

# Anti-Harassment and Bullying Policy

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## ART. 1. Scope and Purpose

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The purpose of the present Anti-Harassment and Bullying Policy (“**Policy**”) is to prevent and combat all forms of harassment, understood as any conduct that undermines the dignity of individuals.

It is inspired by international and national norms and agreements, particularly the ILO Convention 2019, as adopted by all national legislations (in Italy, Law 4/2021).

This Policy applies to all individuals who work, in any capacity, for SAATI S.p.A. and all companies controlled by it (collectively “**SAATI**” or “**SAATI Group**”) as well as to all individuals who, for any reason, come into contact with them. Its objectives are:

- a) to protect the dignity and equality of people in the workplace by promoting and encouraging the adoption of decisions and behaviors inspired by the principles of fairness, respect, equal opportunity, collaboration, and honesty;
- b) to combat all forms of violence in the workplace;
- c) to define the behaviors that constitute objective situations of harassment, including, in particular: sexual harassment, mobbing, straining, workplace stalking, discrimination and bullying;
- d) to ensure, in the event of reported harmful conduct, the immediate use of prompt and impartial procedures aimed at discreetly and effectively resolving harassment cases and preventing their recurrence;
- e) to identify, as part of the action to prevent and combat harmful conduct, the actors involved and their respective roles;
- f) to identify and monitor incidents of sexual harassment, mobbing, straining, workplace stalking, bullying or discrimination, in order to establish appropriate management strategies to prevent and combat them;
- g) to recognize the effects of domestic violence and, to the extent reasonably feasible, mitigate its impact in the workplace;
- h) to promote awareness and application of existing legislation protecting the dignity and equal opportunities for all workers, and to promote information on the norms regarding harassment in the workplace.

SAATI Group complies with - and all employees of SAATI Group are required to comply with – all relevant applicable international and national laws and norms on the subject matter. However, the standards and provisions of SAATI Group may, in some cases, be more restrictive than the legislation of certain Countries, therefore it is possible that SAATI may prohibit behaviors that are permitted under local legislations.

SAATI Group requires compliance with the standards set forth in this Policy regardless of whether they are prohibited by local law or not.

## **ART. 2. Duties of collaboration**

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All individuals to whom the present Policy applies must contribute to ensuring a work environment in which the dignity of individuals is respected.

In particular, each SAATI employee has a duty to promote and maintain a work environment in which the dignity of each individual is respected and interpersonal relationships are fostered based on principles of equal opportunity and mutual fairness.

Any witnesses of harmful conduct are required to demonstrate proper, responsible, and supportive behavior towards the victims.

The Executive Management Committee of the parent company and all individuals with organizational responsibilities within SAATI Group have the duty to promote the prevention of the aforementioned prejudicial or discriminatory behaviors that may occur within their teams, and to contribute to creating a positive climate characterized by mutual respect, collaboration, and organizational well-being. Furthermore, they are required to support any person wishing to address such behaviors by providing guidance and clarifications regarding the procedures to follow.

## **ART. 3. Definition of sexual harassment**

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Sexual harassment is defined as any unwanted act or behavior of a sexual nature, whether expressed physically, verbally or non-verbally, with the purpose or effect of violating a person's dignity and/or creating an intimidating, hostile, degrading, humiliating or offensive environment.

For instance, the following behaviors are considered sexual harassment:

- a) verbal comments about a person's body or comments about sexuality or sexual orientation or gender identity, deemed offensive by the recipient;
- b) intentional, unwanted and inappropriate physical contact;
- c) implicit or explicit requests for unwanted or offensive sexual favors;
- d) promises, whether implicit or explicit, of advantages, privileges or career advancements in exchange for sexual favors;
- e) threats or retaliation following the refusal of sexual favors.

Sexual harassment can result in discrimination, just as less favorable treatment suffered by a person for refusing or submitting to the aforementioned behaviors constitute harassment and discrimination.

## **ART. 4. Definition of bullying**

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Bullying is characterized by arrogant and impudent behavior. Specifically, it involves an attitude of overpowering the weaker individuals through physical and psychological violence.

Bullying can take various forms:

- direct bullying: physical bullying (punching, hitting, pushing) or verbal bullying (insults, both direct and indirect, harassment).

- indirect bullying: for example, spreading gossip that diminishes a person and their work.
- digital bullying and cyberbullying: any form of bullying that occurs through the internet and digital means.

### **ART. 5. Definition of mobbing**

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Mobbing refers to a conduct carried out by a hierarchical superior or one or more colleagues or collaborators, proacted over time, held against an employee of SAATI in the workplace with vexatious intent, which involves systematic and repeated hostile behaviors that take the form of abuse of authority, denigration, marginalization or psychological persecution, which can lead to moral humiliation and exclusion with detrimental effect on the person's psycho-physical well-being as well as their overall personality.

For the purpose of establishing the existence of the harmful conduct, the following elements are relevant:

- a) the multiplicity of persecutory behaviors, whether illicit or even lawful when considered individually;
- b) the vexatious intent of the conduct, manifested by its deliberate systematicity and persistence over time;
- c) the occurrence of harm to the employee's physical or mental health;
- d) the causal link between the harmful conduct and the prejudice to the person's psycho-physical integrity.

### **ART. 6. Definition of straining**

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Straining is defined as any conduct, whether isolated or omissive, carried out by a hierarchical superior or a colleague in a position of functional superiority with a discriminatory or persecutory intent, which creates for a subordinate a work situation of permanent or lasting forced stress capable of prejudicing a person's psycho-physical integrity.

