



CEMBRE

CODE OF CONDUCT AGAINST HARASSMENT AND VIOLENCE IN THE WORKPLACE

CEMBRE GROUP

REV.	DATE	SUBJECT	PREPARED by	APPROVED by
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1. FOREWORD

This code of conduct is based on the principles of International Labour Organisation (ILO) Convention No. 190 and International Labour Organisation (ILO) Recommendation No. 206.

This code makes explicit reference to the CEMBRE GROUP Code of Ethics and the provisions contained in the 'Whistleblowing management procedure and the Protection of Whistleblowers (so-called Whistleblowing)' of the CEMBRE GROUP.

Each CEMBRE GROUP subsidiary is required to comply with the relevant provisions of its own national legislation. If the local legislation of one of the countries in which the Group operates is more restrictive than this Code of Conduct, CEMBRE undertakes to operate in compliance with such legislation.

2. OBJECTIVES

By adopting this code, CEMBRE wishes to express its commitment to preventing and combating any situation that may fall within the scope of harassment and violence in the workplace, in order to ensure full respect for people and the maximum protection of individual dignity.

This commitment is achieved through concrete actions to prevent and combat all forms of harassment and violence in the workplace. These include, but are not limited to: continuous training and awareness- for personnel, availability of safe and accessible channels for whistleblowing, and control by all relevant bodies.

CEMBRE's primary objective is to ensure a working environment based on inclusion, dignity and respect for the physical and psychological integrity of individuals.

3. DEFINITIONS

The term '**Violence and Harassment**' in the workplace refers to a set of unacceptable practices and behaviour, or the threat of engaging in those practices or behaviour, either on a single occasion or repeatedly, and which are intended to cause or are likely to result in physical, psychological, sexual or economic harm. This also includes gender-based violence and harassment. Behaviour of this nature has the effect of creating an intimidating, hostile, degrading, humiliating and offensive environment for the person.

The term '**Gender-based Violence and Harassment**' refers to violence directed towards a person because of that person's gender or sexual orientation or that affects persons of a particular gender disproportionately. It also includes sexual harassment.



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The term '**Sexual Harassment**' indicates any unwanted act, gesture, word or physical contact with a sexual connotation, which offends the dignity of the person regardless of that person's gender and/ or which restricts their personal freedom.

'**Sexual harassment**' can be verbal or non-verbal (unwanted compliments, inappropriate comments, etc.). It can be psychological in nature (relating to the alleged inferiority of the person because they are of a certain sex or disparaging because of their different expression of sexuality, etc.).

'**Mobbing**' indicates offensive, intimidating, persecutory, harassing behaviour and, more generally, any improper use of power (arising from a position of authority, the use of physical force and/or intimidation) that may lead an individual to feel denigrated, humiliated, harmed, threatened or upset.

'**Discrimination**' indicates any harassment referring to any characteristic of the person and/or individual life choice such as age, marital status, civil union, physical appearance, disability, nationality, ethnic or national origin, gender reassignment, pregnancy, religion or belief, sex or sexual orientation, membership of political and/or trade union representatives. Conduct of this nature is discriminatory either when carried out in a direct form (where a person is treated less favourably than another person in a similar situation is, or would have been, treated) or in an indirect form (where a person, or category of persons, is placed at a particular disadvantage compared to another person, or category of persons, in a similar situation).

'**Oppression**' indicates insults, offensive comments, taunts and other visual, verbal or physical conduct, including communication by electronic means, that may contribute to an intimidating, hostile or offensive working environment.

'**Retaliation**' indicates any undesirable behaviour resulting from refusing, reporting and/or complaining about bullying, harassment, sexual harassment, discrimination and/or retaliation against a person and/or third parties.

'**Stalking**' indicates repeated harassment and bullying behaviour. The person who is subject to this type of behaviour lives in a severe state of anxiety or fear for their own safety or that of people close to them, or is forced to alter their habits or lifestyle.

'**Work environment**' indicates all places where the working activity takes place, whether public or private, including break areas, bathrooms or changing rooms, as well as in the course of travelling, business trips, training, work-related events or social activities.

The work environment also includes the virtual and digital environment. This means all platforms, computer systems and corporate or private communication tools used in the performance of work.



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This includes, but is not limited to: video-conference meetings, e-mails, chats and instant messaging on collaboration platforms (such as Teams, Zoom, Google Meet) and the use of social media.

4. SCOPE AND INTENDED RECIPIENTS

This Code of Conduct adopted by CEMBRE applies to all persons acting on behalf of the company or in the context of professional relations with the Company, in any capacity and in any location, including:

- managers, employees and members of CEMBRE's corporate bodies in the course of their work or interactions with internal and external stakeholders;
- contract workers in the course of their work or interactions with internal and external stakeholders;
- collaborators, consultants, interns in the course of their work or interactions with internal and external stakeholders;
- business partners, suppliers, customers, visitors;
- third parties involved in company activities, even outside the workplace (e.g. during business trips, events, training, etc.).

hereinafter referred to as 'the Intended Recipients'.

The Policy is brought to the attention of the Intended Recipients by means of appropriate communication activities.

5. FUNDAMENTAL PRINCIPLES

The company is committed to preventing and counteracting any situation which may fall within the conduct described in this Code of Conduct.

It is for this reason that CEMBRE has decided not to tolerate any form of violence, harassment, mobbing, discrimination, retaliation or any other behaviour detrimental to a person's individual dignity or integrity.

Any conduct in breach of this Code shall be subject to the consequences set out in Section 7 below.

