantees equal opportunities to all collaborators and employees, based on professional skills and individual abilities, without any discrimination based on age, gender identity, sexual orientation, health status, race, nationality, political opinions, religious beliefs or other personal convictions, social origin, language or other criteria that interfere with the fundamental rights and freedoms of individuals.

The relevant departments must:

- adopt criteria of merit, competence, and in any case strictly professional criteria for any decision relating to an employee;
- select, hire, train, remunerate, and manage staff without discrimination;
- create a working environment in which personal characteristics are not subject to discrimination.

Aruba interprets its entrepreneurial role, both in protecting working conditions and in protecting the mental and physical integrity of workers, with respect for their moral personality, preventing them from being subjected to unlawful conditioning or undue discomfort. Specific policies and procedures are also in place to ensure respect for the health and safety of workers and the protection of the environment and energy resources.

Aruba promotes a climate of mutual respect for the dignity, honour and reputation of each individual among its partners and employees at all levels, implementing specific measures to prevent offensive or defamatory interpersonal behaviour or, in any case, discriminatory interpersonal behaviour, including harassment, which in any case has the purpose or effect of violating a person's dignity and/or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

### 5.1.5 Work-life balance

Aruba intends to provide its staff with the opportunity to manage the time they devote to their personal and professional lives through a balance that takes into account both the company's business objectives and the psychological and physical well-being of employees resulting from greater freedom of self-determination.

Whenever compatible with production requirements and the tasks performed, Aruba encourages the adoption of flexible working arrangements, including smart working and teleworking, ensuring equal treatment for those who work remotely.

### 5.1.6 Pregnancy and maternity, parenthood and care

Discrimination in relation to pregnancy and maternity is a particular form of sexual discrimination. Aruba is committed not only to complying with all applicable regulations, but also to promoting the protection of pregnancy, maternity, and

parenthood, not only with a view to achieving substantial gender equality, but also for ensuring the health of the mother after childbirth and her bond with her newborn child.

#### 5.1.7 Differences in treatment based on specific regulatory provisions

Different treatment based on age, as well as on another characteristic related to a reason subject to the prohibition of discrimination, does not constitute discrimination only where this is provided for by current legislation on the subject and in compliance with the requirements indicated therein, in relation to the nature of a specific work performance and/or the context in which it is carried out. In any case, this characteristic must be an essential and decisive requirement for performance of the work itself, the purpose must always be legitimate, and the requirement must be proportionate.

#### 5.1.8 Equal pay

Aruba intends to ensure pay equality regardless of gender during the recruitment phase and throughout the career of its staff. Aruba's remuneration policy is gender neutral and does not provide for asymmetries in the costs incurred. In determining, paying, and modifying remuneration, Aruba complies with the following principles:

- Remuneration is recognised in relation to the role and responsibilities, and any additions to this remuneration in the form of benefits are based exclusively on the results produced and recognised.
- Remuneration and the allocation of benefits are documented for transparency purposes.
- All workers have the right to report any disparities.

#### 5.1.9 Prevention of abuse and harassment

Aruba rejects all forms of abuse and harassment and, in this regard, exercises zero tolerance in preventing and suppressing such behaviour. Aruba implements its prevention measures through concrete actions based on the following principles:

- Identifying risks related to abuse and harassment
- That preventive actions are planned in relation to these risks
- The possibility of reporting suspicions and/or incidents of abuse and harassment
- The organisation provides absolute protection for whistleblowers from any subsequent retaliation
- That Aruba analyses and understands any incidents of abuse and harassment
- The development of polite and gender-neutral communication

## 5.2 NON-DISCRIMINATION OF CUSTOMERS

In providing its Services, Aruba respects the principles of equality, impartiality, objectivity, continuity, the right to information and choice, participation, efficiency and effectiveness, courtesy, transparency, non-distortion of competition, and proportionality.

These principles constitute the fundamental criteria to which Aruba conforms in providing Services to Customers and are supplemented, from time to time, by those set forth in specific industry regulations or best practices in the field. The contents are detailed below.

### 5.2.1 Equality

In accordance with the principle of equality, Aruba does not discriminate between its Customers on the basis of age, gender identity, sexual orientation, health status, race, nationality, political opinions, religious beliefs or other personal convictions, social origin, language or other criteria that interfere with the fundamental rights and freedoms of individuals.

