



Positive Work Environment & Anti-Harassment



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1. Overview

Coesia, as an equal opportunity employer, is committed to providing and maintaining a work environment free of discrimination and/or harassment.

Coesia considers respect for people, their intrinsic value and dignity as a key principle of its action. Coesia acknowledges every individual who engages with its Companies and thus plays a part in building the history and future of the Group.

Coesia acknowledges the value of dignity, diversity and the rights of all persons, and guarantees equal opportunities and treatment to all employees, condemning any form of prejudice, discrimination, abuse, mobbing or harassment.

Coesia aims to maintain a healthy, respectful and responsible workplace that attracts and develops people regardless of their national origin, language, citizenship, ethnicity, skin color, race, gender, gender identity or gender fluidity, gender reassignment, sexual orientation, age, professional position, religious, political or personal beliefs, union activity or involvement, physical or health condition, disabilities, marital status, pregnancy and maternity, cultural or social backgrounds, respecting and valuing individual differences.

In keeping with this commitment, Coesia will not tolerate any kind of discrimination or harassment in its workplaces whether on or off work premises.

2. Scope

This policy applies to all employees, applicants for employment, contractors, subcontractors, consultants, commercial intermediaries, agents, representatives, suppliers, business partners, and anyone who performs services for or on behalf of Coesia. In the remainder of this policy, the term “employee/s” refers to this collective group.

For the purposes of this policy, “Coesia” or the “Company” or the “Group” means Coesia S.p.A. and its Subsidiaries, and Subsidiary means a company that is directly or indirectly controlled by Coesia S.p.A.

This policy covers all forms of harassment in the workplace regardless of the medium through which the harassment occurs (in-person, via phone, online, via email, or through other digital or social platforms, or in any other manners). It applies to conduct on company premises, at company-sponsored events, business trips, training, and in situations where employees are representing Coesia off-site.

3. Definitions

For the purposes of this Policy, the following terms shall have the meanings provided herein, without prejudice for the definitions included in the Coesia Code of Ethics:

3.1 “Discrimination” includes:

- a. Any distinction, exclusion or preference made on the basis of national origin, language, citizenship, ethnicity, skin color, race, gender, gender identity or gender fluidity, gender reassignment, sexual orientation, age, professional position, religious, political or personal beliefs, union activity or involvement, physical or health condition, disabilities, marital status, pregnancy and maternity, cultural or social backgrounds, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation;
- b. Such other distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation as may be determined by applicable regulations.

Any distinction, exclusion, or preference in respect of a particular job based on the inherent requirements thereof shall not be deemed to be discrimination.

3.2 “Harassment” consists of any unwanted and/or offensive behavior towards an individual which creates an intimidating, hostile or humiliating work environment for the individual concerned. It comprises objectionable acts, comments, verbal and/or physical offenses or displays that demean, belittle, or cause personal humiliation or embarrassment, and any act of intimidation or threat.

The most common types of harassment/unacceptable behaviors are described here below. The list is not exhaustive and needs to be examined in compliance with local laws that may vary from country to country.

- *Sexual Harassment*: refers to any unwanted conduct or unwelcome behavior (verbal comments, actions or gestures) of a sexual nature, which has the purpose or effect of undermining or violating a person’s dignity, or physical and mental integrity or creating an intimidating, hostile, degrading, humiliating or offensive work environment.
A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation, or physical violence which are of a sexual nature.
- *Bullying*: a repeated pattern of incidents or behaviors which intimidates, demeans, humiliates, or embarrasses a person or group of people. Bullying can include actions, comments, displays; persistently picking on someone; and, demeaning, belittling, spreading rumors, gossiping or damaging someone’s reputation.

- *Other types:* demonstration of hostility or aversion towards an individual that creates a hostile, degrading, humiliating or offensive work environment, unreasonably interferes with an individual's work performance or behavior, or otherwise adversely affects the person's employment opportunities, including physical violence or intimidation, public humiliation, persecution, insults, stalking, sending offensive or derogatory messages through any system, media or device, ridicule or mockery, and other verbal or physical conduct of offensive nature.

Regardless of specific legal definitions of harassment and sexual harassment, if an employee's conduct could be improper and offensive to another, then that conduct might be construed as not appropriate to a work relationship.

