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ANTARES VISION GROUP DIVERSITY, EQUITY & INCLUSION POLICY

Approved by Antares Vision Board of Directors on the 31st of January 2023.

INTRODUCTION & PURPOSE

Antares Vision Group is committed to recognize the centrality of people and ensure a fair and inclusive work environment, in which people are treated with dignity, decency and respect, free from any form or type of violence and harassment, to which all the members of the corporate administrative and control bodies and all employees must commit to.

In full alignment with its Human Rights Policy, Antares Vision Group's commitment to the principle of inclusion is reflected in the creation of a work environment based on the principles of equal opportunity, regardless of differences in gender, religion, race, nationality, sexual orientation, social status, physical ability, and age.

Moreover, with the adoption of this diversity, equity, and inclusion policy (the "**Policy**"), and in line with its Code of Ethics¹, Antares Vision Group intends to:

- prohibit without exception all forms of violence and harassment in the workplace within the group,
- expressly reject any behaviour constituting physical or psychological violence, coercion, harassment (including harassment of a sexual nature, howsoever made), bullying or attitudes referable to mobbing and harassment practices,
- provide equality, fairness, and respect for all the individuals involved in its activities: employees, interns and collaborators at all levels, whether temporary, part-time or full-time.

These values, along with the ones contained in its Code of Ethics, have directed Antares Vision Group towards the adoption of this Policy as an integral part of its social responsibility, to protect itself and its Stakeholders.

This Policy has been drawn up in compliance with the main international conventions, standards, and recommendations on the matter, as well as in compliance with Antares Vision Group internal policies and procedures.

Therefore, the principles contained in this Policy are in line with:

Internal References

- Antares Vision Group's Code of Ethics
- Antares Vision Group's Human Rights Policy

International References

- International Labour Organization Convention ("ILO") No. 190 on the Elimination of Violence and Harassment in the World of Work, adopted in Geneva on 21 June 2019 at the 108th session of the General Conference of ILO.
- Recommendation no. 206 on the elimination of violence and harassment in the workplace.
- Law no. 4 of 15 January 2021 ratifying and implementing the ILO Convention no. 190 on the Elimination of Violence and Harassment in the Workplace
- INAIL Guidelines - "Recognizing and preventing harassment and violence in the workplace" (2021)
- UN Global Compact and UN Women, Women's Empowerment Principles (and Gender-Based Violence and Harassment at Work Policy Template)
- ILO, 2022. Transforming enterprises through diversity and inclusion.

¹ [Antares Vision Group's Ethical Code](#). The Code of Ethics, approved by Antares Vision and extended to the companies of Antares Vision Group, reports the guidelines of conduct and the common values, such as legality, correctness and transparency, which inspires Antares Vision Group for the attainment of its economic, production and social aims.



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- UN Global Compact Network Italia, 2022. Diversity & Inclusion in azienda. L'esperienza dell'Osservatorio D&I.

1. GLOSSARY

Capitalized words in this Policy have the following meanings, whether used in singular or plural form:

Affiliates: means any company in which Antares Vision has a non-controlling interest.

Antares Vision: means Antares Vision S.p.A., with its registered office in Via del Ferro 16, Travagliato (BS), registered at no. 02890871201 on the register of enterprises of Brescia.

Antares Vision Group: means Antares Vision and its Subsidiaries.

Recipients: has the meaning ascribed to it in Section 3.

Stakeholders: means any party with a direct or indirect interest in Antares Vision Group's business, such as customers, people working for the group, whether they are executives or employees, suppliers, contractors, partners, other companies and trade associations, the financial community, civil society, local, and indigenous and tribal communities, national and international institutions, the media, and the organizations and institutions that represent them.

Subsidiaries: means any companies in which Antares Vision has a controlling interest. According to Consolidated Financial Statements, Antares Vision controls a subsidiary if, and only if, it has: (i) power over the entity it has invested in (or holds valid rights that give it the current ability to control the significant activities of the entity it has invested in); (ii) exposure or entitlement to variable returns, deriving from its relationship with the entity it has invested in; (iii) the ability to exercise its power over the entity it has invested in to affect the amounts of its returns.

Suppliers: means any suppliers of goods and services, including advice and professional services.

2. SCOPE OF APPLICATION AND RECIPIENTS

This Policy applies to Antares Vision and its Subsidiaries.

Each company of Antares Vision Group must adopt this Policy in compliance with its corporate governance system.

Therefore, the Policy is addressed to all members of the corporate body, employees, officers, collaborators, suppliers of goods and services, consultants and in general anyone who has a business relationship with Antares Vision Group, regardless of the legal nature of the relationship (the "**Recipients**").

All Recipients are required to know the provisions of the Policy and to actively contribute to its implementation, reporting any flaws or violations. For this purpose, Antares Vision Group undertakes to promote knowledge of the Policy to all Recipients.

The Policy is also brought to the attention of the Affiliates, to promote conduct consistent with those adopted by the entire Antares Vision Group. Therefore, the Affiliates are required to sign a declaration of acknowledgment and knowledge of this Policy, committing themselves to comply with the principles contained therein.



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3. ENHANCING DIFFERENCES, ENSURING FAIR AND EQUAL OPPORTUNITIES

Antares Vision Group believes that creating an inclusive work environment, where employees are treated fairly and given equal opportunities is a key condition to ensure social and economic stability and profitability to its business model.

