

**Immobiliare Grande Distribuzione**  
Società di Investimento Immobiliare Quotata S.p.A.  
Acronym IGD SIQ S.p.A.



## **DIVERSITY, EQUITY & INCLUSION POLICY**

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## *Introduction – The sustainability strategy*

In 2006, IGD adopted an Organizational, Management and Control Model, with the aim of building a structured and organic system of rules, procedures, tools and control activities designed to ensure fair and transparent conditions for the stakeholders in the conduct of business and corporate activities, and at the same time prevent the various types of crimes envisaged by Legislative Decree 231/2001. The Company has amended this Model over time, adapting it to regulatory amendments (the most recent update was approved by the Board of Directors at the meeting held on 1/8/2024, and is available at the web address <https://www.gruppoigd.it/governance/etica-dimpresa/modello-organizzativo/>).

IGD embarked on its sustainability journey back in 2011, based on the understanding that adopting social and environmental responsibility criteria in the real estate sector is the way to pursue healthy and long-lasting growth, far from any speculative rationale.

Since 2013, we have progressively increased the integration of E.S.G. (Environmental, Social, Governance) issues within our strategic planning, which is shared with internal and external stakeholders.

In 2017, the “Becoming G.R.E.A.T.” strategy was defined, as proof of our objective of conducting business in a perspective of sustainable growth, paying attention to environmental issues (Green), people (Responsible), in an ethical manner (Ethical), in attractive locations (Attractive), together with our stakeholders (Together). The definition of this sustainability strategy is based on the identification and continuous updating of material topics, from which the company defines its sustainability risks and targets.<sup>1</sup>

IGD annually monitors the results achieved within its sustainability reporting, the contents of which are defined on the basis of international reference standards, as well as on standards specific to the real estate sector.

In 2020, IGD joined the Global Compact, the most important sustainability initiative for organizations worldwide, promoted by the United Nations.

## *General principles and external and internal references*

This Policy is based on the following definitions of **diversity, equity, and inclusion**, which the Company recognizes:

- **Diversity** represents the set of characteristics that makes each individual unparalleled and unique, considering areas such as ethnicity, age, gender, physical and psychological differences, sexual and emotional orientation;
- **Equity** refers to equal treatment and equal opportunities, which must be granted to all people;
- **Inclusion** is understood as the valorisation and recognition of diversity, with the aim of ensuring a fair and welcoming physical and social environment.

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<sup>1</sup>For further information, please visit the company website at <https://www.gruppoigd.it/en/sustainability/our-sustainability-strategy/> and <https://www.gruppoigd.it/en/sustainability/our-priorities/>

The Company considers respect for people an essential value and, for this reason, promotes the protection of all persons and is committed to valorising diversity, prohibiting any behaviour that undermines individual dignity.

It is also committed to creating a fair, inclusive and respectful working environment and to avoiding forms of discrimination based on diversity, without exceptions.

The Company intends to promote these principles both in its relationships with its employees and external contractors and by contributing to their dissemination in public debate and in relationships with all external stakeholders.

This Policy identifies and defines the objectives, strategies, and best practices adopted by the Company to foster a work environment that values diversity, ensures equity, and promotes people's inclusion.

In defining this Policy, the Company used the following internationally recognized documentation as a reference:

- Universal Declaration of Human Rights of the United Nations (1948);
- United Nations 2030 Agenda for Sustainable Development;
- Principles of the UN Global Compact, which IGD has adhered to since 2020;
- United Nations Guiding Principles (UNPG);
- United Nations Conventions on the Rights of Women, on the Elimination of All Forms of Racial Discrimination, on the Rights of the Child, on the Rights of Persons with Disabilities;
- Declaration on Fundamental Principles and Rights at Work and the Conventions of the International Labour Organization (ILO).

The Policy also takes into account the results of the work carried out on DE&I issues by the Company over the years, as contained in the following documents:

- The Organizational, Management and Control Model;
- The Code of Ethics, which includes the Charter of Values;
- the National Collective Bargaining Agreement for the relevant sector and, updated and signed in 2025, both the second-level supplementary agreement and the "Protocol for the development of positive actions in the field of equal opportunities, solidarity and work-life balance", aimed at the entire Group personnel operating in Italy.

### ***Scope of application***

This policy applies to employees within their contractual relationship with IGD, in all countries in which the Company conducts business.

Although commonly applied, its validity is also included within the "Responsible Supply Chain Policy" and the "Responsible Tenancy Policy", which IGD has adopted since 2024.

