

ANTI-HARASSMENT POLICY

CEG Elettronica Industriale S.p.A. employees and those who work on its behalf have the right to dignified treatment. Being respected means being treated honestly and professionally. A respectful work environment goes beyond compliance with legal requirements. It is an environment free from inappropriate behavior, free from the demoralizing effects of harassment or unwelcome, offensive, or improper behavior, and free from any type of harassment based on age, disability, marital status, race, color, national origin, religion, sex, sexual orientation, or gender. Incidents of harassment and inappropriate behavior will not be tolerated at CEG Elettronica Industriale.

For the purposes of ILO Convention No. 190/2019 on the elimination of violence and harassment in the world of work, the following is defined:

Harassment at work

Harassment is any inappropriate or unacceptable behavior, including behavior related to gender, with the purpose or effect of violating the dignity of a worker and creating an intimidating, hostile, degrading, humiliating, or offensive environment (Legislative Decree 198/2006, Article 26, paragraph 1). Harassment takes the form of words, gestures, or actions that tend to annoy, alarm, abuse, humiliate, intimidate, belittle, or embarrass another person and create an intimidating climate, a hostile, or offensive work environment.

Sexual harassment

Sexual harassment is unwelcome sexual advances, requests for favors, verbal or physical behavior, gestures, or any other behavior of a sexual nature that could be perceived as offensive or humiliating. When it occurs, it interferes with work and creates an intimidating, hostile, or offensive work environment.

Inappropriate behavior

Our goal is to have a work environment where everyone is treated with respect and professionalism. Any unprofessional or disrespectful behavior, even if not illegal, interferes with this goal and will not be tolerated. CEG Elettronica Industriale reserves the right to respond to inappropriate behavior even in the absence of complaints or indications of offense.

Performance evaluation should not be considered as an insult or harassment

Effective leadership requires management, managers, and supervisors to communicate with their employees about their work performance. Managers should be clear about the employee's actual performance and how their work contributes to the team's ability to deliver results consistent with CEG Elettronica Industriale values. Discussions regarding performance reviews can sometimes be difficult and should always be conducted with professionalism and respect. Constructive criticism and supervisory actions regarding performance deficiencies or workplace issues are not harassment or retaliation.

What to avoid

- Any behavior that is unprofessional or disrespectful, or that has the purpose or effect of harassing.
- Any retaliation against anyone who raises a concern or potential violation of this policy.
- Miss the opportunity to respectfully communicate to anyone that you found their behavior offensive.
- Any violation of this policy.

How to report a violation

Employees must promptly report incidents of harassment to their immediate supervisor, senior management or Human Resources.

Investigations and responses

All reported incidents will be investigated, maintaining the source of the report confidential unless the company deems it necessary to disclose it to the parties to resolve the issue. If inappropriate behavior occurs, specific disciplinary action will be taken. Any employee who, in good faith, reports a possible violation of this policy will be protected from any form of retaliation.



Responsibilities of the Top Management of CEG Elettronica Industriale

Every supervisor or manager at CEG Elettronica Industriale is responsible for ensuring that CEG Elettronica Industriale offers a work environment free from harassment and inappropriate behavior and that complaints are handled promptly and effectively. With the assistance of Human Resources, CEG Elettronica Industriale's senior management must inform their organization of the policy and promptly investigate allegations of harassment, take appropriate disciplinary action, and ensure that any form of retaliation is prohibited. As a supervisor or manager, it is your responsibility to report any harassment or inappropriate behavior and complaints to Human Resources.

Retaliation is prohibited

This policy strictly prohibits any form of retaliation against an employee or other person who reports harassment or other inappropriate behavior.

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Uberto Canaccini



President & CEO