### **ART. 7. Definition of workplace stalking**

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Workplace stalking refers to the conduct of a hierarchical superior or a colleague which, through a series of harassing behaviors – including threats, harassment, sexual harassment or continued harmful acts – causes a subordinate to experience prolonged and severe anxiety or fear, or causes a justified fear for one's own safety or the safety of a close relative or another person with whom they have an emotional relationship, potentially forcing them to alter their lifestyle habits.

### **ART. 8. Definition of discrimination**

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Direct discrimination refers to any provision, criterion, practice, act, order, agreement or behavior which has a prejudicial effect on a person on the basis of:

- a) sex;
- b) gender;
- c) age;

- d) ethnic or national origin;
- e) phenotype;
- f) religion, ideology or other personal beliefs;
- g) political or trade union affiliation;
- h) sexual orientation;
- i) marital status;
- j) psycho-physical conditions;
- k) pregnancy status;
- l) maternity or paternity status;
- m) other personal, family or social conditions.

Indirect discrimination occurs when a seemingly neutral provision, criterion, practice, act, order, agreement or behavior puts or is likely to put certain individuals at a particular disadvantage compared to others on the basis of the aforementioned grounds.

Different treatment attributable to characteristics that constitute essential requirements for the work performance does not constitute discrimination, provided that the objective pursued is legitimate and the means employed to achieve it are proportionate to the aim and reasonable.

Less favorable treatment suffered by a worker for refusing or submitting to harassing acts or behaviors, including those of a sexual nature, constitutes discrimination. Discrimination also encompasses unfavorable treatment by a superior in response to a legitimate complaint or action.

## **ART. 9. Management of harassment situations**

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SAATI Group undertakes to promptly and impartially investigate and manage any report of a harassment incident. SAATI Group will take all necessary measures to ensure the confidentiality and discretion of the reports made, and to the individuals involved, in compliance with applicable norms, including those regarding privacy. Pursuant to this Policy, employees who are called upon are required to cooperate in investigations.

In this regard, SAATI Group is committed to creating a work environment where each employee feels protected and free to make appropriate reports without fear of retaliatory acts.

If a conduct believed to be contrary to this Policy occurs or if it is believed that someone has violated it, SAATI Group expects that such circumstances will be reported, assuring the employee that such report will be investigated with respect and will not be subjected to intimidation or retaliation.

### **SAATI Group's commitments**

SAATI Group is committed to not tolerating behaviors that can be considered harassment, ensuring that there is respect among individuals and creating opportunities to raise awareness about harassment in all its forms, by providing information about the tools available to everyone to prevent, limit and manage situations of harassment.

SAATI Group protects individuals who are victims of harassment by guaranteeing privacy

and excluding any retaliatory actions.

For this purpose, SAATI Group provides the following tools:

- Training and communication;
- Internal reporting channels.

In particular, anyone who wishes to report a case of harassment, without prejudice to the possibility of recourse to the competent authorities, may:

- contact the HR manager of reference, the Global HR Director, the head of the department involved, or
- send an anonymous or non-anonymous report through the IT platform that can be reached through the following link: <https://saati.integrityline.com>.

### **What happens after the reporting**

A commission, working with the utmost confidentiality, will be responsible for evaluating the report, conducting specific analyses, involving the relevant corporate functions and eventually external experts or consultants, ensuring maximum protection for the whistleblower under the present Policy.

In the case of an unfounded report, the investigation will be concluded and appropriate disciplinary action will be taken against the whistleblower if it is established that the report was made with the intention of harming the reported person. In the event of a justified report, the relevant HR manager will implement the necessary measures against the person responsible for the harassing behavior.

## **ART. 10. Prohibition of Retaliatory Acts**

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SAATI Group is firmly committed to protecting and safeguarding from eventual retaliatory acts, for as long as necessary, anyone who reports behavior prohibited by this Policy.

Therefore, SAATI Group, in order to prevent and protect whistleblowers from retaliatory acts, is committed to promoting an environment in which the latter:

- feel comfortable communicating openly and honestly;
- are encouraged to expose and raise in good faith and promptly any issues regarding situations they may consider unethical, fraudulent or illegal, without fear of retaliation.
- are encouraged to report in good faith issues concerning themselves, even in cases where they may not have concrete evidence.

A retaliatory act is an adverse conduct against a person on the grounds that this person:

- has reported an actual or perceived violation of SAATI Group's policies or norms, or reported prohibited or inappropriate behavior in the workplace; and/or
- has expressed opposition to conduct that may violate SAATI Group's policies or norms, or other prohibited or inappropriate behavior in the workplace; and/or
- has participated in the reporting and investigation process as outlined in SAATI Group's policies and norms; and/or
- has provided support to an investigation or proceeding regarding an actual or perceived violation of SAATI Group's policies and norms.

Anyone who engages in retaliatory acts against a whistleblower, including acts aimed at silencing the latter through financial incentives or other benefits, will be subject to disciplinary proceedings or termination of the existing contract, if appropriate. Retaliation is strictly prohibited and constitutes in itself a violation of this Policy.

**ART. 11. Awareness-raising and training**

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SAATI Group, in order to ensure maximum publicity and dissemination of this Global Policy, commits to its publication on the company intranet as well as the implementation of dedicated awareness-raising activities to all personnel. This Policy will be included in the onboarding kit for newly hired personnel. Dedicated training will also be provided to managers, who are responsible for promoting the prevention of harassment in the workplace and ensuring knowledge of and compliance with this Policy.

It is the responsibility of the Management Team of the parent company to promote appropriate monitoring actions to assess the effectiveness of initiatives in preventing and combating behaviors detrimental to a person's dignity.

**ART. 12. Reporting**

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On an annual basis, each company within SAATI Group is required to carry out reporting activities pertaining to the reports referred to in this Policy, which will be sent to the Global HR Director.

Place and Date: Appiano Gentile, December 20, 2023

Issued by: Global HR Director

Signature: 