4. Responsibilities

Every Employee is responsible for:

- Understanding and complying with this Policy.
- Cooperating to maintain a respectful workplace environment free of discrimination and personal harassment.

All employees are encouraged to communicate any violation, unethical behavior, or conduct contrary to this policy, in accordance with any rights granted by any applicable law, in the following manner:

- If employees feel comfortable, any matter can be reported to either their Supervisor, Human Resources, Internal Audit or via the Whistleblowing channel described in the Global Whistleblowing Policy, on a strictly confidential basis, in case of having experienced or witnessed Harassment or Discrimination, or in case of questions or concerns.

Every Supervisor¹ is responsible for:

- Promoting a harassment-free workplace and setting an example of appropriate behavior in the workplace.
- Dealing with harassment situations immediately after becoming aware of them, whether a harassment complaint has been made.
- Communicating immediately to Human Resources, Internal Audit or the Whistleblowing Channel in case of having experienced or witnessed Discrimination or Harassment or receiving any report of Harassment or Discrimination.

¹ Supervisor: refers to an employee responsible for coordinating (hierarchically and/or functionally) other employees or a specific department within the organization.

- Ensuring that harassment situations are handled in a sensitive and confidential manner.

For any and further clarification or assistance on what is provided therein, or on the responsibilities of each individual, the Coesia Legal and Human Resources Departments are available to provide the necessary assistance in order to ensure that all aspects of this Policy are clear and transparent for everyone involved.

5. Reporting violations

Creating a workplace free of discrimination and harassment is everyone's responsibility. All Employees are encouraged to express their opinions and report immediately any discrimination and/ or form of harassment.

Coesia has in place a Global Whistleblowing Policy available to allow Employees, and other interested parties to report, either openly or on an anonymous basis, any conduct contrary to the Code of Ethics or its principles, including this policy.

The procedures set forth in sections shall be followed in all cases unless local regulations require otherwise.

6. Investigations and safeguards

All complaints of Discrimination or Harassment will be taken seriously and treated with respect. Every complaint shall be investigated promptly, impartially, and thoroughly. The persons involved in the review and investigation of any possible violation of this policy shall take reasonable actions to maintain confidential the event and persons involved to the extent consistent with the need to conduct a fair, complete, and responsive investigation, in strict and full compliance with any privacy regulations and or any applicable law.

If the investigation confirms that Discrimination or Harassment took place, prompt and appropriate remedial action will be taken to properly sanction and stop the harassing or discriminatory conduct and prevent it from recurring. Remedial action may consist of disciplinary action against the harasser up to and including dismissal with cause in accordance with applicable regulations.

If the person who engaged in conduct in violation of this policy is not a Coesia's employee but a contractor, subcontractor, commercial intermediary, agent, representative, supplier, consultant, business partner or anyone performing services for or on behalf of Coesia, then Coesia will take, or cause such third party to take, whatever action is reasonable and appropriate under the circumstances to properly sanction and stop the harassing or discriminatory conduct, and prevent it from recurring.

Considering the circumstances of each case and while investigation is conducted, Coesia shall adopt provisional measures to protect the person discriminated against or harassed.

7. Disciplinary actions

Employees found to have engaged in harassment will face disciplinary action, up to and including termination of employment or any other contractual relationships. The measure of the disciplinary action will depend on the circumstances of the case.

8. Non-retaliation

Coesia forbids retaliation against any person by any other person for:

- Rejecting or protesting Harassment or Discrimination;
- Reporting Harassment or Discrimination; or
- Participating or cooperating in an investigation of Harassment or Discrimination.

Retaliation is a serious violation of this policy and should be reported in the same manner as a complaint of Discrimination or Harassment.

9. Prevention and education

Coesia will conduct regular training sessions for all employees to prevent harassment in the workplace. This includes educating employees on what constitutes harassment, how to report it, and the consequences of engaging in such behavior.

Beyond preventing harassment and discrimination, Coesia actively promotes diversity and inclusion through programs and initiatives that celebrate diversity and foster an inclusive culture.

10. Global consideration

Given our multinational operations, Coesia recognizes and respects cultural differences and legal requirements across the regions we operate in. This policy will be adapted as necessary to comply with local laws and customs, without diminishing our commitment to a harassment-free workplace.

This policy is intended to support a safe, respectful, and inclusive work environment across all Coesia's global operations. It underscores our commitment to integrity, respect, and ethical behavior in all our business dealings.