



BonelliErede

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Policy on human rights and diversity and inclusion

Document title	Policy on human rights and diversity and inclusion
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Document history

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Reviews

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I. Purpose

This policy on respect for human rights and the safeguarding of diversity and inclusion 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.

II. General commitments and principles

We respect human rights and are guided by the principles underlying 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 Covenant 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 on 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

BonelliErede opposes any form of child, forced or compulsory labour and any form of slavery and human trafficking. We are committed to working actively to prevent and combat situations of abuse or exploitation, including through internal training and awareness programmes.

III. 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, diversity and inclusion within society, by the businesses/organisations we work with, and in the countries where we operate.

This policy sets out the values and guidelines to guide the choices of all BonelliErede people (be they professionals or business support staff), wherever they operate, in their work and dealings with colleagues, consultants, clients and suppliers.

IV. Our commitments and actions across key human rights areas

We respect, protect and promote human rights and are committed to preventing and 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 professionals or business support staff.

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 denigrate 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 non-discriminatory, inclusive, transparent 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 (<https://www.belex.com/joinus/>). 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:** We apply 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 (<https://www.belex.com/joinus/>).
- **Work-life balance:** BonelliErede is conscious that our private lives are fundamental to our wellbeing; as such, we facilitate the balance between personal and professional life by offering flexible working solutions and initiatives to balance work and private commitments (<https://www.belex.com/joinus/>).

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.

We recognise the right to disconnect as an essential element to protect business support staff's wellbeing. Indeed, staff members have the right to disconnect from technological devices and platforms outside normal working hours. During this period, they thus have the right not to respond to emails or telephone calls, unless requested from time to time by their manager for urgent business needs. Disconnection must occur

only after ensuring that any data used and documents in progress have been correctly saved in the firm's document management system and are not lost, disclosed, or left unattended and thus accessible to unauthorised persons.

Parental leave policy: We have adopted a policy on parental leave for associates that introduces enhanced provisions to strengthen support for parenting, encourage a better work-life balance, and recognise and value the father's role in the family (the policy is available in the Forma>Regole>Procedure section of the firm's portal). The policy applies to all associates who are new parents, regardless of their gender, gender identity or expression, sexual orientation, age, disability, ethnicity, nationality, religion, or parental status. Below is a summary:

- **Maternity leave:** We guarantee 6 months' maternity leave to all female associates in all offices. When an associate goes on maternity leave, the firm supplements the allowance paid by the competent social security institutions (e.g., the national pension fund for lawyers in Italy) so that the associate continues to receive her full remuneration, thus ensuring economic continuity and peace of mind in such a fundamental phase of life.
- **Paternity leave:** We guarantee 1 month's paternity leave to all male associates following the birth of their child, with the aim of fostering a fairer sharing of parenting duties and nurturing the father-child bond. When an associate goes on paternity leave, the firm supplements the allowance paid by the competent social security institutions (e.g., the national pension fund for lawyers in Italy) so that the associate continues to receive his full remuneration.
- **Other provisions:** We grant new parents flexibility when returning to the firm, including in terms of working remotely, and ensures that parental leave will not affect their career prospects or their overall appraisal process.
- **Foster, adoptive and single parents:** All provisions of the parental leave policy also apply to fostering, adoption and single parenthood.

Health insurance: All professionals benefit from health insurance coverage arranged by the firm with leading insurance companies. For associates, the related cost is fully borne by the firm.

Business support staff benefit from the following health insurance coverage under the National Collective Bargaining Agreement for Employees of Professional Firms:

- Unisalute: employee health insurance (<https://www.unisalute.it/>)
- Cadiprof: family health insurance that offers additional health benefits and also covers family members of employees at professional firms (<https://www.cadiprof.it/>)
- Ebipro: reimbursement for sports activities, nursery fees, university tuition fees, school textbooks, and public transport (<https://www.ebipro.it/>)
- Fas Andi: dental insurance (<https://www.andisalute.it/>)

Tax assistance policy: Business support staff are entitled to free tax assistance, covering the preparation of individual/joint Form 730 tax returns and Equivalent Economic Situation Indicator (ISEE) declarations (available also to friends and family at preferential rates), in accordance with the firm's tax assistance policy (available in the Forma>Regole>Procedure section of the firm's portal).

