

FINCANTIERI



WHISTLEBLOWING **- Summary -**

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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 Sustainability 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.

As an ethical safeguard to maintain high awareness of the conduct adopted by employees and by all those operating with the Company, Fincantieri has implemented a whistleblowing system, in line with Legislative Decree No. 24 of March 10, 2023. This system serves as a tool to report issues related to non-compliance with the provisions of the Code of Conduct, the Organizational, Management and Control Model pursuant to Legislative Decree 231/01, the Anti-Corruption Policy, the Supplier Code of Ethics, the 'Human Rights – Commitment to Respect for Human Rights and Diversity' Policy, the 'Workplace Harassment' Policy, other corporate policies and procedures, as well as violations of national and European Union law.

In compliance with the certified management systems UNI ISO 37001:2016 and UNI/PdR 125:2022, Fincantieri also uses this whistleblowing system to report cases of corruption, violations of gender equality principles, discrimination, and harassment.

The Company has appointed the 'Group Compliance, Anti-Corruption and Model 231' Function as the body responsible for managing the reports.

2. PURPOSE AND RECIPIENTS

The purpose of this document is to define the content, performing method out and subsequent management of the reports sent to report any conduct not in line with the Code of Conduct, the Organizational Model, the Anti-corruption Policy, the Supplier Code of Ethics or the anti-corruption company policies and procedures adopted by the Company, by the members of the Company Bodies, by the Function Managers, as well as by employees, external collaborators, suppliers and customers.

3. REPORTING SYSTEMS

Reports can be brought to the attention of the Oversight Board / Group Compliance, Anti-Corruption and Model 231 Function through the alternative use of the following internal channels:

- **Online Platform:** Reports can be submitted via the platform either in written form or through voice messaging, with or without recording. In both cases, the channel is suitable for ensuring the confidentiality of sources and the information received, subject to legal obligations, and allows for confidential communication between the whistleblower and the designated recipient. Access to the platform is available both on the company Intranet, on the page dedicated to the Oversight Board, and

on the Fincantieri website, in the Governance and Ethics section, by following the path: Governance and Ethics / Business Ethics / Reports (whistleblowing)
(<https://www.fincantieri.com/en/governance/business-ethics/whistleblowing/>)

- **mail address:**

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Via Genova 1 – 34121 Trieste

RISERVATO Organismo di Vigilanza / Funzione “Group Compliance, Anticorruzione e Modello 231”

- **Direct meeting with the Report manager:** in the case of a direct meeting with the Report manager, the Company will ensure that it takes place within a reasonable time frame and at a location agreed upon with the whistleblower, deemed appropriate by the Report manager, and suitable to ensure confidentiality. The report will be documented and signed by both the Report manager and the whistleblower or recorded.

While the preferred method remains the use of the internal reporting channels mentioned above, in the cases expressly provided for under Article 6 of Legislative Decree No. 24/2023, the whistleblower may use the channel made available by the competent authority (ANAC). In particular, the report to ANAC may be made exclusively in the following cases:

- when the internal reporting channel is not active or does not comply with legal requirements;
- when the whistleblower has already made an internal report that has not been followed up;
- when the whistleblower has legitimate reasons to believe that the internal report has not been effectively analyzed or that it may result in the risk of retaliation;
- when the whistleblower has legitimate reasons to believe that the violation may pose an imminent or obvious danger to the public interest.

4. REPORTING

The report can be made at any time and can refer to events that have occurred or are in progress in the work context.

In general, the following may be subject to reporting:

- Violations of national law (civil, criminal, administrative, and accounting offenses; unlawful conduct relevant under Legislative Decree No. 231/2001), the Code of Conduct, the Supplier Code of Ethics, the Organization, Management and Control Model pursuant to Legislative Decree No. 231/2001, and the related internal regulatory framework;
- Violations of the “Anti-Corruption” Policy, the “Human Rights – Commitment to Respect for Human Rights and Diversity” Policy, the “Against Workplace Harassment” Policy, and the related internal regulatory framework;
- Violations of European Union law (offenses committed in breach of the EU regulations listed in Annex 1 of Legislative Decree No. 24/2023 and all national provisions implementing them).

Some non-exhaustive examples of possible reports include:

- conflict of interest cases unknown to the company;
- corruption attempt of a third part towards any employee or of any employee towards a third party;
- fraud;
- inappropriate use of the company assets;
- intentional communication of false information to a Public Administration;
- discrimination;
- harassment;
- violation of national and European Union laws.

