
 cementirholding	GROUP POLICY	Doc N° CH_GPO_28
		Rev. 0
GROUP EMPLOYEES' DIVERSITY, EQUITY & INCLUSION POLICY		

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1 OBJECTIVE AND SCOPE

1.1 OBJECTIVE

Diverse, equitable and inclusive companies drive innovative results. Our industry still struggles with diversity, equity and inclusion, often failing to attract diverse talent due to inclusivity issues in the workplace. For organizations looking to shape up their diversity, equity and inclusion programs and policies, the change can be challenging but also very rewarding.

Most companies enact change to deliver business value, and many who launch diversity, equity and inclusion initiatives do so because there is research showing that companies with more diverse teams outperform those with a more homogeneous workforce and, this way, greater diversity in the workforce results in greater profitability and value creation.

The purpose of this policy is to establish some guidelines in Cementir Group that promote a culture of respect for diversity, work equality, non-discrimination and the inclusion of labor groups in Cementir Holding. Through this it strives to ensure the equality of opportunities for group employees.

The main objectives of this policy are:

- Attract, hire and retain diverse talent for all positions within the Company;
- Facilitate an inclusive working environment that ensures that all people within the Company feel accepted and integrated;
- Promote equal opportunities in all areas of the Company;
- Promoting collaboration and respectful communication among members of all the teams in the Group;
- Promoting the achievement of UN's Agenda 2030 and specifically of the goals 5 (Gender Equality) and 10 (Reduce Inequalities).

1.2 SCOPE

This Policy applies to Cementir Holding N.V. (the "Corporate") and to the Companies included in Cementir Group reporting package, over which the Corporate exercises direct or indirect control¹.

This Policy is communicated to all employees, without distinction of level, in the most appropriate way and in accordance with the local rules and practices.

Each Business Unit is internally and externally responsible for the effective application of the contents of this Policy by adopting the principles, roles and responsibilities, methodology and tools here formalized and applicable starting from when this Policy is issued.

All the Group employees are required to acknowledge and act in compliance with this Policy during their entire employment relationship.

¹ In accordance with the definition of the International Financial Reporting Standards (IFRS).

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2 REFERENCES

2.1 EXTERNAL REFERENCES


- *Italian Legislative Decree No.216 of July 9th, 2003* – implementing EU Directive 2000/78/CE. Article 1. of this law states:

This decree contains the provisions relating to the implementation of the equal 'treatment of persons irrespective of religion, beliefs, disability, age, and sexual orientation, in terms of employment and working conditions, providing the necessary measures so that these factors are not the cause of discrimination, a view that considers the different impact that the same forms of discrimination can have on women and men.
- *Italian Stability Law of 2016 (Italian Law No. 208 of December 28, 2015)* provides numerous incentives for Italian businesses to hire a more diverse workforce.
- *Legislative Decree No. 254 ("Decree")* was approved by the Italian government on December 30, 2016 and implemented the European Union framework on the disclosure of nonfinancial and diversity information by certain large undertakings and groups (Directive 2014/95/EU of the European Parliament and of the Council of October 22, 2014, amending Directive 2013/34/EU).
- The United Nations International Charter of Human Rights (UN):
 - Universal Declaration of Human Rights;
 - International Convention on Civil and Political Rights;
 - International Convention on Economic, Social and Cultural Rights;
- The fundamental conventions of the International Labor Organization (ILO) - n. 29, 87, 98, 100, 105, 111, 138, 182 - and the declaration on Fundamental Principles and Rights at Work;
- The UN Convention on the Rights of Children;
- ILO Conventions n.107 and n.169 on the Rights of Indigenous and Tribal Populations;
- The European Convention on Human Rights;
- UN Sustainable Development Goals (SDGs);
- *Dutch Act no. 495* - amending Book 2 of the Dutch Civil Code to ensure a more balanced ratio between men and women on the management and supervisory boards of large public limited and private limited companies (*Wet ingroeiquotum en streefcijfers*) dated 29 September 2021, published on 26 October 2021 and effective 1st January 2022

The Dutch Act 495 amends and replaces articles 2:142 b and 166 of the Dutch Civil Code.

2.2 INTERNAL REFERENCES

- Code of Ethics;
- Code of Conduct;
- CH Board Diversity Policy;
- Group Human Rights policy;
- Risk Management Policy (CH_GPO_11);

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- Cementir Corporate N.V. “Organizational and Management Model” pursuant to Italian Legislative Decree 231/01.

3 ACRONYMS

CEO	Chief Executive Officer
BoD	Board of Directors
Group	Corporate and Business Units (BU)
Corporate	Cementir Holding N.V.

