



FINCANTIERI

EXCERPT

**MEMORANDUM OF UNDERSTANDING
RELATING TO COLLABORATION RELATIONSHIPS BETWEEN
GUARDIA DI FINANZA AND FINCANTIERI S.P.A.**

The Guardia di Finanza (Italian Finance Police), with registered office in Rome, Viale XXI Aprile no. 51, tax code 80194230589 (hereinafter, also the "Corps"), represented by Commander General, Gen. Army Corps Andrea De Gennaro

and

FINCANTIERI S.p.A. with registered office in Trieste, via Genova 1, fully paid-up share capital Euro 878,268,079.20, Venezia Giulia Company Register number and tax code 00397130584, VAT no. 00629440322 (hereinafter, "Fincantieri"), represented by the Chairman, Mr Biagio Mazzotta

hereinafter referred to jointly as the "Parties":

CONSIDERING

that Fincantieri is interested in contributing towards combatting economic and financial illegality, fraudulent phenomena and money laundering, as well as promoting the utmost legality and transparency in the executive phase of contracts, in observance of EU, Italian and regional regulations on the matter, as well as those on occupational safety and protection;

that the Guardia di Finanza and Fincantieri can better ensure the achievement of the overriding public interest in legality by entering into this memorandum of understanding;

AGREE

to govern, coordinate and develop the above-mentioned collaboration, in implementation of the regulatory framework in force and in compliance with their respective responsibilities and skills, in order to ensure the broader activity of:

- a. prevention from attempts at criminal infiltration into the legal and economic fabric;
- b. strengthening the system for preventing and combatting conduct harmful to public economic and financial interests connected to the execution of works, services and supplies;
- c. combatting clandestine work and the non-payment of social security contributions;
- d. combatting fraud and corruption.



To guarantee this collaboration, Fincantieri:

- a) makes available qualified data and information as well as useful context analyses that can be highly preventive between the Company and the local bodies of the Guardia di Finanza, by institutionalising a collaboration of excellence and strengthening the protection of regularity and transparency in associated sectors;
- b) makes its suppliers and sub-contractors and - through them - also any of their sub-contractors, aware of the existence of this Memorandum;
- c) works to guarantee the acceptance by suppliers and sub-contractors of the principles set forth in this Memorandum, asking them to guarantee such acceptance by any of their own sub-contractors as well.

Rome, 21/03/2025

(Processing of personal data)

1. The processing of personal data carried out as part of the activities performed by virtue of this Memorandum is inspired by respect for the principles of fairness, lawfulness, transparency, necessity, adequacy, pertinence and limitation with respect to purposes, storage and accessibility dictated by Regulation (EU) no. 2016/679, as well as observance of the specific standards and procedural rules set forth in that EU Regulation, Italian Legislative Decree no. 196 of 2003, Italian Legislative Decree no. 101 of 2018, Italian Legislative Decree no. 51 of 2018 and Italian Presidential Decree no. 15 of 2018.
2. The Parties, working as independent data controllers within the scope of their respective responsibilities and for their own purposes, adopt the most appropriate technical and organisational measures to guarantee and demonstrate the compliance of the personal data processing carried out with European and Italian legislation, also for the purpose of respecting the security aspects pursuant to article 32 of Regulation (EU) no. 2016/679 and article 25 of Italian Legislative Decree no. 51 of 2018.