



2.2 Diversity, Inclusion and Gender Equality policy



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Document revision

2	13/05/2025	Guiding principles added references to career development policies and internal/external communication	Mauro Sgarbossa	CEO	Public
1	09/05/2025	Laws and Regulatory References updated	Mauro Sgarbossa	CEO	Public
0	29/4/2025	First release	Petra Bertagnoll	CEO	Public
Rev.	Date	Description	Modified	Approved	Classification



Goal and field of application

This policy aims to integrate diversity, inclusion and gender equality into all aspects of our business operations, culture, and leadership practices. We seek to ensure equal opportunities for all employees, regardless of gender, and to create an inclusive and supportive work environment that fosters professional growth and work-life balance. **This policy applies to all companies within the Gruber Logistics Group.**

Validity: Corporate

Legend and Glossary

Diversity: The range of visible and invisible differences among people, including but not limited to gender, age, ethnicity, sexual orientation, disability, cultural background, religion, and political beliefs.

Inclusion: The practice of creating a work environment where all individuals feel respected, valued, and engaged, and have equal access to opportunities and resources regardless of their personal or social identity.

Gender Equality: A state in which individuals of all genders have equal rights, responsibilities, and opportunities in all areas of life, including employment, leadership, and personal development.

Gender Pay Gap: The average difference in pay between men and women for equivalent work, roles, or responsibilities, considering equal experience and qualifications.

Direct Discrimination: Unequal or less favorable treatment of an individual explicitly based on gender, sexual orientation, disability, ethnicity, religion, or other protected characteristics.

Indirect Discrimination: Policies or practices that appear neutral but result in a disproportionate disadvantage to individuals of a specific gender or other group.

Unconscious Bias: Implicit attitudes or stereotypes that influence judgment, decisions, and behavior unconsciously and may lead to unintended discrimination.

Inclusive Leadership: A leadership style that actively embraces and promotes diversity and inclusion through equitable practices, empathy, transparency, and collaboration.

Gender Mainstreaming: The systematic integration of gender perspectives into all stages of policy-making, organizational planning, decision-making, and operational processes.

Work-Life Balance: The ability of employees to balance professional duties with personal life and family responsibilities, supported through flexible work arrangements and parental support programs.



Harassment: Unwanted behavior that violates a person's dignity or creates an intimidating, hostile, or offensive work environment, especially when based on gender or sexual orientation.



Our commitment to diversity, inclusion and gender equality

At Gruber Logistics, we are committed to fostering a diverse and inclusive environment. We believe that diversity, inclusion and diversity, inclusion and gender equality are not just significant subject matters but are also integral to our corporate values.

They have positive or, if not cultivated, negative impacts on the economy, environment, and people. Negative impacts can include economic losses, social division, and human rights violations resulting from instances of discrimination. On the other hand, the positive impacts include economic benefits from innovation, social cohesion, and the advancement of equality and human rights.

By actively mitigating negative impacts and maximizing positive impacts, we have the potential to cultivate an inclusive and diverse environment that benefits individuals and society as a whole.

We uphold the values of respect and non-discrimination, in accordance with our Code of Ethics. We affirm that we do not tolerate any form of discrimination on the grounds of gender, sex or sexual orientation, disability, or religion in our dealings with and among workers.

At Gruber Logistics, diversity, inclusion and diversity, inclusion and gender equality are more than just policies - they are part of our identity, embedded in our corporate values, and crucial to our success. We are committed to creating a workplace where everyone is treated with respect and dignity, and where everyone has an equal opportunity to succeed and to express themselves in a safe and protected way without any kind of direct or indirect discrimination. We believe that by doing so, we can contribute to a more equitable and inclusive society.

This policy aligns with international standards, including the United Nations Principles for Responsible Management Education (UN PRME) and the UNP PDR 125, ensuring a comprehensive and sustainable approach to gender equality.



Laws and Regulatory References

Italian Constitution

- Art. 3: All citizens have equal social dignity and are equal before the law, without distinction of sex.
- Art. 37: Protection of female labor and the right to equal pay.

Legislative Decree 198/2006 – Code of Equal Opportunities

- Gathers and coordinates existing laws on equality between men and women, equal opportunities in employment, and the fight against gender discrimination. It is the main legal reference on the matter.

