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PREAMBLE

In accordance with the principles and guidelines set forth in Leonardo S.p.A.'s DE&I Policy, IDV Group adopts this Diversity, Equity, and Inclusion Policy.

This Policy represents the commitment of IDV Group S.p.A. (hereinafter also "IDV Group" or "the Company") in Italy and abroad to promote a corporate culture that respects individual uniqueness and fosters a collaborative, inclusive, and diverse work environment, in accordance with the requirements of market best practices regarding diversity, equity, and inclusion, as well as the currently applicable principles of the Code of Ethics.

With this in mind, IDV Group is actively committed to promoting the principles of inclusion, equity, and the recognition of individual uniqueness, as well as to preventing and eliminating all forms of direct or indirect discrimination and harassment—including sexual harassment—at every stage of the employment relationship within the corporate community. These values are a priority in *change management* processes and are fundamental to a work environment in which the rights and dignity of everyone working for the Company are respected.

In this context, IDV Group is committed to fostering an ongoing dialogue on Diversity, Equity, and Inclusion (DEI) with all its stakeholders, with the aim of better understanding their legitimate expectations regarding these issues.

The provisions of this Policy apply immediately to all employees and contractors of IDV Group, both in Italy and abroad. IDV Group is also committed to communicating the principles of this Policy to its stakeholders, particularly suppliers and customers.

NATIONAL AND INTERNATIONAL REFERENCE STANDARDS

IDV Group bases and draws inspiration for its commitment from standards issued by national and international organizations, applicable laws and regulations, and codes of conduct, such as:

- the 2030 Agenda for Sustainable Development and the related United Nations Sustainable Development Goals (SDGs), in particular:



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- SDG No. 5, “Achieve gender equality and empower all women and girls”;
- SDG n.8, “Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all”;
- SDG No. 10, “Reduce inequality within and among countries”;
- the United Nations Universal Declaration of Human Rights;
- the ten principles of the United Nations Global Compact, and in particular principles 1 through 6, which promote respect for human rights and labor rights;
- the fundamental conventions of the International Labour Organization (ILO), in particular Convention No. 111 on Discrimination (Employment and Occupation) and Convention No. 190 on gender-based violence and harassment in the workplace;
- the guidelines of ISO 26000, “Guidance on Social Responsibility”;
- the guidelines of the OECD (Organization for Economic Cooperation and Development);
- the Women’s Empowerment Principles promoted by UN Women and the United Nations Global Compact;
- the principles enshrined in the Italian Constitution, in particular Article 3, which promotes equal dignity and equality before the law (formal and substantive equality), and all applicable anti-discrimination legislation;
- Legislative Decree No. 198 of April 11, 2006, the Code on Equal Opportunities for Men and Women;
- Article 6 of Law No. 246 of November 28, 2005. (Official Gazette No. 125 of May 31, 2006 – Ordinary Supplement No. 133);
- Law No. 162/2021: Amendments to the Code referred to in Legislative Decree No. 198 of April 11, 2006, and other provisions regarding equality between men and women in the workplace (Official Gazette No. 275 of November 18, 2021);
- ISO 19011 Guidelines for auditing management systems;
- UNI ISO 30415, Human Resources Management—Diversity and Inclusion;
- the Directive (EU) 2023/970 on pay transparency;
- Reference Practice UNI/PdR 125:2022, establishing guidelines for a gender equality management system that requires the adoption of specific KPIs related to gender equality policies within organizations.

IDV GROUP'S COMMITMENT TO DIVERSITY, EQUITY, AND INCLUSION

For IDV Group, uniqueness is a strategic factor in competitiveness, talent attraction, the development of human capital, and innovation.

The Company actively promotes the principles of inclusion, equity, and the recognition of individual uniqueness, as well



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as the prevention, elimination, and redress of all forms of direct or indirect discrimination, violence, and harassment—including sexual harassment—at every stage of the employment relationship, in day-to-day operations, and in business dealings, with particular attention to what occurs within the corporate community.

This commitment is reflected in the adoption of specific tools, such as:

- the Code of Ethics;
- the Group's Human Rights Policy;
- the Supplier Code of Conduct;
- the body of internal regulations governing employees' professional lives, from the very first moment they encounter the Company and the Leonardo Group;
- the Steering Committee, whose primary responsibility is to safeguard diversity and equal opportunities in the workplace, including identifying and proposing policy and monitoring measures related to obtaining and maintaining the UNI PDR 125:2022 Gender Equality Certification.

