

Dello 26.02.2026

PRINCIPLES AND PURPOSE

OPTOTEC SPA is committed to creating and maintaining a safe, respectful working environment free from any form of violence and harassment. This policy aims to prevent such behaviors and to protect all employees.

DEFINITIONS

Workplace violence:

Attitudes or behaviors that may cause physical or psychological harm to an employee, including physical assaults, insults, and threats.

Harassment:

Inappropriate and unwanted behaviors that may include, but are not limited to, sexual harassment, intimidation, and hostile attitudes.

Sexual harassment consists of any conduct of a sexual nature expressed in physical, verbal, or non-verbal form that is unwanted.

The company considers sexual harassment particularly serious even where the behavior of the perpetrator is not accompanied by blackmail or threats but is nevertheless unwanted by the person subjected to it.

By way of example, and not limited to, the following are considered forms of sexual harassment and discrimination:

- **Verbal (written and/or spoken):** sexual innuendos, sexual or racial epithets, jokes about sexual characteristics, insulting or derogatory comments, vulgar mockery, threats, proposals, or vulgar or offensive sounds;
- **Visual:** degrading or vulgar images, photographs or objects, obscene gestures, distribution or sending (including electronically) of sexist or pornographic material;
- **Physical:** unwanted physical contact of any kind.

Any initiative that involves carrying out or threatening retaliation following a negative response to a verbal and/or physical approach is also considered harassment.

OPTOTEC'S COMMITMENT

The company believes that violence and harassment in the workplace constitute an abuse of the individual, as they are unacceptable and incompatible with decent work. Therefore, it is committed to:

- promoting a working environment based on mutual respect and the dignity of all;
- providing training and resources to facilitate understanding of workplace violence and harassment dynamics;
- promoting behavior aimed at preventing and eliminating any type of inappropriate attitude, insults, or threats;
- applying zero tolerance toward any form of violence or harassment;

- promoting a corporate culture in which all employees commit to adopting behaviors based on respect toward any interlocutor.

SCOPE OF APPLICATION

The provisions of this Policy apply regardless of the type of employment relationship or role held (fixed-term employees, permanent employees, temporary workers, collaborators, interns), with reference to any violence or harassment occurring during work or arising from work activities (break areas/lunch breaks, during business travel, during training events, during commuting to or from work, or during work-related trips).

PREVENTION AND MANAGEMENT OF REPORTS

While OPTOTEC SPA believes that the most effective way to eliminate violence and harassment in the workplace is through prevention, the company prioritizes preventing and eliminating any form of violence, discrimination, and harassment in the workplace.

Specifically, the company:

- promotes cultural change and prevention;
- encourages constructive dialogue, directly or through the Gender Equality Steering Committee, with any employee to prevent and, where possible, resolve situations that may appear discriminatory;
- has implemented reporting mechanisms (Instruction OIOA8001-00 – Procedure for Reporting Workplace Violence and Harassment);
- develops guidance measures and awareness initiatives (training and information courses);
- encourages employees to report any form of inappropriate behavior;
- in cases where behaviors that could constitute harassment occur, adopts organizational measures deemed appropriate in order to prevent similar situations from recurring, in line with company needs;
- protects individuals who report incidents from possible retaliation or repercussions;
- guarantees confidentiality and privacy for all parties involved;
- treats reports seriously and conducts investigations thoroughly and promptly;
- applies sanctions in cases of violations of this Policy.

MONITORING AND REVIEW

This Policy will be monitored and reviewed annually to ensure its effectiveness and to adapt it to the needs of employees and the company.

SHARED RESPONSIBILITY

Every employee has the duty to contribute to creating a safe and respectful working environment by adopting appropriate behavior and reporting any acts of violence or harassment.

**Management
Steering Committee**



**CORPORATE POLICY AGAINST VIOLENCE AND HARASSMENT
IN THE WORKPLACE**