Legislative Decree 151/2001 – Consolidated Law on Maternity and Paternity

- Protects parenthood and promotes work-life balance.

Law 162/2021 – Reform of the Code of Equal Opportunities

- Introduces gender equality certification and incentives for companies that obtain it.

Treaty on the Functioning of the European Union (TFEU)

- Art. 157: Principle of equal pay between men and women for the same work. Directive 2006/54/EC – Equal treatment between men and women in employment and occupation.

Directive 2023/970/EU – Pay equality and pay transparency.

2030 Agenda for Sustainable Development

- Goal 5: Achieve gender equality and empower all women and girls.
- Goal 9: Build resilient infrastructure, promote inclusive and sustainable industrialization, and foster innovation.
- Goal 10: Reduce inequality within and among countries.

Voluntary standards

- UNI/PdR 125:2022
- Accredia's FAQs (May 2023 and November 2024)



Guiding Principles

Our approach to diversity, inclusion and gender equality is built on the following principles:

- **Non-Discrimination and Equal Opportunity:** All employees have equal access to career opportunities, training, promotions, and remuneration.
- **Inclusive Leadership and Empowerment:** We foster a leadership culture that values diversity and promotes gender balance in decision-making.
- **D&I Mainstreaming:** Diversity and inclusion considerations, including gender, cultural background, age, disability, and other dimensions, are embedded in recruitment, employee development, and performance evaluations.
- **Recruiting:** Fair, inclusive, and merit-based hiring practices ensure equal access to opportunities for candidates of all genders, backgrounds, and identities..
- **Work-Life Balance and Flexibility:** Flexible working arrangements are provided to support all employees in balancing professional and personal responsibilities.
- **Zero Tolerance for Harassment and Discrimination:** We maintain a strict policy against identity-based harassment, discrimination, or violence.
- **Career Development:** We provide equal opportunities for career progression, training, and development to all employees, ensuring that gender, background, or identity do not hinder growth and advancement within the company.
- **Communication:** Communication strategies and practices are designed to be inclusive and transparent. For further details, refer to our specific communication policy.

Corporate Values

Our commitment to diversity, inclusion and gender equality is reflected in our core values:

1. **TRUST** - Build partnerships that last: Trust is the foundation of all our relationships with employees, customers, and partners. We are responsible for ensuring we never compromise the trust placed in us. This trust extends to our commitment to diversity, inclusion and gender equality, creating a workplace where everyone feels valued and respected.
2. **MOTIVATION** - Inspire to grow: Our employees are our driving force. We believe in every single employee's professional and personal success. We aim to provide every employee space for their individual development, which includes fostering a diverse and inclusive environment.
3. **CHALLENGE** - Go for it: We are used to making the impossible come true. A diverse workforce brings a wide range of perspectives and ideas, helping us to meet challenges head-on and find innovative solutions.
4. **IMPROVEMENT** - Strive for the better: Embracing change is difficult, but it can help us improve



if we all work together towards a common goal. Our commitment to continuous improvement includes our efforts to promote diversity, inclusion and gender equality.

Dimensions of Diversity

Gender: We strive for gender balance in management and beyond to ensure a fair and equitable representation.

LGBTQ+: We promote an inclusive environment for all employees and providing targeted support to the LGBTQ+ community.

Racial and Ethnic Origin: We implement strategies to attract, support, and include ethnic minority staff, aligning our workforce with the diverse societies we serve.

Religion or Belief: We foster an inclusive environment that accommodates various religious beliefs, ensuring all employees feel respected.

Disability: We commit to a fully accessible workplace and providing support for individuals and managers to create an inclusive environment for employees with disabilities.

Age: We emphasize an intergenerational focus to foster collaboration and understanding across age groups.

Objectives

To successfully implement diversity, inclusion and gender equality at Gruber Logistics, we commit to:

- Ensuring fair recruitment, selection, and promotion processes.
- Increasing gender diversity in leadership roles.
- Providing training on diversity, inclusion and gender equality and unconscious bias.
- Creating a culture of respect, inclusivity, and collaboration.
- Regularly evaluating diversity, inclusion and gender equality metrics, including pay equity.
- Defining clear KPIs to monitor progress, such as increasing female representation in leadership roles.

Implementation and Responsibilities

- **Top Management:** Ensures the allocation of resources and accountability for diversity, inclusion and gender equality goals.



