



DIVERSITY & INCLUSION POLICY

Abstract

This policy outlines our commitment to fostering an inclusive, respectful, and equitable workplace where diversity is valued as a driver of innovation and sustainable growth. It sets clear expectations to ensure equal opportunities and prevent any form of discrimination across the organization.

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PURPOSE

At Cleafy, we believe that excellence is driven by diversity of perspectives, backgrounds and experiences. This Policy is not merely a set of rules, but a shared commitment to fostering a workplace where everyone feels safe, respected, valued and empowered to express their full potential.

Our goal is to promote an inclusive culture based on fairness, mutual respect and equal opportunities, where differences are recognised as a source of strength.

SCOPE

This Policy applies to all employees of Cleafy based in **Italy, Spain** and the **UK**, and also to the external contributors (e.g. contractors) regardless of their role or level within the Company.

It aligns with the national applicable labour laws and is enforced uniformly across all levels of the organisation within the Company.

PILLARS OF PROFESSIONAL CONDUCT

A. Mutual Respect and Dignity

All professional interactions, whether formal or informal, must be grounded in respect and dignity.

Expected behaviours include:

- Valuing colleagues' contributions and perspectives.
- Providing constructive and respectful feedback.
- Respecting personal boundaries and individual sensitivities.

Prohibited behaviours include:

- Use of offensive language, slurs, or derogatory comments.
- Jokes or remarks based on stereotypes related to ethnicity, nationality, gender, gender identity, sexual orientation, religion or belief, age, disability, political opinions or any other personal characteristic.

B. Inclusive Language and Communication

Language shapes culture. We are committed to inclusive, conscious and responsible communication.

- Use neutral and inclusive language in both official and everyday communications.
- Avoid assumptions about gender, background or personal circumstances when addressing others.
- Promote equity in meetings and discussions, actively preventing behaviours such as interruption, exclusion, idea appropriation or silencing of voices.

Managers and meeting facilitators are expected to ensure balanced participation and respectful dialogue.

C. Managing Bias (Unconscious Bias)

We acknowledge that unconscious biases may influence decision-making.

- All decisions related to recruitment, evaluation, promotion and compensation must be based solely on merit, skills, performance and objective criteria.
- Managers are required to critically review their decisions to ensure they are not influenced by personal affinity, stereotypes or bias.
- Cleafy may promote training and awareness initiatives to help identify and mitigate unconscious bias.

EQUAL OPPORTUNITY, DEVELOPMENT AND ACCESS TO GROWTH

Diversity and inclusion extend beyond respectful behaviour. Cleafy is committed to ensuring equal opportunities in all aspects of the employment relationship, including recruitment, compensation, professional development and career progression.

We are dedicated to:

- Providing fair and equitable access to training, mentoring and development programmes.
- Ensuring that performance evaluations and promotion decisions are based on objective, transparent and merit-based criteria.
- Promoting equal access to leadership opportunities and high-visibility projects.
- Removing structural or cultural barriers that may limit the growth of underrepresented or disadvantaged groups.
- Guaranteeing that selection for external visibility opportunities, such as speaking engagements, panels, conferences and scientific or industry events, is based exclusively on competence and merit, while actively promoting a balanced gender representation among those chosen to represent the Company in these contexts.
- Ensuring that parenthood, parental leave and caregiving responsibilities do not adversely affect performance evaluations, compensation or career progression, and supporting work-life balance initiatives that enable all employees to grow professionally.

While the Company does not commit to quotas, it is committed to fostering an environment where talent, potential and performance are the only drivers of professional advancement.

ZERO TOLERANCE: Harassment, Bullying and Mobbing

Cleafy adopts a zero-tolerance approach to any form of harassment, bullying or abusive behaviour.

This includes, but is not limited to:

1. **Sexual Harassment:** Unwelcome advances, inappropriate physical contact, sexually suggestive comments or behaviour.
2. **Digital Harassment:** Sharing offensive, discriminatory or inappropriate content via email, messaging platforms, social media or other digital channels, including outside working hours.
3. **Bullying and Mobbing:** Repeated actions aimed at humiliating, isolating or professionally undermining an individual, including public shaming, persistent unfair criticism or deliberate sabotage of work.

Such behaviours constitute serious violations of this Policy.

REPORTING CHANNELS AND INVESTIGATION

Anyone who experiences, witnesses or becomes aware of conduct that may violate this Policy is encouraged to report it promptly. Reporting concerns is a shared responsibility and a critical component of maintaining a respectful and inclusive workplace.

Reporting Channels

Reports may be submitted through one of the following channels:

- **Line Manager or Senior Manager**, unless they are involved in the matter.
- **HR Department**, unless they are involved in the matter.
- **Whistleblowing email:** whistleblowing@cleafy.com (available for anonymous reporting, where permitted by applicable law). For further details please refer to the related policy.

If the concern involves your direct manager, HR representative, or any of the individuals listed above, you may use the Whistleblowing email or escalate the matter to a senior executive not involved in the allegation. Please consider that you can also open an anonymous report by using various online sources to send anonymous emails (such as <https://anonymousemail.me/>). In this case, if you want to stay up to date on the ongoing process, please indicate a valid e-mail address to be contacted back.

For Reports specifically concerning discrimination, harassment, bullying or mobbing¹, employees may alternatively write directly to the **Steering Committee (Comitato Guida)** at comitatoguida@cleafy.com. This mailbox is monitored by HR and the Executive Assistant, who are specifically authorized and trained to receive such Reports. Upon receipt, they shall promptly share the Report with the Whistleblowing Officer, who remains responsible for its handling with the support of the Steering Committee. Reports submitted through this channel benefit from the same guarantees of confidentiality, protection against retaliation and procedural rigour set out in this Policy.

Employees may write directly to this address using their own email account. Should they prefer to ensure anonymity, they may instead use an anonymous email sending tool, as indicated above.

Employees who feel more comfortable reporting an episode to another trusted person (e.g. their manager) are free to do so. However, please note that in order for the matter to be handled through a structured process, the report needs to be formalised in some way: for instance, if the employee does not feel comfortable submitting the report directly, their trusted person may report it on their behalf to the Steering Committee, the CEO, or the Whistleblowing Officer.

Suggestions and Ideas

The reporting process is not limited to concerns. Cleafy also welcomes positive contributions: anyone who has suggestions, ideas or proposals to promote equal opportunities, diversity and inclusion within the company is encouraged to share them.

Suggestions may be submitted through one of the following channels:

- By email to the Steering Committee at comitatoguida@cleafy.com, using their own email account.
- By email addressed to the HR Department at hr@cleafy.com.
- Those who wish to remain anonymous may send their suggestion by anonymous emails.

Suggestions will be reviewed by the Steering Committee and, where appropriate, taken into account when defining initiatives and actions related to this Policy.

¹ UNI/PdR 125:2022 - Guidelines on the management system for gender equality

Investigation Process

All reports will be assessed promptly, impartially and fairly. Where appropriate, a formal investigation will be initiated in accordance with internal procedures and applicable laws. Individuals involved will be treated with respect, and confidentiality will be maintained to the greatest extent possible.

Protection Against Retaliation

Any form of retaliation against a person who raises a concern or participates in an investigation in good faith is strictly prohibited. Retaliation itself constitutes a serious violation of this Policy and may result in disciplinary action, up to and including termination.

Knowingly making false or malicious allegations may also lead to disciplinary measures.

CONSEQUENCES AND DISCIPLINARY MEASURES

Violations of this Policy undermine trust and the values of Cleafy. Any breach of this Policy will be addressed in accordance with the provisions set out in the Company's Disciplinary Policy, as amended from time to time, and in compliance with applicable laws and contractual agreements

POLICY MODIFICATION AND FAIRNESS

We reserve the right to modify this Policy or act in any other legal or reasonable manner as each case demands. However, we will consistently enforce discipline in a fair, consistent, and lawful manner.