

Policy

Against Harassment in the Workplace

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INTRODUCTION

With this Policy, Fincantieri S.p.A. and its Subsidiaries (hereinafter Fincantieri Group) are committed to counter any inappropriate behaviour related to harassment that may affect the health and psychological condition of the victim, creating a hostile working environment. Consequently, any conduct of violence and harassment at work is not accepted as it is contrary to Fincantieri Group's values and commitment.

1. PURPOSE

This Policy, inspired by international and national norms and agreements and the principles of the Code of Conduct, reinforces Fincantieri Group's commitment to upholding an inclusive, fair, participatory and professional working environment, free of any form or type of harassment, sexually inappropriate behaviours and bullying, and to promoting equal treatment and education on inappropriate behaviours.

All members of the corporate administrative and control bodies, all employees, customers and suppliers of Fincantieri Group must commit to respecting these principles and values.

The objective of this Policy is to prevent, prohibit and constantly monitor phenomena attributable to harassment, bullying and sexually inappropriate behaviours, as well as to provide support to individuals (Employees and Third Parties) who report such conducts, protecting them from any retaliation.

This Policy reinforces Fincantieri Group's commitment directed at ensuring a working environment inspired by respect for equal treatment and equal dignity regardless of age, race, colour, nationality, citizenship, political opinion, religious belief, gender, sexual orientation and identity, disability status and membership in any other category protected by law.

Fincantieri Group firmly believes that any harassment, bullying or sexually inappropriate behaviour constitutes a threat to the dignity of the person subjected to it, undermining his or her psycho-physical integrity, job performance and ultimately the reputation of the Group itself.

Furthermore, this Policy also applies to any harassment carried out against employees that occurs off-duty or off-site in circumstances that are work-related in nature (e.g., transfers, corporate retreats, company events, etc.), including conduct that occurs through the use of company devices and related communication channels. Specifically, the latter case refers to harassment perpetrated through electronic means including: telephone, voicemail, text or picture messages, instant messaging programs, or any social media and/or network platform.

2. SCOPE OF APPLICATION

This Policy applies to Fincantieri S.p.A. and the Group's Subsidiaries, directly or indirectly controlled, based in Italy and abroad. This Policy also applies to Third Parties, as defined in paragraph 4, as well as to all Persons who perform work activities in Fincantieri Group, regardless of their contractual status, both as Protected Persons and as persons required to comply with this document in the execution and according to the formulations set forth in the appropriate contractual provisions / statements.

3. REFERENCES

This Policy has been formulated based on the directions contained in the Code of Conduct as an internal reference, as well as in the following external sources:

- Universal Declaration of Human Rights, adopted by the United Nations General Assembly at its third session on 10th December 1948 in Paris by resolution 219077A;
- UN Global Compact and UN Women, Women's Empowerment Principles (and Gender-Based Violence and Harassment at Work Policy Template);
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises;
- International Labour Organisation Convention No. 190 of 2019 on the Elimination of Violence and Harassment in the World of Work, adopted in Geneva on 21st June 2019 at the 108th session of the General Conference of the same Organisation (hereafter "Convention 190");
- Recommendation No. 206 on the elimination of violence and harassment in the workplace;
- Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework;
- European Council Directive 2000/78/EC of 27th November 2000 establishing a general framework for equal treatment in employment and occupation provides that harassment is considered a form of discrimination where unwanted conduct occurs with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, humiliating or offensive environment;
- Directive 2006/54/EC of the European Parliament and of the Council of 5th July 2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation;
- European Framework Agreement of 26th April 2007 - Forms of Harassment and Violence at Work, which provides employers, workers and their representatives with a framework of concrete actions to detect, prevent and manage situations of harassment and violence at the workplace;
- Law No. 202/2002 and subsequent amendments on equal opportunities and between women and men (Romania);
- Law No. 53/2003, the so-called Labour Code (Romania);
- Law No. 286/2009 with reference to the Romanian Criminal Code;
- Government Emergency Ordinance No. 57/2019 concerning the Administrative Code (Romania);
- Government Ordinance No. 137/2000 on the prevention and repression of all forms of discrimination (Romania);
- Government Decision No. 262/2019 for the approval of the Methodological Standards for the implementation of Law No. 202/2002 on equal opportunities and treatment between women and men (Romania);
- Provisions of the Labor Code 2019 (Vietnam).

4. GENERAL DEFINITIONS

Bystander: a person who is present at or informed by a victim of conduct of violence or harassment at work, but does not take part in it, or a person who intervenes in a situation where an act of violence or harassment at work is taking place.

