

ANTI-BRIBERY POLICY

Corruption indicates, in a generic sense, a process of degeneration and decomposition, and more specifically the conduct of a person who induces someone, in exchange for money or other benefits and / or advantages, to act against their duties and obligations.

The Top Management of FINCANTIERI NEXTECH SPA is firmly convinced that its commitment to the prevention of Corruption, in the terms described in the documentation of the integrated management system, can influence its contractual relations thus ensuring a progressive dissemination of ethical principles and values to an ever wider sphere of stakeholders.

Aware of the negative effects of corrupt practices on the economic and social development in the area in which it operates, it adopts a firm and absolutely forbidden approach to any form of corruption.

The prevention of corrupt practices therefore represents, in addition to being a legal obligation, one of the principles underlying the actions of FINCANTIERI NEXTECH S.P.A.

As a concrete implementation of its commitment in this area, FINCANTIERI NEXTECH S.P.A., in addition to this policy, adopts:

- a Code of Ethics that defines the values and principles to which FINCANTIERI NEXTECH S.P.A. is inspired, and undertakes to respect, in pursuing its mission;
- a Management System for the Prevention of Corruption according to the UNI ISO 37001 Standard;
- the Organization and Management Model pursuant to Italian Legislative Decree 231/2001;

FINCANTIERI NEXTECH S.P.A. therefore pursues any corruptive behavior, requires compliance with the law and undertakes to adopt and enforce the Management System for the Prevention of Corruption, also in order to increase the awareness of all interested parties on the rules and behaviors that must be observed .

FINCANTIERI NEXTECH S.P.A. aims to imprint correctness, fairness, integrity, loyalty and professional rigor in operations, behaviors and the way of working both in internal relations and in relations with external parties, placing full compliance with the law at the center of attention as well as compliance with company procedures.

All staff, in carrying out their activities, as described also in terms of assignments, delegations and responsibilities in the explanatory job descriptions of the organization chart, must adhere to the principles of transparency, clarity, correctness, integrity and fairness; in business relationships, conduct and practices that may even appear illegal or collusive, payments that may appear illicit, favoritism, direct or indirect solicitation of personal and career advantages for oneself or for others are prohibited.

Managers and owners of processes / activities at all levels are also responsible for the correct application and compliance with the requirements, required by the management system for the prevention of corruption, for the functions, areas and departments within their competence.

The area managers and senior management then respond overall to the application and compliance with the requirements of the management system for the prevention of corruption that pertain to their role in the organization.

FINCANTIERI NEXTECH S.P.A. undertakes to continuously improve its Management System for the Prevention of Corruption and guarantees authority (defined through the responsibilities attributed to the function and made known to all company personnel) and independence (guaranteed by non-involvement in

FINCANTIERI NEXTECH S.p.A.
con socio unico

Sede legale

Via Carlo Ottavio Cornaggia, 10
20123 Milano (MI)

Sede operativa

Via Trieste, 3
19020 Follo (SP)
Tel. +39.0187.980965
Fax +39.0187.981251

Sede commerciale

Via Sicilia, 137 - 00187 Roma (RM)
Tel. +39.06.97614061
Fax +39.06.97252020
commerciale@insis.it
segreteria@insis.it

Cap. Soc. € 10.791.563,00 i.v.
R.E.A. MI - 2073993
C.F. e P.IVA - 00890740111
PEC: insis@pec.insis.it
insis.it

the activities identified at corruption risk) of the Compliance Function for the prevention of corruption.

Those who work in the name and on behalf of FINCANTIERI NEXTECH SPA, are aware of incurring, in the event of corruption and violation of the Law on corruption, in offenses that can be sanctioned not only on a criminal and administrative level, but also on a disciplinary level corporate. FINCANTIERI NEXTECH S.P.A. therefore requires its "Business Partners" to comply with the laws in force, the ethical codes of the companies and this Policy, on the basis of clauses whose non-compliance implies the termination of the contract.

FINCANTIERI NEXTECH SPA, considering the reporting tool to be effective in combating corruption, encourages reports of alleged corruption through a "whistleblowing" procedure which governs the management and verification of reports, to guarantee the confidentiality of the content of the reports, the identity of the whistleblower and the reported person and to protect the whistleblower from any discrimination or retaliation.

This area includes the express provision (referred to, where appropriate also in the contracts, in the procedures) by FINCANTIERI NEXTECH S.P.A. the prohibition of retaliation, and the corresponding right not to be subjected to it, for those who make reports, within the terms indicated by the reference standard.

"Corruption is a crime based on calculation, not on passion. People tend to bribe or be bribed when the risks are low, the fines and punishments minimal, and the rewards great "
Robert Klitgaard, corruption expert

The Management gives the maximum dissemination of this Policy, ensuring that it is understood and implemented by all employees; for this purpose it will be made available on the company website.

Milano, 10.11.2020

Fincantieri NexTech S.p.A.