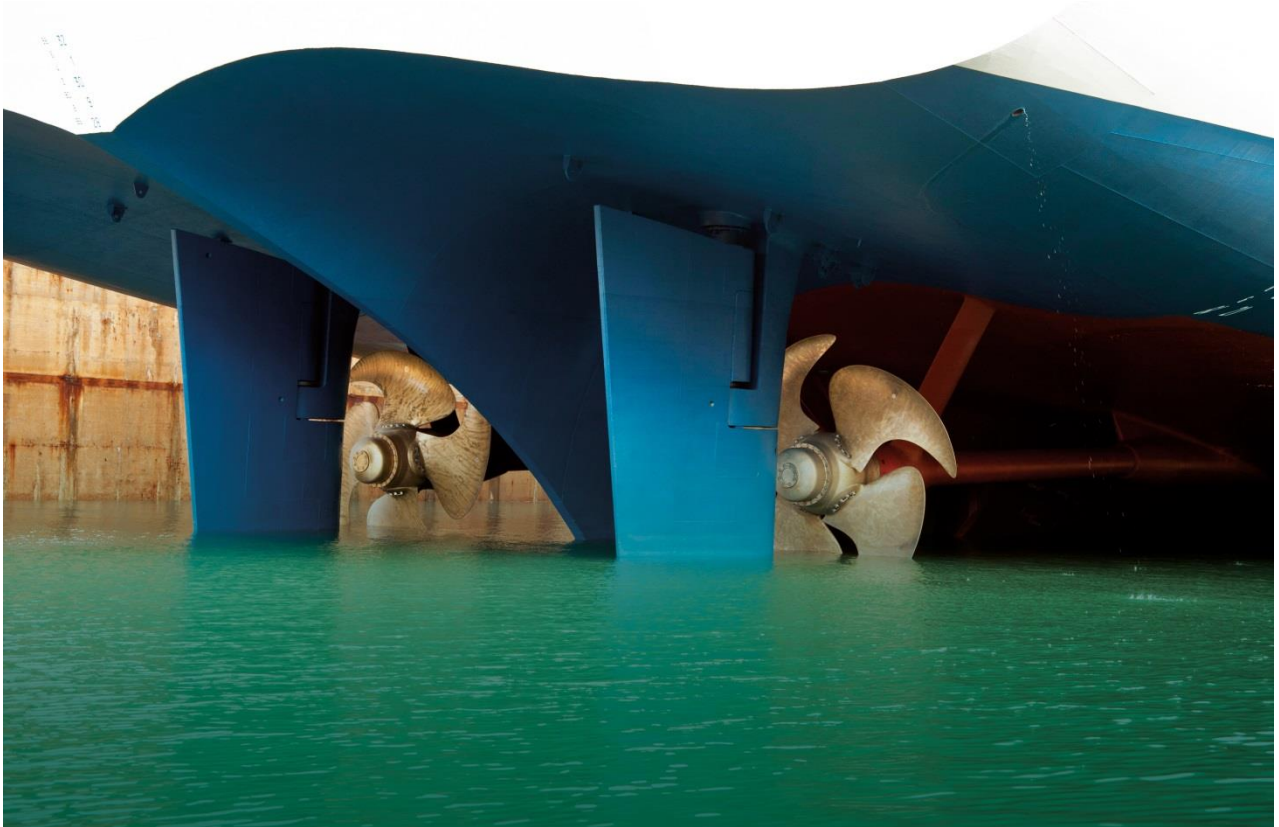


# FINCANTIERI



**KNOW YOUR CUSTOMER**  
**- Summary -**

# FINCANTIERI

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## 1. INTRODUCTION

FINCANTIERI operates according to principles of fair competition with honesty, integrity, fairness and good faith and with the highest degree of respect for the legitimate interests of shareholders, employees, customers, commercial and financial partners, and countries and communities where it conducts business. In particular, FINCANTIERI proactively promotes Corporate Social Responsibility as a social and environmental focus integrated into its business model, and informs the public of all related activities in its periodic reports.

