

## ANTI-COUNTERFEIT POLICY

The organization of Fincantieri NexTech S.p.A. considered as necessary the constant integration and monitoring in its Integrated Management System for Quality, Safety and Health at Work, Environment and Information Security, the aspects strictly related to the authenticity of the products and the protection from counterfeit parts for long-term maintenance of levels of reliability, sustainability, profitability, competitiveness and customer satisfaction.

In this perspective, the principles adopted are the following:

- Compliance with current anti-counterfeiting regulations;
- The development of policies and guidelines to effectively combat the use of counterfeit parts in its production cycle and in that of its suppliers;
- The satisfaction of the expectations of the interested parties and the formal obligations undersigned by the Company, as a fundamental prerequisite for the creation of value;

In order to achieve these objectives, the Management undertakes to:

- Identify the strengths and weaknesses of the organization in order to eliminate the dangers and reduce the risks deriving from the use of counterfeit parts;
- Train, raise awareness and ensure continuous updating of its corporate resources;
- Optimize the management of incoming products for the identification of "Suspicious" parts / products;
- Ensuring information and training activities for the staff of supplier companies in order to analyze the risks and all aspects that may have specific effects on the economy and on the satisfaction of its customers;
- Disseminate its policy to all functions of the organization, its customers and its suppliers and contractors;

In order to implement the policy and to achieve the results expected by FINCANTIERI NEXTECH, each supplier must:

- Engage in the confidentiality of the data transmitted. The drawings, models or specifications sent by FINCANTIERI NEXTECH S.p.A, must not be copied by the supplier or transmitted to other people and used by him for purposes other than those inherent to the supply of the product;
- Establish and maintain a process of prevention from any counterfeiting of parts or materials and ensure that in no case counterfeit components are delivered to the buyer. To this end, it must develop solid procedures and implement training sessions for personnel to guarantee the Customer;
- It must absolutely not modify parts / components made to design for which FINCANTIERI NEXTECH has provided the relative specifications;
- Ensure that the supply is free of Counterfeit or Suspected Counterfeit parts;
- Purchase the parts directly from the original manufacturer or its official / authorized distributors, requesting a declaration as an Original Manufacturer
- Inform FINCANTIERI NEXTECH in advance about the use of suspicious parts or changes to specifications / drawings.
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It will be the responsibility of Fincantieri Nextech to request objective evidence of the application of the above and its effectiveness.

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**CEO**

Gianfranco Roati

**FINCANTIERI NEXTECH S.p.A.**  
con socio unico

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