Security event: any intentional or negligent action or event that may cause actual or potential harm to the company's human resources and tangible and intangible assets.

Persons of Fincantieri Group: all employees, collaborators of Fincantieri S.p.A. and Legal Entities on a global scale, as well as members of the corporate administration and control bodies.

Harassed Person: a person towards whom violence or harassment at work is directed.

Protected Persons: this category includes all Persons who perform work activities within Fincantieri Group regardless of their contractual status, Third Parties, persons undergoing training, including trainees and interns, workers with whom the employment relationship has been terminated with respect to episodes occurring during the period in which they worked for the Group, candidates who enter Fincantieri S.p.A. selection process, and any other person who comes into contact with the Persons of Fincantieri Group or Third Parties in the performance of their work activities.

Whistleblower: a person who makes a report regarding conduct or incident of violence or harassment at work.

Third Party / Third Parties: any third party who cooperates or works on behalf of or in the interest of Fincantieri Group, such as customers, suppliers, commercial and industrial partners.

5. COMMITMENT AND GENERAL PRINCIPLES

In the performance of their daily work activities, even when performed remotely with agile work modes (so-called smart working), all Fincantieri Group employees must contribute both to creating and maintaining a working environment characterized by behaviour based on mutual respect and fairness, and to eliminating intimidating, hostile, degrading, humiliating or offensive attitudes.

Persons of Fincantieri people and Third Parties, therefore, have the duty to commit themselves to respecting the rights and dignity of the individual, as well as to maintaining an environment in which harassment, bullying, and sexually inappropriate behaviours are considered totally unacceptable.

Indeed, Fincantieri Group does not tolerate any form / type of harassment, sexually inappropriate behaviour and bullying, as it considers respect for the rights and inviolability of all people to be fundamental.

For this reason, consequently, Fincantieri Group is committed to preventing abuse and harassment by informing, training and raising awareness on the subject among all employees, so that they are able to recognize and report inappropriate behaviours, and by raising awareness among Third Parties as well.

6. DEFINITIONS OF VIOLENCE AND HARASSMENT AT WORK AND PROHIBITED CONDUCTS

Violence and harassment within the scope of this document are violence and harassment at work, understood as violence and harassment occurring against Protected Persons during work activities or circumstances having a work nature.

Such situations can occur in different circumstances and places:

- in the workplace;
- in places designated for breaks or in places where sanitary facilities are used;
- during business travel or trips (including travel or trips for training, events or activities, including those of social nature, related to work);
- as a result of work-related communications, regardless of the mean of communication used;
- on social media;
- within accommodations provided by the employer;
- while commuting to work or returning home.

Violence and harassment refers to any physical, verbal or nonverbal conduct, or the threat to engage in it, whether on occasion or repeatedly, that is intended to, causes, or is likely to result in physical, psychological, or economic harm.

Generally, one is faced with harassment or violence when the following circumstances occur:

- verbal or visual expressions that are abusive, insulting or otherwise marked by unwelcome confidentiality and inconsistent with the nature of the connection with the interlocutor;
- acts of bullying, mobbing, or behaviour such as to cause a constant and permanent negative change in the work situation, likely to affect the right to health (so-called *streaming*), or any other form of psychological manipulation or abuse;
- unwanted physical contact;
- unwanted verbal or non-verbal appreciation;
- inappropriate comments with references to a person's sexuality;
- gestures or proposals of a sexual nature;
- sending inappropriate images and messages via e-mail or instant messaging programs;
- intimidation, threats and blackmail suffered for rejecting behaviour aimed at sexual intercourse;
- assigning the employee degrading or overloading tasks, creating a hostile working environment.

6.1 GENDER-BASED VIOLENCE AND HARASSMENT

Gender-based violence and harassment means violence and harassment (as defined above) perpetrated against persons because of their sex or gender¹, or affecting persons of a specific sex or gender, including sexual harassment.

¹ The term "gender" refers to the set of socially constructed roles, behaviours, activities and attributes that a given society considers appropriate for persons belonging to a particular sex. Gender is to be distinguished from "sex", understood instead as the sex assigned at birth, i.e. the set of physical and biological characteristics that distinguish females, males and intersex persons. Indeed, a person's gender identity (understood as the

Gender-based violence and harassment include, but are not limited to:

- violence perpetrated, in physical and/or psychological form, against a person on grounds of his or her gender, gender identity or sexual orientation, including violence against women and against LGBTQIA+ persons², and persecutory acts (so-called *stalking*);
- the dissemination of intimate images;
- sexual harassment (defined in paragraph 6.2 below) and sexual assault, attempted or actual.

