

Policy

Travel Risk Management

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INTRODUCTION

The growing international dimension of Fincantieri Group (hereinafter also Fincantieri) and the volatility arising from uncertain and ever-changing international contexts, together with an increasingly stringent industry regulation, requires the adoption of a Travel Risk Management (TRM) framework that provides for travel risk assessment and management processes: (i) consistent with the guidelines defined by the Group's Enterprise Risk Management (ERM) process; (ii) suitable for guaranteeing the continuity and resilience of the Group; (iii) and in *compliance* with the obligations on the Employer arising from the Italian regulations in terms of *Duty of Care*, in the protection of the Company's Assets and its People.

The Chief Executive Officer (CEO), with a *Statement of Intent* addressed to the whole Fincantieri Group, highlighted the commitment to comply with *Duty of Care* obligations towards employees operating abroad, providing advanced prevention and protection measures in the areas of Health and Safety (*Health, Safety and Security - HSS*), compliant with internationally recognized best practices, and which have also been approved by UNI (Italian Standardization Body).

1. PURPOSE

The following Policy provides a systematic reference framework concerning Travel Risk Management.

Fincantieri undertakes to develop, apply, and disseminate within its framework the best practices for identifying, managing and mitigating Security risks against its assets and *Duty of Care*¹ in compliance with regulations and human rights, in the belief that the prevention and control activities are an integral part of management and *business* activities.

In this perspective, Fincantieri:

- Adopts the principles contained in the above definition, in order to ensure the highest level of protection for its employees, protecting the tangible and intangible assets it has in order to ensure the achievement of its *business* and social objectives;
- Makes the utmost effort to analyze the potential Security risks relating to the entire set of company assets, combining effectiveness, efficiency and innovation in their management, through a system that allows for the involvement of all parties involved in the company processes;
- Defines, approves and promotes the most suitable corporate policies, processes, behaviours and technologies, aimed at guaranteeing the protection of corporate assets, periodically monitoring the level of effective implementation and arranging, where necessary, the appropriate countermeasures aimed

¹ The "duty of care" refers to the obligations placed on the Employer to care about the health, safety, security and well-being of their travelling employees and detached personnel. Under Italian Law, these obligations are provided for by "D.Lgs 81/2008; Art. 2087 c.c.; D.Lgs. 151/2015, art. 18; D.Lgs 231/2001".

at remedying any situations of non-compliance, maximizing synergies with the country system and with the institutions;

- Guarantees the maximum involvement of Fincantieri's *Management* and *Stakeholders* in order to support the main corporate decision-making processes in crisis conditions, through effective and timely information flows aimed at guaranteeing *business* continuity and correct decision-making;
- Promotes the valorization, perception and knowledge of safety at all levels, promoting a process of continuous improvement that makes it possible to raise the overall level of safety, through correct and informed behavior by all employees;
- Supports the definition of a regulatory body in the *Security Risk Management* area structured around policies, rules and operating procedures that are binding for all employees.

2. SCOPE OF APPLICATION

The following Policy applies to Fincantieri S.p.A. and the Group's Subsidiaries, directly or indirectly controlled, based in Italy and abroad. Fincantieri Group is also committed to promoting and spreading the principles defined in this document to the Stakeholders it operates and collaborates with.

3. REFERENCES

Fincantieri Group's commitment, established first and foremost by the commitments ratified through the Charter of Sustainability Commitments and by the Sustainable Development Goals (*Sustainable Development Goals - SDGs*) with which it adheres to the *Global Compact*, is embodied in a series of corporate procedures and practices that constitute a travel risk management system.

The latter, with a view to integrating and supporting the Environmental, Occupational Health and Safety Management Systems implemented by individual Sites in accordance with ISO 45001 and ISO 14001, contributes to the creation of sustainable business value, in line with the provisions of the standard UNI ISO31030, *best practice* of reference at international level, and with the general principles and guidelines included in the Suppliers' Code of Ethics, and in the Policies as well as in the Company Policies and commitments in the fields of Corporate Security, Enterprise Risk Management (ERM), Internal Control and Risk Management System (ICRMS), Sustainability, Anti-Corruption and 231 Model, Human Rights, and Health and Safety at Work, Environment and Energy.

4. COMMITMENT AND GENERAL PRINCIPLES

The principles adopted by Fincantieri as a reference for travel risk management concern:

- Compliance with international, national and local legislative provisions in force regarding travel risk management as well as national and international UNI ISO standards;
- Alignment with other relevant documents belonging to the Group's regulatory body, such as Risk Management, Travel Management and Sustainability;
- Correct assignment of roles and responsibilities, both strategic and operational, bearing in mind that legal responsibility (Accountability) always remains with Top Management;
- The objective of continuous improvement in the field of Travel Risk Management through the development of Policies, in accordance with the adopted regulations and reference standards;
- The promotion of awareness (Security Awareness) and training of Management and personnel;
- The involvement of the necessary resources (financial, material and human) for travel risk management in cooperation with other functions (departments) involved in travel management and in the pre-evaluation of travel from an HSS and Procurement profile;
- The appropriateness and adequacy of corporate needs and resources for the performance of all operations; The efficiency of the criteria for assessing travel risk;
- The efficiency in managing any changes to plans and exceptions to the following Policy "Travel Risk Management" (also "TRM Policy");
- The availability of the TRM Policy to all *Stakeholders* involved. In this perspective, this Policy is made available to employees through publication on the corporate intranet and accessible to Stakeholders through Fincantieri's institutional website and other specific communication channels, if more appropriate;
- The efficiency of the procedures for managing exceptions to the TRM Policy;
- The alignment of procedures with the definition of Duty of Care and the limits of Fincantieri's *Duty of Care*;
- The efficiency in the management of communications, monitoring, registration and review for the purpose of continuous improvement.

5. MAIN ACTIONS IN THE TRM PROGRAMME

Fincantieri, through the International Security (CO-ISY) department belonging to Security Department (CO-COS) and in collaboration with the competent corporate Functions, undertakes to develop, implement and improve the *Travel Risk Management* program and related processes and procedures, translating the principles listed in this document into the following actions:

- a) Ensure the development of travel risk management processes which are clear and consistent with the organization and its internal and external context, including:

- the involvement and contribution of appropriate internal resources and, where appropriate, selected external resources in accordance with the appropriate *Due Diligence* measures;
- adequate and appropriate human and financial resources in order to manage these processes;
- long-term professional cooperation with travelling staff, to facilitate future and ongoing dialogue;
- the definition of clear roles and responsibilities in the fulfillment of the program for all expected Functions to ensure the efficient implementation of the program;
- appropriate training of *Management* and personnel involved in the *Travel Risk Management* process, including the verification of any skills and experience of internal and external trainers;
- the creation of crisis committees, chaired by employers and made up of all Functions deemed necessary.

b) Develop procedures for Travel Risk Assessment, defining:

- the actions needed to assess the level of risk for the trip(s);
- that the risks for the safety of travelling personnel are identified in good time for the planning, and possible financing, of mitigation measures with the involvement, if appropriate, of other *Stakeholders*;
- procedures to verify that risk assessment controls are appropriate and sufficient, or carry out additional controls as appropriate; these actions must include, but shall not be limited to:
 - determination of the overall risk profile of the organization in relation to the travel risks characterizing the destination, always giving priority to mitigation measures calculated on risk assessments for travelling personnel;
 - Consultation and compliance with the guidance published by the Ministry of Foreign Affairs regarding security abroad;
 - The definition of the risk categories that may involve the organization, including travelers, such as:
 - risks to personnel (such as trauma and illness, including work-related illness, assault, imprisonment, kidnapping and theft, robbery and death, etc.);
 - legal risks, related to violation local laws, or related to the violation of Duty of Care;
 - risks related to *Business Continuity* which may require *Incident* and/or *Crisis Management* interventions;
 - reputation risks;
 - financial risks;
 - risks to intellectual property and other sensitive data;

- risks to the productivity and effectiveness of travel.
- c) Develop procedures for Travel Risk Treatment: develop processes and procedures for the implementation of strategies of risk treatment, such as *Risk Avoidance*, *Risk Sharing*, and *Risk Reduction*. These actions must include, but shall not be limited to:
 - authorization processes, insurance coverage, travel restrictions, identification of appropriate criteria for the selection of accommodation, transportation, and ground support services;
 - procedures for the management of cases of off-duty time, bleisure, multiple travelers and those accompanying travelling staff, as well as procedures for handling exceptions to the TRM Policy and related procedures;
 - procedures to establish the levels of expertise and experience to be required of all persons involved in the Travel Risk Management process. In particular, travel organizers/coordinators, travelers and HSS assistance providers, duly selected through Due Diligence processes;
 - procedures for the identification, collection and distribution of information useful for safety to travelers and other Stakeholders;
 - plans and procedures for the management of medical or Security incidents and of possible necessary evacuations.
- d) Defining appropriate communication processes:
 - develop procedures for managing both strategic and operational communications, during the regular course of business and in the event of unexpected events, incidents, emergencies, or crises.
 - guarantee appropriate disclosure of the TRM policy and related procedures duly updated, to all *Stakeholders*.
- e) Guarantee constant monitoring and review of the TRM Program: develop procedures for monitoring and reviewing the Travel Risk Management Program, to evaluate the efficiency of the TRM Policy and of the related procedures, together with all the *Stakeholders* involved.
- f) Guarantee a recording and *reporting* process: develop a comprehensive documentation and *reporting* process for all data and activities pertaining to travel risk management.

6. RESPONSIBILITY AND UPDATE

The Parent Company, through the Security Department, is responsible for monitoring and controlling the Policy “Travel Risk Management”.

The Policy will be periodically reviewed and validated by the Sustainability Committee and, in order to ensure its effective implementation and adequacy, will be adapted to any changes in the external environment.

The Policy and subsequent revisions will be subject to approval by the Board of Directors.

Version in process of approval by the Board of Directors on XX month 20XX