Reports must always be adequately detailed in order to allow the necessary verification of the reported facts, even regardless of the identification of the responsible party. A report is considered detailed when the whistleblower describes facts, events, or circumstances that constitute the basis of the alleged misconduct with a sufficient level of detail to identify useful or decisive elements for verifying the validity of the report (for example, type of offense committed, reference period, value, causes and objectives of the offense, areas and individuals affected or involved). If available, it is useful to attach documents / evidence to support the report content. Therefore, reports without any substantial element supporting them, excessively vague or not very detailed, are not taken into consideration.

The abuse or misuse of the reporting tool, such as reporting events that the whistleblower knows to be unfounded, raising purely personal matters, or submitting reports with clearly defamatory or slanderous content, will result in the application of the Company's disciplinary system.

In case of doubts regarding the interpretation of events or situations that may constitute a corrupt act or any other offense/violation, it is possible to contact the Oversight Board / Group Compliance, Anti-corruption and Model 231 Function using the same reporting channels indicated in paragraph 3, "Reporting Systems".

Although not explicitly regulated by Legislative Decree No. 24/2023, Fincantieri commits to evaluating any anonymous reports exclusively when they are specific, detailed, and supported by appropriate documentation.

5. REPORT MANAGEMENT

The "competent entity" for handling reports is responsible for monitoring their management within the timeframes established by law and provides the whistleblower with an initial acknowledgment within 7 days of receipt of the report, and a follow-up response within 90 days regarding the outcome or status of the investigation.

The report will therefore be assigned:

- to the Oversight Board when relevant to Legislative Decree 231/2001;
- to the Oversight Board and/or the Group Compliance, Anti-Corruption and Model 231 Function when concerning Anti-Corruption matters (based on its relevance to Legislative Decree 231);
- to the relevant company functions for all other reports.

All reports are subject to a preliminary assessment by the Report manager, in order to evaluate their admissibility and whether they can be pursued, based on the existence of subjective and objective requirements. Specifically, the following aspects are verified:

- that the whistleblower is subjectively entitled to make the report;
- that the subject of the report is relevant and falls within the admissible cases;

- that, in the case of anonymous reports, the essential elements for verification are present, or that the whistleblower is available to provide appropriate additional information.

Following the verification phase, if there are no elements to confirm the admissibility and the possibility to proceed with the report, the Report manager will close the case (rejection), providing appropriate justification for the decision in accordance with the criteria outlined in paragraph 4, 'Reporting'.

If, on the other hand, the preliminary assessment concludes with a positive outcome, the Report manager assigns the report to the competent body (see Oversight Board / Group Compliance, Anti-Corruption and Model 231 Function / Other Function) for the purpose of verifying the information provided and initiating the necessary checks and investigations to assess the validity of the report. During this phase, if deemed appropriate, both the whistleblower may be contacted to obtain further information and the alleged perpetrator of the violation may be interviewed. Reports received through channels other than the digital platform (e.g., regular mail) will be uploaded and managed within the online platform by the Report manager. The use of the digital platform not only allows the Supervisory Body and the Group Compliance, Anti-Corruption and Model 231 Function to communicate with the whistleblower (also anonymously), but also enables the whistleblower to monitor the status and outcome of the report at any time using their access credentials.

In the case of reports received by an entity other than the one designated as the Report manager, using channels other than those listed in paragraph 3 "Reporting Systems," these must be forwarded to the competent entity (Report manager) within 7 days of receipt, providing simultaneous notification to the whistleblower through methods that ensure the confidentiality of the content.

If a report involves or implicates a member of the Oversight Board or the Group Compliance, Anti-Corruption and Model 231 Function, the management of the report will be assigned to the other individuals of the Oversight Board and/or the Group Compliance, Anti-Corruption and Model 231 Function.

If, from the verifications carried out, the Oversight Board / Group Compliance, Anti-Corruption and Model 231 Function detect a violation of the rules of conduct and of the relevant policies and procedures (Code of Conduct, the Organizational Model, the Anti-corruption Policy, the "Human Rights – Commitment to Respect for Human Rights and Diversity" Policy, the "Against Workplace Harassment" Policy, the Supplier Code of Ethics or the anti-corruption company policies and procedures), they report the disciplinary offense to the Company for the appropriate decisions based on what is stated in the Organizational Model, action independent of any criminal proceedings against individuals or administrative proceedings against the Company pursuant to Legislative Decree 231/01.

