

EQUALITY POLICY OF GENDER AND RELATED

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Rev.	Date	Motivation	Editorial Staff	Approval
0	November 30, 2024	First issue	Head of the Gender Equality Management System	Steering Committee

MISSION AND STRATEGIC VISION

Alpha Trading SpA is a petroleum products distribution company founded in 1985 that operates both in Italy and internationally. Its registered office is in Milan and its sales and administrative offices are in Genoa. It is primarily active in three markets: naval bunkering, biofuels, and bitumen. Alpha Trading's goal is to consolidate and develop its trading business both through competitive offerings and the provision of comprehensive services.

Over the years, the company has consolidated relationships and preferential contractual relationships with all the main suppliers *worldwide*, be they *majors* or global independent suppliers, by virtue of which it is able to formulate competitive offers in all the main world ports.

It has also developed considerable *know-how*, together with close commercial and financial relationships, in particularly competitive but problematic geographical areas, which allows it to offer its customers prices and services that most other companies are not able to do.

Alpha Trading SpA is controlled by the Holding 3B Investment SpA, which since 2013 has held the entire share package of Alpha Trading SpA, which in turn is 80% owned by the sub-holding Armada SpA and 20% by the holding Sitofin SpA.

Armada is equally controlled by Adriano Parodi and Stefano Marchiol, historical managers of Alpha Trading SpA, who hold the role of Managing Directors of Alpha Trading SpA.

Sitofin is headed by Claudio Bombardieri, Chairman of the Board of Directors of Alpha Trading SpA.

In carrying out its activities, the Company has always been guided by five fundamental values:

- **Customer focus:** Alpha Trading focuses its business on promptly meeting all customer needs, be they economic, financial, commercial, or operational;
- **Respect for the Environment :** Alpha Trading is committed to reducing the impact its activities have on the environment by promoting product innovation;
- **Protection and development of people :** The Company ensures its employees a dignified, safe working environment capable of increasing their skills;

- **Product quality** : Alpha Trading invests in the constant search for the highest levels of quality for its products and services;
- **Vital and independent entrepreneurship** : Alpha Trading seizes the opportunities of the market in which it operates and transforms them into value for its stakeholders.

THE PATH TOWARDS GENDER EQUALITY

With the aim of carrying out its mission to the best of its ability and in line with its strategic vision, Alpha Trading SpA has decided to adopt a Gender Equality Management System (SGPG) compliant with UNI/PdR125:2022, as a valid tool for ensuring gender equality in the presence and professional growth of women, enhancing an inclusive culture and activating processes capable of developing female empowerment .

Achieving certification for Alpha Trading SpA will represent only the first step in implementing gender equality policies, with a view to improving and promoting gender equality. The certification, in fact, aims to support and incentivize organizations to adopt policies aimed at reducing the gender gap, with the resulting benefits for staff well-being, in addition to reputational and ethical impacts.

THE INSPIRING PRINCIPLES

The fundamental principles underlying Alpha Trading SpA's Gender Equality Policy are:

- IMPARTIALITY AND INCLUSIVITY
- FAIRNESS AND TRANSPARENCY
- STAFF DEVELOPMENT
- PROTECTION OF THE PERSON
- ANTI-ALL FORMS OF VIOLENCE AND DISCRIMINATION

The attention with which Alpha Trading SpA focuses its efforts to ensure that its SGPG meets the requirements specified in UNI/ PdR 125:2022, and is inspired - in line with the *2020-2025 Gender Equality Strategy defined by the European Union* - by the pursuit of the following objectives:

- ✓ increasing women's participation in the labor market;
- ✓ reducing the pay and pension gap between men and women, also to combat female poverty;
- ✓ promoting equality between men and women in decision-making;
- ✓ combating stereotypes, gender-based violence, and protecting and supporting victims.

THE MANAGEMENT'S COMMITMENT

To promote the achievement of the principles and objectives set out, the Management of Alpha Trading SpA believes the continued adoption of the SGPG is essential in order to develop an organizational model that promotes gender equality and enhances equity and inclusiveness .

