



ANTI-DISCRIMINATION POLICY

VERSION	1
ADOPTED ON	December 17, 2021,
MODIFIED BY	The Board of Directors on February 28, 2024

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1. Introduction

This anti-discrimination policy (“**Policy**”) affirms the commitment of Stevanato Group S.p.A. and its subsidiaries (“**Stevanato Group**” or “**Group**”) to provide a work environment in which all individuals are treated with respect and dignity and are free from improper discriminatory practices, prohibited forms of harassment and inappropriate conduct, including sexual harassment.

2. Definitions

For purposes of this Policy, the following definitions apply:

“**Discrimination**” refers to the treatment or consideration of, or making a distinction in favor of or against, someone based on the group, class, or category to which that person belongs or does not belong, rather than on individual merit.

“**Harassment**” includes, but is not limited to unwelcome verbal, physical, and/or visual conduct that creates an intimidating, offensive, or hostile work environment or that interferes with work performance. Sexual harassment is a specific form of Harassment based on acts of a sexual nature and includes quid-pro-quo harassment, which occurs when a job benefit is directly tied to an employee submitting to unwelcome sexual advances.

“**Policy**” means this Anti-Discrimination Policy.

“**Retaliation**” occurs when employers treat applicants, employees or former employees, or people closely associated with these individuals, less favorably for reporting discrimination; participating in a discrimination investigation or lawsuit (for example, serving as a witness), or opposing discrimination (for example, threatening to file a charge or complaint of discrimination). Retaliation can include any negative employer’s action, such as demotion, discipline, firing, salary reduction, or job or shift reassignment.

3. Persons subject to this policy

This Policy applies to all employees, officers, directors, clients, consultants, vendors or any other parties having business dealings with the Stevanato Group.

4. Principles and rules

Stevanato Group operate with respect for all individuals and preserve the dignity of every individual with whom each company of the Group interact.

In order to pursue this goal, Stevanato Group do not tolerate any form of discrimination, harassment, retaliation, intimidation, humiliation, bullying, unfair treatment or hurtful or inappropriate behavior at any time.

4.1 Discrimination

Stevanato Group strongly supports the right of all its employees to work in an environment that is free from all forms of discrimination and harassment, including sexual harassment. In all aspects of employment, such as recruitment, performance appraisals, compensation and benefits, training and development, promotion, transfer and termination, Stevanato Group will treat employees in a non-discriminatory manner; accordingly, making decisions without regard to such factors as: age, gender, sexual orientation, physical or mental disability or handicap, medical condition, pregnancy, marital status, race, national origin, ancestry, political opinions, religious and religious creed, status as a veteran or any other legally protected status of an individual.

Stevanato Group is committed to taking proactive steps to seek candidates from diverse backgrounds, provide targeted development opportunities aspiring to achieve gender parity at all levels of the organization, create diversity and inclusion awareness programs in every aspect of its business, with policies that support success and restrict barriers to the advancement of individuals from all backgrounds.

4.2 Harassment

Any form of harassment, even when not unlawful or directed at a protected category, is prohibited and will not be tolerated. Harassment and discrimination are prohibited at all times and in all locations. This policy applies at the Company's office(s) or other work environments, Company-sponsored social or other events, as well as activities at which the employee represents the Company. Employees are encouraged to come forward early to help the Company to stop any inappropriate behavior before it rises to the level of unlawful sexual harassment.

These behaviors are also prohibited with electronic equipment. This includes company-provided systems, including e-mail, voice mail, texting, video conferencing and the Internet, including through posts to social media, and personal electronic devices and systems used to communicate with other individuals.

The Company will provide a work environment free from all forms of sexual harassment including posters or signs. The Company prohibits employees from using the Company's equipment to view, download, or print sexually explicit material. Considerate adult behavior is required and expected at all times. All employees are expected to be sensitive to the individual rights of their co-workers. Sexual harassment is a form of sex discrimination that violates local, state, and/or federal laws, including but not limited to Title VII of the Civil Rights Act of 1964.

Specifically, Stevanato Group prohibits harassing conduct directed at its employees and contractors from customers or anyone with whom employees conduct business on behalf of the Group.

4.3 Retaliation

Stevanato Group will not permit or condone any acts of retaliation through intimidation, coercion, or any other form of adverse employment action, against anyone who files or cooperates in the investigation of harassment or discrimination complaints.

5. Reporting violations of the policy

Any violation of this policy against discrimination and harassment must be reported immediately.

The management of reports relating to violations of this Policy is governed by the Whistleblowing Policy published on the website www.stevanatogroup.com.

In particular, reports may be made:

- In written form, with a voice messaging system through the protected IT platform *Integrityline*, available online on the website www.stevanatogroup.com/en/about/whistleblowing.

The reports will be managed according to the methods and timing set out in the aforementioned Policy.

As established in the Whistleblowing Policy, in the event of a report, Stevanato Group will not tolerate against Whistleblowers – who has reported in good faith corporate facts of alleged violation of this Policy – Facilitators, Related Persons, Reported Persons, or anyone who has cooperated in the investigation to establish the validity of the Report (including their respective Related Persons), any form of threat, retaliation or discrimination, either attempted or actual.

6. Penalties for violations of the policy

Each company of the Group shall prepare and implement organizational verification and monitoring measures to ensure compliance with this Policy.

If the result of the investigation indicates that corrective action is called for, such action may include disciplinary action up to and including termination of the offender.

7. Disclosure of the policy

Each company of the Group undertakes to communicate this Policy to its employees and all interested parties, including providing the appropriate training for the correct interpretation of its contents and the tools to facilitate its application. Stevanato Group will provide training about discrimination and harassment for our employees and will require employees to complete training upon hire and at least every two years or sooner as required by law.

This Policy is available on Stevanato Group's website at <https://www.stevanatogroup.com/en/code-of-ethics>.

8. Policy approval, review and update

This Policy is approved by the Board of Directors of the Stevanato Group S.p.A. and applies to all companies of Stevanato Group.

Stevanato Group will consider making any revisions and/or updates to this Policy, taking into account any changes in applicable laws and regulations, the effectiveness of the Policy in practice and any changes in the corporate structure of the Group.

Each company of the Group is allowed to adopt its own anti-discrimination policy, provided that it does not conflict with the principles and values contained in the present Policy.

Change Log

ED. (see version above)	Date	Author	Modification Description