



AVIATION SERVICES



Policy on Gender Equality, Non-Discrimination and Diversity, Equity and Inclusion

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Policy on Gender Equality, Non-Discrimination and Diversity, Equity and Inclusion (DEI)

In Aviation Services we wish to ensure an inclusive work environment that promotes coexistence and celebrates differences, where everyone can contribute and succeed with equal rights and opportunities.

Indeed we believe that diversity is not only a fact, considering the differences in origin, nationalities, cultures, religions, gender, sexual orientation and gender identity, age and physical or mental disabilities that exist within our company, but also an advantage and an opportunity: individual characteristics - both visible and invisible - make people unique and determine cognitive diversity, a different way to perceive and interpret the world around us, a variety of perspectives that allows us to anticipate the needs of customers and stakeholders, to grasp new opportunities, to generate ideas and innovative solutions that are functional for continuous improvement.

To get the most of this resource and make it a distinctive feature and value for our company, it is essential to offer to our people a positive and supportive working environment, open to everyone's contribution, where each individual feels safe in expressing his or her individuality, ideas, skills and talent, and where nobody feels "left behind".

This is why we decided
to define in this Policy

a set of principles and conduct guidelines to achieve our goal and promote a non-discriminatory, fair and inclusive work environment, both in relation to gender and other personal characteristics.

A 'Zero tolerance' approach to any form of discrimination and harassment

To ensure that everyone feels safe to express themselves and develop their talents, ideas, perspectives and abilities, in Aviation Services we do not tolerate any form of discrimination and we contrast any intolerance based on unconscious bias, to equality, marriage, maternity, and diversity.



racism and stereotypes, especially those focused on gender or personal characteristics related to nationality, ethnicity, cultural identity and religious beliefs, socio-economic background, sexual orientation and gender identity, age, health and psycho-physical conditions.

In particular, any form of discrimination or harassment in the workplace - as well as outside, when it occurs in the context of working relationships - is prohibited, including any form of:

- **direct discrimination** - occurs when a person is subject to prejudice or treated less favorably than another one in a similar situation, because of the above-mentioned personal characteristics, irrespective of whether the difference in treatment is intentional or unintentional;
- **indirect discrimination** - when a provision, criterion, practice, act, fact or organisational behavior, although apparently neutral, discriminates against some people or limits their access to certain opportunities because of their belonging to a specific group;
- **harassment** - unwanted conduct carried out for discriminatory purpose or

effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment (e.g. abusing or aggressive verbal behavior and attitude, harsh comments or jokes based on a person's characteristics); it can take the form of sexual harassment when the unwanted conduct is based on this area (e.g. jokes with sexual content, seeking unnecessary physical contact, requests for sexual favours or services);

- **bullying** - persistent criticizing, degrading or denigrating conduct that is intended to intimidate and undermine the confidence of an individual or group and to create a hostile work environment for them.

As a company we encourage the support of all our employees in fighting and reporting such behaviors to their line manager and to the Human Resources department, who will investigate the facts with the utmost confidentiality, assess the event accurately and impartially and, if the investigation confirms an inappropriate behavior, will take appropriate corrective action which might include disciplinary actions up to and including a termination of the employment.

To ensure the highest standards of confidentiality we also provide a reporting channel managed by a third party, which allows anonymous reporting. In addition, in accordance with our non-retaliation and no-blaming policy, we will not tolerate any retaliation against anyone who has made a complaint or provided information about an incident of harassment or discrimination.

Each organisational unit responsible or team leader has the duty to act as a positive model for their staff, to



ensure non-discrimination in their decision-making and personal conduct, to identify and promptly address any event that might violate this Policy, and to promote inclusion among the people they supervise.

To each person, in their daily conduct, we ask commitment to put into practice the values of our Code of Ethics and the principles defined in this Policy, training themselves in recognising their own more or less unconscious biases and making their part to create a work environment that respects everyone's dignity.

supporting the full development and valorization of our people's potential.

Therefore as a company we have adopted a set of policies and guidelines aimed to both remove the barriers that prevent real and effective equal treatment and to provide equal opportunities for growth and development based on meritocracy and individual contribution to results.

These policies represent a formal commitment by the company to implement them across all business processes, with particular reference to those most sensitive to issues of equity and inclusion.

Actions to promote equity, inclusion and women's empowerment

Respect for human dignity alone does not guarantee an environment that is also fair and inclusive.

As defined in our Code of Ethics, in Aviation Services we aim to promote gender balance and to ensure that opportunities for professional growth are open to everyone,

HR Management

We adopt transparent and objective recruiting procedures for our staff, in compliance with current legislation, taking care to promote gender balance at all levels of the organization and the diversification of our Company's population according to other criteria (age, nationality, disability, etc.), also in areas characterized by great homogeneity.

