



**POLICY FOR EQUAL OPPORTUNITIES**

**OF**

**A.S. ROMA S.P.A. (THE "COMPANY")**

**In force from December 7, 2021**



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Società Soggetta ad attività di direzione e coordinamento da parte di NEEP Roma Holding S.p.A.

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## 1. Introduction

- 1.1. The Company recognizes the values of inclusion and equal opportunities, proposing itself as the company's authors, organization and management respect for these values.

## 2. Purpose

- 2.1. The purpose of this "Policy for equal opportunities" (the "**Policy**") is to create a work environment, within the Company and the group it heads (the "**Group**"), which ensures fairness and impartiality in terms of equal career opportunities, competitiveness, flexibility and treatment, including remuneration, as well as growth and inclusion in the Group, without any distinction, direct or indirect, in relation to sex, race, religion, creed, origins, ethnicity, citizenship, age, sexual orientation and identity, gender expression, sensory, cognitive and / or motor disability, state of health, nationality, political opinion, social category, language and / or any other personal characteristic or quality.
- 2.2. In order to ensure the effectiveness of the principles contained in this Policy, the Company, in addition to the protection activity of diversity, adopts a proactive approach, aimed at overcoming cultural stereotypes and identifying and resolving the factors that prevent full employment inclusion. The Company also promotes conditions that allow for the removal of obstacles that limit people's expression and their full enhancement within the Group's organization.

## 3. Application

- 3.1. This Policy applies to all those who act in the name and / or on behalf of the Company, including, by way of example, directors, auditors, employees, managers, officers, consultants and suppliers, athletes and the registered staff, the technical and medical staff and anyone else who lends their business to the Company and the Group (the "**Recipients**").

## 4. Principles

- 4.1. No one may be discriminated against on grounds of sex, race, religion, creed, origins, ethnicity, citizenship, age, sexual orientation and identity, gender expression, sensory, cognitive and / or motor disability, state of health, nationality, political opinion , social category of belonging, language and / or any other personal characteristic or quality.
- 4.2. The Company ensures equal opportunities for all Recipients.
- 4.3. Diversity is a value to be protected and encouraged with concrete actions relating to all organizational and management processes through understanding, inclusion and appreciation of people's differences.
- 4.4. The Company promotes and enhances gender balance and overcoming any stereotype, discrimination or prejudice, also by strengthening the presence of women in development programs.

- 4.5. The Company promotes the development and management of the needs of the different generations, favoring intergenerational dialogue that allows comparison between different experiences.
- 4.6. The Company is committed to promoting interculturality, enhancing the integration of heterogeneous backgrounds and experiences and making people with different cultures coexist in order to enhance the prospects for growth and innovation related to this relationship model.

## 5. **Actions**

- 5.1. The Company undertakes to identify and remove any obstacle - of a cultural, organizational and relational nature - that actually limits equality among all Recipients in access to work, at work and in professional and career progression and which, in any case, prevents the full realization of equal opportunities for work and work among all Recipients.
- 5.2. The Company is committed to disseminating managerial and leadership styles at all levels that enhance inclusion as a reference cultural paradigm.
- 5.3. The Company promotes a human resources development and management strategy capable of developing an inclusive culture, aimed at guaranteeing all Recipients access to the same opportunities for professional growth also in compliance with the provisions set forth pursuant to the Employee Development Procedure adopted by the Company.
- 5.4. The mechanisms for the enhancement of talents, as well as remuneration and professional growth policies, must be geared towards not discriminating on the basis of gender, including through the adoption of specific actions.
- 5.5. In order to prevent and overcome obstacles related to any sensory, cognitive and / or motor disabilities of people, the Company adopts concrete insertion and inclusion measures - also by favoring accessible work environments - aimed at enhancing talents and skills, providing for specific training actions and launching awareness-raising initiatives and targeted actions.
- 5.6. All Recipients of this Policy must adopt appropriate behaviors, aimed at guaranteeing a peaceful working environment, the physical and moral integrity and well-being of each other Recipient.
- 5.7. The Company undertakes to repress all forms of discrimination, according to the disciplinary provisions in force.

## 6. **Reporting and monitoring**

- 6.1. Each Recipient may and must report the occurrence of discrimination events which he/she has witnessed or of which he/she has been a victim to the Company's Legal & Compliance Department, also by *e-mail*, and/or through the use of proper tools adopted from time to time by the Company. The Company's Legal & Compliance Department and/or the tools adopted from time to time by the Company ensure in any case the

confidentiality of the report, unless the disclosure of the identity of the whistleblower is required in accordance with the provisions of the law or on the basis of applicable policies. The Company will not tolerate any form of retaliation against anyone who has reported forms of discrimination; any violation of the prohibition of retaliation against reporting subjects will be punished according to the disciplinary provisions in force. Each Recipient may also contact the Company's Legal & Compliance Department in order to obtain clarifications with reference to this Policy.

- 6.2. The Company periodically verifies the effective implementation of this Policy, also by evaluating the reports referred to in the previous paragraph.

## 7. Dissemination and updating

- 7.1. This Policy is communicated to all Recipients, also through proper and specific training sessions, and is made available on the company intranet site.
- 7.2. This Policy will be evaluated for the purpose of updating at least once every two years, also in light of the evidence emerging from the reporting and monitoring activities referred to above.

## 8. Procedures and other related documentation

- 8.1. This Policy must be read and respected in conjunction with all the other internal procedures of the Company, including in particular at least the following other procedures and related documents:
- Code of Ethic;
  - Employee Handbook;
  - Harassment Prevention Policy.