6.2 SEXUAL HARASSMENT

Sexual harassment refers to harassment carried out for reasons related to sex, harassment with a sexual connotation, and sexually inappropriate conducts.

Sexual harassment and sexually inappropriate conducts amount to outright discrimination based on sex and, as such, violate the principle of equal treatment between men and women.

Sexual harassment, in particular, includes any conduct, with sexual connotation (expressed in physical, verbal, or nonverbal form), or the threat to engage in it, whether on a single occasion or repeatedly, that is intended to cause, causes, or may be perceived to cause a violation of the dignity of the Harassed Person or the creation of an intimidating, hostile, degrading, humiliating, or offensive climate.

It is an aggravating circumstance if the sexual harassment is accompanied by implicit or explicit threats, or blackmail by hierarchical superiors or persons who can otherwise influence the establishment, conduct and termination of the employment relationship (so-called *quid pro quo harassment*).

Examples of sexual harassment include, but are not limited to:

- making inappropriate sexual gestures;
- use anecdotes, jokes or stories of a sexual or lewd nature that make the interlocutor uncomfortable;
- expressing evaluations of a person's sexuality or physical attractiveness, or making sexual comments about the person's appearance, clothing or body parts;
- making derogatory or degrading comments about a person's sexual orientation or gender identity, or using insults with a gender/sexual connotation;
- repeatedly contacting a person (e.g., telephone calls or persistent messaging);
- making unwanted sexual advances;
- send sexually suggestive communications in any format, or share or display sexually inappropriate images or videos in any format;
- unwanted touch, including purposely pinching, stroking, rubbing or brushing against another person;
- promising advantages of any kind - personal or business - in exchange for sexual "favours";

subjective experience of perceiving oneself as belonging to a gender) does not necessarily correspond to the sex assigned at birth: when the gender identity does not correspond to the assigned sex, one speaks of trans/transgender people. Sexual orientation refers to the physical, romantic and/or emotional attraction a person feels towards other people, including but not limited to homosexuality, heterosexuality and bisexuality.

² LGBTQIA+ is the acronym for lesbian, gay, bisexual, transgender, queer, intersex, asexual, respectively. The "+" is an inclusive symbol indicating the inclusion of all non-heterosexual orientations and gender identities.

- threatening retaliation or negative consequences of any kind - personal or work-related - where sexual “favours” are not granted.

6.3 BULLISM

Bullying is defined as the repetition of verbal or physical conduct of a threatening, intimidating or humiliating nature, sabotaging or damaging a person’s work performance. Bullying injures personal and professional dignity and creates a hostile working environment.

This includes:

- verbal abuse and provocation;
- oppressive conducts;
- marginalisation;
- humiliation, insults and slanders;
- behaviours that take the form of so-called *mobbing* as they are aggressive, persecutory and carried out in the workplace in order to target and marginalize the person who is the victim;
- physical and verbal aggression.

7. ZERO TOLERANCE POLICY

Fincantieri Group expressly rejects any behaviour that constitutes physical or psychological violence, coercion, harassment (including harassment of a sexual nature however carried out), bullying, or attitudes in any way attributable to mobbing and harassment practices, therefore prohibits without exception all forms of violence and harassment at work within the Company.

In this regard, Fincantieri Group has decided to adopt the so-called *Zero Tolerance Policy* to counter all those behaviours having discriminatory and inappropriate connotations in the workplace.

Fincantieri Group’s *Zero Tolerance Policy* is based on the following general and essential principles:

- The corporate culture of Fincantieri Group is based on respect, professionalism, non-discrimination and equal opportunities.
- Fincantieri Group prohibits the commission of acts of violence or harassment at work, as defined in this document, against Protected Persons. The People of the Group are called upon to respect and promote the principles contained in the *Zero Tolerance Policy*.
- Protected Persons have the right to a workplace free from violence and harassment. The Persons of Fincantieri Group have the responsibility to work together to create a working environment based on respect, to support as much as possible those who report conducts or episodes of violence and harassment, and to cooperate in related investigations. Fincantieri Group’s Management is responsible for promoting a culture of *zero tolerance* of violence and harassment at work and a free working environment. Each manager is responsible for supervising

compliance with this document by his or her employees, spreading its principles, and taking measures to prevent, identify and report potential violations.