To this end, CEMBRE confirms that it is strengthening its commitment to prevention through training and awareness-raising for all personnel and the promotion of a culture of respect, listening and inclusion.



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CEMBRE's commitment also passes through its long-standing whistleblowing channels, which ensure confidentiality, protection and support for victims and those who report in good faith.

6. PROHIBITED BEHAVIOUR

The following actions are strictly prohibited. They are by way of example only, and include but are not limited to:

- Verbal violence and harassment, including but not limited to insults, threats, shouting or abusive language;
- Physical violence that may result in physical harm. This includes but is not limited to hitting, pushing or other behaviour that damages the person's physical integrity;
- Non-verbal violence and harassment. This includes but is not limited to gestures, expressions, postures or the display of offensive or discriminatory material;
- Gender-based violence and harassment. This includes but is not limited to derogatory or denigrating remarks about a person's sexual orientation or gender identity, or the use of insults with a gender/sexual connotation;
- Sexual violence and harassment. This includes but is not limited to non-consensual physical contact, inappropriate physical gestures, sexual comments, unwanted sexual advances;
- Sexual and/or discriminatory comments such as sexual or lewd anecdotes or stories that make a person feel uncomfortable, the sharing of sexual content in any format;
- Discriminatory comments such as anecdotes or stories about racial, religious or political issues that make a person feel uncomfortable;
- Pressure, blackmail of a sexual or professional nature;
- Promises of favouritism in exchange for requests of a sexual or personal nature;
- Behaviour that leads people to feel isolated, excluded or subjected to other forms of bullying;
- Dissemination of offensive or private content that offends a person's dignity or the private and professional sphere of a person;
- Unwanted attention, harassment or repeated threats, stalking, control, repeated sending of messages or calls, intrusion into a person's private or professional life or other forms of stalking.

Behaviour of this nature is strictly prohibited and is unacceptable in any work context, whether it occurs in person (e.g. in the office, in the department, on business trips or during company events) or through the virtual environment and digital tools (as further specified under '**Working Environment**').



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The Company reserves the right to adopt the appropriate measures also in relation to violent or harassing conduct, ascertained in judicial proceedings or in any case documented, carried out by its employees in relation to the Intended Recipients referred to in point 4 also outside the workplace, if such conduct is incompatible with the company values or may compromise the relationship of trust or the company climate.

7. DISCIPLINARY AND LEGAL CONSEQUENCES

Compliance with the Principles contained in this Code shall be considered an essential part of the existing contractual obligations with all Intended Recipients, and the commitment to comply with the Code shall be provided for in specific clauses.

Non-compliance with the rules of conduct set out in this Code of Conduct by employees and collaborators constitutes a breach of the obligations arising from the employment relationship and, according to principles of gradualism, may lead to:

- disciplinary sanctions (according to the applicable rules and regulations);
- corrective or suspensive measures up to and including termination of employment;
- reporting to the relevant authorities, in the cases provided for by law.

For all other Intended Recipients, in the event of a breach of this Code of Conduct, the resolutions provided by the contract and applicable regulations, such as termination of the contract, shall be activated.

8. TRAINING AND CORPORATE CULTURE

The company undertakes to take action against the conduct prohibited by this code through:

- mandatory training courses;
- internal communication campaigns;
- company self-assessment tools and feedback;
- any other initiative that the company may deem appropriate in the future.

9. WHISTLEBLOWING CHANNELS

All Intended Recipients are required to promptly report any violation, or suspected violation, of this Code of Conduct of which they become aware. For this reason, in addition to the possibility of contacting the HR Department at any time, the company has made available a confidential



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channel, accessible to all. Through this channel, situations and behaviours prohibited by this code can be reported.

On the website www.CEMBRE.com there is a Whistleblowing page where all the Group's procedures are set out and where the following link to the whistleblowing portal can be found: <https://whistleblowingCEMBRE.openblow.it>.

Handling of all whistleblowing reports will be impartial, confidential and prompt, in compliance with current legislation and ensuring protection against any possible retaliation.

Reference is made to the Whistleblowing procedure regarding all steps and safeguards implemented following a whistleblowing report.

10. FINAL CONSIDERATIONS

Everyone is called upon to contribute in their daily work and actions to the values and commitments undertaken by CEMBRE.

All Intended Recipients must pay careful attention to situations of non-compliance with this Code within their organisational units, departments and offices, as well as when carrying out their functions or roles. Intended Recipients must report any relevant situations so that CEMBRE can take appropriate protective measures to safeguard the victim and its own integrity and reputation.

11. PRIVACY

All information, documents and personal data processed in the context of whistleblowing (whether formal, informal or through monitoring tools such as employee climate surveys) are handled in accordance with the General Data Protection Regulation (GDPR - EU Regulation 2016/679) and applicable national data protection legislation.

12. REVISION AND UPDATING

This Code is periodically monitored and updated, also on the basis of regulatory developments and application experience.

It is an integral part of the Code of Ethics and refers to the 'Whistleblowing management procedure and the Protection of Whistleblowers (so-called Whistleblowing)'.



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The first edition of this Code was approved by resolution of the Board of Directors of CEMBRE S.p.A. on 14/11/2025. Subsequent amendments and/or additions shall enter into force on the day established by law or regulation or by resolution of the Board of Directors, or, in case of urgency, by the Managing Director.

Reference standards

This Code is based on the following references:

- ILO Convention No. 190 and Recommendation No. 206;
- Code of Ethics and 'Whistleblowing management procedure and the Protection of Whistleblowers (so-called Whistleblowing)'.