# **POLICY ON NON DISCRIMINATION & DIVERSITY**

## **1. OVERVIEW**

The following document outlines our Policy on non-discrimination and diversity applicable to the Brembo Group ("Brembo"). It contains guidelines on how to **promote Diversity, Equity and Inclusion** ("**DEI**") throughout our organization and foster a solid DEI culture.

#### DEFINITIONS

*Diversity:* all kind of differences occurring among any and all individuals (cultural, physical, psychological etc.)

**Equity:** the guarantee of fair treatment, access, opportunity and advancement in the workplace while at the same time eliminating barriers not related to merit which prevent the full participation of some groups.

*Inclusion:* the act of creating environments in which any individual or group can be and feel welcomed, respected, supported and valued to fully participate in the life of the organization.

The policy is anchored in Brembo culture through its commitment reflected in both the **Code of Basic Working Conditions** and the **Code of Ethics**.

# 2. APPLICATION

The Policy applies to all people who work for and with us, including our employees in Brembo-owned entities and joint ventures, contractors and consultants, advisors, agency workers and interns acting on the Company's behalf.

It covers all aspects of employment with us and requires, for its correct application, accountability and commitment from both employer and employees from all interested parties.

# 3. GOAL

Brembo aims at maintaining a respectful working environment and actively stands up against discrimination.

Personal conditions cannot lead to any discrimination based on:

- · gender or gender reassignment and sexual orientation
- ethnicity (including ethnic origin, nationality and national origin)
- belonging to minority
- political opinions and religious beliefs

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- social origin
- civil status
- · family status
- disability
- any other personal condition.

Brembo defined who should be the focus of Diversity, Equity and Inclusion activities. Demographic factors, life context and physical and mental differences can all play important roles in shaping who employees are when they come to work and how they experience the workplace.

Bringing together people from different backgrounds and experiences can create valuable insights to the workplace and enhance the way we all work.

We at Brembo are firmly convinced that **people shall have equal access to employment, facilities**, **services and programs only according to their knowledge**, **qualifications**, **competences**, **performance and motivation and not with regards to other personal conditions**.

All employees shall be helped and encouraged to develop their potential. Their talents and resources shall be fully utilized to enable the organization to thrive.

Brembo acknowledges and promotes the value of diversity and takes a zero-tolerance approach to any form of discrimination such as harassment (including gestures, language, posture and physical contact). It is our goal to contribute positively to the success of the Company by promoting a diverse and inclusive workplace which supports an engaged high-performance culture.

The Policy seeks to promote a more diverse, inclusive and representative workforce whilst ensuring that the best qualified, skilled and experienced people are attracted, hired, developed and retained.

From prevention and protection against all forms of discrimination to initiatives aimed at enhancing diversity and guaranteeing inclusion is our ongoing mission.

### 4. GUIDELINES

In line with the above mentioned principles, Brembo continues its commitment to respect diversity and equal opportunities through behaviors, processes and guidelines for the recruitment and selection, training, remuneration and people management such as the ones aimed at guaranteeing the pluralism of professionalism and the adherence to criteria based on merit, competencies and skills.

Brembo expects its employees, agents, business partners and other stakeholders when and wherever those individuals are conducting Brembo business or participating in any Brembo project, process,

event or activity, shall establish and maintain an environment free of discrimination (including harassment, bullying, or retaliation) as an essential part of **the Brembo way of doing business**.

#### Brembo is committed to:

- ✓ creating a workplace that **promotes diversity, equity and inclusion**
- ✓ taking measures that will make people feel welcome and appreciated as they are and as they contribute
- maintaining a workplace where employees are able to perform their duties free from all forms of discrimination and harassment
- ✓ treating people fairly and equally regardless of their gender, age, culture/ethnicity and other personal conditions
- ✓ developing inclusive leaders to commit to DEI principles and practice more inclusive behaviours and skills
- ✓ promoting an **open working culture** that recognizes each individual's value
- monitoring and reviewing the effectiveness of this Policy and associated procedures and approaches.

#### **5. RESPONSIBILITIES**

Diversity is a shared responsibility among all the stakeholders of the organization (e.g. Top Management, Managers, Employees, Human Resources and Organization Global Central Function) and applies to all Brembo contributors.

### 6. MONITORING, ENFORCEMENT AND REVIEW

#### Monitoring

All employees are expected to be aware of Brembo's policies regarding diversity and uphold them. If employees note that a section of the Policy is not being upheld, they should bring it to the attention through the dedicated channels and/ or to HRO Global Central Function at <u>Working\_Conditions@brembo.it</u>.

#### Enforcement

No form of intimidation, bullying or harassment will be tolerated regardless of whether it is intentional or unintentional. Any employee, in good-faith, that believes that there may have been a violation of this Policy should report it. No retaliation will be taken against any employee who makes such a report or cooperates in an investigation related to any report.

Discrimination is unacceptable, and equality of opportunity has been a long-standing feature of our employment practices and procedures, as we strive to recruit, develop and retain the most talented people.

Brembo has also set up information channels to ensure adequate information flow to the Supervisory Committee regarding irregularities or violations of the Code of Ethics and Organization, Management and Control Model under the Legislative Decree 231/01 and to Internal Audit GCF with regard to any anomalies or weaknesses in the Company's Internal Control System (Group's Whistleblowing Procedure).

Breaches in the Policy must be assessed from a disciplinary point of view in accordance with the applicable Company norms and regulations, also providing, where expected conditions are met, the application of specific disciplinary measures.

Issues and non-compliance will be dealt with on a case-by-case basis.

#### Review

The Policy will be monitored periodically. Brembo reserves the right to review and amend this Policy from time to time to ensure that it adequately promotes inclusion and diversity.

This Policy is fully supported by Top Management.

### 7. COMMUNICATION

The Policy will be posted on the Company website at: <u>https://www.brembo.com/en/company/corporate-governance/codes-policies</u>. It is also internally communicated through the usual communication channels.