

LGBTQ+ INCLUSION POLICY

Approved by Human Resources and Organization on February 5, 2024

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FOREWORD

The Poste Italiane Group has always been active in supporting the values of diversity and inclusion through the adoption of corporate, organizational and management mechanism based on the respect for the rights and freedom of individuals. In this direction, the path taken over the years has allowed to introduce new approaches for managing issues related to diversity, integrating the protection and the enhancement of pluralities, implementing a strategy aimed at identifying and eliminating factors that prevent people from work inclusion.

In accordance with what was already been affirmed by the Group's Code of Ethics, which recognizes the value of a work environment free from all form of discrimination or harassment, the Poste Italiane Group is committed to preventing, identifying and avoiding potentially prejudicial behaviours, acts or practices.

The range of these principles concerns situations of inequality in which the discrimination factors impact both the public sphere of the employee (i.e. gender, age, disability, etc.) and the private sphere (i.e. religion, personal beliefs, affective /sexual orientations, etc.). In this direction, with the Diversity and Inclusion Policy issued and approved by the Board of Directors in February 2020, the Group is committed to enhance gender balance and to overcome all stereotypes, discrimination or prejudice, in order to create the best structural conditions aimed to allow everyone to express themselves to the best, promoting people's individual and organizational well-being. To reinforce this approach, the Active Parenting Support policy was issued in October 2022 to draw a development strategy to implement a modern model for managing the parenting experience and to introduce innovative leverages for consistent and harmonious support of shared parenting in terms of work life adjustment, childrearing and childcare.

The purpose of this policy is to promote equal access to employment opportunity and work environments where everyone can feel free and safe to express themselves and thus give their best and to define the tools and measures to fight any forms of discrimination or prejudicial related to gender and affective/sexual orientation.

The prohibition of discrimination in employment, moreover, finds its foundation in Article 3 of the Italian Constitution and in the other norms that represent its historical development (such as Article 15 of the Worker's Statute) and has been transposed in the national legislation incorporating international and EU regulations (Legislative Decree No. 215/2003 implementing Directive 2000/43/EC for equal treatment of people regardless of racial or ethnic origin; Legislative Decree No. 216/2003 implementing Directive 2000/78/EC for equal treatment in occupation and employment; Legislative Decree No. 198/2006 containing the Code of Equal Opportunities for Men and Women).

In this way, anti-discrimination law has gradually expanded its scope, coming to recognize factual situations, linked to the evolution of culture and civilization, which demand to be considered and to receive protection and safeguards. Social experience testifies that the legislative tools, still fragmented, although increased over the years, don't constitute by themselves the only way to implement anti-discriminatory solutions and must be increasingly supported by positive and concrete actions also by companies and all players, institutional and non-institutional, who have an impact on such paths of cultural evolution for a civil, open, sustainable, cohesive and respectful of people's rights society.

OBJECTIVES AND SCOPE

Diversity structurally characterizes the identity of our Company, which is already appreciated in the main processes and programs of people development, management and enhancement through specific guidelines, policy and initiatives. The inclusion of LGBTQ+¹ people refers to the value of the centrality of person, to the protection of his or her identity, and uniqueness and, in general, way of being, with impact on the broader concept of individual and organizational well-being.

¹ LGBT: acronym initially used to denote (in order) lesbian, gay, bisexual, transgender-transsexual people. Later its use was expanded and the Q for queer was added. The use of the + at the end of the acronym generically indicates the greatest possible inclusiveness and all other definitions with respect to sexual orientations and gender identities.

This policy aims to integrate the principles, values and rules that the Company intends to give itself with respect to norms of behaviour and internal processes, consequently defining an intervention plan aimed at promoting a cultural change, making everyone aware of the value of an inclusive environment, regardless of gender identity and affective/sexual orientation.

The approach followed in the formulation of this policy and its objectives is that of "inter-sectionality", in line with the National LGBTQ+ Strategy 2022-2025 for Preventing and Combating Discrimination, to respond cross-culturally to the ways in which gender and affective/sexual orientation intersects with other personal characteristics/identities and may contribute to experiences of potential prejudice.

Therefore, it is intended to promote policies, solutions and measures capable of improving working conditions through inclusive processes towards each individual, valuing the identity representations in which each person identifies, including people in gender transition and, in general, to prevent and fight all forms of direct/indirect discrimination related to affective/sexual orientation.

