

ANTI-HARASSMENT POLICY

ADOPTED BY THE BOARD OF DIRECTORS OF MAIRE S.P.A.

ON NOVEMBER 25th, 2024



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The MAIRE group operates in an international and multicultural environment and is committed to cultivating and maintaining a respectful work environment across all levels and geographical areas of operation. The Group strives to ensure that all individuals feel valued, respected, and empowered to contribute their unique talents to MAIRE's activities. Therefore, the MAIRE group is dedicated to providing and protecting a healthy, transparent, open, and inclusive workplace for all. This commitment includes ensuring the workplace is free from any form of violence, harassment, and discrimination, always upholding the dignity of every individual.

The protection of physical safety, health, and well-being in the workplace, along with respect for human rights and the promotion of diversity, equity, and inclusion, are paramount. These principles represent the ethical values that guide MAIRE's strategies, choices, and daily actions.

The MAIRE group **rejects and condemns all forms of violence, harassment and discrimination** related to gender, culture, nationality, age, political opinions, religion, sexual orientation, gender identity, and psycho-physical or socio-economic conditions.

With this Policy, the MAIRE group establishes the principles and rules to be followed to prevent and combat all forms of violence, harassment, and discrimination occurring in the workplace. This encompasses conduct that occurs at work, in connection with work, or arises from work.

The MAIRE group will take appropriate action to address any conduct by Recipients that violates the principles of this Policy. This includes addressing conduct identified through reports or internal verification activities.

This Policy is an integral component of the MAIRE group's Document Management System, aligning with the principles and values enshrined in key documents such as the Code of Ethics, the 231 Model (where applicable), the Human Rights Policy, HSE&SA Policy, Human Resources Policy, Sustainability Policy, and the Diversity, Equity and Inclusion Policy. Furthermore, this Policy adheres to internationally recognized regulations¹ and standards, as well as local regulations.

¹ By way of example and not limited to:

- C190 Violence and Harassment Convention, 2019 (No. 190);
- R206 - Violence and Harassment Recommendation, 2019 (No. 206);
- United Nations Global Compact ("UNGC") Guiding Principles on Human Rights and Labour;
- Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (UE) 2023/285.



1. DEFINITIONS

- **Code of Ethics:** Group Code of Ethics in force pro tempore, represents the set of conduct values, principles and guidelines that inspire the entire operations of the Group, adopted by the Board of Directors of MAIRE and the Group Companies
- **ITALIAN LEGISLATIVE DECREE 231/2001:** Italian Legislative Decree no. 231 of 8 June 2001, concerning containing the “Regulations governing the administrative liability of legal persons, companies and unincorporated associations, in accordance with Article 11, Law 300 of 29 September 2000” as amended and supplemented.
- **Recipients:** members of the corporate bodies, supervisory bodies, Personnel and Third Parties (as defined below).
- **Discrimination:** the act of treating one person less favourably than another based characteristics such as gender, culture, nationality, age, political opinions, religion, sexual and affective orientation, physical-mental and socio-economic conditions.
- **"Group" or "MAIRE group":** MAIRE S.p.A. and the companies of the MAIRE group (as defined below).
- **Harassment:** any form of violence, harassment and discrimination (as defined in this *Policy*).
- **Workplace:** (a) the places where the work activity is carried out, including public and private spaces and digital environments, when used as a workplace; (b) designated areas for rest breaks or meal, restrooms or changing rooms; (c) public and private transport used to travel to and from workplaces and/or any destination related to the work/training activity; (d) accommodation and any facilities used for work purposes.
- **MAIRE:** MAIRE S.p.A. with registered offices in Rome, via Castello della Magliana 27, registered in the company register of Rome with the registration number and tax code 07673571001, VAT no. 07673571001.
- **231 Model:** this Organisation, Management and Control Model adopted in accordance with art. 6, paragraph 1, letter a) of Italian Legislative Decree 231/2001.



- **Supervisory Body or SB:** the organism with independent powers of supervision and control, which is entrusted by the Company with the responsibility for supervising the operation of and compliance with the Model, as well as its updating.
- **Group policies:** the Human Rights Policy, the HSE&SA Policy, the Human Resources Policy, the Sustainability Policy, the Diversity, Equity and Inclusion Policy.
- **Personnel:** employees, trainees, contract workers, and individuals who currently work or have previously worked for a MAIRE Group Company, including trainees, interns, and volunteers.
- **Local policies:** policies adopted by individual MAIRE Group Companies to ensure compliance with local regulations.
- **"Whistleblowing" procedure:** procedure that governs the process for submitting, receiving, investigating, and resolving reports of alleged violations of the Code of Ethics, 231 Model, Legislative Decree No. 231/2001, applicable laws, and the MAIRE group's Document Management System (as defined herein).
- **Report:** Any communication received concerning conducts of violence, harassment, and/or discrimination in the Workplace. The MAIRE group has established specific reporting channels, ensuring maximum confidentiality in their management. This confidentiality covers the identity of the reporter, the person mentioned or involved in the report, as well as all content contained in the report. It also extends to the content of the report and any related documentation.
- **Document Management System:** set of procedures and standards designed to effectively manage the company's processes, ensuring consistent and compliant conduct across the MAIRE group.
- **Sister Company:** the companies directly controlled by MAIRE S.p.A.
- **Group Company or MAIRE Group Company:** any company directly or indirectly controlled by MAIRE.
- **Third parties:** include, but are not limited to, suppliers, contractors, consultants, clients, business partners, and who act in the name of and on behalf of MAIRE or the



Group Companies, as well as all other subjects who in one way or another come into contact with these.

