

# Human Rights Policy – Diversity & Inclusion

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**BonelliErede**  
with LOMBARDI

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## Purpose

This policy on respect for human rights and the safeguarding of inclusion and diversity sets out the principles that inspire Bonelli Erede Lombardi Pappalardo (“**BonelliErede**”) to fight discrimination and ensure equal opportunity and treatment for all BonelliErede people. We recognise that diversity is a valuable resource and encourage our people to embrace it in order to maintain a fair, welcoming work and social environment that is free from obstacles based on gender, ethnicity, skin colour, geographic origin, social or economic background, differences in abilities, religious beliefs, sexual orientation, age, role or classification, and any other diversity or prejudice.

An inclusive work environment, in terms of both atmosphere and accessibility, allows people to empower each other and positively influence their own and the firm's performance.

## **1. The principles**

The firm respects human rights and is guided by the principles underlying the international standards, including the following:

- UN International Bill of Human Rights, which includes:
  - Universal Declaration of Human Rights
  - International Covenant on Civil and Political Rights
  - International Convention on Economic, Social and Cultural Rights
- UN Women's Empowerment Principles
- UN Convention on the Elimination of All Forms of Racial Discrimination
- UN Convention on the Elimination of All Forms of Discrimination against Women
- UN Convention of the Rights of Persons with Disabilities
- UN Convention on the Rights of the Child
- European Convention on Human Rights
- UN Convention against Corruption
- The Ten Principles of the UN Global Compact

## **2. Scope**

Diversity and inclusion in the workplace are of the utmost importance to BonelliErede, including in our business strategy, and we expect all BonelliErede people to share and live by these values.

We also feel it is our duty to promote respect for human rights, inclusion and diversity within society, by the businesses/organisations we work with, and in the countries we operate in.

This policy sets out the values and guidelines to guide the choices of all BonelliErede people, wherever they operate, in their work and dealings with colleagues, consultants, clients and suppliers.

### 3. **Our commitments to different aspects of respect for human rights**

We are committed to respecting, protecting and promoting human rights and to remedying business-related human rights violations.

**Non-discrimination and equal opportunities:** We oppose – and are committed to preventing within the firm – all forms of discrimination based on ethnic origin, skin colour, gender, age, physical or mental disability, sexual orientation, religious or political beliefs, nationality, or social background against any of our people, be they business support staff, professionals or leadership.

**Anti-harassment:** We have zero tolerance of all forms of violence and harassment at work; we explicitly oppose and condemn all behaviour that constitutes physical or psychological violence, attitudes or behaviour that denigrates personal dignity, beliefs or conditions, bullying, victimisation, coercion, threats, and physical or verbal abuse (including all forms of sexual harassment). To this end, we raise our people's awareness by providing them information and training, we have reporting tools in place designed to protect reporters and their identity (see section 7), and we follow up on reports with concrete action.

**Fair treatment:** We ensure that all our people's personal dignity is guaranteed, as is an adequate standard of living throughout their career with us by means of remuneration and benefits commensurate with the type of work they perform, their contractual classification and the country where they are employed.

- **Selection and hiring:** We apply a transparent, inclusive and meritocratic selection and hiring process for our people. Our recruitment and people management procedures are fairness-based in line with the principles underlying our code of ethics and this policy and are designed to prevent favouritism, abuse and discrimination based on gender, ethnic origin, religious and political beliefs, trade union membership, language, age or abilities. BonelliErede opposes all forms of discrimination, harassment, coercion, deceit, or lack of

transparency in the recruitment process for business support staff and professionals.

- **Professional and personal development:** BonelliErede is conscious that all members of leadership, professionals and business support staff need to be able to express individuality in their work. We value the diversity, individuality and aptitudes of each and every person, especially because it helps drive innovation and contributes to the firm's growth. We guarantee equal opportunities in terms of professional development, access to training and refresher courses, and the assignment of projects/roles. We also provide structured 360-degree feedback (from both peers and colleagues at different levels). And to facilitate growth, we provide and encourage our people to attend soft skills and coaching courses and tutoring and mentorship programmes.
- **Career management:** BonelliErede promotes a transparent, inclusive and meritocratic career advancement process that is free from all forms of discrimination and respectful of the individuality and diversity of each and every person. Our advancement process is in no way influenced by gender, ethnic origin, religious beliefs or sexual orientation. We are transparent in our communications on career advancement paths and take the utmost care in setting objectives to ensure that our people understand them and pursue them with verve. All this to also encourage correct and transparent behaviour by all.