The goal of the policy is to help provide effectiveness for the principle of equal opportunity in order to:

- protect the fundamental freedoms and specific characteristics of individuals at every stage of the employment relationship;
- promote equality, both formal and substantial, with preventive solutions and mechanisms for any prejudicial treatment unrelated to the work abilities required for the job performance;
- foster an active engagement of the Company, internally and externally, to generate tools and initiatives of cultural awareness, listening and communication in line with Corporate Sustainability strategies.

This path of awareness must be transformed into concrete actions and projects that involve people and must be representative of tangible organizational and structural change in the area of affective/sexual orientation.

In this context, the Company has already undertaken an active path through membership in associations (i.e. Parks - Liberi e Uguali, composed exclusively by employers), committed to supporting the company and the institutions in the creation of inclusive workplaces that respect all people, and in particular LGBTQ+ workers. Thanks to these collaborations, the Company has developed and is committed to maintain active training and awareness-raising paths dedicated to the main features of the LGBTQ+ issues reaching the entire corporate population, including the managerial population.

On the regulatory level, in accordance with the law, all the provisions and supplementary protections provided in the National Collective Labor Agreement (CCNL) for marital relationships are applied to civil unions.

The Poste Italiane Group has also implemented a reporting system by introducing the Whistleblowing Committee and the "Guideline-System for Reporting Violations (Whistleblowing)," to regulate the way through which staff, clients and third parties can send, with the maximum guarantee of privacy, reports about any illegal or fraudulent behaviour, irregularities in the conduct of business, acts or facts that may constitute a violation of the rules, internal and external, which govern the Company's activities, the principles and rules of conduct contained in the Code of Ethics and in the Integrated Policy of Poste Italiane Group and the provisions of Poste Italiane's 231 Model².

Moreover, the reports may also refer to violations of worker protection and to behaviours that aren't in line with the ethical duties applying to all staff in order to prevent and fight all forms of discrimination and/or harassment. The Committee's role is to analyse the documentation received and conduct an examination regarding the existence of the necessary conditions in order to initiate the substantiation/reliability investigations with the relevant functions and to be able to arrive at concrete verifications and necessary actions regarding the reported facts (i.e. management actions, initiate audit or fraud investigations actions, request, when necessary, the intervention of external Authorities in charge of investigations and assessment that can't be provided within the Company, etc.).

In terms of participations with Social Partners, a National and Regional Committee for the implementation of the principles of equal treatment and equal opportunities is provided for by the current National Collective Labour Agreement (CCNL). The Committee aims to implement and reinforce a culture attentive to diversity, including gender diversity, through positive actions aimed at implementing examples of good practices in the Group, with the objective to promote the removal of obstacles that in fact hamper the realization of equal opportunities. In this context, the Committee also constitutes a place for in-depth study of the issues of the Protocol implementing the Framework

² For "whistleblowing" reports see art. 2, paragraph 1, lett. a) and b) of Legislative Decree No. 24/2023.

Agreement on Harassment and Violence in the Workplace annexed to the current National Collective Labour Agreement (CCNL).

On this basis, rest the main pillars and areas of application on which the Poste Italiane Group is committed to take action to support LGBTQ+ people:

1. Paths of listening, training and cultural awareness.

It's the Company's intention to:

- improve programs for the emergence of needs through surveys and listening investigations with the use of trusted and participated caring models;
- organize training and education plans for the staff and the citizens, with a multi-level and expanded offering, aiming at upgrading professional and social awareness of the context of reference;
- increase the managerial population engagement and activate inclusive mechanisms in working teams, with the aim of planning consequent improvements and corrective actions.

Within this framework, there is also a corporate commitment in terms of languages and adaptation of internal and external communications to gender-free standard, in collaboration with Corporate Sustainability Policies and in collaboration with institutions, national and local Organization and all stakeholders involved on these topics.

Particular attention may be dedicated to potentially more sensitive/vulnerable targets, such as the younger generations in the school and career guidance programs activated by the Group.

2. Social Parenting Support.

The Company is attentive of the dynamic definition of welfare and/or regulatory measures aimed in particular at enhancing the parenting path and raising people's awareness of the importance of an active role of both parents. In this regard, with the aim of also offering greater economic support to people in the creation of a new family structure, regulatory provisions have been identified and adopted over the years that are more favourable rather than those provided in this regard by law.

