

**POLICY FOR PROTECTING THE DIGNITY OF GROUP COMPANY EMPLOYEES AND
PREVENTION OF DISCRIMINATION, HARASSMENT AND VIOLENCE IN THE
WORKPLACE.**

Contents

- INTRODUCTION AND PURPOSE 2
- APPLICATION 2
- DEFINITIONS 3
 - "Discrimination" 3
 - "Psychological violence" 3
 - "Harassment" 4
 - "Bullying" 4
 - "Sexual harassment" 4
 - "Occupational stalking" 5
- MEASURES REQUIRED FROM GROUP COMPANIES 5
- DISCIPLINARY RESPONSIBILITY 5
- BODIES 6
 - Trusted Adviser 6
 - Trusted Adviser requirements and identification methods 6
 - Board for managing discrimination, harassment and bullying 7
- PROCEDURES FOR DEALING WITH COMPLAINTS OF SEXUAL OR MORAL DISCRIMINATION, VIOLENCE OR HARASSMENT. 7
 - Reporting Procedure 7
 - Determining violations and procedures 8
 - Informal procedure 8
 - Formal procedure 9
 - Formal procedure before the Board 9
 - Safeguard clause 10
 - Confidentiality 10
 - Expenses 10
 - Final rules 10
- CONFIDENTIALITY IN MANAGING COMPLAINTS 10
- FALSE REPORTING 11
- PREVENTION, TRAINING AND INFORMATION 11
- PERSONAL DATA PROCESSING 11
- POLICY DISSEMINATION 11

INTRODUCTION AND PURPOSE

The Faravelli Group strives to maintain the best conditions for well-being by creating a workplace that is inspired by principles of equality and protection of personal freedoms, dignity and inviolability.

Interpersonal conflicts are part of life and may arise in the workplace. Although they are not synonymous with harassment and violation of personal integrity, we know that in certain environments violence is not curbed and takes place because there is a lack of adequate awareness of the concept of violence, and a system for listening, assisting and protecting the victim.

Our goal is to prevent unresolved problems between employees that could lead to behaviours detrimental to the personality, dignity or psychophysical integrity of employees and make the workplace a safe place, where employees can freely express their personality, without fear of discriminatory actions or behaviours that endanger their psychophysical health.

With this Policy¹, the Faravelli Group confirms its commitment to the protection of the personal integrity of its employees, at all hierarchical levels. The group does not allow any form of violence, harassment or discrimination carried out in the company.

This Policy defines the rules that all Group Companies must apply to prevent any discriminatory behaviour and ensure equal conditions for employees regardless of age, ethnicity, social status, political opinion, religious belief, gender, sexual orientation, and disability.

APPLICATION

¹ This Policy refers to the following rules:

- Articles 2, 3, 4, 32, 35, 36 and 37 of the Italian Republic Constitution;
- Resolution of 29 May 1990 on the protection of the dignity of employees at work (OJ no. C/157 of 27 June 1990);
- Commission Recommendation 92/131/EEC of 27 November 1991 on the protection of the dignity of people in the workplace (OJ no. L/49 of 24 February 1992), with the attached code of conduct on measures adopted to combat sexual harassment;
- European Parliament resolution A3-0043/94 of 11 February 1994 on the appointment of a company adviser (OJ no. C 61 of 28 February 1994);
- Directive 2002/73/EC of 23 September 2002 on the principle of equal treatment for those accessing employment, vocational training and promotion, and working conditions (OJ no. L 269/15 of 5 October 2002);
- Commission notification to the Council and the European Parliament of 8 November 2007 presenting the European Framework Agreement on Harassment and Violence at Work;
- European Parliament resolution of 11 September 2018 on measures to prevent and combat harassment and sexual harassment in the workplace, public places and political life in the EU;
- Art. 2087, Italian Civil Code (Protection of working conditions);
- Articles 521, 527, 594, 660, Italian Criminal Code;
- Legislative Decree of 11 April 2006, no. 198 (Equal Opportunities Code under Article 6 of Law of 28 November 2005, no. 246) - Art. 26 and 50 bis (OJ no. 125 of 31 May 2006 - Ordinary Supplement no. 133);
- Code of Ethics, disciplinary measures and committees;
- National Collective Labour Agreement for the commerce sector.