'Talking Room' initiative: Business support staff may request one-to-one HR advisory sessions on HR-related topics such as: requests for clarification on attendance, working hours, payslips, administrative documents, resignations, appraisals, and onboarding; and relational or management issues.

Health and safety at work: BonelliErede is conscious that health and safety is essential. We comply with all applicable regulations and promote best practices to ensure they are upheld. We are committed to creating a healthy and safe workplace that protects the wellbeing of everyone and reflects the highest standards in this area.

We prioritise the health and safety of our people by organising annual mandatory training programmes. Business support staff have

the right and duty to attend first aid and fire safety training courses. All courses are designed to increase awareness and knowledge of health and safety, including through online platforms. Training sessions are easily accessible to all, with the flexibility to participate without being limited by geographical or time constraints. This approach ensures that staff members can effectively balance their work commitments while actively participating in essential training. We believe that psychological wellbeing and a good work-life balance are especially important. To help with this, we offer training on stress and work management.

Business support staff must immediately report any unsafe conditions to the person responsible for the prevention and protection service (RSPP, *Responsabile del Servizio Prevenzione e Protezione*) and request corrective action for any hazardous situations.

Continuous monitoring of workplace accident rates (serious and minor accidents): We monitor and record all workplace accidents, aiming for zero serious accidents and a gradual reduction in the rate of minor accidents, while promoting a proactive and participatory safety culture.

Employee welfare: The firm approves an annual welfare plan for business support staff with the aim of fostering a healthy balance between professional responsibilities and personal/family needs. The plan includes a benefits allowance that beneficiaries can use for listed services (e.g., educational or recreational activities, public transport, and shopping or fuel vouchers). Details of the welfare plan are communicated to beneficiaries individually.

BeKind – a day for a friend: This initiative – designed to promote a culture of internal solidarity – allows business support staff at the firm’s Italian offices to donate a portion of their accrued leave (holidays and certain other types of paid leave envisaged by law (i.e., *ex festività* and ROL)) to colleagues in need. The related policy (available in the Forma>Regole>Procedure section of the firm’s portal) governs how to make requests and donations while ensuring fairness, transparency and compliance with applicable regulations.

Meal vouchers: Business support staff receive an electronic meal voucher for each day they work 4 hours or more.

Car policy: Certain business support staff are assigned a company car for business and personal use. Eligible staff are selected by General Management based on their roles and responsibilities. The

assignment criteria and rules for use are set out in the firm's company car policy.

Birthday leave: Every associate and staff member is entitled to a day off for their birthday.

Local communities: We embrace social and community responsibility by supporting social, cultural and educational initiatives that address the specific needs of the communities we operate in. 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 a violation of human rights.

Privacy: BonelliErede is 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 lawfully and appropriately.

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.

Social dialogue: We apply national collective bargaining agreements and ensure respect for all employee rights, including freedom of association. We support the creation of internal committees to foster communication and uphold this freedom.

Associates' Forum: The Associates' Forum is designed to gather associates' needs and views on matters concerning the firm, and its members are directly involved in strategic projects/initiatives (new HQ, in-house secondment programme, gender equality certification, etc.). The Associates' Forum plays: (a) an advisory role in projects/initiatives identified and proposed by the firm's leadership;

and (b) a proactive role in firm-wide social events and cohesion-building initiatives. It comprises 10 associates who have worked for the firm for at least 1 year (generally), selected based on criteria that ensure fairness and representation in terms of gender, office, department and seniority.

V. Our commitments and actions across key D&I areas

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: We promote 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. Training programmes are thus provided 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: We encourage inclusive environments where everyone feels respected and valued, regardless of their gender identity, gender expression, or sexual orientation. We oppose and are committed to eliminating discrimination in all its forms.