The Company recognizes the need to implement leverages to fight the emerging phenomenon of the declining of birth rates and to encourage the active participation of both parents in family life by creating an inclusive work environment, with the dual aim of incentivizing their participation in family life and providing appropriate protections for parental figures.

3. Specific guidelines to support gender transitions.

The Company recognizes the opportunity to implement good practices aim to guarantee greater inclusion of transgender people in order to enable employees undertaking gender transitions to work in conditions of ease and serenity.

These are actions aimed at helping the transition process, on the one hand by actively supporting the employees involved and, on the other, by involving and raising awareness among people Management functions and colleagues.

A first step to be taken in this direction is to give workers, already during the transition process, the possibility of requesting a change of their name and gender on identification documents for internal use.

By the same, it's considered appropriate to provide for the possibility of changing the ID info on the tags/cards used during the front office working time, allowing employees to show the name chosen during the transition process, and to be identified by the gender in which they identify themselves, notwithstanding the need to maintain in those ID tags/cards elements useful for unambiguous identification of the employees concerned.

On the other hand, the change may not concern the documentation functional to the identification of the person for legal and/or administrative purpose (i.e. contracts, payroll, etc.), which may be updated exclusively after ended the legal process of biographical rectification, in accordance with the legislation in force from time to time.

In order to effectively implement the measures described above, it's considered necessary to put in place training actions aimed at raising awareness of the issue of the gender transition and sensitizing resources and

managers who come into contact with colleagues and associates who undertake this path towards the importance of using the name and gender of choice in interpersonal relationships instead of those assigned at birth.

Without prejudice to the inescapable right of all employees not subject to mandatory dress codes or uniforms to freely select their own clothing within the limits of respect for common decency, it's also considered appropriate to recognize the possibility for male and female workers to request, where provided, a work uniform corresponding to their choice of gender.

Lastly, in compliance with the legal restrictions regarding the provision of separate toilets for men and women, unisex toilets may be realized that do not have any coding on the basis of sex or gender.

In any case, during gender transition, it's considered reasonable to recognize the possibility for each worker to use toilets that conforms to his or her gender identity.

These measures will be subject to a dedicated communication towards the corporate population in advance.

4. Diversity Management and Welfare for the Protection of LGBTQ+ People.

The Company pays special attention to overcoming any obstacles to job placement and career progression by fostering the creation of inclusive environments free of gender stereotypes, including through the prevention of all types of micro-aggression including verbal aggression. In this objective, include, for example, in the Selection processes and in the Employer Branding area, the definition of gender free personnel selection announcements, the participation and organization of inclusive events such as Career Days to meet supply/demand, welfare actions for the psycho-organizational well-being of workers (i.e. coaching, counselling, listening desk, etc.), participation in and promotion of Employee Resource Group (E.R.G.), i.e., groups of resources formed on a voluntary basis for sharing and confrontation also through Community, as well as the exchange of best practices with other corporate realities and primary industry associations.

5. Prevent harassment and discrimination.

Specific attention is paid to actions for the prevention and pro-active management of any episodes of harassment, including verbal harassment and discrimination in the workplace with respect to any situation, including LGBTQ+, including through the operation of third-party, neutral and independent control bodies, such as the Whistleblowing Committee, to promote a commitment capable of generating expanded and authoritative conditions and trust mechanisms over time.

MONITORING AND REPORTING

The Poste Italiane Group verifies the effectiveness of the approach adopted with this policy through quantitative and qualitative systems (i.e., positioning surveys, caring interviews on the levels of use and effectiveness of the measures introduced).

The governance system of the policy's effectiveness is also ensured by the Human Resources and Organization/Industrial Relations and Group Sustainable Development, Risk and Compliance/Group Sustainable Development functions, which monitor, over time, the effectiveness of the interventions undertaken with performance indicators consistent with corporate sustainability policies, as well as with integrated systems for measuring and monitoring corporate results.

Downstream of the cyclical (usually annual) analyses, functional correctives may be adopted to ensure full adherence of initiatives to the objectives of implementing and developing Diversity and Inclusion policies.

DISSEMINATION AND UPDATING

This policy is a resource management tool and as such constitutes a procedural reference for the Human Resources Functions as well as for the other Business Functions involved in the application, with reference to their respective interests.

