

SOCIAL ACCOUNTABILITY AND EQUAL OPPORTUNITY POLICY

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1. Introduction

This *Social Accountability and Equal Opportunity Policy* (hereinafter "*Policy*") drafted by OverIT is intended to ensure the protection of human rights, contribute to equal access to employment and career opportunities and to promote gender equality.

The Policy recognizes that fostering a positive and inclusive environment that protects both mental and physical well-being creates greater value for people and organizations. OverIT believes that valuing diversity and supporting women's empowerment, along with all groups experiencing inequality in society, drives business development while creating significant social value. To this end, OverIT is committed to implementing concrete and measurable actions that are genuinely valued by all stakeholders.

2. Terms and definitions

Work-life balance: ability to balance the work and private spheres.

Steering Committee or **Equal Opportunity Committee**: a committee that oversees the effective adoption and ongoing implementation of this *Policy* and is composed of the Chief Executive Officer, Chief People Officer, HR Global Operations Director, Chief Legal Officer, and Sustainability Manager.

Diversity: the aggregate set of differences across groups and individuals that shape people as identities distinct from one another. Falling under this definition is anything that makes each individual unique, including ethnicity, age, lifestyle, gender, nationality, language, religious and political beliefs, union opinions, experiences, sexual and affective orientation, psychological or cognitive differences, and physical and social conditions.

Location Flexible: a hybrid work mode combining in-person work at the company premises and remote work. At OverIT, employees can benefit from this work mode based on flexibility and responsibility, with no specific limits beyond those identified by the Company's internal procedures.

OverIT Group or **OverIT**: corporate group comprising the companies subject to the management and control of OverIT S.p.A., also referred to as the "Company."

Inclusion: the recognition, understanding and appreciation of diversity as a valuable asset within the Company.

Harassment: any unwanted and/or inappropriate conduct that has the purpose and/or effect of violating an individual's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment, even when no such intent is apparent.

Organization, Management and Control Framework (i.e., "OMC Framework"): set of protocols that regulate and define the corporate framework and the management of its sensitive processes. If properly developed, adopted, updated, and implemented, this tool mitigates the risk of wrongdoing in criminal offenses.

Equal Opportunity: the ideal condition ensuring that every individual, regardless of their gender, nationality, religion, sexual orientation or disability, has access to the same opportunities to pursue employment and career advancement.

Recruitment: personnel selection.

Social Accountability: compliance with the provisions of national and international labor laws and with the contractual provisions agreed upon between OverIT and its employees. The term, as used here, also implies compliance with the standards set forth in SA 8000.

3. Scope of application

The Policy applies to all corporate bodies of the OverIT Group, both in Italy and abroad, and to all stakeholders, i.e. to anyone who collaborates with the Company for whatever purpose or has business relations with OverIT companies. Additionally, possible internal and external stakeholders include the local area and community, Non-Governmental Organizations (NGOs), schools, and universities. The development of this Policy takes into account the rights of all stakeholders, including any individuals experiencing inequality.

All employees sign an acknowledgment of the Code of Ethics, this Policy and other key documents relevant to business process management upon onboarding.

4. Roles and responsibilities

OverIT holds each and every individual responsible for respecting human rights and advocating the principle of Equal Opportunity. Managers and Executive functions are also in charge of ensuring adherence to the principles set forth in this *Policy* within their teams. The role of Coordinator of this Policy is entrusted to the Sustainability Manager, who is also Head of the Integrated Management System and a member of the Equal Opportunity Committee and is entrusted with sufficient resources (budget) and assured cooperation from all corporate functions in the pursuit, achievement and maintenance of Social Accountability and Equal Opportunity objectives.

5. General principles

This Policy is drafted in compliance with the OverIT Code of Ethics and, in greater detail, with the following principles outlined therein:

"*Work-life balance; guarantee of freedom of association and the right to collective bargaining*; *non-discrimination*; *equal opportunity*; *prohibition of forced, child and irregular labor*; *accountability and fair treatment*; *fair* wage; *respect for human dignity*; *respect for health and the environment*; *sustainability-by-design*."

Furthermore, the Policy acknowledges the corporate values that inspire OverIT's decisions and actions (Trust, Customer Success, Excellence and Simplicity) and is also consistent with key international human rights guidelines, standards and conventions, such as:

- the Universal Declaration of Human Rights (“UDHR”) by the Office of the United Nations High Commissioner for Human Rights (“OHCHR");
- the Declaration on Fundamental Principles and Rights at Work and the Core Conventions of the International Labor Organization ("ILO");
- the UN's 2030 Agenda for Sustainable Development and related goals ("SDGs Sustainable Development Goals");
- the Ten Principles of the United Nations Global Compact;
- the United Nations Women's Empowerment Principles (WEPs);
- the UN Conventions on the Rights of Women, the Elimination of All Forms of Racial Discrimination, the Rights of the Child and the Rights of Persons with Disabilities;
- the ILO Convention on Violence and Harassment of June 2019;
- the National Collective Labor Agreements (the Italian CCNL) in the "Tertiary and Trade" and "Industry Executives" sectors and all applicable rules and regulations in the areas of health and safety, Social Accountability and Equal Opportunity.