- **Violence and harassment:** violence and harassment encompass any act, behaviour, or threat—whether occurring once or repeatedly—that aims to, causes, or is likely to cause physical, psychological, sexual, or economic harm to an individual. Violence and harassment can take any form: physical, visual (e.g., derogatory posters, drawings, pictures, or videos displayed in the Workplace), verbal or written (including any work communication viewable by others, regardless of delivery method or information and communication technologies used), sexual, psychological, or bullying and insults.

Gender-based violence and harassment is a subset of violence and harassment, specifically encompassing forms perpetrated against individuals because of their gender, including sexual harassment.

Violence and harassment may or may not be related to discrimination, as defined above.

2. SCOPE OF APPLICATION

This Policy applies to all **Recipients** and each Group Company regarding situations occurring at work, in connection with work, or arising from work.

All Group Companies are required to adopt this Policy through a resolution of the Board of Directors (or equivalent administrative body) and to enforce its contents.

In any country where local regulations necessitate specific policies, the MAIRE group will ensure that those policies contain principles and rules no less stringent than those outlined in this Policy.

3. REFERENCE PRINCIPLES

Prohibition of Violence, Harassment and Discrimination in the Workplace and Zero-Tolerance Culture

The MAIRE group promotes a zero-tolerance culture, categorically rejecting and condemning all forms of violence, harassment, and discrimination in the workplace. This encompasses discrimination based on gender, culture, nationality, age, political opinions, religion, sexual orientation, gender identity, physical or mental abilities, socio-economic conditions, or any other characteristic.



MAIRE reserves the right to take action against any proven conduct of violence, harassment, or discrimination that affects its relationships with Group Companies.

Prevention and Support Measures

The MAIRE group is dedicated to preventing violence, harassment, and discrimination in the Workplace and takes proactive measures to achieve this.

MAIRE condemns and actively addresses all conduct of violence, harassment, and discrimination in the Workplace. The Group is committed to supporting victims of such conducts by taking appropriate measures to ensure their immediate cessation. In particular, the MAIRE group:

- promotes an inclusive culture through training, awareness initiatives, and the implementation of company policies that ensure respect for human rights and promote the health and well-being of employees and the communities in which it operates;
- provides accessible reporting channels for Recipients to report any instances of violence, harassment, or discrimination;
- ensures prompt intervention in response to reports of violence, harassment, or discrimination by conducting thorough and impartial investigations, while maintaining confidentiality;
- protects individuals who report episodes of violence, harassment, or discrimination from any form of retaliation.

Confidentiality

The MAIRE group prioritizes confidentiality for all individuals involved in episodes of violence, harassment, or discrimination. All Reports are handled with the utmost confidentiality on the identity of the reporter and the person mentioned or involved in the report, as well as all content contained in the report and the relative documents.

The processing of personal data adheres to the General Data Protection Regulation (GDPR) (EU) 2016/679, the MAIRE group Privacy Guidelines, and all other applicable data protection laws and regulations in the countries where the Group operates.

Prohibition of Retaliation

The MAIRE group strictly prohibits retaliation or discrimination against individuals who, in good faith, report conducts of violence, harassment, or discrimination. Any form of retaliation will result in a disciplinary sanction.



Sanctions

The MAIRE group will take disciplinary sanction against any Recipient found to have engaged in violence, harassment, or discrimination, or violated any principles of this Policy. This includes behaviour identified through reports or internal investigations.

4. APPLICATION MODES

4.1 Prevention and Training

The MAIRE group is committed to taking all necessary measures to prevent any form of violence, harassment, and discrimination in the Workplace.

As part of this commitment, the MAIRE group emphasizes the dissemination of the principles and rules outlined in this Policy, the Code of Ethics, 231 Model (where applicable), Group Policies, and the Document Management System. The MAIRE group ensures that all Recipients are informed about the risks of violence, harassment, and discrimination in the Workplace, as well as the relevant prevention and support measures in place.

This Policy is disseminated through internal and external communication channels, including the Group intranet and the websites of MAIRE and Group Companies.

Furthermore, the MAIRE group incorporates the contents of this Policy into its regular training and information programs provided to all Personnel.

4.2 Reporting and Support Measures

The MAIRE group is committed to supporting Recipients who are victims or witnesses of violence, harassment, or discrimination in the Workplace, recognizing that such episodes can impact work performance, personal well-being, and relationships.

Recipients who experience or witness violence, harassment, or discrimination are encouraged to report these episodes through the following channels established by the MAIRE group:

1. reporting channels outlined to in the Whistleblowing Procedure, such as:
 - the whistleblowing platform (available at <https://whistleblowing.mairetecnimont.com>);
 - by the ordinary mailbox that can be used by writing to *Group Corporate Affairs, Governance, Ethics & Compliance* of MAIRE, Via Gaetano De Castillia 6/A, 20124, Milan (Italy);
 - if appointed, to the Supervisory Board of the MAIRE Group Company to which



- the Report refers, at the address of its registered office;
2. reporting channels provided under the SA8000 Corporate Social Responsibility Management System for certified MAIRE Group Companies, such as:
 - the SA8000 Form available on the MAIRE *website* at [Social Accountability and Human Rights | Maire](#) and on the Group's intranet, in the "HSE & SA8000" section;
 - physical Report Box located at the premises and worksites, by submitting a verbal or written (via *e-mail*) report to the SA8000 Management System contact persons and SA8000 Workers' Representatives;
 3. a verbal or written report (by *e-mail*):
 - *to the Line Manager*;
 - the Function responsible for human resources;
 - the designated individual or body responsible for managing such reports, as outlined in Local Policies (if applicable);
 - the designated competent/responsible doctor;
 - the *Group Security Vice President*,
 - Group Corporate Affairs, Governance, Ethics & Compliance Vice President.

Any individual who receives a report through the channels outlined in points 2 and 3, or through any other means, must immediately inform the Group Corporate Affairs, Governance, Ethics & Compliance Vice President.

A dedicated Working Group manages all reports. This group comprises:

- individuals responsible for handling Reports as defined in the Group "Whistleblowing" Procedure: the Group Corporate Affairs, Governance, Ethics & Compliance Vice President; the Chairman of the Supervisory Board of the relevant Group Company; the Head of the Group Internal Audit Function; the Group Human Resources, ICT, Organization & Procurement Senior Vice President; the Group General Counsel; the Group Compliance, Ethics, Diversity & Inclusion Head of Department; and, if applicable, the Chairman of the Supervisory Board of the Sister Company controlling the relevant Group Company;
- *Group Security Vice President*;
- *Group HSE&SA and Project Quality Vice President*;
- the Head of Human Resources for the Group Company involved in the report. Additionally, any individual or body designated by Local Policies to manage such reports may also be included.

The Working Group manages the Report promptly, adhering to the principles of this Policy and the Group Whistleblowing Procedure. When faced with imminent danger to life, health, or safety, the Working Group ensures the Recipients the adoption of immediate precautionary



measures, such as suspension of work activities, and informs both the Chairman and Managing Director of MAIRE and the Chairman of the relevant company or companies.

The department responsible for human resources management may grant affected Staff members who are victims of Workplace violence, harassment, and/or discrimination time off, leave, or flexible working arrangements, in accordance with applicable national labour contracts and local regulations.

Throughout this process, the management process of the Reports ensures equal protection for both the reporter and the reported person.

Therefore, reports must be accurate, detailing the facts, events, or circumstances that constitute the alleged violence, harassment, and/or discrimination. Reports with the sole purpose of denigration or defamation of the reported person are not allowed.

Making a report with the knowledge that the alleged conduct does not constitute violence, harassment, and/or discrimination is a conduct subject to sanctions.

The MAIRE team conducts its investigation of received reports independently from any investigations carried out by competent authorities. Individuals who witness or experience violence, harassment, and/or discrimination always retain the right to report these episodes to the appropriate authorities.

4.3 Sanctions

If, following an internal investigation, a breach of this Policy is confirmed, the MAIRE group will promptly enact disciplinary measures and corrective actions. These sanctions will be appropriate and proportionate to the severity of the violation.

Any confirmed instance of violence, harassment, or discrimination by a staff member constitutes a breach of contract. This may result in disciplinary sanction, with the severity of the consequences reflecting the nature and gravity of the offence.

In the most serious cases, confirmed conducts of violence, harassment, or discrimination may lead to termination of employment or collaboration. This will be carried out in accordance with legal and contractual procedures. This does not preclude MAIRE and its Group Companies from seeking compensation for any damages incurred.

The Human Resources department of the Group Company where the individual(s) responsible for the violence, harassment, or discrimination work will determine the appropriate disciplinary sanctions. This determination will be made in coordination with the Working Group.



If any member of the corporate bodies, supervisory bodies or Third parties is found to have engaged in violence, harassment, or discrimination, contractual remedies will be pursued. These remedies may include, but are not limited to, revocation of mandate, suspension, or termination of the contract. The Group Corporate Affairs, Governance, Ethics & Compliance Function of MAIRE, in conjunction with the Group Human Resources, ICT, Organisation & Procurement department and the Group General Counsel of MAIRE (as well as any other relevant Group Company Functions), is responsible for evaluating and determining appropriate sanctions.

4.4 Monitoring

The MAIRE group maintains ongoing monitoring of any internal cases of confirmed violence, harassment, and/or discrimination. This is done to ensure a work environment free from all forms of discrimination, violence, and harassment, and to enable the Group to take specific, appropriate sanction when necessary.