The violation of codes of conduct, relevant policies, and procedures by external collaborators, consultants, and business partners may result in contract termination in accordance with contractual clauses and applicable legal provisions.

At least annually, both the Oversight Board and the Group Compliance, Anti-Corruption and Model 231 Function inform the Board of Directors and the Board of Statutory Auditors by means of a written report on the control and verification activities carried out and on any initiatives following violations of the rules of conduct and relevant policies and procedures.

In all cases, if the verifications carried out show that there has been a violation of the law, the Oversight Board / Group Compliance, Anti-Corruption and Model 231 Function inform the Company to promote the consequent initiatives, including the report to the competent judicial authority.

The Oversight Board / Group Compliance, Anti-Corruption and Model 231 Function documents and archives, within the online platform, the reports received, the decisions made, and the supporting documentation related to the investigations carried out, in compliance with the principle of confidentiality of the data and information contained therein, as well as with the legal provisions on personal data protection.

6. PROTECTION (OF INDIVIDUALS, SOURCES, AND INFORMATION)

The members of the Oversight Board and the Group Compliance, Anti-Corruption and Model 231 Function — without prejudice to legal obligations—ensure the confidentiality of the sources and the information they come into possession of.

The Company does not engage in any retaliatory actions (including but not limited to: disciplinary sanctions, demotion, suspension, dismissal; see also Article 17, paragraph 4 of Legislative Decree 24/2023), nor does it discriminate in any way in the workplace against employees who, in good faith, have taken steps to report events or situations related to non-compliance with the Code of Conduct, the Organizational Model, the “Anti-Corruption” Policy, the “Human Rights – Commitment to Respect for Human Rights and Diversity” Policy, the “Against Workplace Harassment” Policy, the Supplier Code of Ethics, or any other anti-corruption policies and procedures adopted by the Company, or violations of national or European Union laws.

This protection is also extended to the categories identified under Article 3 of Legislative Decree 10 March 2023 n.24, including but not limited to:

- facilitators (those who assist the whistleblower);
- individuals in the whistleblower’s work environment who have a close emotional or familial relationship with them;
- colleagues who have a regular and ongoing working relationship with the whistleblower;
- entities owned by the whistleblower or in which they work, as well as entities operating within the same work environment.

The company will take appropriate disciplinary action against anyone who violates the protective measures for the individuals identified in Legislative Decree 24/2023 or who takes retaliatory or discriminatory action against them, in accordance with the provisions of the Company’s Organizational, Management and Control Model pursuant to Legislative Decree 231/2001.

Such protections will not be granted if the whistleblower has acted in bad faith (e.g., by making false or defamatory accusations) or has been involved in the unlawful conduct being reported.

Finally, in the event that an anonymous whistleblower is subsequently identified, the Company ensures that all the safeguards outlined in this paragraph are granted to them.

7. CONFIDENTIALITY

The Report manager, the Oversight Board, the Group Compliance, Anti-Corruption and Model 231 Function, any professionals involved, the Heads of Functions/Departments, and any other parties involved in handling reports are required, within the limits set by law, to maintain confidentiality regarding the facts contained in the

report as well as the identity of the whistleblower and the individuals involved, as provided by the applicable regulations.

Unless necessary for the purposes of the investigation, the Report manager must keep the identifying data of the whistleblower separate from the content of the report when transmitting it to the Function/Department or the external consultant appointed to carry out the investigation, and also in the information flows to the Board of Directors, Board of Statutory Auditors, and other relevant Bodies.

Investigative activities aimed at verifying the validity of the reported facts must be carried out with the utmost confidentiality, including regarding the origins that triggered the activity.

In any case, the identity of the whistleblower may not be disclosed to individuals other than those authorized under Articles 29 and 32 of the General Regulation of the European Parliament and Council on Data Protection 679/2016 ("GDPR") and Article 2-quaterdecies of the Privacy Code to receive and manage the report, unless the whistleblower's consent is first obtained.

Such consent may be requested by the Report manager from the whistleblower in order to safeguard the right to defense within the framework of disciplinary proceedings, in the event that the circumstances provided for under Article 12, paragraphs 5 and 6 of Legislative Decree 24/2023 are met.