All employees sign an acknowledgment of the Code of Ethics and other key documents relevant to business process management upon onboarding.

6. OverIT’s Commitment

OverIT is committed to ensuring a safe and healthy working environment in every other sense, fostering a culture grounded in mutual respect and Equal Opportunity. The Company is committed to removing cultural and organizational barriers that could hinder fair and equitable working conditions, guaranteeing equal access to employment and professional development opportunities for everyone, regardless of gender, ethnicity, age, lifestyle, nationality, language, religious or political beliefs, union opinions, experiences, sexual and emotional orientation, psychological or cognitive differences, physical abilities, or social conditions. This principle is upheld across all business processes, with particular focus on recruitment and hiring, career management, compensation and pay equity, support for parenting and caregiving, work-life balance, and the prevention of any form of abuse or harassment.

OverIT adopts a management model that ensures the respect and sustainability of these commitments over time, enabling progress to be measured through specific indicators. The company recognizes the importance of training and awareness initiatives on diversity and inclusion, as well as addressing unconscious biases, and actively promotes the use of mindful, stereotype-free language.

Globally, OverIT is dedicated to developing long-term initiatives to support and welcome individuals from vulnerable groups. Through these efforts, OverIT champions and guarantees a fair and respectful workplace environment.

6.1. Recruitment

OverIT's recruitment process is inspired by principles of neutrality, gender equity, and balanced role distribution, including for executives, business unit managers, and top management reporting. Questions about marital status, pregnancy, or caregiving responsibilities are strictly prohibited. Candidate selection is conducted on a neutral basis, based on professionalism, competence, specialization, and experience, minimizing unconscious bias as much as possible. From the hiring stage, compensation is determined solely by job duties and responsibilities, without influence from gender or affiliation with other social groups.

6.2. Career management

In designing career paths, OverIT pursues gender equality, ensuring fair access to management and leadership roles in line with the Company's commitment to gender equality and diversity. OverIT guarantees equal opportunities for training and internal mobility. When identifying successors for key positions, OverIT adheres to principles of fairness, equal opportunity, and gender equality.

6.3. Wage equity

Salary for all employees is based on role, responsibilities, individual skills, and relevant market benchmarks, with additional benefits or bonuses tied solely on proven performance. OverIT recognizes wage equity as strategic to the organization's growth and implements effective measures, including regular monitoring of market benchmark reviews and performance-based variable remuneration.

6.4. Parenting and care

At OverIT, parenting is seen as an opportunity to develop new skills. The Company supports employees through all stages of parental leave (before, during and upon return), including adoption, ensuring non-discrimination and continuity of job status, salary, and benefits. OverIT monitors regulatory changes and commits to providing adequate notice. OverIT appropriately informs employees about the procedures for requesting part-time work arrangements. Recognizing the challenges of parenthood, OverIT is committed to developing initiatives for employee support throughout their leave, with particular attention to the parent who is away from business processes the longest, ensuring a smooth reintegration. Additionally, OverIT supports shared family caregiving responsibilities through further initiatives.

6.5. Abuse and harassment prevention

OverIT adopts a zero-tolerance policy toward any form of abuse, harassment, discrimination, or inappropriate conduct in the workplace. With special emphasis on incidents of harassment and bullying, the first player in charge of implementing any measures deemed necessary to protect the work environment is the Human Resources function.

Furthermore, anyone who becomes aware of any violations (whether alleged or ascertained) of the principles contained in this Policy and in OverIT's Code of Ethics, or of the provisions set forth in the OMC Framework, has free access to the following reporting channels:

- address of OverIT S.p.A., via U. Bassi 81, 33080 Fiume Veneto (PN);
- Whistleblowing platform accessible at these links https://overit.whistleblowing.it/;
- https://www.anticorruzione.it/-/whistleblowing, external channel made available by the National Anticorruption Authority (ANAC;
- https://www.dnv.it/contatti/Form-Segnalazioni-Reclami.html,to report to the DNV Business Assurance Italy S.r.l. certification body;
- saas@saasaccreditation.org to report to the body responsible for compliance with the SA 8000 standard (SAAS - Social Accountability Accreditation Services), headquartered at 15 West 44th Street, 6th Floor, New York, NY 10036.

OverIT commits itself to evaluating and implementing the appropriate corrective measures in connection with the reports submitted.

6.6. Sustainable procurement

OverIT's procurement focuses on digital infrastructure, energy, and human capital and is committed to two crucial pillars in supplier selection:

- from an environmental perspective, OverIT prioritizes suppliers that measure their carbon footprint and utilize renewable energy sources whenever possible;
- from a social perspective, OverIT only collaborates with partners who guarantee fair working conditions and adhere to Equal Opportunity principles.

To this end, OverIT subjects all potential suppliers to a rigorous qualification process. This process aims to investigate the environmental and social practices adopted throughout the supply chain, as well as the presence of any specific certifications or policies. A partnership with a supplier is only initiated once this qualification process has been successfully completed.

