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Nondiscrimination/Anti-Harassment Policy and Complaint Procedure

Objective

The World Sustainability Foundation is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, the World Sustainability Foundation expects that all relationships among people in the office will be business-like and free of bias, prejudice, and harassment.

The World Sustainability Foundation has developed this policy to ensure that all its employees can work in an environment free from unlawful harassment, discrimination, and retaliation. The World Sustainability Foundation will make every reasonable effort to ensure that all concerned are familiar with these policies and aware that any complaint in violation of them will be investigated and resolved appropriately.

Any employee who has questions or concerns about these policies should talk with the director of human resources or the Director.

These policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related social activities or discussions. In other words, no one should make the mistake of engaging in discrimination or exclusion to avoid harassment allegations. The law and the policies of the World Sustainability Foundation prohibit disparate treatment based on sex or any other protected characteristic, with regard to terms, conditions, privileges, and perquisites of employment. The prohibitions against harassment, discrimination, and retaliation are intended to complement and further those policies, not to form the basis of an exception to them.

This Policy promotes the belief of our company that any act of harassment, bullying, or sexually inappropriate behavior is a threat to the dignity of the person who is subjected to it, potentially compromising health, trust, morale, motivation at work, work performance, the organizational climate, and the company's reputation. Harassment, sexually inappropriate behavior, and bullying are contrary to the objectives stated above and this Policy and, therefore, will not be



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tolerated under any circumstances. All Employees must be aware that behaviors and words can be perceived and interpreted differently by each person; therefore, caution is required.

Laws and regulations related to harassment and discrimination at work

The World Sustainability Foundation complies with—and all Employees must comply with—all applicable international and national laws and regulations.

This Policy applies to all the conduct committed by Employees, both inside and outside the company, regardless of gender or seniority.

Therefore, this Policy applies both in the company offices and off-site (for example, in client offices, during events, and at business travel locations), and is valid in all work contexts, including business trips, meetings, events, and all social situations related to the company and its business. While the company cannot control the behavior of Third Parties, it does not tolerate any acts of harassment, sexually inappropriate behavior, or bullying that may involve such Third Parties and will implement appropriate consequence management measures to suppress and prevent such behavior. The company will take all appropriate measures to prevent such harassment, sexually inappropriate behavior, and bullying and to ensure that the person reporting them does not suffer negative repercussions in terms of task assignment or other work-related activities.

The World Sustainability Foundation wishes to provide a reference to all applicable Laws and regulations in Italy related to harassment and discrimination at work. The companies actively invite employees, external collaborators, and suppliers to be aware and informed of these laws and regulations.

Below are references to current Italian laws and regulations.

Decreto-legge 31 ottobre 2025, n. 159: Prevede misure urgenti per la tutela della salute e sicurezza, rafforzando l'obbligo di prevenzione di condotte moleste nei luoghi di lavoro.

Legge 15 gennaio 2021, n. 4: Ratifica ed esecuzione della Convenzione dell'Organizzazione internazionale del lavoro (OIL) n. 190, che impone misure per prevenire e contrastare la violenza e le molestie nel mondo del lavoro.

Decreto Legislativo 25 gennaio 2010, n. 5 – Attuazione della direttiva 2006/54/CE relativa al principio delle pari opportunità e della parità di trattamento fra uomini e donne in materia di occupazione e impiego

D.Lgs. 9 aprile 2008, n. 81 (Testo Unico sulla Sicurezza): L'art. 28 obbliga a valutare tutti i rischi, inclusi quelli da stress lavoro-correlato e molestie, con particolare attenzione al genere.

Decreto legislativo n. 198 del 2006 - Codice delle pari opportunità tra uomo e donna

Direttiva 2006/54/CE, del Parlamento europeo e del Consiglio, del 5 luglio 2006 (art. 2)



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Decreto legislativo n. 145 del 2005 - Attuazione della direttiva 2002/73/CE

Decreto legislativo n. 215 del 2003 - Attuazione della direttiva 2000/43/CE

Decreto legislativo n. 216 del 2003 - Attuazione della direttiva 2000/78/CE

Direttiva 2002/73/CE, del Parlamento europeo e del Consiglio, del 23 settembre 2002 (art. 1)

Direttiva 2000/78/CE, del Consiglio, del 27 novembre 2000 (art. 2)

Direttiva 2000/43/CE, del Consiglio, del 29 giugno 2000 (art. 2)

Raccomandazione n. 92/131, della Commissione, del 27 novembre 1991

Decreto legislativo 198/2006

Equal employment opportunity

It is the policy of The World Sustainability Foundation to ensure equal employment opportunity without discrimination or harassment based on race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, genetic information, or any other characteristic protected by law. The World Sustainability Foundation prohibits any such discrimination or harassment.

Retaliation

The World Sustainability Foundation encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of the World Sustainability Foundation to promptly and thoroughly investigate such reports. The World Sustainability Foundation prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports.

Sexual harassment

Sexual harassment constitutes discrimination and is illegal under state and local laws. For this policy, "sexual harassment" is defined, as by National Law, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example: a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

National Law recognizes two types of sexual harassment: a) quid pro quo and b) hostile work environment. Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances or requests for sexual favors; the use of job-related threats or rewards to solicit sexual favours sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual



deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; comments on a worker's appearance, age, private life, etc.; sexual comments, stories and jokes; repeated and unwanted social invitations for dates or physical intimacy; sending sexually explicit messages (by phone or by email) and other physical, verbal or visual conduct of a sexual nature.

It is important to note that these examples are not exhaustive and that sexual harassment can include any conduct of a sexual nature that is unwanted and unwelcome by the recipient. sexual harassment may also occur between people of the same sex.

