

POLICY CONFLICT MINERALS

FINCANTIERI

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POLICY CONFLICT MINERALS

1. INTRODUCTION

The Fincantieri Group is committed to promoting and supporting a responsible supply chain which shares its principles and values, built on lasting relationships based on integrity, transparency and respect.

Fincantieri, as stated in the Charter of Sustainability Commitments, expresses its responsibility towards increasingly sustainable development through maintaining principles that it considers fundamental, at the basis of which attention to and respect for the fundamental rights of the individual represent a priority and constitute an indispensable factor for development.

The Group is aware that the purchase or production of certain goods may have negative environmental or undesirable social impacts. In this context, one of the issues attracting the most attention is that of so-called 'conflict minerals', minerals or metals containing tin, tantalum, tungsten or gold ('3TGs'), originating from areas affected by armed conflicts, areas which have survived conflict or areas with precarious or non-existent governance or security, or generalised and systematic violations of international law, including human rights violations ("Conflict-Affected and High-Risk Areas, CAHRAs").

Following the adoption by the United States Securities and Exchange Commission of the rule on "conflict minerals", as defined in Section 1502 of the "Dodd-Frank Wall Street Reform and Consumer Protection Act", and following the issuance of Regulation (EU) 2017/821 by the European Parliament and the Council of the European Union, Fincantieri, in line with its sustainability policy, is committed to implementing the provisions of the aforementioned regulations, aligning itself with international standards and committing to maintaining a responsible and conflict-free supply chain.

2. PRINCIPLES

As already set out in Code of Ethics for Suppliers, Fincantieri is committed to promoting a responsible supply chain free of minerals from CAHRAs, as their trade could lead to the direct or indirect financing of armed groups, encourage corruption and money laundering, and cause the violation of human rights through the exploitation of forced labour. Suppliers must therefore ensure responsible procurement of 3TG minerals, ensuring that none of the products supplied to Fincantieri contain minerals from CAHRAs. For the company, sharing and respecting principles and rules that belong to sustainable action are of fundamental importance. The principles adopted by Fincantieri as the basis and reference for the responsible management of 'conflict minerals' include:

- compliance with relevant international and national legislation and standards;

- strict observance of worker protection, environmental protection, safeguarding the interests of shareholders, employees, customers, business and financial partners, communities and local communities, creating value for all stakeholders;
- the promotion of awareness among employees and suppliers involved in the procurement process, including through specific training and/or information activities;
- monitoring of the procurement process for responsible management of the supply chain in compliance with the duty of care of all those involved;
- meeting the expectations of stakeholders as a fundamental prerequisite for the creation of value and the promotion of a sustainable supply chain.

3. COMMITMENTS

The Group does not directly purchase 3TG minerals but believes that the procurement of systems and materials, managed as part of an extensive and well-structured supply chain, may indirectly result in the acquisition of products potentially containing minerals from CAHRAs. For this reason, it is committed to ensuring a 'conflict-free' supply chain through the following actions:

- transposition, in the contracts signed with suppliers, of the logic and commitments of the Policy for the conscious and responsible control of the entire supply chain, from the extraction of the ore to the definition of the scope of supply;
- taking the necessary actions to identify risks arising from improper handling of conflict minerals and identify products and/or semi-finished products that could contain minerals from CAHRAs;
- requiring accurate information from suppliers, through internationally recognised standards, regarding the origin of raw materials and minerals in supplies in order to ensure safe and adequate traceability;
- conducting constant monitoring of the supply chain in order to mitigate the risk of sourcing minerals from CAHRAs;
- preparing plans and corrective actions in case of non-compliance of declarations that may include checks;
- increasing, in terms of knowledge and awareness, the preparation of its personnel, requiring similar interventions for those engaged in the supply chain, pursuing the contribution of all those involved to the achievement of corporate objectives.

4. COMPLIANCE WITH THE POLICY

This Policy is to be shared with all suppliers who, in turn, undertake to share the principles contained herein with their employees, associates, collaborators and subcontractors, with a view to making a valuable contribution to its dissemination and proper implementation. Suppliers are also responsible for

monitoring compliance with the Policy both internally and within the supply chain, promptly informing Fincantieri of any relevant issues that are incompatible or in violation of the Policy, using the channels provided by the Company. In a spirit of partnership and full transparency, the corrective measures that will be implemented in order to achieve compliance with the Policy should also be shared. For its part, Fincantieri will closely monitor suppliers' adherence to the Policy, reserving the right to request all necessary documentation from them and to carry out independent audits at their facilities, premises, buildings and plants. If the results of these checks are unsatisfactory and the supplier fails to implement the recommended corrective actions, Fincantieri, at its discretion, reserves the right to suspend existing contractual relations with the supplier until the actions in question are implemented, or to terminate the same contractual relation.

5. COMMUNICATION

Fincantieri undertakes to ensure the clear and correct communication and dissemination of this Policy, through internal and external communication channels, and to promote compliance with it among all stakeholders.

Within this context, the following is envisaged:

- publication of the Policy on Fincantieri's company intranet;
- publication of the Policy on the institutional website at <http://www.fincantieri.com>;
- dissemination of the contents of the Policy during dedicated training sessions.

6. RESPONSIBILITY AND REVIEW

Fincantieri is responsible for ensuring compliance with this Policy, which shall be periodically reviewed and approved by the CEO of Fincantieri S.p.A. and, in order to ensure its effective implementation and suitability, shall be adapted to any changes in the external context.

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