4 DIVERSITY, EQUITY & INCLUSION IN CEMENTIR GROUP

The diversity of the workforce is defined as the degree of inter-organizational representation of people with different affiliation groups and cultural meanings, concept that seeks to expand the plurality of perspectives and experiences within an organization, understood as a strategic resource to ensure comparative advantages of the business.

Improving lives and generating value among employees is part of Cementir Holding values and mission. Our commitment is to provide solutions that support a sustainable social, economic and environmental future. The company seeks to be every day a better place to work, which means living security values every day, integrity, agility, excellence and enjoyment of the work.

Cementir Holding’s workforce is made up of people from diverse origins and cultures. The Group does not see diversity simply as a responsibility that must be enforced, a policy to be implemented, benefits to be offered, or a program that must be executed, but the diversity is part of its own group values and mission. Therefore, all our internal processes of recruitment, training, development and compensation are based on qualifications, performance, skills and experience.


That is why diversity, equity and inclusion become a competitive advantage that adds value to management, ensuring the fulfillment of customer objectives and expectations, in a context that requires increasing capacity for competitiveness, innovation and flexibility.

Moreover, the Group constantly promotes multicultural, multigender and multi-age working experience using the competencies and skills spread across the Group. We believe that this approach, way of working and way of collaborating empowers our organization and improves our performances by creating a dynamic and agile environment.

4.1 DIVERSITY, EQUITY & INCLUSION POLICY DRIVERS

Cementir Holding is committed to building diversity and inclusion in the workplace, and will advance this standard by the following components and specific activities based on the following drivers:

- Build Leadership and Accountability;
- Enhance Diversity Initiatives in Talent Management;

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- Foster and Sustain Diversity and Inclusion.

4.1.1 Build Leadership and Accountability

Transform organizational culture by incorporating diversity in all levels of the organization and develop accountability in the executive leadership team regarding diversity initiatives. Cementir Holding constantly reviews all relevant policies, procedures and practices through a lens that builds, fosters and sustains diversity as a priority.

4.1.2 Enhance Diversity Initiatives in Talent Management

Develop a workforce profile based on Cementir Holding employees and identify gaps on a regular basis. Create and execute diversity, equity and inclusion strategies for the underrepresented groups in recruitment, advancement, and retention with a goal of being more reflective of the workforce profile. These strategies may include the following:

- Expanding recruitment efforts by advertising job opportunities to diverse professional networks, agencies and media and by establishing relationships with partner agencies to attract applicants from underrepresented groups;
- Collaborate with external stakeholders, employees, and unions to develop strategies and special programs to promote diversity in the workplace;
- Incorporate diversity into the succession planning framework and encourage Managers to identify and develop a diverse pool of talent within the organization;
- Implement special programs for the training and development of underrepresented groups to eliminate and reduce barriers and improve their ability to obtain leadership roles within the organization.

4.1.3 Foster and Sustain Diversity, Equity and Inclusion

Implement diversity training and develop strategies for employee engagement, thanks to:


- Training to build awareness of diversity during onboarding.
- Encouraging and supporting employee network groups to further support diversity initiatives within the organization.

4.2 BEST BEHAVIORS

Diversity, equity and inclusion are core to who we are and how we work. Cementir Holding promotes a collective commitment to foster an environment where all differences are valued, practices are equitable, and everyone experiences a sense of belonging. For this reason, the Company promotes and supports across the Group the following best behaviors.

Prioritize Communication

To manage a diverse workplace, organizations need to ensure that they effectively communicate with employees. Policies, procedures, safety rules and other important information should be designed to overcome language and cultural barriers by translating materials and using pictures and symbols whenever applicable.

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Treat each employee as an individual

Avoid making assumptions about employees from different backgrounds. Instead, look at each employee as an individual and judge successes and failures on the individual's merit rather than attributing actions to their background.

Role model adaptation

It is not enough to teach employees what it means to be inclusive. Like any form of behavior change, inclusion requires individuals to identify key moments in which to build new habits or "micro behaviors" (daily actions that can be practiced and measured). And, when these habits are put into action in an environment that supports honest conversations and healthy tension, real change becomes possible.

Maximize joy and connection, minimize fear


People are wired to react with fear and distrust when their beliefs are challenged. While fear can be a powerful motivator, it also encourages people to narrow their perspective — which has the opposite desired effect for creating a more inclusive workplace. Finding ways to frame challenges through a lens of possibility and elevating the power of shared experiences and storytelling to do so — creates greater potential for positive change.

Development

Inclusion awareness training should be integrated into existing diversity training programmes. It can even be added to team development programmes. A team may not be achieving high performance because one or more of the team members feels excluded either from the team or from the organisation. Development interventions should ensure that individuals are equipped with the right mindset, toolset and skill set to be effective in their role. This is key to helping individuals feel part of the organisation.

