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DIVERSITY & INCLUSION POLICY

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PREAMBLE AND PURPOSE

Cereal Docks is an Italian industrial group operating in first agri-food transformation, producing ingredients such as flour, oils and lecithins, obtained from oily seeds (soy, sunflower, and rapeseed) and cereals (corn, wheat, barley) intended for food, pharmaceutical, cosmetic, animal nutrition, technical and energy sector applications.

In 2021, the parent company, Cereal Docks S.p.A., turned into a Benefit Company by amending the articles of association and its corporate purpose, introducing a dual purpose: generate profit and pursue purposes with a positive impact on society and the environment. The move to Benefit Company is part of the process the company has started over the years towards a more sustainable, accountable business model, and that began by introducing tracked, sustainable supply chains, moving onto drafting the first Sustainability Reports on to defining a Sustainability Plan.

Becoming a dual-purpose company means formalising specific commitments and responsibilities involving management and shareholders directly in achieving higher purpose, accountability and transparency standards. In the Cereal Docks Group context, those commitments are structured in nine Common Benefit Goals, including enhancement of human capital inside and outside the Group.

In fact, for the Group people are the most important ingredient for long-term success. For that reason, guaranteeing that every resource can feel enhanced and recognised as being unique becomes a fundamental, company management factor. With this awareness, the Cereal Docks Group commitment takes shape in creating a collaborative, open, respectful working environment where people are free to express their potential and can contribute daily to achieving the company purpose “guarantee nourishment and well-being to people, animals and the environment to keep the ecosystem perfectly balanced”, with their individual characteristics and details.

Diversity, in all its expressions, is a value to be protected and encouraged through concrete actions starting from the acknowledgement and respect of the dignity and the unique value of each individual: ensuring and monitoring that this happens is the fundamental assumption for creating and sustaining a healthy, positive working environment, with no discrimination.

According to the Cereal Docks Group, promoting diversity inclusively not only contributes to people’s well-being and motivation, it indirectly represents a growth and innovation opportunity for business itself. Diversity is what permits that heterogeneous exchange of ideas and different points of view

		
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stimulating creativity and the generation of innovative solutions. This process creates value and, as a result, gives the entire Group a competitive advantage.

The beneficial effects resulting from a good company climate improve its image and reputation and, hence, the greater capacity to attract, recruit and hold on to talents.

In this framework, this Diversity & Inclusion Policy (the “Policy”) aims to define the Diversity & Inclusion principles and commitments of the Cereal Docks Group in order to stimulate an open company culture and a climate respectful of all diversities including, but not only, the concept of race, ethnicity, gender, sexual orientation, identity, religion, political opinions, state of health, disability, and national origin. With this Policy, the company undertakes to identify the principles that must guide employees and those interacting with the Group and lays the bases for a proactive strategy to avoid stereotypes and pre-concepts. In order to guarantee that people can feel welcomed and enhanced fully expressing their uniqueness.

This Policy develops the commitments established by the Codes of Ethics of the Cereal Docks Group Companies related to protection of rights and the person’s value and strengthens the reference principles and relative responsibilities in compliance with Legislative Decree 231/2001.

The Policy also aligns with the Sustainable Development Goals, with special attention for nos. 8, 5, 10 and establishes an important step in formalising the Group commitment for inclusion.

PRINCIPLES

The Cereal Docks Group recognises riches in diversity; an asset to be preserved and encouraged. Interaction between the various personalities, life experiences and different cultural contexts significantly contributes to generating a positive change in the Company.

The principles guiding the Group are focussed on five pillars:

Equal opportunities and gender balance

Cereal Docks believes in gender equality and guarantees equal opportunities in all working relationship stages, from the selection process to assigning roles; avoiding any potential barrier, stereotype, discrimination and unwitting prejudice, including those linked to sexual orientation and/or gender identity. The selection and professional growth policy in the Group is only centred on enhancing the skills and know-how of each person based on a meritocratic process, regardless of gender, background

		
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and the role held. The Cereal Docks Group promotes company welfare policies to promote the life-work balance, protection of parenting and removal of potential salary differences.

Interculturalism

The cultural mix and union of different backgrounds guarantees a heterogeneous mix of know-how, skills and experiences that stimulate innovation, speeds up company growth and improves the problem solving and decision making processes. Hence, the Cereal Docks Group promotes an inter-cultural vision and favours the interactions and meeting of people from different cultures, undertaking to fight any form of discrimination and prejudice. The goal is to create a working environment that welcomes each individual, recognising value and respecting the differences.

Generational diversity

In generational diversity Cereal Docks Group recognises a key for its success and looks to the co-existence of different generations collaborating in the Group as a source of value and innovation. The innovative potential comes from the union, comparison and exchange of the different know-how, skills and experiences characterising each generation, feeding company creativity and growth. From this awareness, Cereal Docks undertakes to create an environment where there is synergy between the talents and skills of the different generations; creating collaboration and dialogue through training and flanking and setting up intergenerational teams in order to promote the transfer of know-how and skills between seniors and juniors, and vice versa, but also enhance the individual talent of each person.