Its update is by the Human Resources and Organization/Industrial Relations function on the basis of the results of periodic monitoring.

REFERENCE LEGISLATION

- Art. 3 of the Italian Constitution.
- Law No. 164/1982 "Rules on the rectification of sex attribution".
- Law No. 184/1983 "Right of the child to a family".
- Decree Law No. 69/1988, conv. in Law n. 53/1988 "Norms in matter providential, for the improvement of the management of the harbour agencies and other urgent dispositions".
- Law No. 104/1992 "Framework Law for assistance, social integration and the rights of disabled people".
- Legislative Decree No. 286/1998 "Consolidated text of the provisions concerning the regulation of immigration and rules on the status of foreigners".
- Law No. 53/2000 "Provisions for the support of motherhood and paternity, for the right to care and training and for the coordination of city times".
- Legislative Decree No. 151/2001 "Consolidated text of the legislative provisions on the protection and support of motherhood and paternity".
- Legislative Decree No. 215/2003 "Implementation of Directive 2000/43/EC on equal treatment for persons irrespective of racial or ethnic origin".
- Legislative Decree No. 216/2003 "Implementation of Directive 2000/78/EC on equal treatment in employment and working conditions".
- Legislative Decree No. 198/2006 "Code of equal opportunities for men and women".
- Legislative Decree No. 150/2011 "Provisions complementary to the Code of Civil Procedure on the reduction and simplification of civil proceedings of knowledge".
- Legislative Decree No. 81/2015 "Organic discipline of employment contracts and revision of the regulations on the subject of duties".
- Law No. 76/2016 "Regulation of civil unions between persons of the same sex and the regulation of cohabitation" (so-called Cirinnà Law).
- Legislative Decree No. 101/2018, "Provisions for the adaptation of national legislation to the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data" (GDPR).
- Legislative Decree No. 5/2017 "Adaptation of the provisions of the civil status system regarding registration, transcripts and annotations, as well as modifications and legislative additions for the regulation of civil unions".
- Legislative Decree No. 6/2017 "Amendments and additions in criminal law for the necessary coordination with the discipline of civil unions".
- Legislative Decree No. 7/2017 "Amendments and reorganization of the rules of private international law for the regulation of civil unions".
- Legislative Decree No. 24/2023 "Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, on the protection of persons who report infringements of Union law and on provisions concerning the protection of persons who report infringements of national legislation".

POLICY REFERENCE PRINCIPLES

- This policy has been drafted in line with the Group's commitment, starting at the Top Management, on issues of Diversity and Inclusion.
- The Company has over time equipped itself with Memoranda of Understanding and active participation mechanisms to which it refers in line with regulations and standards issued at the international level.
- Universal Declaration of Human Rights and subsequent international conventions on civil and political rights and economic, social and cultural rights.
- Communication from the European Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, COM (2020) 698, "Equality Union: LGBTIQ Equality Strategy 2020-2025."
- National LGBT+ Strategy 2022 - 2025 for Preventing and Combating Discrimination on the grounds of Sexual Orientation and Gender Identity.
- Declaration on Fundamental Principles and Rights at Work and the eight Core Conventions of the International Labour Organization (ILO).
- Agenda 2030 for Sustainable Development adopted on September 25, 2015 by the United Nations General Assembly and its 17 Sustainable Development Goals (SDGs).
- Equal Opportunity Charter: by signing this Charter, the Company contributes to the fight against all forms of discrimination in the workplace - gender, age, disability, ethnicity, religious faith, sexual orientation and values diversity within the corporate organization.
- Membership in primary associations and dedicated campaigns through dedicated diversity professionals (i.e. Parks - Free and Equal, Value D, etc.).

- Joint bodies: the current National Collective Labour Agreement (CCNL) regulates the operation at national and regional levels of the Committee for the Implementation of the Principles of Equal Treatment and Equal Opportunity.
- Policy Diversity and Inclusion: specific policy to make transparent active strategies and practices in order to stimulate a collaborative, supportive work environment open to contributions from all people and resources to increase the trust of people, customers and, in general, civil society.
- Corporate policy on the safeguarding and protection of Human Rights.
- Active Parenting Support Policy.
- Integrated Report and Annual Financial Report.