- **Gender equality officer:** Responsible for promoting and ensuring equal treatment and opportunities for all genders within an organization
- **Human Resources Department:** Integrates diversity, inclusion and gender equality into recruitment, training, and performance management.
- **Managers:** Play a key role in implementing diversity and inclusion measures within their teams, fostering an inclusive work environment, and supporting the achievement of related organizational goals.
- **All Employees:** Expected to uphold this policy, promote inclusivity, and report any concerns related to gender equality.
- **Steering Committee for Equal Opportunities (SC)/ Comitato Guida per le Pari Opportunità (CG):** A dedicated committee will be established to monitor gender equality initiatives, report on progress, and propose further improvements.

Gender Pay Gap Monitoring and Corrective Actions

Gruber Logistics is committed to ensuring pay equity across all genders. Monitoring and addressing the gender pay gap is a key component of our broader Diversity & Inclusion strategy. To uphold fairness and transparency in compensation, the following actions will be implemented:

- **Annual gender pay audits** will be conducted to assess disparities in remuneration.
- If gaps are identified, **a structured action plan** will be developed, ensuring pay equity within defined timelines.
- Transparent salary reviews and adjustments will be implemented to maintain fairness in compensation.

For detailed procedures and criteria, please refer to the dedicated policy “Policy for Pay Equity GL Group “.

Work-Life Balance and Parental Support To support employees in balancing professional and personal responsibilities, and avoid gender biases, Gruber Logistics offers:

- Offer flexible work arrangements, including remote work and part-time opportunities.
- Provide parental leave for all genders, promoting equal caregiving responsibilities.
- Implement **reintegration programs for employees returning from parental leave**, ensuring a smooth transition back to work.
- Establish awareness campaigns and internal support networks for working parents.



Recruitment, Selection and Inclusion

Gruber Logistics promotes inclusive and equitable recruitment by valuing diversity in all stages of the hiring process. We aim to attract talent from a wide range of backgrounds, ensuring equal opportunities for all candidates. Our approach encourages impartiality, avoids bias, and supports the representation of underrepresented groups across all roles. We are committed to building a workforce that reflects the diversity of the communities we operate in. For detailed procedures and criteria, please refer to the dedicated policy “Recruiting Policy”.

Prevention of Discrimination and Harassment

At Gruber Logistics, we are committed to fostering a workplace culture rooted in respect, safety, and equal opportunity for all. As part of our broader Diversity & Inclusion strategy, we have developed targeted measures to prevent and address discrimination, harassment, and gender-based violence. These efforts are supported by structured procedures, continuous monitoring, and clear communication to ensure a safe and inclusive environment for every employee.

- **Zero-tolerance policy against discrimination, gender-based violence, and harassment.**
- Implementation of **structured grievance mechanisms** to handle reports of discrimination or harassment confidentially and effectively.
- Clear procedures for investigating and addressing complaints, with **dedicated support channels for affected employees.**
- Annual training sessions to raise awareness and prevent identity-based misconduct in the workplace.

Monitoring, Reporting, and Continuous Improvement Gruber Logistics will track progress through:

- **Diversity, inclusion and gender equality audits** to assess representation, salary equity, and career advancement.
- **Annual internal reports** on gender balance and inclusion initiatives.
- **Employee surveys** to measure perceptions of inclusivity and workplace fairness.
- **Periodic policy reviews and updates** to align with industry best practices and legal requirements.

Communication and Awareness To ensure widespread understanding and adherence, we will:

- **Conduct training sessions** and presentations on gender equality and other diversity dimensions.
- **Share policy updates** through internal and external communication channels.
- **Provide resources and support mechanisms** for employees experiencing challenges regarding their identity.



Gruber Logistics recognizes the role of communication in fostering an inclusive organizational culture. All internal – and external – communication is done observing our core Diversity and Inclusion principles. We also promote Diversity Management and People Care initiatives in line with ESG principles.

Conclusion

At Gruber Logistics, we believe that a diverse and inclusive workplace leads to a more dynamic, innovative, and sustainable organization. By committing to diversity, inclusion and gender equality, we create a work environment where everyone, regardless of their identity, can thrive and contribute to the company's success. We will continuously improve our policies to ensure compliance with UNI/PdR 125:2022 and to uphold the highest standards of diversity, inclusion and gender equality.