IDV Group also demonstrates its commitment by participating in various initiatives aimed at promoting gender balance, an inclusive culture, and adequate gender representation at public events and gatherings in which it participates.

KEY ASPECTS RELATED TO DIVERSITY, EQUITY, AND INCLUSION

IDV Group offers its employees a fair and inclusive work environment where they can fully realize their potential, fostering a sense of belonging and enabling everyone to contribute proactively to the achievement of the company's results.

Given the international context in which it operates, IDV Group recognizes the importance of multiple aspects of uniqueness, equity, and inclusion.

The following lists and explores the key dimensions related to diversity, equity, and inclusion:

Gender and Sex

IDV Group is committed to supporting gender balance and overcoming all stereotypes, discrimination, and unconscious bias to ensure women's empowerment—that is, by actively promoting gender equality, strengthening and supporting women's presence in key roles, and creating the best working conditions so that every person can fully realize their potential.

Gender Identity and Sexual Orientation

IDV Group S.r.l.
Società per azioni con unico socio
Direzione e coordinamento:
Leonardo – Società per azioni

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IDV Group is committed to removing all barriers related to an individual's identity and emotional/sexual orientation. The company is also committed to combating all forms of violence related to these issues through tools, channels, and prevention plans designed to receive, analyze, and address reports of alleged violations of the Code of Ethics and the regulations referenced therein.

Parenting and Caregiving

IDV Group promotes the sharing of family responsibilities, including through initiatives aimed at supporting parenting, such as: i) specific information programs on parental leave and related phases, and ii) measures to support employees with special caregiving needs for family members, partners, elderly relatives, or children.

Age (Generations)

IDV Group values integrated strategies for addressing and managing the needs of the different generations coexisting within the organization, as it believes that generational diversity is a tool for growth, particularly through the transfer of knowledge and the diverse social, cultural, and professional experiences of employees.

Physical and Intellectual Disabilities and Medical Conditions

IDV Group is actively committed to implementing concrete measures aimed at fostering the inclusion and development of people with physical and intellectual disabilities (including neurodivergent conditions) or specific health conditions, while promoting a path of progressive improvement designed to make all work environments increasingly accessible and inclusive. In this context, the Company works to identify and remove any physical, informational, and organizational barriers, facilitating access to workplaces, information resources, professional training, continuing education, and professional retraining activities at all its locations.

Nationality, Ethnicity, Religion, and Beliefs; Multiculturalism and Interculturalism

IDV Group promotes, both internally and externally, openness to cultural integration and multiculturalism in line with the principles established in the Code of Ethics, committing to recognizing, celebrating, and valuing the diversity of its employees' cultural traditions, beliefs, and experiences.

Social Background

IDV Group ensures that its employees have access to opportunities that best leverage each employee's personal aptitudes, regardless of their socio-economic background, educational path, or personal circumstances.



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PRINCIPLES UNDERPINNING THE IDV GROUP'S OPERATIONS

To foster and ensure a diverse, equitable, and inclusive environment in our day-to-day operations, the following key areas of focus have been identified:

- people and human resources management processes;
- relationships with suppliers;
- culture, communication, and information;
- development of innovative business solutions and responsible use of technology, particularly regarding the use of Artificial Intelligence.

People and Human Resources management processes

To create a workplace that ensures equal opportunities, it is essential to start with the processes that impact human resources, as these are crucial for promoting employees' well-being, engagement, and personal and professional development, as well as increasing productivity. Specifically, through these processes, the Company aims to achieve the following objectives:

Recruitment

- Ensure equal employment opportunities by guaranteeing fair treatment based on individual skills, professional expertise, and abilities. Job offers are extended to all candidates in accordance with the principles of fairness, transparency, and inclusion, without any discrimination, including using inclusive language;
- ensure respect for equal opportunity regarding candidates' private lives, personal beliefs, opinions, and family circumstances. IDV Group works to ensure that the personnel it hires match the profiles actually required to meet the company's needs, avoiding favoritism and preferential treatment of any kind and basing its decisions exclusively on criteria of professionalism and competence. Employees are hired under regular employment contracts based on their skills and job-related knowledge, in accordance with applicable laws and national and company-level collective bargaining agreements.

IDV Group expects that the establishment of employment relationships will take place in compliance with relevant anti-discrimination laws.