Disability

Cereal Docks sustains equal opportunities for employment and professional growth, regardless of any sensory, cognitive and/or motor difficulties and considering Law 68/99 on the protection and placement of Protected Categories. This commitment is applied in effective actions to remove the cultural, systemic and physical barriers, adopt suitable tools and aids, and promote training and integration activities to increase sensitivity and awareness regarding disabilities. The target is to fully enhance the talents and skills of each individual, in order to create an inclusive working environment, open to all.

Inclusive governance

Cereal Docks believes it must act on communications and on internal collaboration so that everyone can feel they are an integral, involved part, with benefits for the person's working well-being and for company performances. That is why Cereal Docks is committed to reducing the gap between top

		
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management and all employees by asking senior executives, top management and department heads for dialogue, discussion and involvement of all organisational levels; to create a working environment that favours mutual respect and trust amongst Group collaborators.

ACTIONS AND RESPONSIBILITIES

The above principles mean to spread a company culture that includes and enhances diversity, guaranteeing equal opportunities and the possibility to grow in the Organisation.

Even though that responsibility involves the entire company population, here below you will find indication of the main players in the Group assigned to promote and supervise suitable management, spread and integration of the Diversity & Inclusion principles.

Management

The inclusion culture is a process starting at the top and involving all Top Management. That is why the top must be a guide and model for the entire Organisation and be the first promoter of an open, discrimination-free climate, through inclusive practices, processes and governance operations.

More specifically, the task of the Cereal Docks Group Top Management is to: Show a strong personal commitment towards diversity and inclusion. That includes taking part in initiatives and programmes promoted by third parties linked to diversity, the regular communication of how important these issues are and adhering to inclusive principles;

- Favour the dialogue between different organisation levels, even by defining information and communication sessions in one's teams and promoting specific team building and mentoring activities - in collaboration with the Human Resources and Communication departments - ;
- Allocate financial and human resources to initiatives and programmes promoting diversity and inclusion. This means the financing of training programmes and the support of internal work groups focussed on these issues;
- Be an inclusive conduct model. In fact, top management must promote a working environment in which each employee feels respected, valued and an integral part of the corporate community. This is implemented through the acknowledgement and celebration of differences and contrasting discriminatory or exclusive conduct;
- Collaborate with Human Resource and Communication departments to make sure that diversity and inclusion are integrated and conveyed throughout all aspects of the organisation;

		
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- Define monitoring, improvement and mitigation plans with the Human Resources department of important Diversity & Inclusion gaps.

Human Resources

The Human Resources department plays a key role in implementing and promoting diversity and inclusion in the company. It is responsible for supervising respect for fundamental principles and must prevent, mitigate and solve negative impacts caused by potential cases of discrimination, harassment, retorsion, bullying and mobbing.

On this point, Human Resources Management must:

- Ensure that the selection and recruitment processes are objective, without interference or conflict of interests, and inclusive, based on competence, merit and qualifications with no discrimination based on race, gender, religion, sexual orientation, age, physical or mental abilities and political orientation;
- Develop and promote training programmes that favour diversity and inclusion awareness in order to educate and sensitise all employees on this issue;
- Collaborate with the different departments to draw up policies and procedures that fight any form of discrimination in all aspects of company life, including decision-making processes, promotions and growth opportunities;
- Strengthen company welfare through services that improve the welfare of workers and their families;
- Receive any confidential reports from employees who have suffered discrimination, harassment and non-inclusive conduct and make sure that those reports are handled confidentially and promptly;
- Share useful data and indexes to detect residual gaps in Diversity & Inclusion targets.

Internal communication

The internal communication role is of crucial importance as it must accurately and effectively transmit an inclusive culture that respects people. It is an ongoing process addressed at all organisation levels and must occur through clear, coherent messages.

For this purpose, to encourage diversity and inclusion, Internal Communication of the Cereal Docks Group undertakes to:

- Define a specific internal communication diversity and inclusion strategy;

		
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- Collaborate with the Human Resources department to develop sensitisation and training programmes to promote Diversity & Inclusion awareness;
- Check that institutional messages are inclusive, respect culture and language differences and are not offensive. Avoid sexist, racist or discriminatory language.

DISSEMINATION AND UPDATING

This Policy applies to all directors, managers and employees of the Cereal Docks Group, and to all other parties who collaborate and operate on behalf and in the name of the Group. The Policy is available to all Cereal Docks Group employees and is published on the company website, for all stakeholders, including collaborators, suppliers and partners, for transparency purposes in order to promote full human rights awareness and spread an inclusive culture at all levels.

The Policy will be reviewed and updated, based on monitoring company gaps, new national and international feelings, regulatory changes, evidence from assessments and reports collected.