6.7. Objectives

OverIT has established the following objectives for the 2024–2030 period, aimed at strengthening its commitment to Social Responsibility and Equal Opportunity:

- maintain a zero-accident rate for serious work-related injuries annually;
- increase paternity leave to 20 days, effectively doubling the mandatory leave required by law.
- guarantee at least one annual meeting with the Social Performance Team (composed of worker representatives for the SA8000 management system) and ensure that every employee is covered by the relevant National Collective Labor Agreement (CCNL);

- provide a minimum of 10 hours of training per employee annually - exclusive of mandatory safety training, peer-to-peer sessions, and onboarding - through courses highly targeted to business and team needs;
- ensure that every employee receives at least one formal performance evaluation per year;
- maintain a zero-case record for confirmed incidents of discrimination and/or workplace harassment annually;
- a zero-case record for confirmed incidents of corruption annually;
- continue to qualify every new supplier by evaluating their environmental and social practices;
- ensure that at least 90% of suppliers commit to signing the compliance clause of the OverIT OMC Framework.

7. Communication

OverIT recognizes the importance of inclusive representation in the Field Service Management community. To this end, OverIT ensures that its communication strategies, both internal and external, are grounded in responsibility and free from gender stereotypes. The Company is committed to promoting fair representation of women and other minority groups, understanding the significant role this plays in challenging stereotypes and unconscious biases in both social and professional contexts. This includes the use of language that respects differences. Additionally, OverIT is dedicated to ensuring gender balance among speakers at panels, conferences, and other events it organizes or participates in, including scientific forums.

8. Stakeholder engagement

OverIT is committed to promoting Equal Opportunity beyond its organizational framework by actively engaging with external stakeholders on gender equality, diversity, inclusion, and integration. This may involve collaboration with NGOs, Industry Associations and other organizations dedicated to advancing human rights and Equal Opportunity.

9. References

The Policy is linked to the Integrated Management System for Quality, Environment, Social Responsibility and Equal Opportunities (“IMS”) designed by OverIT and is one of its annexes. A distinctive attribute of OverIT’s IMS is the integration, to the greatest possible extent, of Quality and Environment systems compliant with the requirements of UNI EN ISO 9001 and UNI EN ISO 14001, with those of Social Responsibility and Equal Opportunity in accordance with the requirements of SA 8000 and UNI/PdR 125. This *Policy* is also linked to all IMS documents, and especially to Human Resources procedures and marketing and communication processes. The indicators that OverIT commits to monitor are included in Annex 1 to this Policy, which forms a significant part of the information needed to determine and explain how the Company is pursuing its goals. Ultimately, OverIT is committed to reviewing this Policy at least once a

year to assess its consistency with the business environment or when significant events occur that have an impact on it (e.g., violations or reports).

Annex 1

OverIT commits to monitor the following indicators included in the Sustainability Report or other documents as appropriate, on an annual basis:

- **Workforce**: number of employees broken down by gender, geographic area, contract type (full time/part time, fixed-term/indefinite-term, etc.) and nationality;
- **Hires**: number of recruits broken down by gender; number of people exiting the Company broken down by gender; number of people interviewed broken down by gender and age;
- **Careers**: number of people, broken down by gender, who received an annual performance review; number of people in managerial roles broken down by gender; number of people at each contractual level broken down by gender; number of Leadership Team and Board of Directors members broken down by gender;
- **Wages**: ratio of men's and women's salaries broken down by contractual level or job category; number of promotions broken down by gender;
- **Parenting**: number of people who have been on parental leave broken down by gender; percentage of returns from parental leave broken down by gender; number of paternity leave days taken out of the total available;
- **Work-life balance**: percentage of employees accessing Location Flexible Policy and Smart Week Policy broken down by gender;
- **Harassment prevention**: number of reports received through official reporting channels broken down by gender; percentage of employees who have benefited from training concerning the issues of discrimination, unconscious bias, harassment and language.

Additionally, OverIT is committed to closely monitoring the results of the "Equality" section related to the Great Place to Work climate analysis or to any other climate survey that the Company will decide to take. Furthermore, it will pay special attention to the EcoVadis sustainability rating.

Document approval details

Role		Name	Signature
Approved by the: Steering Committee	Chief Executive Officer	Pierpaolo Bergamo	*Signatures have been executed in the Italian version of this Policy.*
	Chief People Officer	Matteo Pallaver	
	Chief Legal & Sustainability Officer	Aurora Grieco	
	Sustainability Manager	Alessandra Piai	
	HR Global Operations Director	Maurizio Biazzo	

Review history

Version	Date	Major amendments
1.0	March 5, 2024	First draft of the *Social Responsibility and Equal Opportunity Policy*.
2.0	August 29, 2024	Integration of the requirements of UNI/PdR 125:2022.
2.1	July 10, 2025	Minor changes to the sections on Company's commitment and Recruitment.
2.2	December 20, 2025	Inclusion of a dedicated section on sustainable sourcing and quantitative objectives to 2030.
2.3	October 20, 2026	Integrated information regarding the acknowledgement of this Policy by each employee upon joining the Company.