

Introduction

Comer Industries and Walterscheid Powertrain Group Company (hereinafter “the Company”) has decided to adopt a Policy enhancing the principles of Diversity and Inclusion, summarizing in a sole document the objectives that already drive people's actions based on shared corporate values.

The Company at all levels, is committed to respect freedom and human rights in its daily activities and to be a proactive actor of change contributing to overcome any form of **discrimination and non-tolerance**.

In accordance with the commitment to **sustainable development** stated in our *Purpose*, it is also through **diversity** that the foundations for dimensional and profitable growth are laid; to enhance this principle means overcome **cultural stereotypes** and adopt an **inclusive** approach to people management.

The Company steadily acts to ensure that every issue over the entire professional life of our people is managed without harming personal **dignity**, handling all activities in full compliance with current privacy regulations.

In order accomplish the above, the Company is committed to ensure that the communication, both internal and external, is based on the principles of responsibility, using language that respects gender differences and avoiding gender stereotyping.

To support the commitment of all colleagues to act with respect and integrity in all the relations also with customers, suppliers and all actors with who they interact with, the Company is strongly committed to ensure the principles and the rules stated in the Code of Ethics are respected at all levels. For this reason, the Company guarantees the protection of the identity of whistleblowers who report events that do not comply with company regulations, thereby protecting people against any form of **discrimination**, direct or indirect, or retaliation linked to any whistleblowing.

Policy objectives

The Company is committed to fight all forms of discrimination - direct or indirect - and **non-tolerance**, based on gender, age, sexual orientation, disability, nationality, political opinions and religions in all Company entities, over any production processes, departments and at all stages of the employment relation, including recruitment, job evaluation, performance appraisal, career promotion, compensation and termination of the relation.

The Company is committed to promote effective **gender equality** at all stages of the employment relationship, such as recruitment, job evaluation, performance appraisal, career promotion, compensation and termination of the relation.

Furthermore, the Company wants to adopt measures to increase employees' knowledge of equal opportunities, diversity and inclusion issues, including the development of information, training programs.

Integration among people from different cultures and geographical areas is encouraged and valued as an element of growth and cross enrichment.

The Company's action aims to **protect** and **encourage** diversity as an engine of action that increase diversity of visions, creating the best working conditions so that everyone can feel free to express ideas and to contribute to generated value.

The Company, in line with its value of **Honesty** and **Transparency**, is committed to ensure fairness and equity in professional relations with the aim to ensure equal treatment and equal opportunities for each person over each stage of the professional life.

The Company encourages and supports the culture of **Teamwork** in order to achieve our business goals, which is the reason why collaboration between different teams across any corporate functions is considered "added value" and a way to improve both the spirit of **inclusion** and people's skills.

Attracting talent is also considered a foundational activity to increase **inclusion** and attractiveness as the Company is committed to maintain and consolidate synergies with the territory and communities in which it operates, through partnerships with the most important Universities.

Policy measures

The Company adopts an **inclusive** leadership style, based on delegation at all functional levels and that is oriented to enhance the talent and the growth of each person, ensuring in the management of relations of a hierarchical nature, the authority is performed in a **fair and correct** way, preventing any abuse and behavior that is harmful to the dignity and the autonomy of any individuals.

The Company, in following a people management policy based on the above principles, adopting standard assessment tools for each person in the organization. It is each direct manager's responsibility to evaluate their own people on the basis of their performance, the organizational **behaviors** adopted and the **company values**; it is the HR department's responsibility and scope to ensure and guarantee the accuracy of the entire process.

The Company values the professional development of each person by focusing on the development of **skills** through collaboration between the various work teams. Every business opportunity, which is transformed into a real project, is the result of the synergy between the teams of the different functional areas. In addition, the Company places at the center of its action the continuous research for on-the-job or classroom training paths to improve the exchange of cross-functional knowledge of people, organizing **training** activities between different functions and thus increasing the awareness and the **knowledge** of the business.

The activity of welcoming itself - *welcome on board* for new people coming to the Company has a central role in the **inclusion** strategy. On this topic, the Brand & Integration and HR & Organization Departments organizes **induction** plans for all new hires with the aim of sharing an overview of the corporate culture, products and processes, aimed to an effective integration into the organization.

The Company has a *recruiting & talent acquisition* process that focuses on finding and attracting talent, ensuring, where possible and based on the knowledge and skills required, **equal opportunities**. The Company is also proactively committed to establish relations with the world of academic training co-participating in the management of some lectures within University Class of the engineering department. The Company has several partnerships in place with the most important Universities

organizing “Career Days” on a permanent base.

The Company is committed to analyze and update metrics to monitor its Diversity and Inclusion Policy with the purpose of constantly improving the following KPIs:

- Distribution of employees by employment contract;
- Distribution of employees by type of employment;
- Employee turnover by gender, age and country;
- Distribution of employees by contractual level;
- Ratio of the gross annual global salary of women workers to the gross annual global salary of all workers by contractual level;
- Ratio of number of hiring of women to the total number of hirings in the year;
- Number of OBEYA projects.

Annually, the HR Department shares the KPIs with the Corporate Management for approval and then plan on improvement actions based on shared and validated objectives.

The Company undertakes to spread the principles of this Policy by using internal and external communication channels.

Approval of Policy

Name: PRESIDENT AND CEO - Matteo Storchi

Date: November 2022

Signature:

