

FINCANTIERI



RELATIONS WITH PUBLIC ADMINISTRATION

- Summary -

FINCANTIERI

CONTENTS

- 1. INTRODUCTION2
- 2. PRINCIPLES2

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 constantly improve 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. PRINCIPLES

This document summarises the principles of conduct and professional ethics that all FINCANTIERI personnel must follow in managing relations and fulfilment of obligations with the Public Administration and Independent Administrative Authorities.

By "Public Administration" we mean national, European or other foreign public institutions, as well as private organisations and bodies that provide public services.

In particular this document shows the principles of conduct that the company personnel has to follow, when performing their duties and specifically authorised, having to deal with or have relations with administrations, public officers, organisations and/or institutions.

FINCANTIERI has always ensured that personnel having relations with the Public Administration conduct themselves in a correct, transparent and traceable way.

FINCANTIERI

FINCANTIERI, in whatever way has to relate to the Public Administration, is bound to comply with the law, the provisions provided for by the Code of Conduct and Organisational, Management and control Model pursuant to Legislative Decree 231/2001 adopted by the company, and the subsequent principles of conduct:

- the fulfilment of obligations to the Public Administration and the provision of the relative documentation must be carried out with the utmost diligence and professionalism so that clear, accurate, complete, faithful and truthful information is provided, avoiding, and in any case reporting, instances of conflicts of interest, following the appropriate procedures and protocols;
- relations with the Public Administration officers must be characterised by uprightness, transparency, cooperation, helpfulness and fully respecting their institutional role, carrying out requests and obligations timely and promptly;
- promising and/or offering goods or advantages to the Public Administration officers for the purpose of influencing their independence of opinion or to lead them to unjustifiably favour the company's products is not permitted;
- all documentation for the Public Administration must be processed timely and in clear, objective and complete language and must be checked and signed by the FINCANTIERI Managers involved or by other personnel with appropriate delegated powers.

If FINCANTIERI employs external professionals (consultancy companies, agents, etc.) in its relations with the Public Administration, their contracts and appointments must include the appropriate declaration of acknowledgement of the Legislative Decree 231/2001 and commitment to respect it.

FINCANTIERI guarantees that any controls requested by the Public Administration will be performed correctly and manages any requests put forward by the Public Administration.

The abovementioned principles must also be respected when dealing with commercial relations with the Public Administration, such as, by way of example, when:

- drafting contracts for the sale of ships to the Italian Navy;
- awarding bids to supply military ships (foreign military market);
- drafting contracts for the sale of products and services.

FINCANTIERI employees are duly bound to keep track of their relations with the Public Administration and to keep the relative documentation, so that the Oversight Board or other corporate and control bodies can monitor the propriety of relations between the parties.

FINCANTIERI will apply its Disciplinary System, if conduct deviates from the principles outlined in this document.