This Policy is issued by Giusto Faravelli S.p.A. and implemented by its subsidiaries. It applies to all employees hired with an employment contract, regardless of their relationship and role, and people who carry out their work within the Group under consultancy, procurement, or partnership contracts.

The principles contained in this Policy apply to all aspects of the employment relationship (selection, recruitment phase, professional growth, compensation etc.).

All Group Companies base employment relationships on employee merit and performance, without being influenced by race, ethnicity, sexual orientation, political opinions, etc. Faravelli Group Company personnel must ensure a working environment where respect for the person's dignity is the basis of interpersonal relations and discrimination (racial or ethnic), violence (physical or mental) and harassment (sexual or moral), is considered unacceptable.

Group Companies must send these regulations to employees, and new hires when the employment relationship is being established.

DEFINITIONS

Under this Policy, the following definitions apply.

"Discrimination"

Discrimination consists of unequal treatment of an individual or group of individuals when they belong to a specific category.

Personal dignity is inviolable, everyone must be respected, protected and treated equally. The equal treatment principle is infringed when a person is treated differently because of their origin, ethnicity, sex, age, language, social position, way of life, religious, philosophical or political beliefs, physical or mental impairment, and such behaviour leads to reputational damage and marginalisation.

Direct discrimination is when a person is treated less favourably than others in situations involving religion, belief, disability, age or sexual orientation.

Indirect discrimination is when an apparently neutral provision, criterion, practice, act, agreement or behaviour may put a person who has a specific religion or ideology, disability, age or sexual orientation at a disadvantage compared to others.

"Psychological violence"

Psychological violence is a form of psychological terror exercised in the workplace, through aggressive and vexatious behaviours repeated by colleagues or superiors.

It is an action repeated over time by one or more abusers, to harm someone systematically and with a specific purpose. The victim is intentionally attacked using strategies that target their psychological, social and professional isolation. Often the result is a decrease of the victim's social relationships, who is forced to isolation and marginalisation.

Harmful conduct carried out publicly or privately constitutes psychological violence and includes:

- harming a person's image, such as offences, intimidation, insults, slander, aggressions, mockery, the dissemination of confidential information, allusions to physical or psychological problems of a person or their family members, subjugation;
- harming an employee's profession, such as threats of dismissal, unjustified transfers, prejudices to career prospects, unjustified removal from entrusted assignments, assigning improper, inadequate, impossible or unnecessary tasks, systematic devaluation of results, hindering work activity, removing assigned tasks, lack or unjustified deprivation of work tools, unjustified expulsion from projects, requesting unjustified extraordinary services, excessive control over performance, repeated and unjustified reminders, unjustified refusals of vacation or leave, etc...;
- harming professional development, marginalising or isolating, unjustified change of duties or colleagues for persecution purposes, limiting the right of expression or communication, arbitrary removal from the workplace, exclusion from parties or office lunches, etc.

“Harassment”

According to the European Agency for Safety and Health at Work, “Harassment consists of repeated and unreasonable conduct directed against an employee or group of employees aimed at persecuting, humiliating, intimidating or threatening the harassed person. Harassment can involve verbal and physical aggression, and more subtle behaviour such as social isolation. Harassment might target the victim's dignity, professional capacity, privacy, physical features, race, gender or sexual orientation.”

“Bullying”

The term bullying describes a series of long-term hostile actions, systematically undertaken in the workplace to destroy a person psychologically and socially with the goal of driving them away from their workplace.

“Sexual harassment”

“Sexual harassment in the workplace” is any sexual or gender-based conduct which is unwanted and offends the person's dignity.

The following are considered examples of sexual harassment:

- explicit or implicit requests for sexual services, provocative or unseemly sexual gestures or winks, unwanted or annoying voluntary physical contact, verbal appreciation of physical appearance or body parts;
- any implicit or explicit promise or act, following refusal of sexual services, such as threats, retaliation, marginalisation, etc., that may affect the establishment, conduct or termination of the employment relationship;
- allusions or comments about sexuality or sexual orientation that harm or are offensive;
- display of pornographic or offensive material in the workplace, including personal computer screen savers;
- writings, verbal expressions, email or telephone messages, telephone calls, etc. that are disparaging and offensive, or referring to sex or a different expression of sexuality. Sexual harassment by people who exploit their position of power is aggravated if it is accompanied by threats or blackmail about their working conditions.

“Occupational stalking”

Occupational stalking is the persecution of an employee in the workplace where the persecuting person (stalker) affects the victim’s daily life habits for reasons arising from the employment relationship. This is an additional bullying strategy to force the victim to resign or dissuade them from exercising their rights.

Occupational stalking takes place through repeated attacks of psychological violence that use warning or disciplinary letters sent when the worker is not on duty, holidays, evening or night hours, through email, certified email, whatsapp, or by sending threatening letters of possible complaints and disciplinary proceedings against the victim, to annoy, create fear, anxiety, harassment to the victim’s family, private life, and force the employee to leave or be absent from the workplace.

MEASURES REQUIRED FROM GROUP COMPANIES

To protect the dignity and well-being of its workers, Group Companies must ensure that employees:

- respect the rights, dignity and worth of others;
- provide support in implementing equal opportunities and non-discrimination;
- protect everyone’s health and safety;
- treat others as themselves;
- create and maintain a working environment that is harmonious and not intimidating, hostile, degrading, humiliating or offensive;
- show impartiality, to ensure that everyone is treated fairly and equally;
- support anyone who claims to have been discriminated against or harassed and are sensitive to the situation, advising them to report the case;
- report any harassment or discrimination of which they become aware;
- keep the received information confidential.

All Group Companies ensure that each worker refrains from:

- engaging in harassment behaviour (intimidation, bullying, abuse, insults, marginalisation, exclusion, stalking and any discriminatory conduct);
- inducing, pressuring or persuading others to discriminate or harass or suggesting an act of discrimination or harassment;
- persecuting a worker who has complained of discrimination or harassment or has taken legal action or provided testimony or information in a discrimination or harassment case;
- participating in or encouraging rumours regarding alleged or actual harassment or discrimination.

DISCIPLINARY RESPONSIBILITY

Violence, harassment and discrimination violate laws and regulations on dignity, health protection and equal treatment. Any direct or indirect harassment, violence or discrimination based on ethnicity, religious belief, personal, political or trade union opinions, age, sex, and disability will not be tolerated by any Group company and be subject to disciplinary action.

Those who don't report harassment cases are equally reprehensible and punishable.

BODIES

To ensure the effective application of this Policy and establish procedures to protect the right to equal opportunities, enhance the well-being of employees and combat discrimination, harassment, sexual harassment, bullying and occupational stalking, the Group identified contact people and bodies in the following paragraphs that help in situations of work dissatisfaction, discrimination, conflict, discomfort and harassment.

Trusted Adviser

The Parent Company Giusto Faravelli S.p.A. appointed a Trusted Adviser. The Adviser operates within this Policy scope and provides assistance to Group Company employees.

The Trusted Adviser, collects requests and complaints, by making personal appointments for:

- qualified listening;
- suggestion to manage difficult situations;
- advice and assistance to Company employees who experience psychological distress related to work;
- advice to the bodies of each Group Company to find the best solution.

The Adviser is the personnel contact in cases of harassment, sexual harassment, discrimination, bullying, stalking or conduct which is detrimental to the person's dignity and freedoms in the workplace. Employees may obtain advice and assistance to resolve any uncomfortable situations.

