

TRAVEL RISK MANAGEMENT POLICY

**FINCANTIERI**

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# TRAVEL RISK MANAGEMENT POLICY

## 1. PURPOSE AND SCOPE

This document provides a systematic reference framework concerning the Travel Risk Management.

Fincantieri undertakes to develop, apply, and disseminate within the company the best practices for identifying, managing and mitigating security risks against its assets and Duty of Care<sup>1</sup> 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, the Company:

- 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 analyse 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 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;
- it promotes the valorisation, 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 behaviour by all employees;

<sup>1</sup> 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”.

- 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 of the Company and those belonging to external companies who work for Fincantieri.

The Chief Executive Officer (CEO), with a statement of intent addressed to all corporate structures, 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), which will be compliant with internationally recognized best practices, and which have been approved by UNI (Italian Standardization Body).

## 2. RECEIVERS

The Policy applies to all persons involved in travel on behalf of Fincantieri Group.

## 3. PRINCIPLES

The principles adopted by Fincantieri as a reference for travel risk management are in line with the provisions of Policy 022-020 “Occupational Health and Safety, Environment and Energy” and Policy 022-022 “Corporate Security”, comply with the guidelines contained in UNI ISO 31030, and 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 Fincantieri 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, Guidelines 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 Policy 022-034 “Travel Risk Management” (also “TRM Policy”);
- the availability of the TRM Policy to all of the stakeholders involved;
- 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.

#### 4. REGULATIONS

Fincantieri Group’s commitment, established first and foremost by the commitments ratified through the *Charter of Sustainability Commitments and by the 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 that, 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 UNI ISO31030, one of the best practices of reference at international level, and with the general principles and guidelines defined by the following Company Policies and Commitments:

- Directive 022-022 “Corporate Security Policy”;
- Enterprise Risk Management Model (ERM) and Internal Control and Risk Management System (“ICRMS”);
- Charter of Sustainability Commitments;
- Sustainability Plan;
- Organizational, Management and Control Model pursuant to Legislative Decree n. 231/2001;
- Policy 022-020 “Health and Safety at Work, Environment and Energy”;
- Policy 022-033 “Human Rights – Commitment for the respect of human rights and diversity”;
- Policy 022-025 “Anti-Corruption”;
- Policy 022-026 “Purchasing”;
- Policy 022-032 “Suppliers’ Code of Ethics”;
- Code of Conduct;
- Listed Companies Corporate Governance.

## 5. ROLES AND RESPONSIBILITIES

Fincantieri, through the International Security (CO-ISY) department belonging to Security Function (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:
  - the determination of the overall risk profile of the organisation 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 organisation, including travellers, such as:
    - risks to personnel, such as trauma and illness, including work-related illness, assault, imprisonment, kidnapping and theft, robbery and death;
    - 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, 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 travellers 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 organisers/coordinators, travellers and HSS assistance providers, duly selected through Due Diligence processes;
  - procedures for the identification, collection and distribution of information useful for safety to travellers and other stakeholders;
  - plans and procedures for the management of medical or security incidents and of possible necessary evacuations.

**d) Define 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. The Policy will be reviewed on a periodic basis, or whenever necessary due to the occurrence of a relevant event.

**f) Guarantee a recording and reporting process:**

develop a comprehensive documentation and reporting process for all data and activities pertaining to travel risk management.

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