All our employees, since their hiring, are involved in training initiatives focused on gender equality, diversity and inclusion, providing them with useful tools to identify their own unconscious biases and stereotypes, as well as an important opportunity for personal empowerment that makes



them less likely to accept such phenomena and the inequalities they create.

Our remuneration policy is based on the principles of equity, ensuring the same economic treatment and benefits for the same positions, while performance assessment is based on meritocratic and objective criteria aimed to measure everyone's contribution to the results of his/her area.

All resources have access to the same training tools based on their role/position, and the company ensures equal and balanced participation of both genders in training and development courses, including leadership courses; career paths are defined in advance and transparently set out the objective requirements for moving to higher positions (e.g. education, years of experience, language and IT skills); assessment of soft skills and potential is inspired by the commitment to ensure equal opportunities and, for higher positions within the organization, always involves managers of the headquarter.

Work-life balance and maternity/paternity protection

We apply policies that promote a healthy work-life balance, recognizing the importance of both aspects for the mental and physical well-being of our employees. We actively support women's empowerment and include in our Corporate Welfare a range of services focused on work-life

balance, supporting their specific needs and -family care in general, as traditionally it impacts women more than men.

For the same reason, we grant special protection to maternity/paternity and we are committed to provide additional support measures during and after such events, in addition to those already provided for in our sector general contract, such as additional paid leave and wage integration, the possibility to ask for a reversible part-time, services aimed to facilitate the reintegration after periods of long absence from work.

Communication

All communication initiatives are inspired by the objective of promoting a non-homogenizing culture, avoiding stereotypical representations of our company and the society we live in, incorporating elements of diversity as much as possible and using an inclusive language that aims to gender-neutrality.

In our institutional communication, we promote and contribute to the diffusion of equality and inclusion values, showing our company's will to pursue gender equality, to value diversity and to support women's empowerment.

We encourage our suppliers to adopt policies, certifications and tools in line with our company's values and policy.



Participation in conferences, round tables, events

Although we are not interested in the direct organization of seminars, conferences and similar events, as a company we pay great attention to the fact that gender equality is addressed on such occasions. For this reason, when Aviation Services participates directly (by sending our representatives and resources as speakers, sponsoring the event, etc.) or indirectly (by joining the event as listeners) in events organised by others, we check that at least one third of the speakers is of the under-represented gender and that they are not limited to welcoming, coordinating, discussing or organizing roles (e.g. moderators); if this is not the case, we inform the organization of the event that there could be an issue from a gender equality point of view and that we might consider to resign from participating. Similarly, we are willing to report to the organization of the event if any gender stereotype should be manifested during the works.

Of course, should we organize such events in the future, we will be committed to grant an equal participation of speakers of both genders and the promotion of a balanced representation of gender diversity during them.

Facility management and ICT

In designing our offices, we make reasonable adjustments to ensure that people with disabilities have full access to workstations and services.

We try to reduce any barrier to accessibility as much as possible by using design and interfaces developed according to inclusive principles such as the 'design for all' and the 'universal design' for our web pages and all the information and communication tools for our employees, explicitating these requirements to our suppliers.

Governance and Monitoring

In order to ensure the effective implementation and the continuous and effective compliance with this policy, Aviation Services has introduced an internal Steering Committee dedicated to the D.E.I. - Diversity, Equity and Inclusion, headed by the Chairperson of Aviation Services and composed of the Human Resources Manager, the Health and Safety Manager, the Organization Manager.

The Steering Committee is responsible for:

- the definition and updating of this Policy, in coordination with the Top Management;
- the definition and updating of the Strategic Plan, which illustrates the state



of the art about diversity, equity and inclusion; the assessment of the related risks and opportunities; the corporate goals and objectives for the areas included in the Policy and the actions to be implemented for their achievement and the reduction of the gaps, as well as the methodology and frequency of monitoring for the KPIs and the relevant metrics in these areas;

- the support to the Top management in the periodic review of the system, based on achieved results, needs for updating and modifying its components, and changes in the regulatory and business context.

The HR Department, as process owner, is in charge of:

- monitoring and assessing the applicability of any regulatory developments in the field of DEI,
- collecting and monitoring data for the KPIs and the relevant metrics,
- ensuring the implementation of the Strategic Plan and the relevant actions planned in the HR area,

- ensuring that HR processes are in line with the principles, guidelines and objectives stated in the Policy,

- coordinating internal training and communication on this subject,

- monitoring and assessing the reports received about discrimination and harassment events, surveys of employee perceptions about DEI, and employee suggestions for improvement.

The entire management team has received in-depth training on non-discrimination and DEI policies, and is directly involved in internal communication initiatives on these specific matters.

This Policy is communicated to all employees and external stakeholders by posting it on the notice boards available in offices; through a one-to-one communication via the payroll portal; by the publication on the company website and through specific communication to our external stakeholders.



