



***TRAINING PLAN LEGISLATIVE DECREE NO. 231/2001
and ANTI-CORRUPTION***



LEGISLATIVE DECREE NO. 231/01 – MANDATORY TRAINING PROGRAM

	GENERAL PART	SPECIAL PART (specific crimes)	REFRESH	UPDATE
MODULES NO.	1	3	1 (contents recap)	Ad hoc
METHOD	E-learning	E-learning	E-learning	E-learning
RECIPIENTS	All employees (workers, employees, middle managers, senior managers) and interns	All employees (workers, employees, middle managers, senior managers) and interns	All employees (workers, employees, middle managers, senior managers) and interns	All employees (workers, employees, middle managers, senior managers) and interns
GOALS	Acquire awareness of the content of Legislative Decree No. 231/01 and the operational consequences arising from the adoption of an Organizational, Management and Control Model		Ensure constant awareness and understanding of the content of Legislative Decree No. 231/01 by periodic refresh (every three years)	Ensure a periodic updating in relation to new legislative interventions
CONTENTS	<ul style="list-style-type: none"> Regulatory framework Administrative liability of entities Crimes contemplated in the Decree and their evolution Disciplinary system Pre-requisite for exemption from administrative corporate liability Control system Whistleblowing system 	<ul style="list-style-type: none"> Crimes against the Public Administration and Corporate crime Crimes against health and safety and environmental offences Crimes against the individual and tax crime 	<ul style="list-style-type: none"> General principles of Legislative Decree No. 231/01 Crimes against the Public Administration and Corporate crime Crimes against health and safety and environmental offences Crimes against the individual and tax crime Update 	In relation to new legislative interventions

ANTI-CORRUPTION – MANDATORY TRAINING PROGRAM

	GENERAL PART	SPECIFIC PART	REFRESH	UPDATE	SEMINARS
MODULES NO.	1	1	2	Ad hoc	1
METHOD	E-learning	E-learning	E-learning	E-learning	E-learning
RECIPIENTS	All employees (workers, employees, middle managers, senior managers) and interns	Company attorneys	All employees (workers, employees, middle managers, senior managers), interns and Company attorneys (Specific part)	All employees (employees, middle managers, senior managers), interns and Company attorneys (Specific part)	Board members and Top Management
GOALS	Acquire awareness of Fincantieri Anti-bribery Management System (ISO 37001:2016 certification)	In-depth analysis of Fincantieri Anti-bribery Management System (ISO 37001:2016 certification)	Ensure a periodic refresh of Fincantieri Anti-bribery Management System (every three years)	Ensure a continuous contents update based on the annual risk assessment	Extend the Anti-bribery training program to the Board members and Top Management to outline the main Company and personal responsibilities involved (every three years)
CONTENTS	<ul style="list-style-type: none"> The Anti-bribery Management System fundamental characteristics Management and control tools and procedures Normative requirements and control principles Whistleblowing system 	<ul style="list-style-type: none"> The corruption risks The corruption case studies The disciplinary system The «grants, donations, sponsorships gifts and hospitality» procedure Corruption indicators Non compliance management Training and available resources 	<ul style="list-style-type: none"> The General part is directed at all the employees (workers, employees, middle managers and senior managers). The Specific part is directed at the Company attorneys 	Based on annual risk assessment	The contents are based on those of the related e-learning courses (General and Specific)