Demonstrate Cultural Sensitivity

Being aware that there are cultural differences and similarities between people without assigning them a value, positive or negative, better or worse. Cultural sensitivity implies that both groups understand and respect each other's characteristics.

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Promote Implementing and Integrating Diversity

Understand and communicates business imperatives to harness diversity seeking market opportunities in diversity and recognizing others for supporting diversity. Always seeking opportunities to work across levels and functions

5 COMMITMENT

Cementir Holding undertakes to:

- Promoting diversity and respect for differences, to ensure synergy of visions and ideas in their work teams;
- Respect the basic rights of all employees, without discrimination based on race, disability, ethnicity, color, pregnancy, gender, language, nationality or any other reason such as religion, age, sexual orientation and identity, political opinion, social status and disability;
- Promote a culture with equal opportunities, ensuring development and retention of talented people who unfold in a harmonious and challenging, to be able to continue to grow in the company;
- Incorporate inclusive language into communications and corporate activities to avoid biases and stereotypes;
- Maintain efforts so that collaborators can reconcile their lives family and staff, providing support to both parenthood and to promote the integral lives of people;
- Incorporating people with disabilities, developing an inclusive culture freedom from any instance of discrimination and enthusing that the values of the honesty, integrity, respect and trust are always present;
- Encouraging the use of different whistleblowing channels as a powerful tool to avoid any discriminating action.

6 ROLES AND RESPONSIBILITIES

The Group is responsible for developing the Diversity, Equity and Inclusion Policy, ensuring its adoption and monitoring related progresses;


The Group is responsible for the periodic oversight and update of all the aspects related to the Diversity, Equity and Inclusion Policy;

The Top Management is responsible for cascading and ensuring that workplace practices are in place to give effect to the Diversity, Equity and Inclusion Policy;

In order to ensure the adoption of the Diversity, Equity and Inclusion policy as well as the presence of workplace practices to give effect to it, the Cementir Holding Board of Directors sets mid/long-term targets related to Diversity, Equity and Inclusion and reviews them on a yearly base, with particular focus to the composition of BoD and Senior Management². In details:

²Senior management is composed by the first line of reporting of

- Group CEO/COO

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- According to the internal timeline the BoD define the annual target related to Diversity, Equity and Inclusion, for the Board itself and the Senior Management. Targets can be extended to specific clusters or all employees, and additional targets can be defined in order to reinforce the commitment of the Group to Diversity, Equity and Inclusion matters;
- Group HR define an internal action plan to support the achievement of the abovementioned objectives with the support of the relevant departments at Group and local level;
- Group HR and Internal Audit are responsible for monitoring and reporting to the Board about the progresses in achieving objectives set by the Board. They are also responsible in case of additional targets defined;

The Group's Sustainability report is identified as the tool to monitor and report the information about progresses towards achieving diversity, equity & inclusion application in Cementir Group (e.g. men and women in the Board, in senior management positions, etc.), in addition to any reporting obligation under applicable laws.

Eventual discrimination cases reported against the policy will be examined by the Ethics Committee while the employees have the possibility to report them using the whistleblowing channels.

-
- Group Chief Professional family
 - Head of Region/ BU Managing director

including the level N-1 and N-2 in the organization without assistant roles and non-core businesses activities

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7 ANNEXES: RELEVANT CONCEPTS

Considering the market in which Cementir operates, the following diversity aspects have been identified as relevant for Cementir and its business and will therefore be considered when selecting and hiring people:

- **People with disabilities:** the one who has one or more physical, mental, or sensory deficiencies, temporary or permanent in nature, when interacting with various barriers present in the environment, is prevented or restricted from its full participation and effective in society, on an equal footing with others;
- **Gender:** Refers to a social construct of what it means to be a man and woman, who varies in time and place and is built on behavior learned;
- **Sexual orientation:** Refers to the direction of sexual and emotional attraction individuals, either towards people of different sexes (heterosexuals), or of the same sex (homosexual) or of both sexes (bisexual);
- **Gender identity:** Refers to the internal and individual experience of the gender such how each person feels it, which may or may not correspond to sex birth, including the body's personal experience (which could involve modifying body appearance or function through means surgical or otherwise, as other expressions of gender, including clothing, the mode of talk and manners. Gender identity is not the same as sexual orientation);
- **Race or ethnicity:** These are the groups in which humans are subdivided, starting with characteristics that are transmitted by inheritance. In addition, ethnicity comprises a set of cultural traits, language, religion, celebration of certain festivities, artistic expressions, etc.;
- **Nationality:** It is a polysemic concept that may refer to nationality legal, administrative, can also be historical, which is the name that the Constitution reserves for certain Communities.