



(St)	Proj	Unit	Type	Dev.	Serial	Rev
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DOCUMENT TITLE			ANTI-HARASSMENT AND ANTI-DISCRIMINATION POLICY			

POLICY

ANTI-HARASSMENT AND ANTI-DISCRIMINATION POLICY 8301-SI-003

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ANTI-HARASSMENT AND ANTI-DISCRIMINATION POLICY

1. FIGHT AGAINST AND PREVENTION OF HARASSMENT AND DISCRIMINATION

SICIM believes that diversity and plurality are values that help create a stimulating and serene working environment, capable of fostering innovative ideas and respectful behaviour.

SICIM is committed to promoting inclusion and valuing diversity so that everyone can express their full potential in a professional environment free from all forms of harassment, violence, and direct or indirect discrimination.

This Policy, which applies to all SICIM resources, regulates behaviour both within and outside the Company, regardless of gender, seniority level, or role, and:

- **Emphasizes** the commitment to supporting a work environment free from all forms of harassment, violence, direct and indirect discrimination.
- **Reiterates** the prohibition of any act of harassment, violence, or discrimination that undermines human dignity, trust, motivation, performance, organizational climate, and SICIM's reputation.
- **Aims to prevent**, identify, prohibit, and monitor all such phenomena and support those who report them, protecting them from retaliation.

Every department, office, and site manager must work to prevent harassment and discrimination. All those in managerial roles (Management, Heads of Departments) are responsible for ensuring the dissemination and compliance with this Policy and procedure and must, if requested, unconditionally support those wishing to report a violation, providing guidance and clarification on procedures.

2. IN SICIM WE DO NOT TOLERATE:

Workplace harassment:

Undesirable behaviour, even if related to sex, that violates a worker's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment (Legislative Decree 198/2006, Art. 26.1). It is considered an aggravating factor if the harassment includes implicit or explicit threats or blackmail by a superior or someone who can influence employment conditions.

Sexual harassment:

Sexual harassment may include (but is not limited to):

- Unwanted sexual advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature;
- Offensive language with sexual innuendos;
- Explicit sexual gestures;
- Sending sexual/pornographic content (e.g., images, videos);
- Displaying sexual/pornographic materials at work;
- Unwanted physical contact or disrespect for personal boundaries;
- Comments on physical appearance with sexual references;
- Sexual coercion.



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Workplace violence:

Incidents where personnel are abused, threatened, or assaulted during work activities, including commuting, affecting health, safety, or well-being. Violence may be horizontal (between colleagues), vertical (between superiors and subordinates), or from third parties (clients/suppliers).

Direct discrimination

Occurs when someone is treated less favourably than another in a comparable situation based on gender, nationality, ethnicity, language, age, disability, sexual, political, union or religious orientation, contract type, or flexible work arrangements. Gender discrimination includes the use of sexist criteria in workplace interactions.

Indirect discrimination:

Situations where a neutral rule, practice, or behaviour places someone at a disadvantage due based on gender, nationality, ethnicity, language, age, disability, sexual, political, union or religious orientation, contract type, or flexible work arrangements. Gender discrimination includes the use of sexist criteria in workplace interactions.

Retorsion:

Any behaviour, act, or omission—actual, attempted, or threatened—taken in response to a report that causes or may cause unjust harm to the reporting individual.

3. OTHER DEFINITIONS

Positive actions: Measures to remove obstacles preventing equal opportunities and to promote female employment and substantial equality between men and women (Legislative Decree 198/2006, Art. 42).

Reporting Channel: Mechanism to handle situations that violate this policy. See procedure **0210-SI-003 - Whistleblowing Procedure** and <https://www.SICIM.eu/en/governance/whistleblowing/>.

Reported Person: Individual or entity mentioned in the internal or external report or in the public disclosure as the person to whom the violation is attributed or as the person otherwise implicated in the violation reported or disclosed publicly.

Whistleblower: Person who reports or publicly discloses information about violations acquired in the workplace.

Feedback: Communication to the whistleblower on the status or outcome of the report.

Report: Written or verbal communication of violation submitted through the reporting channel.

Follow-up: Actions taken to assess the reported facts, investigate outcomes, and adopt measures.

4. SAFEGUARD MEASURES AND REPORTING PROCEDURES

In order not to create contradictory or inaccurate indications, operational guidelines for managing reports are available in the Whistleblowing section at: <https://www.SICIM.eu/en/governance/whistleblowing/procedure/>.

For reporting methods, refer to document “**0211-SI-001 - Whistleblowing Manual**”.

In carrying out their activities, resources must contribute to creating and maintaining a respectful working environment, guaranteeing respect for the rights, value and dignity of the person.

SICIM underlines to all resources the importance of reporting any form of harassment, violence and direct and indirect discrimination.



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Any form of harassment, violence and direct and indirect discrimination is not tolerated and is considered unacceptable.

When the SICIM resource encounters an act, or attempted act, of harassment, violence or direct and indirect discrimination, without prejudice to the possibility of appealing to the competent authorities, he or she may open a report.

5. REPORT REGISTER AND ANNUAL REPORT

SICIM maintains a Register of harassment and discrimination cases. The person in charge of the Reporting Channel updates the register in real-time.

On an annual basis, SICIM receives a specific report from the Reporting Channel Manager with evidence relating to the activities carried out during the year based on the reports received. It will consist of a periodic report containing, on an anonymous basis, the cases and the progress of the reports received in the reference period.

SICIM undertakes to carry out an updating and planning activity of any strategies and preventive actions aimed at containing the risks of this Policy.