**Health and safety at work:** We are conscious that health and safety is essential and are committed to providing a healthy, safe working environment. We adhere to the highest standards and expect our people to do the same.

We believe that psychological wellbeing and a good work-life balance is especially important. To help with this, we offer training on stress and work management.

BonelliErede is conscious that our private lives are fundamental to our wellbeing; as such, we are committed to facilitating the balance between personal and professional life by offering flexible working solutions and initiatives to balance work and private commitments.

We also place a strong focus on organisation, planning and division of labour to facilitate the efficient management of resources and

working time so that our people can work at their best and guarantee clients top quality services.

**Local communities:** We are conscious of the needs of the communities we operate in and support social, cultural and educational initiatives. We believe that dialogue with institutions and non-governmental bodies is fundamental to identify priority areas in which we can offer support. To actively contribute to the local area and maintain this commitment, we encourage our people to get involved in philanthropic initiatives and we partner with organisations that are dedicated to achieving the UN sustainable development goals (SDGs) that are most relevant to the firm.

**Integrity:** We oppose all forms of corruption in all our dealings with entities – be they private or public – in any jurisdiction, even if certain types of corruption are permitted, tolerated or not prosecuted in a given case, as we believe that any type of corruption is violation of human rights.

**Privacy:** We are conscious of the importance of guaranteeing personal data subjects adequate safeguards and all stakeholders the right to privacy. We therefore ensure that all information and data provided are used correctly.

**Opposition to forced labour:** We oppose all forms of exploitation of workers, including child, forced and compulsory labour, and all forms of abuse and psychological and physical coercion against our people and people employed along the supply chain. We strongly condemn human trafficking and exploitation in all its forms.

#### 4. **Our commitments to different aspects of D&I**

Diversity and inclusion help boost creativity, innovation and productivity and improve the workplace environment by fostering a sense of belonging. That is why we need to protect diversity in all its aspects and forms.

**Gender:** BonelliErede promotes an inclusive culture through awareness-raising initiatives and training courses aimed at ensuring a gender equality culture. We are also conscious of the need to tackle unconscious bias and are committed to introducing policies and taking actions to promote gender equality, eliminate the gender gap, and support and strengthen the presence of the less

represented gender in key roles. We thus provide training programmes to develop managerial and leadership skills so as to foster gender balance also in positions of responsibility at the firm.

**Gender identity and sexual orientation:** BonelliErede encourages inclusive environments where everyone feels respected and valued, regardless of their gender identity, gender expression, or affective-sexual orientation. We oppose and are committed to eliminating discrimination in all its forms.

**Generation gap:** BonelliErede is committed to fostering dialogue, constructive discussion, and the sharing of knowledge and skills between people of different ages. We thus encourage the integration and mixing of different perspectives and the development of a multigenerational environment in which the characteristics and skills of different generations can be exploited and valued. And to ensure there is a clear channel of communication through which to circulate information between the different generations, we have a representative body for the younger generations.

**Disabilities:** BonelliErede is committed to fostering the recruitment and inclusion of differently abled people and making the most of what they have to offer.

**Interculturality:** The melding of different cultures and experiences is of strategic importance. Intercultural competence and the exchange of diverse viewpoints can but enrich our people and keep our firm competitive.

## 5. Our D&I commitments

Based on the above principles, BonelliErede takes a multi-pronged approach to have a concrete impact our business support staff, professionals, stakeholders and society as a whole.

**Communication:** We believe that listening and dialogue are the foundation for trusting relationships and a sense of belonging and inclusion. We:

- foster open dialogue on diversity and inclusion issues;
- make the most of internal communication channels so that our people can play an active and more conscious role in the firm's life;

- apply the principles of correctness, completeness, simplicity and transparency to all communications;
- develop information-sharing tools and foster the exchange of experiences to facilitate comparison and integration; and
- help those in positions of responsibility develop a sensibility for understanding the needs of the people under their helm, valuing differences of opinion and welcoming their suggestions. All this because it helps the firm continue to improve and grow.

**Governance and leadership:** Inclusion, acceptance of diversity and gender equality must be protected in all aspects of business and professional growth to ensure equal access to roles and leadership positions. In compliance with this principle, BonelliErede's articles of association stipulate that the less represented gender must be present on the Partners' Board and the Remuneration Committee. BonelliErede also carries out awareness initiatives aimed at promoting a culture of gender balance and supporting the recruitment, retention and professional growth of professionals of the less represented gender.