### ***Implementation areas and methods***

In the following areas, the Company promotes a supportive and inclusive environment, which recognizes and protects DE&I values in all functions and areas of operation, without distinction:

1. **Gender**

The Company is committed to preventing all forms of gender discrimination in all areas of work and to eliminating and overcoming prejudice, stereotypes, and discrimination. The Company is also committed to equal pay and to identifying all necessary measures to avoid the gender gap in terms of growth within the company.

2. **Sexual and romantic orientation**

The Company is committed to creating a safe, welcoming, and discrimination-free work environment for all people, regardless of their sexual or emotional orientation. In order to ensure an inclusive work environment, the Company is committed to recognizing the "alias identity" of people in gender transition.

3. **Age**

The Company is committed to creating a working environment that welcomes and values the perspectives and skills of all generations, from the youngest to the seniors, and to implementing policies that foster intergenerational dialogue and comparison.

4. **Disability**

The Company guarantees a fair and accessible work environment, capable of responding to the physical and psychological needs of all people. It also recognizes equal opportunities in all areas of the organization's life (from staff selection to training development and career growth)

5. **Interculturality**

The Company recognizes the importance of the integration of different cultures and experiences. It consequently promotes an intercultural vision that is open to comparison, aware that coexistence between people with different traditions fosters innovation and growth.

The Company adopts measures aimed at implementing the DE&I principles in carrying out its activities in the above-mentioned areas.

○ **Personnel research and selection**

In line with Diversity & Inclusion principles, our personnel search and selection processes are structured to ensure the best fit for the desired professional role, across all areas of the organization, ensuring impartiality while also respecting equal opportunities for professional development and growth.

○ **Induction, onboarding and skills development**

In line with the principle of inclusivity, new recruits receive the Code of Ethics and key information to help them get off to a successful start. The Company is also committed to giving everyone the opportunity to develop their skills and increase their responsibilities within the company.

○ **Training**

Planning of training programs based on the principles of inclusion and equality, extending to all levels and roles as needed, to bring about tangible changes both within and outside the company.

○ **Welfare**

Supporting people's well-being with positive impacts on the corporate environment. For this reason, the Company has activated a Welfare Plan that provides employees with services and benefits in the areas of education, recreation, pension provision and healthcare.

○ **Work-life balance**

Support for work-life balance. From this perspective, the Company adopts an organizational and personnel management model in which this balance is protected through flexible working hours or hybrid work arrangements, depending on the role.

- **Parenting**

In line with the principle of equality, all parents are guaranteed the same rights, and the rules protecting parenthood (expectations, leaves, permits) and the right to assistance are applied, regardless of the type of family they belong to.

- **Corporate initiatives**

Support the organization and/or participation in events and activities that promote the principles of diversity, equity, and inclusion. The Company also organizes and supports initiatives in Shopping Centers aimed at raising visitor awareness on these issues. At the same time, it is promoting the establishment of a Committee for the Promotion of Equal Opportunity Policies, to monitor activities aimed at ensuring gender equality and to pursue policies and activities aimed at the inclusion of vulnerable individuals, people with disabilities, migrants, or persons with experiences of gender-based violence.

- **Corporate climate monitoring**

Periodic assessment of corporate well-being through specific surveys. Based on the results obtained, the Company identifies improvement activities.

- **Language**

Use, at all levels, of a respectful and inclusive language that takes into account the context, the subjective perception of all people, and the potential variables of identity and personal life.

## ***Approval, management and control***

This Policy has been approved by the Board of Directors.

**Update:** To ensure its relevance and effectiveness over time, the contents hereof are periodically updated by the Company in relation to the company's needs and evolutions, cultural developments, and legislative changes relating to diversity, equity, and inclusion.

The Strategic Steering Committee is responsible for implementing, updating, communicating, and monitoring this Policy. In its Sustainability Report, the Company reports on a yearly basis on the results of the initiatives implemented.

**Whistleblowing reports:** Reports of violations, discrimination, and behaviour which are regarded as inconsistent with the contents of this Policy, are handled through the **whistleblowing** procedure, which ensures confidentiality, guarantees the prohibition of retaliation, and establishes specific timeframes for the various stages of the reporting process. Reporting is handled by an external party designated by the Company. Reports can be made using the dedicated IT platform available at the following link: <https://whistleblowing.gruppoigd.it/#/>.

**Publication:** This document is available for consultation on the company's website. For employees, in particular, it is also available on the intranet.