Alpha Trading SpA undertakes:

- ✓ to adopt tools to prevent all forms of gender discrimination and to combat any act that undermines the dignity of staff, regardless of their role or level of responsibility;
- ✓ to enhance diversity in every business process: from the search and selection of human resources to access to training, from the definition of compensation policies to performance evaluation and the attribution of reward systems, from the selection of suppliers to the provision of services/supply of products;
- ✓ to support the family welfare of its employees through the use of *smart working* in a way that promotes the conciliation between professional activity and private life;
- ✓ to promote information, awareness-raising, and employee engagement initiatives on equal opportunities and female empowerment , avoiding stereotypes and promoting the visibility of women's contributions;

- ✓ to promote communication, including through marketing and advertising activities, that transparently declares the desire to achieve gender equality, enhance diversity, and support female empowerment .

SPECIFIC POLICIES ON GENDER EQUALITY

These are more specific policies on gender equality that provide the necessary input to formulate the Strategic Plan for Gender Equality and to identify, develop, and implement procedures specifically dedicated to gender equality, based on the organization's reference context.

The gender equality policies, developed in relation to the policy, are related to the themes of the Strategic Plan:

1. Selection and hiring (recruitment)
2. Career Management
3. Pay equity
4. Parenting, care
5. Work-life balance
6. Prevention of all forms of physical, verbal, and digital abuse (harassment) in the workplace

Specifically, the commitments undertaken by Alpha Trading SpA are:

Selection and hiring (Recruitment)

Objective: Ensure fair and inclusive selection processes that promote gender equality.

- The company is committed to developing and implementing selection procedures that ensure equal opportunities for all candidates, without discrimination based on gender.
- Job descriptions will be written in an inclusive manner, avoiding language and requirements that could indirectly exclude one gender.

Career Management

Objective: To promote professional growth and development opportunities for all, regardless of gender.

- Mentoring programs will be implemented to foster the professional growth of women and men, with a particular focus on women in managerial and leadership positions.
 - Continuous training programs will be developed to promote equitable growth, both in terms of skills and advancement opportunities.
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Pay Equity

Objective: To eliminate any gender pay gap for the same role and qualifications.

- The company will implement a regular salary audit plan to analyze and eliminate any salary discrepancies between men and women performing the same work or work of equal value.
 - Pay transparency policies will be adopted to ensure that all employees have access to clear information regarding the compensation structure.
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Parenting, care

Objective: To support parents in managing family and professional responsibilities.

- Policies will be promoted that support parental leave for all parents, with particular attention to equal access and duration for men and women.
 - The company will promote the return to work after parental leave, ensuring equal opportunities for professional growth for all parents.
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Work-life balance Objective

: Create a work environment that fosters a balance between personal and professional needs.

- Smart working will be encouraged to allow employees to better balance family and professional needs.
 - The company will commit to monitoring employee well-being, with particular attention to how work policies can impact quality of life.
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Prevention activities against all forms of physical, verbal, and digital abuse (harassment) in the workplace.

Objective: To ensure a safe working environment, free from any form of abuse or harassment.

- Awareness-raising and training initiatives will be promoted to prevent harassment and abuse in the workplace, with particular attention to gender dynamics.
- The company will establish confidential reporting channels to allow employees to safely report any incidents of abuse or harassment.
- Strict disciplinary measures will be taken in the event of harassment, with a clear and transparent protocol for handling complaints.

POLICY MONITORING AND IMPLEMENTATION

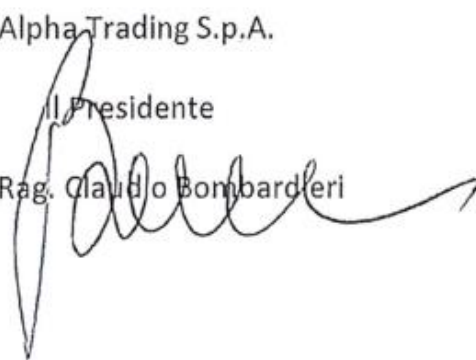
The General Policy on Gender Equality and the related one, within the broader framework of the organization's programmatic guidelines, provides for the definition and periodic review of gender equality objectives, in order to assess their suitability and the need for amendments or additions, together with the Steering Committee for Gender Equality.

DIFFUSION OF POLITICS The gender equality policy is communicated and disseminated to all staff and stakeholders through internal communications and publication on the institutional website.

Alpha Trading S.p.A.

Il Presidente

Rag. Claudio Bombardieri



Comitato Guida