**Training and involvement:** BonelliErede promotes and organises training programmes and experiential workshops focused on personal behaviour and on general issues concerning diversity, equity and inclusion in order to ensure a strong, firm-wide culture of inclusiveness and identify and remove any stereotypes and unconscious bias. This also to support our people create relationships built on awareness and mutual respect so everyone can express themselves without fear of being judged/penalised because of their gender, marital status, gender identity and affective-sexual orientation, health conditions, religious beliefs, political and trade union opinions, social and ethnic origin, nationality, age and differences in abilities.

**Selection and recruitment:** As mentioned above, we are committed to a recruitment process that is transparent and inclusive, specifically by ensuring:

- transparent and inclusive communication about the selection and recruitment process;
- fair and inclusive language in job descriptions;
- a recruitment process that includes all genders; and

- a message in all job postings that affirms the firm's commitment to diversity, equality and inclusion.

In recruiting new resources, we strictly follow our code of ethics to guarantee equal opportunities and equal treatment of candidates and make our selection based solely on skills, experience and performance.

BonelliErede is committed to fostering the inclusion of people from underrepresented groups and to collaborating with organisations that promote social inclusion.

**Remuneration equality:** BonelliErede's remuneration process is based on the principles of equality and meritocracy. In terms of the remuneration of our professionals and business support staff, we are committed to preventing all types of discrimination based on gender, age, religious beliefs, sexual orientation and other aspects and to transparently communicating career progression options. We also monitor and analyse remuneration every year to avoid pay gaps (when comparing like with like) and to develop strategies and initiatives to close any gaps detected.

## 6. Reports

Any violation or suspected violation of the principles underlying this policy can be reported in writing and, if you wish, anonymously. Reports should include not only details of the facts but also the circumstances surrounding the (suspected) violation.

Reports should be emailed to the **D&I Reporting Officers** appointed by the Partners' Board (the General Manager, the HR Director, and the Coordinator of the Associates Forum) to [responsabili segnalazioni D&I@belex.com](mailto:responsabili segnalazioni D&I@belex.com) or posted to:

Bonelli Erede Lombardi Pappalardo – Studio Legale  
Via Barozzi 1  
20122 Milan  
FAO: D&I Reporting Officers

If a report is sufficiently grounded, the D&I Reporting Officers will investigate the matter, gather further information and, if necessary, contact the person who reported the (suspected) violation.



Whenever appropriate, the D&I Reporting Officers will forward the report to the Partners' Board and propose measures to be taken.

BonelliErede protects people who report suspicions against any kind of retaliation or action that could give even a mere hint of discrimination or penalisation. **We also ensure that the identity of anyone who reports suspicions remains confidential**, without prejudice to legal obligations.

## 7. Monitoring, reporting and transparency

Inclusive leadership and vision require commitment, transparent discussion, awareness and taking measure. Given that inclusion is a profound process with positive long-term repercussions, leadership must play a role in driving inclusiveness supported by a solid strategy, based on appropriate tools to ensure its impact. Setting concrete goals and monitoring indicators to ensure the goals are achieved is therefore crucial.

To monitor the application of this policy and optimise the effectiveness of the actions to mitigate and, when possible, prevent a negative impact, we periodically monitor how well we are performing in terms of acting on the principles and commitments under this policy. We use annually updated indicators and are transparent in reporting our findings.

Our monitoring system is based also on the GRI Sustainability Reporting Standards. The KPIs set out in the standards enable us to track the main data trends and the results of the improvement measures introduced over time in the areas covered by this policy.

## 8. Roles and responsibilities

The Partners' Board approves diversity and inclusion strategies and policies.

We have a D&I Committee that deals with all issues relating to diversity and inclusion. The D&I Committee submits proposals to the Partners' Board on D&I strategy and the related action plans, initiatives and targets. It also monitors the application of this policy in compliance with clause 7 and promotes this policy and the

related initiatives both internally to business support staff, professionals, leadership and externally.

**9. Approval, validity and updating of this policy**

This policy was approved by a board resolution and will be periodically reviewed whenever needed, e.g., whenever national and international regulations – which we refer to for best practices – are subject to changes or to caselaw interpretation.

**10. Where this policy is available**

This policy is available internally on the firm's portal and externally on the firm's website.

To further ensure the firm upholds the principles set out in this policy, ad hoc internal meetings are regularly held to give everyone a voice.