Integrity, Ethics and Respect, Merit, Excellence and Innovation, as well as Health and Safety, Environment Protection, Quality and Performance, Sustainable Growth, International Outlook, Rights and Client Focus are the fundamental values behind FINCANTIERI's approach. It is on these values that FINCANTIERI focuses and promotes its relationship of trust with its Stakeholders, that is everyone with an interest in the company, such as shareholders, employees, suppliers and clients.

Within this framework, all those who work or operate in Italy or abroad on behalf of or for FINCANTIERI, or who have business relationships with it, without any distinction or exception, are required to comply with these principles and ensure that they are complied with, each within its/his/her functions and responsibilities. The belief that one is operating in the interests or to the advantage of the Company can in no way whatsoever justify a conduct in conflict with these principles.

In light of this, bribery is an unacceptable obstacle to the ability of the Company to do business. FINCANTIERI is committed to systematically promoting fair competition, which is an essential element for pursuing its interests and a guarantee for all market participants, clients and stakeholders in general. Strict compliance with laws and regulations, ethical integrity and fairness, transparency and honesty are a commitment and constant duty for all FINCANTIERI personnel.

FINCANTIERI condemns the use of any unlawful or inappropriate behaviour to achieve its business goals, which it intends to pursue exclusively through excellent performances in terms of innovation, quality and economic, social and environmental sustainability.

FINCANTIERI confirms its commitment to fight bribery in all its forms by taking a zero tolerance approach against it and to constantly improve the integrity and transparency of its corporate conduct, that will reflect positively on the Company's reputation in the countries in which it operates.

## 2. PRINCIPLES

Entering into a business relationship with a customer entails a careful examination of the prospective client, to guarantee the absence of any law violation or crime, such as:

- corruption;
- money laundering;
- terrorism or financing of terrorism;
- sanctions or violation of economic sanctions (notably European and American).

In the mainframe of Fincantieri policies and procedures, the company adopted a "KYC procedure", aimed to examine the connected risks to a business relationship with a new counterparty.

The scope of the KYC procedure is:

- to provide Fincantieri with the necessary tools to assess the integrity, reputation and financial robustness of its new clients;
- to ensure that Fincantieri does not face regulatory/criminal risks when entering into a business relationship with their clients.

The KYC procedure is applied to all Fincantieri Subsidiaries subject to approval by the respective Management Bodies.

### 3. DUE DILIGENCE

The due diligence on the Fincantieri client is classified in preliminary and enhanced due diligence.

The preliminary due diligence consists of:

- collection of information and data necessary to identify the client, including the ownership / shareholding structure, administrators with power of attorney, direct shareholding in other companies;
- analysis of the collected information to identify possible “red flags” that include, but shall not be limited to, the following: the prospective client is subject to international sanctions, presents reputational or financial issues, is a politically exposed individual or exercise a public function, the Country of residence or the Country in which the prospective client is registered is subject to international economic sanctions, trade restrictions or presents high risk of corruption, etc.

This activity is performed collecting information from open sources and using IT platforms obtaining information from reliable sources.

The collected information in the preliminary due diligence must be examined by the Fincantieri client Evaluation Committee (“KYC Committee”), which provides support in the risk evaluation and on the advisability to begin a business relationship with the client.

If a red flag has been identified, an enhanced due diligence is carried out for a more detailed examination and to evaluate possible tools of risk mitigation.

To perform the enhanced due diligence the additional and more detailed information will be requested to the client by means of tailored questionnaires to be verified by an external source.

#### **KYC Committee review and final decision**

The Fincantieri KYC Committee, examined the due diligence findings, gives an overall risk evaluation and presents the possible recommendations.

The result of the KYC Committee review has to be submitted to the function in charge for the final decision of approval / rejection of the business relationship with the proposed client.

In the event of a negative evaluation by the KYC Committee, the same will inform the Oversight Board, also communicating the final decision of the function in charge.

## **Execution and Performance**

During the following activities of negotiation, finalization and execution of the contract with the client, the Fincantieri functions, according to their respective areas of responsibility, take into account the due diligence results, monitoring the risk areas.

In the case of long-term relationships, there is a periodic update of the due diligence (at least every 2 years).

## **Record-keeping**

A full record of each due diligence process, from the planning to the delivery / closure of the contract, is maintained for a period of 20 years.