Within its activities, Antares Vision Group acknowledges all differences whether they refer to gender, religion, nationality, political opinion, sexual orientation, social status, physical abilities, or age.

The aim is for Antares Vision Group’s workforce to be truly representative of all sections of our Stakeholders and, more broadly, of the entire group. Moreover, this Policy is aimed for each employee of Antares Vision Group to feel respected and work in an inclusive and fair work environment.

Antares Vision Group – in providing goods, services or facilities – is also committed against unlawful discrimination of customers or the public.

Antares Vision Group’s commitment to guarantee diversity, equity and inclusion is also extended to its value chain, namely its Suppliers. Antares Vision Group applies a rigorous selection and monitoring process of Suppliers, in sharing knowledge and in constantly benchmarking practices on such matters. All Suppliers involved in operations with Antares Vision Group must show proven social responsibility.

Antares Vision Group will not tolerate any form of discrimination, based on:

- age;
- disability;
- gender;
- marriage or civil partnership;
- pregnancy and maternity;
- race (including color, nationality, and ethnic or national origin);
- religion or belief;
- sex;
- sexual orientation.

3.1. MULTICULTURALISM

Discrimination based on nationality, ethnicity, religion, and any other aspects related to people’s culture is not tolerated.

As a group operating in more than 60 countries, multiculturalism represents for Antares Vision Group a precious value, as well as a driver to grow and pursue its goal of becoming a global player.

3.2. SEXUAL ORIENTATION & GENDER GAP

Antares Vision Group guarantees equal employment opportunities to employees of all genders and rejects all forms of discrimination based on people’s sex, gender, sexual orientation, gender reassignment, marital status, pregnancy and/or maternity.

Antares Vision Group is committed to close gender gaps and enhance diversity through the adoption of work policies and practices that contribute to the creation of friendly workplaces that values gender diversity.



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3.3. DISABILITIES

Antares Vision Group is fully committed to adopt policies to enhance inclusion of people with disabilities. Therefore, Antares Vision Group ensures equal opportunities in selection processes and encourages employee recruitment, ensures protection measures during the various stages of the employment relationship, and adopts any policies and programs available at both country and local levels.

4. DEFINITIONS OF VIOLENCE AND HARASSMENT

Antares Vision Group rejects any form of physical, verbal, and psychological violence and harassment. Violence and harassment within the scope of this Policy are intended as violence and harassment in the workplace, *i.e.*, violence and harassment that occurs against individuals when, in connection with, or originating in the work environment.

Violence and harassment are defined as any conduct - physical, verbal or non-verbal - or the threat of such conduct, whether on a single occasion or repeatedly, that is intended to, causes or is likely to result in physical, psychological or economic harm.

Violence and harassment examples include, but are not limited to:

- **Moral harassment**, which refers to any unwelcome behavior or conduct, whether physical, verbal or psychological having a negative effect on conditions at the workplace or aimed at humiliating, demeaning, offending, intimidating an individual or a group of individuals and potentially seriously affecting their health, career or dignity.
- **Sexual harassment**, which refers to any unwelcome or unwanted physical, verbal, visual or other conduct against an individual such as sexual innuendo, explicit comments or advances, or coerced sexual act. An aggravating circumstance is the fact that the sexual harassment is accompanied by implicit or explicit threats or blackmail by hierarchical superiors or persons who can influence the establishment, development and termination of the employment relationship.
- **Gender-based harassment**, which refers to any unwelcome behavior directed against persons because of their sex or gender, or which affects persons of a specific sex or gender.

5. IMPLEMENTATION AND MONITORING

To ensure the correct implementation of the Policy, Antares Vision Group may consider the design of a due diligence process providing specific actions for each company of the group and its country of application.

Suppliers' compliance with this Policy is constantly monitored through specific procedures.

Subsidiaries oversee the implementation of this Policy locally.

6. REPORTING VIOLATIONS

The Recipients must promptly report any actual or suspected violations of the Policy.

Reports should be made in writing, preferably in a non-anonymous way. Reports must be made in good faith and must be both specific and detailed. In any event, the information provided will be treated confidentially.

For this purpose, any violation of the Policy must be reported through Antares Vision Group's whistle blower reporting process, accessible at the following link: <https://www.antaresvision.com/whistleblowing>.



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The confidentiality of the identity of people making reports is in any case guaranteed. Any measures of retaliation or discriminatory nature adopted against the person who made the report are in no way tolerated.

7. COMMUNICATIONS AND TRAINING

Antares Vision Group promotes the awareness of the Policy among all Recipients. For this purpose, the Policy must be made available to all Recipients, according to the procedures that must be defined by each company of Antares Vision Group.

This Policy is also published, in Italian and English version, on the website of Antares Vision Group.

Any doubts concerning the application of this Policy shall be addressed to Antares Vision HR Manager.

Antares Vision Group must develop appropriate training and awareness programs regarding this Policy, to strengthen its internal culture to embrace values such as inclusion, equality, and non-discrimination, and to increase awareness on this Policy among the entire group.

8. APPROVAL AND REVIEW

This Policy is approved by the Board of Directors of Antares Vision. Any updates to the Policy will be promptly brought to the attention of the companies of Antares Vision Group, for appropriate adoptions by the respective administrative bodies.