Generation gap: We are 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 (see the **Associates' Forum** above).

Disabilities: We are committed to fostering the recruitment and inclusion of people with disabilities and making the most of what they have to offer.

Interculturality: The melding of different cultures and experiences is a strategic factor for competitiveness and for fostering the growth of our people. We promote the coexistence and cross-fertilisation of diverse cultures within the firm and embrace an intercultural vision that is open to dialogue and integration.

VI. Our D&I commitments, objectives and actions

Based on the above principles, BonelliErede takes a multi-pronged approach to have a concrete impact on 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 Partnership Agreement stipulates that the less represented gender must be present on the Partners' Board and the Remuneration Committee. BonelliErede also carries out awareness-raising 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 – purposes and objectives: We promote and organise training programmes and experiential workshops focused on personal behaviour and on general issues concerning diversity, equity and inclusion with the aim of ensuring a strong, firm-wide culture of inclusiveness and identifying and removing any stereotypes or 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, sexual orientation, health status, religious beliefs, political or trade union opinions, social or ethnic origin, nationality, age, or disabilities.

In 2024, our D&I Committee (see section VIII below) launched a new event series called **D&I Talks**, designed to foster learning, reflection and dialogue on diversity and inclusion. These events feature high-profile guest speakers and take the form of multi-voice conversations that encourage deeper engagement with the topics. Open to the entire firm as well as external guests, the events are held simultaneously at the firm's Milan and Rome offices, with a live video link and simultaneous interpretation available. They take place at least twice a year – often coinciding with significant dates or milestones related to diversity and inclusion – and are promoted through the firm's social media and external communication channels.

We ensure full access to the training resources outlined above for 100% of business support staff and professionals, with the aim of providing training to the entire firm. The availability and effectiveness of these resources and activities are regularly monitored through recurring feedback mechanisms.

Selection and hiring: As mentioned above, we apply a transparent and inclusive recruitment process characterised by:

- transparent and inclusive communication about the selection and recruitment process;
- fair and inclusive language in job descriptions;
- recruitment practices that ensure fair representation of all genders; and
- a message in all job postings that affirms the firm's commitment to diversity, equity and inclusion.

In recruiting new resources, we strictly follow this policy and our Code of Ethics to guarantee equal opportunities and equal treatment of candidates and make our selection based solely on skills, experience and performance (<https://www.belex.com/joinus>).

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.

Female leadership programme: BonelliErede takes part in a joint initiative with other leading international law firms, aimed at developing both personal and professional leadership skills through cross-cultural exchange. Each year, the programme offers several days of training to a select group of talented female senior associates.

VII. 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 at 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 contact

the person who reported the (suspected) violation and the reported person(s).

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.

Periodic reports on whistleblowing cases are submitted to the Board.

VIII. Monitoring, reporting and transparency

The firm conducts regular internal reviews – including anonymous surveys – to assess the implementation and effectiveness of initiatives, address any inappropriate behaviour, and ensure diversity, equity and inclusion objectives are met. Results are reported transparently in annual reports.

IX. 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 diversity and inclusion strategies and the related action plans, initiatives and targets. It also monitors the application of this policy in compliance with section VII and promotes this policy and the related initiatives both internally – to business support staff, professionals, leadership – and externally.

X. Approval, validity and updating of this policy

This policy was approved by a board resolution and is periodically reviewed whenever significant events occur and, in any case, at

least once a year to assess its relevance, completeness and any need for updating.

XI. Publication

This policy is available internally in the Forma>Regole>Procedure section of the firm's portal and externally on the firm's website (<https://www.belex.com/policy>). Everyone who works for the firm is required to read and be familiar with its content.

This policy is the subject of specific training for all new professionals and business support staff. It is also shared with the firm's main suppliers and business partners to promote the principles of responsible conduct throughout the value chain.

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.