Sommario

1. GENERAL PRINCIPLES AND BEST PRACTICE GUIDELINES

At Aton, the person always comes first: this is the essential foundation upon which we build every decision and every activity. This is why we are committed to promoting and ensuring a work environment that respects and values individual differences in all their forms, in accordance with the international ethical and legal standards cited in MOD-AT-02-B "Regulatory References".

Aligned with these principles, we have identified the following development areas for our strategic plan on gender equality:

o   Building a culture of gender equality through continuous training on zero tolerance issues;

o   A commitment to ensuring an inclusive and welcoming work environment, as also demonstrated by our Great Place to Work® certification, by:

- preventing all forms of harassment and/or discriminatory behaviour, and promoting the use of inclusive language both inside and outside the organization;

- raising awareness among all our collaborators—atonpeople—about unconscious biases, especially among those responsible for recruitment and management roles, in order to promote fair behaviours that value the diversity of all individuals;

o   Ensuring that the evaluation system is transparent and objective for everyone, based on meritocracy and equal opportunity, recognizing achieved results and promoting internal mobility, while excluding any form of discrimination or bias;

o   Supporting the professional growth of all atonpeople through highly specialized training paths, structured mentoring programs, and personalized career plans;

o   Addressing and mitigating bias in talent acquisition processes;

o   Valuing the experience of parenthood as an opportunity to acquire new skills that benefit both the individual and the organization.

To achieve these objectives, we aim to raise awareness among atonpeople also through targeted communication activities.

2. DEFINITIONS

This Policy is based on the principles developed by the D&I Observatory of the UN Global Compact Network Italia, which define the conceptual pillars of Diversity, Equity and Inclusion—principles that we at Aton fully share.

DIVERSITY refers to the set of differences that characterize groups and individuals, shaping each person as a unique and unrepeatable identity. This concept encompasses all dimensions that

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contribute to defining individual uniqueness, including—but not limited to—ethnicity, age, personal style, gender, sexual and emotional orientation, religious and political beliefs, life experiences, and psychological, cognitive, physical, and social differences, as well as any other distinctive personal trait.

INCLUSION represents the active process of recognizing, understanding, and valuing differences as strategic assets, and integrating them positively into an equitable and welcoming physical and social environment. A conscious inclusive approach transforms diversity into tangible value for the organization.

EQUITY means ensuring fair treatment through the targeted allocation of resources and opportunities, tailored to the specific needs of individuals or groups, in order to address systemic inequalities, reduce existing disparities, and ensure genuinely equal outcomes.

EQUALITY aims to achieve treatment and recognition based on merit, without evaluations being influenced by gender, ethnicity, religious beliefs, or other personal characteristics. The goal is to remove barriers that prevent the full realization of equal opportunities for career advancement.

BELONGING defines a work context in which each individual feels fully accepted, respected, and free to express their authenticity without fear of discrimination or bias. This concept goes beyond mere physical presence, implying emotional connection, a climate of trust, and a genuine sense of inclusion. Only when people feel a true sense of belonging can they fully contribute, express their potential, and realize their capabilities.

3. TARGET AUDIENCE

This Policy applies to all Aton collaborators, regardless of the type of contract or the legal nature of the employment relationship.

To ensure its proper application at all organizational levels, we have mapped all stakeholders directly or indirectly involved in its implementation:

- All direct and agency staff working at Aton

- Shareholders

- Subsidiaries, affiliates, and related parties

- Suppliers

- Clients

- External collaborators

- Associations

- Local administrations

- The local community

- Participants in the Aton Academy

- Families of collaborators

- Schools and educational institutions that collaborate with Aton on guidance, training, and employer branding activities

- Financial stakeholders

4. POLICY IMPLEMENTATION

The Management System Representative (MS) is responsible for periodically submitting all System documents to the Steering Committee for:

1. verifying the degree of achievement of the defined objectives;
2. promptly identifying any non-conformities;
3. preventing situations that could compromise an inclusive work environment where every form of diversity is respected and valued.

4.1 Monitoring

At Aton, we recognize the strategic importance of monitoring activities within Diversity, Equity & Inclusion (DE&I) policies.

For this reason, we are committed to identifying meaningful indicators to assess progress toward our goals and determine whether mitigation and/or corrective actions are required.

4.2 Periodic Review of the DE&I Policy

This Policy will be reviewed and updated annually by the Executive Management to ensure its ongoing validity from a regulatory standpoint and its alignment with our strategic direction.

If the need for an update arises, Management—after consultation with the Steering Committee— will approve the new version based on:

- the results of internal DE&I surveys;

- data related to key performance indicators (KPIs) as defined in Chapter 5 of UNI/PdR 125:2022.

The entire process will follow inclusive criteria, in full alignment with the values we uphold.

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5. ROLES AND RESPONSIBILITIES

To ensure the full implementation, integration, and effectiveness of this Gender Equality Policy, we have defined the roles and responsibilities of all involved parties.

All Personnel

All collaborators are required to strictly comply with the principles of non-discrimination and to actively promote an inclusive and respectful work environment.

They are also expected to participate in training initiatives on gender equality and to contribute to maintaining a climate of mutual respect.

Each collaborator is further responsible for promptly reporting any violations or behaviour that does not comply with this Policy.

Steering Committee

The Steering Committee is responsible for defining the objectives related to the DE&I Policy and ensuring they are aligned with the company's strategic goals.

The Committee also oversees the periodic evaluation of improvement opportunities and the effectiveness of the measures implemented.

Team Leaders

Team Leaders are expected to foster the creation of an inclusive work environment by applying merit-based principles in recruitment, selection, and performance evaluation processes.

They are also responsible for raising awareness within their teams, offering appropriate support to collaborators, and promptly addressing any reported cases of violation or discrimination.

Executive Management

Executive Management is responsible for promoting diversity and inclusion values by allocating the necessary resources and budget to implement the strategic plan's activities and initiatives.

Management also ensures that all strategic decisions align with the principles of diversity, equity, and inclusion, overseeing the entire implementation process of the Policy.

6. COMMUNICATION AND TRAINING

6.1 Internal and External Communication

The principles of Diversity, Equity, and Inclusion (DE&I) are integral to our vision and strategy. For this reason, we believe it is essential to share this document in order to:

- clearly state our strategic objectives;

- provide tangible examples of inclusive behaviour;

- explain the full Policy, including its underlying values, the benefits it brings, and our expectations for daily behaviour.

This Policy, approved by the Executive Management in coordination with the Steering Committee, will be propagated trough the following channels:

- publication on the company website to inform all stakeholders;

- internal communication channels to promote awareness among all atonpeople, and external channels to reach stakeholders;

- presentations during company meetings and events to update and train all atonpeople.

6.2 Training

At Aton, we recognize the fundamental importance of internal training on zero tolerance issues.

We have therefore planned specific training sessions for all atonpeople to ensure the highest level of understanding, sharing, participation, and active engagement with DE&I topics.

7. REGULATORY REFERENCES

This Policy is based on a framework that includes national and international regulations, as well as internal company guidelines on Diversity and Inclusion. For a complete overview of these references, please consult the attached documentation: "Register of Regulatory References" MOD-AT-02-B.

DOCUMENT CONTROL	
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