

DIVERSITY AND INCLUSION POLICY

Approved by the Board of Directors on July 15th, 2026

Pharmanutra S.p.A.

Via Campodavola, 1 - 56122 Pisa | +39 050 7846500

pharmanutragroup.com | pharmanutra.it | info@pharmanutra.it | pharmanutra@pec.it

C.F. / P.Iva / Reg. Impr. 01679440501 - Codice SDI SUBM70N | Cap.Soc. € 1.123.097,70 I.V. | REA 146259



1. GUIDING PRINCIPLES

This policy is based on the principles set out in the Pharmanutra Group Code of Ethics and in the Organizational, Management and Control Model adopted pursuant to Italian Legislative Decree No. 231/2001.

It is also inspired by the following international and national standards and frameworks:

The Constitution of the Italian Republic;

The Universal Declaration of Human Rights;

The Fundamental Conventions of the International Labour Organization (ILO);

The ILO Declaration on Fundamental Principles and Rights at Work;

The United Nations Conventions on the Rights of Women, the Elimination of All Forms of Racial Discrimination, the Rights of the Child, and the Rights of Persons with Disabilities;

The United Nations 2030 Agenda for Sustainable Development, particularly Sustainable Development Goals (SDGs) 5, 8 and 10;

The Corporate Governance Code for Listed Companies;

The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

2. SCOPE OF APPLICATION

This policy – approved by the Board of Directors of Pharmanutra S.p.A. (the “Company”) – applies to the members of the corporate governance and

Pharmanutra S.p.A.

Via Campodavola, 1 - 56122 Pisa | +39 050 7846500
pharmanutragroup.com | pharmanutra.it | info@pharmanutra.it | pharmanutra@pec.it
C.F. / P.Iva / Reg. Impr. 01679440501 - Codice SDI SUBM70N | Cap.Soc. € 1.123.097,70 I.V. | REA 146259



supervisory bodies, executives, employees and collaborators of the Company, as well as to all Pharmanutra Group companies in Italy and abroad.

The Group also promotes awareness among and encourages all its suppliers, business partners and stakeholders in general to adopt the procedures and practices necessary to foster diversity and inclusion.

3. PROTECTION OF DIVERSITY AND INCLUSION

The Company recognizes diversity and inclusion as fundamental values and strategic drivers for the creation of sustainable long-term value. Valuing individual differences contributes to the quality of decision-making processes, innovation, organizational well-being, and the strengthening of the Company's reputation in the market and among its stakeholders.

This policy sets out the principles, commitments and guidelines adopted by the Company to promote an inclusive, equitable and respectful working environment that upholds the dignity of every individual.

Pharmanutra recognizes and promotes diversity in all its forms, including, but not limited to, gender, age, national, ethnic and cultural origin, disability and health conditions, sexual orientation, religion and personal beliefs, as well as educational and professional background. The Company is committed to:

- promoting a corporate culture based on respect for individuals, fairness and inclusion;
- preventing and combating any form of direct or indirect discrimination, harassment or conduct that undermines personal dignity;

Pharmanutra S.p.A.

Via Campodavola, 1 - 56122 Pisa | +39 050 7846500
pharmanutragroup.com | pharmanutra.it | info@pharmanutra.it | pharmanutra@pec.it
C.F. / P.Iva / Reg. Impr. 01679440501 - Codice SDI SUBM70N | Cap.Soc. € 1.123.097,70 I.V. | REA 146259



- valuing differences as a source of enrichment and organizational growth.

4. INCLUSION AND EQUAL OPPORTUNITIES

The Company guarantees:

- equal opportunities in recruitment, hiring, training, development and performance evaluation processes;
- fair and non-discriminatory remuneration policies based on objective criteria;
- merit-based and transparent criteria in career management and advancement;
- gender diversity, as well as diversity of skills and experience, in the composition of the Board of Directors and other governance bodies, as well as in managerial and leadership positions.

5. WORKPLACE ENVIRONMENT

The Company is committed to creating a working environment that is:

- safe, collaborative and respectful;
- free from harassment, intimidation or discriminatory behaviour;
- based on dialogue, active listening and the recognition of everyone's contribution.

Pharmanutra S.p.A.

Via Campodavola, 1 - 56122 Pisa | +39 050 7846500
pharmanutragroup.com | pharmanutra.it | info@pharmanutra.it | pharmanutra@pec.it
C.F. / P.Iva / Reg. Impr. 01679440501 - Codice SDI SUBM70N | Cap.Soc. € 1.123.097,70 I.V. | REA 146259



6. REPORTING OF VIOLATIONS

Anyone who believes that violations of this policy have occurred may report the matter, including anonymously, through the whistleblowing channel established by the Company and available on its website at the following link:

<https://pharmanutragroup.com/governance/segnalazioni-whistleblowing/>.

7. COMMUNICATION AND UPDATING OF THIS POLICY

This policy is available on the Company's website at www.pharmanutragroup.com. The Group is committed to monitoring and, where necessary, updating the systems and measures aimed at promoting and ensuring diversity and inclusion, in line with developments in applicable legislation and internationally recognized principles and standards.

Pharmanutra S.p.A.

Via Campodavola, 1 - 56122 Pisa | +39 050 7846500
pharmanutragroup.com | pharmanutra.it | info@pharmanutra.it | pharmanutra@pec.it
C.F. / P.Iva / Reg. Impr. 01679440501 - Codice SDI SUBM70N | Cap.Soc. € 1.123.097,70 I.V. | REA 146259

