
Anti-Harassment Policy

Premise

Emak is committed to fostering a safe, respectful, and inclusive work environment for all employees, consultants, suppliers, customers, and visitors to the company. The goal of Emak is to ensure that every individual feels respected, valued, and free from any harassment, discrimination, or inappropriate behavior. Specifically, the company promotes a stimulating work environment that is open to diversity, inclusive, innovative, and transparent, where all individuals employed by the company are respected. Emak demonstrates a zero-tolerance policy for any form of discrimination, violence, or harassment at work.

Purpose

This policy provides a solid foundation for addressing and preventing any type of harassment in the workplace. It is important for all resources employed at Emak to understand their rights and responsibilities, and for the company to act swiftly and effectively in addressing any violations of this document.

Recipients

This document applies to all employees, consultants, suppliers, customers, and visitors of the company. It is mandatory for all individuals who come into contact with Emak to respect and adhere to this policy and actively contribute to maintaining a safe, respectful, and harassment-free work environment.

Effective Date

This document comes into force on 20/01/2025 and will be subject to periodic review to ensure it remains aligned with legal standards and best business practices.

Definitions

Emak considers harassment any behavior that creates a hostile, intimidating, or offensive work environment for the individual, based on personal characteristics such as gender, age, ethnicity, sexual orientation, religious orientation, disability, or origin. Harassment can manifest in various forms, including but not limited to:

- Offensive behaviors, insults, or discriminatory language;
- Unwanted sexual behaviors, such as avances, requests for sexual favors, or comments of a sexual nature;

- Verbal or physical harassment, including intimidation, threats, or violence.

1. **Discrimination**

In violation of this document, it refers to prejudicial treatment based on the individual's real or perceived belonging to one or more dimensions of diversity, such as gender, age, nationality, ethnic or geographical origin, disability, sexual orientation, religious beliefs, personal political convictions, including membership in political parties or trade unions. Discrimination can manifest through actions, words, behaviors, or decisions that limit opportunities, fair treatment, and the well-being of an individual within the workplace.

2. **Harassment**

It is a form of misconduct based on belonging to one or more of the dimensions of diversity described above. Harassment creates a work environment that is intimidating, hostile, or offensive, thereby interfering with the person's job performance and negatively impacting career opportunities. Harassment also includes minor comments, insinuations, and/or inappropriate jokes that can be perceived as discrimination and/or harassment by the individuals on the receiving end, making them feel uncomfortable or hurt.

3. **Sexual Harassment**

Sexual harassment, as defined above, also includes unwanted sexual avances, requests for sexual favors, and other unwanted behaviors of a sexual nature, whether verbal, written, or physical (whether related to the same or any other sex or sexual identity). It is specified that sexual harassment is considered a serious violation and may lead to disciplinary actions, including termination of employment.

4. **Mobbing**

Mobbing, also known as bullying or psychological harassment in the workplace, refers to episodes where an individual is subjected to systematic, repetitive, and harmful behaviors by one or more colleagues, superiors, or subordinates. These behaviors may include: social isolation, constant criticism, ridicule, disparaging comments about work or the individual, threats, sabotage, manipulation of work relationships, or any other form of psychological coercion aimed at damaging the dignity, integrity, or psychological well-being of the person. Mobbing can create a toxic work environment and severely damage the mental health and work performance of the victim.

5. Retaliation

It refers to when an individual faces negative consequences, discrimination, or unfavorable treatment in response to reporting harassment, discrimination, or violations of company conduct. These consequences may include, but are not limited to: discrimination in career advancement, loss of work opportunities, forced transfers, salary reductions, or other forms of discriminatory treatment. It is emphasized that Emak is committed to protecting individuals who report in good faith violations of the anti-harassment policy and preventing any form of retaliation against them.

Obligations

Emak is committed to:

- Providing periodic training on anti-harassment policies for all employees;
- Responding promptly and appropriately to any reports falling under the scope of this document;
- Conducting a thorough and impartial investigation into every report;
- Taking appropriate corrective measures in response to confirmed harassment behaviors;
- Protecting the confidentiality of reports and ensuring there is no retaliation against those who report in good faith.

Each employee is required to:

- Respect the company's anti-harassment policy and behave respectfully towards all individuals;
- Report promptly any behavior that violates this document, of which they are a witness or victim;
- Fully cooperate in company investigations into reports of harassment.

Disciplinary Measures

Violations of this document will be taken very seriously and may result in disciplinary measures, including termination of employment, and termination of business relationships for external parties, or more severe actions as permitted by law or current legal provisions, depending on the severity of the violation.

Reporting Procedures

Emak is committed, in accordance with UNI PdR 125: 2022 standards and national legislation regarding workplace health and safety, to implement internal processes aimed at identifying and taking corrective action for any form of physical and verbal abuse

through risk analysis. To this end, the company has made available a specific procedure to regulate and collect all reports concerning harassment and/or abuse within the workplace. In particular, the company has implemented a whistleblowing procedure that allows individuals to report incidents of this type in a confidential and secure manner. The procedure is described in detail in the “Whistleblowing Regulations of Emak Group” document available in the OdV section of our company intranet. Emak has also integrated the Risk Assessment Document with a dedicated section for analyzing the risk of harassment in the workplace, for both the Pozzilli and Bagnolo plants.

Bagnolo in Piano, 14/01/2025