Special favourable conditions are offered to certain categories of Customers, as defined by current legislation, for the provision of Services of social interest, and measures are defined to promote differentiated forms of use of the Services in order to achieve conditions of equal access and equal use by certain social categories.

In this regard, Aruba undertakes to guarantee the accessibility requirements of its Products and Services which, from time to time, are considered benchmarks in the evaluation and technological development of hardware, software, web, and support services.

### 5.2.2 Impartiality

Aruba provides its Services in an objective, fair, and impartial manner, interpreting the conditions of supply and the specifications for their provision in accordance with these principles.

### 5.2.3 Efficiency and effectiveness

In its relationship with Customers, Aruba undertakes to provide the Services with the utmost diligence and by adopting the technological, organisational, and procedural solutions that are most appropriate for their purpose, in accordance with the principle of efficiency and effectiveness.

The Services are provided in accordance with the service levels and operational continuity objectives set out in the Operating Manuals, in the "Service Charter" where applicable, and in the contractual documents for each Service.

### 5.2.4 Right to information and choice

Aruba guarantees that all Customers have the right to choose between the various services offered, on an equal basis. To this end, Aruba provides users with accurate information about its offers and the economic and technical conditions of each service. It undertakes to use simple, clear, and understandable language, particularly when communicating the economic conditions of the Services offered to the public.

Where required by applicable law, and in particular with regard to electronic communications services, in equivalent circumstances, Aruba applies equivalent conditions to other equivalent providers and also provides Services and information guaranteeing conditions and a level of quality identical to those it ensures for its own Services or for the services of its affiliated companies or business partners.

### 5.2.5 Participation

Customer satisfaction surveys are conducted periodically to improve the implementation and quality of the Services, to measure the courtesy and competence of Customer Support, and to assess the clarity and completeness of the information material.

Aruba is committed to conducting its business with courtesy in its relations with the public and to ensuring maximum availability and accessibility of information on its Services through a variety of contact methods (telephone, online, contact details provided on institutional websites, etc.).

## 5.3 NON-DISCRIMINATION OF SUPPLIERS

Aruba manages the purchase of goods and services in accordance with principles of transparency and fairness and without any discrimination based on age, gender identity, sexual orientation, health status, race, nationality, political opinions, religious beliefs or other personal convictions, social origin, language or other criteria that interfere with the fundamental rights and freedoms of individuals.

For this reason, predetermined criteria are applied for the selection, evaluation, and management of suppliers which, on the one hand, take into account their technical, economic, and financial reliability and, on the other, provide for the application of mechanisms to monitor the quality of the services and goods/services provided.

To ensure compliance with non-discrimination, the establishment of relationships with suppliers/outsourcers is assigned to a specific organisational unit not directly linked to the operational area.

## 6 REPORTS AND VERIFICATION OF ACTIVITIES

Periodically, the relevant company departments may carry out systematic or random checks to verify compliance with the requirements contained in this document.

The owners of the individual activity and/or process carry out first-level checks during operations, either systematically or on a sample basis, , and these analyse the management of the phases described in this Policy.

In particular, they are responsible for collecting, through fair and impartial verification and assessment, reports of cases of discrimination, and/or harassment, and/or retaliation, each for the area of interest referred to in paragraphs 5-7 above, implementing specific measures aimed at remedying the subject of the report and identifying its causes and responsibilities, also in order to prevent its recurrence.

Special internal and/or departmental channels are made available to any employee who believes, in good faith, that they have witnessed a violation of this Policy against themselves or in relation to staff, customers, and/or suppliers. These guarantee, including through the adoption of appropriate confidentiality measures, that the person reporting a violation will not suffer any prejudice and/or retaliation for having made such a report, without prejudice to the obligations and protections provided for by current legislation in this regard.

Second- and third-level controls (audits) are designed to ensure the correct implementation of the principles established by the Policy and compliance with the operational limits assigned to the various functions, as well as the compliance of company operations with internal and external regulations, and are carried out by the relevant company departments.

The results of these checks, indicating any failure to comply with the requirements and the corrective actions planned, are summarised in a specific document, shared with the Legal and Compliance Department.

## VERSION HISTORY

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VERSION

**3.0**OF  
08/27/2025

*Extension with reference to UNI/PdR 125/2022 and comprehensive revision of the document and integration of gender equality principles.*