

# 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 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 improve constantly 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. PURPOSE AND RECIPIENTS

The purpose of the procedure is to define the content, communication tools and subsequent handling of the reports sent to inform of 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

The report can be sent directly to the line manager or to the competent function. If for any reason this method is not considered practicable, the report can be brought to the attention of the Oversight Board / Anti-corruption Function by means of two alternative channels:

- Online platform: sending the report using the platform with or without registration. In both cases, the channel is adequate to ensure the confidentiality of the sources and information available, without prejudice to legal obligations and it allows confidential communication between the whistleblower and the Oversight Board / Anti-corruption Function. The platform is accessible on the company intranet, on the page dedicated to the Oversight Board, and on the Fincantieri official website, in the Ethics and Governance section at the following path: Ethics and Governance / Business Ethics / Whistleblowing (<https://www.fincantieri.com/en/governance/business-ethics/whistleblowing/>)
- mail address: FINCANTIERI S.p.A.  
Via Genova 1 – 34121 Trieste  
RISERVATO Organismo di Vigilanza / Funzione Anti-corruzione

## 4. REPORTING

The report can be sent at any time and can refer to past or current events.

Here some illustrative, although incomplete, examples of possible reports:

- 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.

The reports must always be adequately detailed in order to allow the necessary verifications on the facts highlighted, even regardless of the identification of the responsible party. The report is detailed when the description by the author of facts, events and circumstances representing the key elements of the alleged violation permits to identify useful or decisive aspects to ascertain the report validity (e.g. type of violation, reference period, value, causes and scope of the violation, organizational unit and people 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.

In case of abuse or bad faith use of the whistleblowing channels, for example to report events already known as unfounded by the whistleblower, personal matters or reports with evident defamatory or libelous content, it will be applied the Company's sanctioning system.

If there are any doubts about the interpretation of events or situations that could represent corrupt practices, it is possible to contact the Oversight Board / Anti-corruption Function.

## 5. REPORT MANAGEMENT

The Oversight Board / Anti-Corruption Function receives exclusively, through the two channels, reports about alleged violations and conduct not in line with the Code of Conduct, the Organizational Model, the Anti-

corruption Policy, the Supplier Code of Ethics or the policies and anti-corruption corporate procedures adopted by the Company. The Oversight Board / Anti-corruption Function evaluates the reports received to decide whether:

- processing the report promoting in-depth analyses;
- forwarding the report to the competent functions requesting feedback on the actions taken;
- proceeding with the filing of the report (rejection), adequately justifying the choice made in line with the criteria mentioned in paragraph 4 "Reporting".

If deemed appropriate and the method of reporting allows it, the Oversight Board / Anti-corruption Function can consult both the whistleblower for additional information and the alleged infringer, also giving rise to all the verifications and investigations that are necessary to ascertain the validity of the report. The use of the IT platform allows the Oversight Board / Anti-corruption Function to communicate (also anonymously) with the whistleblower, that can verify the status and outcome of the report at any time thanks to the access credentials.

If, from the verifications carried out, the Oversight Board / Anti-corruption Function detects 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 Supplier Code of Ethics or the anti-corruption company policies and procedures), it reports 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.

At least annually, both the Oversight Board and the Anti-corruption 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 / Anti-corruption Function informs the company to promote the consequent initiatives, including the report to the competent judicial authority.

The Oversight Board / Anti-corruption Function documents and archives the reports, the decisions taken and the documentation supporting the verifications carried out in compliance with the principle of confidentiality of the data and information contained therein, as well as the regulatory provisions on the processing of personal data.

## 6. WHISTLEBLOWER PROTECTION

The members of the Oversight Board / Anti-corruption Function - without prejudice to legal obligations - ensure the confidentiality of the sources and information they possess. The Company does not carry out retaliatory actions (disciplinary sanctions, downgrading, suspension, lay-off) or in any way discriminates in the workplace the company personnel who have carried out in good faith actions aimed at reporting events or situations related to failure to comply with the Code of Conduct, of the Organizational Model, the Anti-corruption Policy, the Supplier Code of Ethics, the anti-corruption company policies and procedures adopted by the Company or in any case the laws. The protections cannot be guaranteed if the whistleblower has acted in bad faith (for example by making false or defamatory accusations) or has contributed to the realization of an illegal conduct.