Career Management

IDV Group S.r.l.
Società per azioni con unico socio
Direzione e coordinamento:
Leonardo - Società per azioni

Sede Legale:
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- Creating and maintaining the employment relationship evolves—the conditions necessary for each employee’s skills and knowledge to continue to grow, following a policy based on merit recognition and equal opportunity, and providing specific programs aimed at professional development and retraining;
- engage employees by planning training initiatives in accordance with the principles of fairness and impartiality, and by fostering the development of managerial and leadership skills, while also raising awareness among managers to ensure they pay the utmost attention to enhancing and developing the professionalism of their staff by creating the conditions for the development of their skills and the realization of their potential;
- ensure the protection of the principles of equality regarding the assignment of qualifications, duties, and career advancement.

Pay equity

- Ensure a compensation policy based on the principles of equal pay for equal work and job classification, with compensation at least equal to that established by collective bargaining agreements and applicable regulations in the countries where the IDV Group operates, with the goal of ensuring a fair income and a living wage;
- ensure ongoing monitoring of any pay gaps, with the goal of adopting strategies and actions to reduce the gender pay gap;
- ensure transparency in the application of compensation policies, including regarding benefits and bonuses;
- implement welfare programs - including through services provided by third parties—that are offered equally to all categories of workers, based on their needs.

Work-life balance

- promote a work-life balance approach for its employees at all stages of their personal and professional lives, by implementing an agreement that provides access to flexible work arrangements (remote work) in accordance with local regulations and company provisions, and establishing simple and accessible rules and procedures for taking advantage of them, while taking operational needs into account;
- facilitate the full reintegration of employees following prolonged periods of absence from work, avoiding any form of discrimination upon their return to the company and promoting the necessary training and mentoring initiatives.

Measures to prevent all forms of physical, verbal, and digital abuse (harassment) in the workplace

- Ensure an inclusive and respectful work environment, where every person is treated with dignity and respect



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and where equal opportunities are guaranteed;

- implement a “zero-tolerance” policy toward unwanted conduct (harassment, discriminatory behavior, etc.) related to any factor identified in this Policy that has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that person;
- identify and monitor the risk of all forms of physical, verbal, nonverbal, psychological, or digital abuse, as well as workplace harassment, and develop plans aimed at their prevention and management;
- to assess, from a disciplinary standpoint, cases of harassment or violence in the workplace and in employment relationships, which may be subject to sanctions in accordance with the forms and procedures provided for by the applicable regulations and collective bargaining agreements, without prejudice to any additional civil and criminal liabilities.

Relationships with Suppliers

In accordance with the principles set forth in the Supplier Code of Conduct, IDV Group requires its suppliers to ensure:

- equal employment opportunities (including hiring, pay, benefits, promotion, termination, and retirement) for their employees and job candidates without discrimination, in compliance with all laws and regulations regarding non-discrimination, based on merit rather than personal characteristics;
- a work environment free from harassment of any kind, intimidation, or other abusive behavior.

Culture, Communication, and Information

IDV Group is committed to:

- using inclusive language and developing internal and external communication initiatives aimed at informing and raising awareness among its employees and external stakeholders regarding Diversity, Equity, and Inclusion policies;
- promote a culture of inclusion, including through informational activities, with the goal of raising awareness of Diversity, Equity, and Inclusion issues as well as the value generated by the Group;
- develop marketing initiatives that do not conflict with the principles of inclusion.

IMPLEMENTATION AND MONITORING

IDV Group is committed to:

- disseminating the contents of this Policy through awareness-raising and training initiatives and making it available to all stakeholders;



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- implement specific mechanisms for the periodic monitoring of the key areas of action identified above, optimizing the effectiveness of measures to prevent and mitigate negative impacts, with a view to continuous improvement.

To achieve its gender equality objectives, IDV Group also commits to ensuring that this Policy is supported at all levels of the Company's organization and is appropriate to the organization's purpose, size, and context, as well as to the specific nature of its risks and opportunities.

REPORT MANAGEMENT

IDV Group encourages anyone who becomes aware of violations (conduct, acts, or omissions) of the law or company protocols—including those that may potentially harm the public interest or the Group's integrity—to file a report in good faith through the internal reporting channel identified on the whistleblowing platform, in accordance with the procedures set forth in the Speak Up Policy, which is available in the dedicated section on the IDV Group intranet and website.

Anyone who receives a report outside of the designated internal channels is required to forward it as soon as possible—and in any case within seven (7) days of receipt—to their direct supervisor or the HR manager, using the Compliance Helpline channels or by emailing compliance@idvgroup.com. The report must be forwarded in its entirety, including any attachments, ensuring the utmost confidentiality at every stage.

