GENDER EQUALITY POLICY

Approved by the Board of Directors on 12 October 2026

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Pharmanutra S.p.A. recognizes gender equality, inclusion, and the promotion of diversity as fundamental elements of its corporate culture and strategic factors for the organization's sustainable growth.

The Company promotes a work environment based on respect, fairness, meritocracy, and equal opportunity, ensuring that everyone, regardless of gender, has a place where they can grow professionally.

In accordance with the principles of UNI/PdR 125:2022, Pharmanutra is committed to developing and maintaining a Gender Equality Management System (GEMS) focused on continuous improvement and the prevention of all forms of direct or indirect discrimination.
Pharmanutra operates in full compliance with national and European regulations, with particular attention to the Legislative Decree transposing Directive (EU) 2023/970 on pay transparency. We are committed to ensuring gender equity and neutrality at every stage of the career path: from recruitment to compensation determination to professional growth.

Pharmanutra's commitment extends to all aspects of the work life of its employees, specifically: ensuring equal opportunities at every stage of the employment relationship; recognizing merit, skills, responsibility, and professional potential regardless of gender; preventing and combating any form of abuse, harassment, or direct, indirect, or intersectional discrimination; promoting an inclusive corporate culture centred on respect for the individual; fostering a balance between personal and professional life; ensuring fair, transparent, and gender-neutral compensation systems; and constantly monitoring the performance indicators of the Gender Equality Management System (SGPG), while implementing measures for continuous improvement.

This Policy applies to all company employees, regardless of their role, level, position, seniority, or type of employment contract.

Our strategy is built on the following fundamental pillars: Culture, Strategy, and Governance; HR Processes; Equal Opportunity; Gender Pay Equity; Parenting and Work-Life Balance; Protection against any form of harassment in the workplace.

In order to translate our values into concrete actions, here are our priority areas for action.

- **Recruitment, hiring and onboarding**

Pharmanutra ensures that its selection and hiring processes are based on impartiality, transparency, the recognition of skills, and equal opportunity, using gender-neutral criteria. Job postings, communications, and recruitment procedures are formulated in an inclusive manner and are free of discriminatory content or gender stereotypes. Candidates are evaluated solely on the basis of their skills, experience, and professional qualifications, and the collection of personal, family, or private information not relevant to the role is avoided.
In accordance with the principles of transparency and pay equity, candidates are provided with information regarding the starting salary or the expected salary range for the position, and they are not asked for information about their previous salaries. In accordance with the applicable national collective bargaining agreement and current legislation, job classification, compensation, and pay progression are determined based on objective, verifiable, and gender-neutral criteria, promoting equal opportunities for professional growth and development.

- **Professional Development and Growth**

Pharmanutra promotes professional growth paths based on merit, skills, responsibility, and results, ensuring equal opportunities for development and advancement regardless of gender. The organization fosters balanced access to positions of responsibility and leadership and ensures that performance evaluation processes, as well as professional and financial advancement, are based on objective, transparent, and gender-neutral criteria.

Pharmanutra also promotes equitable access to training opportunities and managerial development programs, preventing and countering any disparities arising from bias, prejudice, or cultural stereotypes. The criteria for professional and financial growth are defined in a clear, accessible, and verifiable manner, in compliance with the applicable National Collective Bargaining Agreement (CCNL) and current legislation.

- **Pay equity and pay transparency**

Pharmanutra recognizes equal pay for the same work or for work of equal value as a fundamental principle of organizational equity and ensures that compensation systems are based on objective, verifiable, and gender-neutral criteria, consistent with responsibilities, skills, professional experience, and job level.
In full compliance with applicable laws, at Pharmanutra, compensation is based on the duties performed, the responsibilities assumed, and the results achieved, regardless of gender. Employees have the right to request information on average pay levels, broken down by gender, for categories of workers who perform the same work or work of equal value, in accordance with applicable laws and in compliance with personal data privacy protections.

Pharmanutra is committed to monitoring any unjustified pay disparities and taking appropriate corrective measures when necessary. To this end, the performance evaluation and compensation systems are regularly reviewed to ensure their objectivity and transparency.

- **Parenting, Caregiving, and Work-Life Balance**

Pharmanutra considers the protection of parental and caregiving responsibilities to be an integral part of an inclusive and sustainable corporate culture and ensures full compliance with the rights provided for by current legislation regarding maternity, paternity, and other types of leave and time off. The Company is committed to preventing any form of discrimination related to parenthood or family needs, facilitating a smooth return to work following periods of absence, and promoting—to the extent compatible with organizational needs—flexible work arrangements and practices designed to foster a healthy work-life balance. Pharmanutra also supports welfare and well-being initiatives designed to assist employees and their families.

- **Prevention of Discrimination, Harassment, and Abuse**

Pharmanutra condemns any form of discrimination, harassment, abuse, violence, or behaviour that undermines personal and professional dignity, and promotes a corporate culture based on mutual respect, inclusion, and the protection of individuals. The Organization is committed to ensuring safe and respectful work environments by providing secure and confidential reporting channels, including whistleblowing systems, as well as listening mechanisms and anonymous surveys designed to identify any situations of distress. Reports are handled impartially and confidentially, ensuring that whistleblowers are protected from any form of retaliation or unfavourable treatment.

- **Communication and Inclusive Culture**

Pharmanutra promotes internal and external communication—including marketing and advertising activities—guided by the principles of inclusion, respect, and the celebration of diversity. The company adopts inclusive, transparent, and non-discriminatory language, is committed to preventing gender stereotypes, and fosters a balanced representation of people in its corporate materials and content. Through awareness-raising and training initiatives, Pharmanutra also helps to promote and strengthen a culture based on gender equality, inclusion, and respect for diversity.

- **Governance and Monitoring**

This Policy is defined and monitored by Company Management, in close collaboration with the Steering Committee and the Manager of the Gender Equality Management System. This oversight ensures that inclusion objectives are an integral part of the company's strategic plan, with specific indicators and dedicated resources. The Company is committed to making the results of this process accessible to all stakeholders, while constantly monitoring the effectiveness of the initiatives undertaken through employee feedback and satisfaction surveys.

This Policy is communicated to all employees, reaffirmed or updated annually during the review of the Gender Equality Management System, and made available to internal and external stakeholders.