- The Group ensures the provision of appropriate reporting channels for the timely handling of reported situations. Protected Persons are encouraged to report incidents / episodes of violence or harassment at work of which they become aware, following the appropriate reporting channels. Such reports should be made in good faith, without fear of retaliation, ensuring that no Whistleblower is discriminated against with effects on working conditions related to the report.
- Protected Persons have the right to privacy and confidentiality. Information reported and revealed during any investigation will remain confidential. This right is closely related to the right to be informed of any danger present in the workplace.
- Committing any act of retaliation or victimization against Whistleblowers, Harassed Persons, Bystanders, witnesses or informers is prohibited.
- Conducts by Persons of Fincantieri Group, including those carried out in the private sphere and therefore outside the working environment, which, following investigation, are determined to fall within the definition of violence and harassment in the workplace or, in any case, conducts that have an impact, even potential, on the serenity of the working environment, in the relationships with colleagues, suppliers or on the image of the Group's Subsidiaries, will be subject to appropriate measures, including, if necessary, disciplinary measures, to ensure the interruption of the conduct and/or the restoration of a serene environment and/or protect the image of the Group, in application of the provisions of law and contractual regulations. All measures and actions will be undertaken considering the protection of the Harassed Person. Contractual remedies will also be taken against Third Parties, as well as all Persons who perform work within Fincantieri Group regardless of contractual status, who violate the provisions of this document applicable to them according to contractual provisions, including suspension, contract termination, prohibition in doing business with Fincantieri Group and claims for damages.

8. PREVENTION PROGRAM

Convention 190 recognizes that violence and harassment at work “*affect a person's psychological, physical and sexual health, dignity, and family and social environment.*” The Convention itself, therefore, requires that, among other measures, hazards be identified and risks related to violence and harassment at work be assessed, and that measures be taken to prevent and control them. These measures should be appropriate and proportionate to the Company's respective level of control, and should include measurable objectives.

For this reason, Fincantieri Group is committed to establishing programs for the prevention of violence and harassment at work, within which dangers and risks, measures and objectives are assessed, in line with applicable internal regulatory instruments.

9. PROMOTING A CULTURE BASED ON RESPECT: TRAINING AND AWARENESS-RAISING

Fincantieri Group guarantees equal employment opportunities within the corporate sector and prohibits discrimination or harassment based on gender. In line with the pursuit of an inclusive culture, all employment decisions, including hiring, promotion and compensation, are based on qualifications, skills and performance.

All Persons of Fincantieri Group are required to be committed to acting within the scope of their professional activities in full compliance with the Codes of Conduct and the values and principles contained therein.

All Persons of Fincantieri Group, therefore, must be informed and trained on the contents of this document and the applicable regulations on the subject, as well as on their shared responsibility to promote a culture based on mutual respect and the dignity of human beings.

To this end, Fincantieri Group ensures that the contents of this document are included in training and information programs that are provided to all its employees.

These include, but are not limited to:

- periodic training for all employees, on rules of conduct to prevent violence and harassment;
- specific training initiatives related to Social Sustainability issues;
- regular training and educational opportunities for employees on topics such as *unconscious bias* and inclusive language, in order to increase awareness and understanding of gender diversity issues and promote alliance and support among all individuals;
- initiatives aimed at increasing awareness on the topic (e.g., workshops on value issues);
- *Health Safety & Environment* (HSE) training programs to the extent relevant;
- communication initiatives related to specific events / occurrences (e.g., International Day for the Elimination of Violence Against Women).

10. REPORTING

It is essential for the protection of people, the working environment and the reputation of Fincantieri Group that all employees, victims and/or witnesses, report any acts of harassment, bullying, retaliatory acts or sexually inappropriate behaviours. Fincantieri Group highlights the importance of reporting such behaviours, supporting any victims or witnesses, and protecting them from retaliatory acts where they make a report.

In the event that an act of harassment, bullying, retaliation or sexually inappropriate behaviour occurs or is attempted, the employee - without prejudice, however, to the possibility of appealing to the competent authorities - is required to report it through the channels provided by the Whistleblowing procedure in force at his or her Group's Company.

It is understood that these reports must concern truthful facts and be formulated in a specific form. The guarantees of confidentiality provided by *Whistleblowing*, in fact, do not determine impunity with respect to untrue reports capable of harming the honour and reputation of the reported person in cases where he or she becomes aware of them.

11. RESPONSIBILITY AND UPDATE

The Parent Company, through Human Resources and Real Estate Department, is responsible for monitoring and controlling the Policy “Against Harassment in the Workplace”.

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.

Policy approved by the Board of Directors on December 17, 2024