The Adviser facilitates human and professional relations and establishes the existence of the reported behaviour.

The Adviser performs their duties independently.

The Adviser has the means necessary to carry out their duties, while respecting confidentiality. Group Companies shall not hinder the use of the Trusted Adviser and must prevent any retaliation, including those against possible witnesses.

The Trusted Adviser may ask the Company for external expert assistance.

The Trusted Adviser cooperates with Management in promoting training, information and awareness initiatives.

The Adviser performs the duties assigned by informal and formal reporting procedures.

The Trusted Adviser reports on their work and cases to Giusto Faravelli S.p.A. Management annually.

The Trusted Adviser's mandate may be revoked in cases of serious breaches, omissions, delays or violations of the obligations of impartiality, fairness and confidentiality when performing their duties by a justified decision of Giusto Faravelli S.p.A. Management.

Trusted Adviser requirements and identification methods.

The Trusted Adviser is appointed after a selection based on expertise and interviews among people of undoubted ability, independence, impartiality and confidentiality.

- Priority is given to Group Company employees;
- external consultants can be appointed if they have previous experience as Managers of the Counselling service / Trusted Adviser and meet the professional requirements;

applicants must have a social-health or psychological or labour law bachelor's degree, and have proven skills, experience and abilities in the field.

The Trusted Adviser is appointed by the Giusto Faravelli S.p.A. Board of Directors, their mandate lasts for three years and can be renewed using the same procedure specified above. The Adviser may be replaced before the end of the term of office only if there are justified reasons (including failure to meet the requirements) that prevent the mandate continuation.

In cases of resignation or other reasons that do not allow the continuation of the mandate, or the Trusted Adviser loses the necessary requirements, a new selection will be made within 30 days from office termination.

The Trusted Adviser performs their duties independently and during service hours in the Group Company premises. The Company will provide any necessary support in performing their tasks. The Trusted Adviser duties are part of the designated person's workload. Unless otherwise provided for in the decentralised bargaining, there are no additional fees for the assignment.

Board for managing discrimination, harassment and bullying

The Board for managing discrimination, harassment and bullying, hereafter referred to as the Board, comprises the following:

- a. Chairman of the Board of Directors of Giusto Faravelli S.p.A. or their delegate, acting as Chairman;
- b. Chairman of the Board of Directors of the Group company to which the employee belongs, if different from Giusto Faravelli S.p.A.;
- c. Trusted Adviser, acting as secretary;
- d. Head of Human Resources of Giusto Faravelli S.p.A. or their delegate;
- e. Manager of the employee's assignment Office or their delegate;
- f. national trade union representative or a representative of the Unitary Trade Union Representative Body (RSU), chosen by the employee;
- g. occupational physician responsible for the workplace;
- h. Prevention and Protection Service Manager.

The parties must not be personally involved in the case, including any kinship within the fourth degree to the spouse or cohabiting partner of those responsible for or who have suffered the unlawful conduct.

PROCEDURES FOR DEALING WITH COMPLAINTS OF SEXUAL OR MORAL DISCRIMINATION, VIOLENCE OR HARASSMENT.

The following procedure applies to Group Companies for reporting any harmful conduct.

Reporting Procedure

Employees who believe they have suffered acts or conduct that, allegedly, may constitute cases of discrimination, harassment or bullying, under this Code, may use the informal or formal procedure under the following articles. This is without prejudice to any other form of judicial protection.

Maximum data confidentiality and protection from any retaliatory conduct is guaranteed.

Each Group company must prevent any direct or indirect retaliation against those who report cases of discrimination, harassment or bullying, including third parties or witnesses.

Determining violations and procedures

Without prejudice to civil and criminal protection within the legal terms, anyone who has been the subject of harassment, psychological violence, bullying, sexual harassment or discrimination can contact the Trusted Adviser to resolve the situation by initiating the informal or formal procedure. These procedures are managed by the Giusto Faravelli S.p.A. Trusted Adviser.

The Trusted Adviser must initiate the procedure no later than 30 days after the fact was reported.

Maximum confidentiality is guaranteed throughout the formal or informal procedure.

The person accused of harassment, sexual harassment, discrimination, bullying or stalking can request assistance under the disciplinary procedure.

Informal procedure

If an employee believes they have suffered acts or behaviour that, allegedly, may constitute cases of discrimination, harassment or bullying under this Policy, they may contact the Trusted Adviser to analyse the situation, facilitate its overcoming and restore a peaceful working environment. The employee who intends to use the informal procedure can address their verbal or written request to the Trusted Adviser. **This can be done by using the "inclusiveness" channel, specifying that it is "Informal Reporting."** The complaints transmitted using the "Inclusiveness" channel are consulted exclusively by the Trusted Adviser and require the assignment of a unique identification code for the complaint. This allows the display of the complaint status and communication with the Trusted Adviser.

Once the complaint is obtained, the Trusted Adviser:

- confidentially acquires the elements and information necessary to prepare a preliminary investigation;
- examines the case by providing the interested party with any useful information on the seriousness of the facts, possible protections, including legal;
- Once the complaint's legitimacy is verified, and with the consent of the interested party, the Adviser:
 - o takes initiatives to resolve the problem;
 - o requires the opinion of the occupational physician and internal employees or bodies with which the Company has stipulated agreements on the subject;
 - o receives the parties involved and, with their consent, assesses if it is the case for a direct interaction with the Adviser present;
 - o invites the alleged perpetrator of the harassing behaviour to an interview and collects testimonies, accesses administrative documents, arranges a meeting between the injured party and the alleged perpetrator to resolve the case.

During the interview, the Trusted Adviser warns participants that, if the undesirable behaviour continues, the injured party could request the initiation of the formal procedure under the following article.

The Trusted Adviser shall draw up minutes of this meeting. This is signed by the parties, who will receive a copy. Management receives the original and keeps the archive for the procedures specified in this Policy. At the end of the procedure, to be completed within 30 days from the date of the written request, the Trusted

Adviser will send their conclusions in writing to the parties involved, including the most appropriate actions for resolving the case.

If the informal procedure fails or is impossible, the Trusted Adviser informs the interested party about other available options to find the most appropriate solution.

Giusto Faravelli S.p.A. Management provides the necessary tools and cooperation to the Trusted Adviser.

If the informal reporting was sent using the Inclusiveness Channel, the Trusted Adviser's notifications will be sent using this channel.

The interested party may waive the procedure by sending a written request or ask to initiate a formal procedure.

Formal procedure

If the person subject to harmful conduct such as discrimination, harassment, violence or bullying, considers attempts at informal resolution to be ineffective, or if the undesirable conduct continues after these attempts, they may initiate the formal procedure.

The employee who intends to use the formal procedure submits a request to the Trusted Adviser. The request must be submitted by notification sent using the "Inclusiveness" channel specifying that it is "Formal Reporting." The channel issues a delivery receipt containing date and unique complaint code through which the complainant can check the procedure progress and talk to the Trusted Adviser.

Complaints received using the "inclusiveness" channel are received by the Trusted Adviser and forwarded to Management, which sends the documents to the Board, without prejudice to any other form of legal protection.

Under the Equal Opportunities Code - (Legislative Decree no. 198/2006), Giusto Faravelli S.p.A. Management, during the disciplinary procedure, after consulting the alleged victim of bullying, harassment or discrimination, adopts the organisational, regulatory and contractual measures, deemed useful to halt the harmful behaviour, resolve the case and restore a peaceful working environment.

Each initiative must be taken quickly, and the formal procedure must be defined within 60 days from the request submission. The injured party may withdraw the complaint by written request at any time.

Formal procedure before the Board

The Board shall meet at the Secretary's request within 10 days from the complaint receipt.

After verifying that its composition is compliant, the Board will examine the request at the first meeting.

The Board shall examine the request and any attached documentation submitted by the interested party and instruct the Trusted Adviser to carry out the relevant investigation.

At the end of the investigation, the Board assesses the information and documentation collected by the Trusted Adviser, conducts hearings and, with the parties' consent, organises a meeting for a direct interaction. This meeting is mandatory if requested by both parties.

The Adviser shall conduct the investigation within 20 days of the first Board meeting.

The Board identifies the measures under applicable legal, regulatory and contractual provisions for case resolution within 20 days from the date of acquisition of the investigation submitted by the Adviser and suggests these measures to the relevant Governing Bodies.

The examination and verification of these sensitive reports will be carried out under confidentiality obligations.

Safeguard clause

During the informal or formal procedures under the previous paragraphs, without prejudice to proceedings for which mandatory deadlines must be met, the adoption and enforceability of any measure against the applicant attributable to the dispute is normally suspended, unless the measure is countersigned for acceptance by the applicant.

Any retaliation against anyone who reports conduct under this Policy is prohibited. Similar guarantees apply to witnesses. Any case of direct or indirect retaliation can be assessed for disciplinary actions.

Confidentiality

All parties involved in processing cases under this Policy or who have become aware of them, must comply with applicable personal data confidentiality protection provisions.

Expenses

The Trusted Adviser and Board duties and tasks are carried out free of charge, no direct or indirect compensation or reimbursement is provided.

Final rules

This Policy implements applicable national and EU legislation governing equal opportunities, organisational well-being, discrimination, harassment and bullying in the workplace.

This Policy and its amendments will be published **on the company intranet** to ensure the maximum dissemination to Faravelli Group employees.

CONFIDENTIALITY IN MANAGING COMPLAINTS

Each Group company must ensure that the parties involved, in any capacity, at every stage of the procedure operate confidentially while maintaining the secrecy of facts and information they become aware of when managing the case.

Any obligation to testify in the relevant civil or criminal courts remains unchanged.

Those who receive the harassment complaint, manage the disciplinary procedure, are directly and indirectly involved, and give testimony, must refrain from disclosing information to those uninvolved and must respect the privacy of parties and confidentiality of the events. If there are breaches of confidentiality, disciplinary action will be taken.

FALSE REPORTING

Those who make false reporting are subject to disciplinary measures.

False accusations will not be tolerated and give rise to disciplinary liability.

If the complaint proves unfounded, Management may take actions to restore the accused person's position.

PREVENTION, TRAINING AND INFORMATION

Each Group Company must:

- identify and remove the possible causes of misconduct, if the Occupational Physician reports working conditions, organisational and managerial factors that may be a source of occupational stress or give rise to persecution or violence;
- Monitor the effective implementation of this Policy, providing for any additions or changes;
- disseminate an organisational culture aware of the seriousness of discrimination and harassment and the individual and social consequences of such conduct;
- promote cohesion and harmony among employees, through knowledge of interpersonal roles and dynamics within offices, encourage the recovery of motivation and attachment to the working environment by personnel.

Each Group Company shall send this Policy to employees and verify that the reporting procedures are known and understood. Employees must be informed clearly including through training and information sessions about the following:

- channels for sending internal complaints;
- addresses for sending complaints;
- bodies responsible for examining and assessing the complaint and those who will identify methods for resolving the problem;
- the need for a concise but precise description of the discrimination or harassment, alleged victim's name and address;
- the right to report any conduct to the legal authority.

PERSONAL DATA PROCESSING

The data will be processed exclusively for the purposes specified in this Procedure under Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016, and Legislative Decree of 30 June 2003 no. 196, as amended by Legislative Decree 10 August 2018, no. 101, as per [privacy policy under 13 and 14 of European Regulation 679/16 which is attached to this Policy.](#)

POLICY DISSEMINATION

Group Company personnel must comply with this Policy which is sent to them when they are recruited.