Harassment

Harassment based on any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law, or that of his or her relatives, friends or associates, and that: a) has the purpose or effect of creating an intimidating, hostile or offensive work environment, b) has the purpose or effect of unreasonably interfering with an individual's work performance, or c) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment by e-mail, phone (including voice messages), text messages, social networking sites or other means.

Individuals and Conduct Covered

These policies apply to all applicants and employees, whether related to conduct engaged in by fellow employees or by someone not directly connected to the World Sustainability Foundation (e.g., an outside vendor, consultant, or customer).

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings, and business-related social events.

Reporting an Incident of Harassment, Discrimination, or Retaliation

The World Sustainability Foundation encourages reporting of all perceived incidents of discrimination, harassment, or retaliation, regardless of the offender's identity or position.



Individuals who believe that they have been the victim of such conduct should discuss their concerns with their immediate supervisor, human resources director, or the Director. See the complaint procedure described below.

In addition, the World Sustainability Foundation encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that his or her behavior is unwelcome and to request that it be discontinued. Often, this action alone will resolve the problem. The World Sustainability Foundation recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.

Complaint Procedure

Individuals who believe they have been the victims of conduct prohibited by this policy or believe they have witnessed such conduct should discuss their concerns with their immediate supervisor, the director of human resources, or the Director.

When a designated person receives a complaint of sexual harassment, he/she will:

- Immediately record the dates, times, and facts of the incident(s).
- Ascertain the views of the victim as to what outcome he/she wants.
- Ensure that the victim understands the company's procedures for dealing with the complaint.
- Discuss and agree on the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if he/she is not satisfied with the outcome.
- Keep a confidential record of all discussions.
- Respect the choice of the victim.
- Ensure that the victim knows that they can lodge the complaint outside of the company through the relevant country/legal framework.

The person carrying out the investigation will:

- Interview the victim and the alleged harasser separately.
- Interview other relevant third parties separately.
- Decide whether or not the incident(s) of sexual harassment took place.
- Produce a report detailing the investigations, findings, and any recommendations.
- If the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e., an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal).
- Follow up to ensure that the recommendations are implemented, that the behaviour has stopped, and that the victim was satisfied with the outcome. If it cannot determine whether the harassment took place, he/she may still make recommendations to ensure proper functioning of the workplace.
- Keep a record of all actions taken.



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- Ensure that all records concerning the matter are kept confidential.
- Ensure that the process is done as quickly as possible and in any event within [...] days of the complaint being made.

The World Sustainability Foundation encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships become irreparably strained. Therefore, while no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment.

Any reported allegations of harassment, discrimination, or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

The World Sustainability Foundation will maintain confidentiality throughout the investigatory process to an extent consistent with adequate investigation and appropriate corrective action.

Sanctions and disciplinary measures

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

Misconduct constituting harassment, discrimination, or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling, or disciplinary action such as a warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay, or termination, as the World Sustainability Foundation believes appropriate under the circumstances.

If a party to a complaint does not agree with its resolution, that party may appeal to the World Sustainability Foundation's executive director.

False and malicious complaints of harassment, discrimination, or retaliation (as opposed to complaints that, even if erroneous, are made in good faith) may be the subject of appropriate disciplinary action.

Training



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Individuals who deal with sexual harassment complaints are trained specifically on this issue and on the nature of sexual harassment. Training can be part of the responsive action in cases of sexual harassment or discrimination. Training would be carried out by accredited personnel.

Outside complaints mechanisms

A person who has been subject to sexual harassment can also make a complaint outside of the company. They can do so through contacting an external lawyer or The World Sustainability Foundation's job consultant. A list of applicable laws and regulations is available on this procedure.

Implementation of this policy

The World Sustainability Foundation will ensure that this policy is widely disseminated to all relevant people. It will be included in the staff handbook. All new employees must be trained in the content of this policy as part of their introduction to the company.

Every year, the World Sustainability Foundation will require all employees to attend a refresher training course on the content of this policy.

It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

Prohibition of Retalial Acts

The Company is firmly committed to protecting any Employee who reports behavior prohibited by this Policy, or who raises concerns, from any retaliatory actions. Such Employee will be protected for as long as necessary, not only from the alleged "wrongdoer," but from anyone.

Therefore, to prevent, investigate, and protect Employees from retaliatory actions, the Company is committed to fostering an environment in which Employees:

i) feel comfortable communicating openly and honestly;



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ii) are encouraged to promptly and in good faith raise any concerns regarding situations they may believe to be unethical, fraudulent, or illegal, without fear of retaliation;

iii) are encouraged to report concerns that concern them in good faith, even in cases where they lack clear evidence.

Retaliatory conduct is adverse conduct against a person because that person:

- reported an actual or perceived violation of a Company policy or law, or reported prohibited or inappropriate workplace conduct; and/or
- opposed conduct that may violate a Company policy or law, or other prohibited or inappropriate workplace conduct; and/or
- participated in the reporting and investigation process under the Company policy; and/or
- supported an investigation or proceeding regarding an actual or perceived violation of a Company policy.

Anyone who engages in retaliatory conduct against the reporting Employee or Third Party, including acts aimed at easing the Employee into silence through financial incentives or other benefits, will be subject to disciplinary action. Retaliation is strictly prohibited and in itself constitutes a violation of this Policy.

Monitoring and evaluation

The World Sustainability Foundation recognises the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

Supervisors, managers, and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the company will evaluate the effectiveness of this policy and make any changes needed.

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Via Giotto 26, 20145 Milan, Italy

<https://worldsustainabilityfoundation.org/en/>



Approved by Paolo Bray – Director and founder

World Sustainability Foundation