



Sistema di gestione per la parità di genere

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CODE OF PRACTICE AGAINST VIOLENCE AND HARASSMENT IN THE WORKPLACE

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1. PURPOSE AND SCOPE OF APPLICATION

This Code aims to define, in line with the principles expressed in the Code of Ethics and in light of the applicable regulations, the conduct that is not tolerated, in order to ensure a work environment free from any form and type of violence and harassment.

It applies to:

- a) all individuals performing work activities at AI Engineering S.r.l., regardless of the type of contract, including trainees, both as protected individuals and as parties required to comply with this Code;
- b) candidates during recruitment and selection processes;
- c) individuals with whom the employment relationship has ended, in relation to incidents occurring during their period of employment at AI Engineering;
- d) third parties (clients, suppliers, and consultants).

2. DEFINITIONS AND EXAMPLES

WORKPLACE VIOLENCE AND HARASSMENT: the scope of this Code includes violence and harassment, as defined below, occurring in the workplace, including:

- public and private spaces where they serve as a workplace or are related to work;
- break or lunch areas, or places where sanitary services are used;
- during work-related travel, training, events, or activities, including social events related to work;
- following or during work communications, including those enabled by information and communication technologies;
- within accommodations provided by employers;
- during commuting to and from work;
- during job interviews and recruitment activities.

VIOLENCE AND HARASSMENT: any conduct – expressed in physical, verbal, or non-verbal form – or the threat of such conduct, either in a single instance or repeatedly, which is intended to cause, causes, or could result in physical, psychological, or economic harm. This includes gender-based violence and harassment, as defined below.

By way of example and not limited to, violence and harassment include:

- physical violence or the threat of physical violence;
- offensive verbal expressions or unwanted familiarity;
- use of an aggressive, intentionally intimidating tone of voice, as well as vulgar language;
- unjustifiably treating someone with the intent to harm or humiliate them;
- verbal expressions that are denigratory, offensive, or related to personal identifying characteristics (ethnicity, nationality, religion, political affiliation, mental and physical disabilities, health condition, age, and any other personal characteristic);

- bullying, mobbing, or behavior that negatively and permanently alters the working situation, affecting the right to health (so-called "straining"), or any other form of manipulation or psychological abuse;
- digital/online harassment/stalking.

GENDER-BASED VIOLENCE AND HARASSMENT: violence and harassment, as defined above, directed at individuals because of their sex or gender, whether directed at an individual or a group. It includes sexual harassment, as defined below.

By way of example and not limited to, gender-based violence and harassment include:

- physical and/or psychological violence against an individual for reasons related to their sex, gender, gender identity, or sexual orientation, and acts of stalking;
- derogatory or degrading comments about someone's sexual orientation or gender identity, or using gender/sexual insults;
- distribution or threats of distributing intimate images;
- sexual violence, whether attempted or actual.

SEXUAL HARASSMENT: any conduct of a sexual nature – expressed in physical, verbal, or non-verbal form – or the threat of such conduct, either in a single instance or repeatedly, which is intended to, causes, or could be perceived as causing a violation of the dignity of an employee or create an intimidating, hostile, degrading, humiliating, or offensive work environment.

An aggravating circumstance is when sexual harassment is accompanied by implicit or explicit threats or coercion by superiors or individuals who can influence the establishment, performance, or termination of the employment relationship (so-called "quid pro quo harassment").

By way of example and not limited to, sexual harassment includes:

- sexually suggestive staring or making inappropriate sexual gestures;
- telling sexual or lewd jokes or stories that make others uncomfortable;
- commenting on someone's sexuality or physical attraction, or making sexual comments about appearance, clothing, or body parts;
- repeatedly contacting someone (e.g., phone calls or persistent messaging) or repeatedly asking for a date;
- making unwanted sexual advances;
- sending sexually suggestive communications in any format, or sharing or showing sexually inappropriate images or videos in any format;
- unwanted touching, including pinching, caressing, rubbing, or deliberately brushing against another person;
- promising personal or work-related benefits in exchange for sexual favors, or engaging in sexual blackmail;
- threatening retaliation or any negative consequences – personal or work-related – if sexual favors are not granted.

DIRECT DISCRIMINATION: any provision, criterion, practice, act, agreement, or behavior, as well as any order to carry out an act or behavior, resulting in less favorable treatment of an employee, or a candidate during the recruitment and selection process, compared to another person in a similar situation, based on gender, nationality, ethnicity, language, age, disability status, sexual orientation, political, trade union, or religious beliefs, parental or family care needs, pregnancy status, or maternity or paternity rights.



INDIRECT DISCRIMINATION: any provision, criterion, practice, act, agreement, or behavior, including organizational practices or those related to working hours, which appears neutral but results in less favorable treatment of an employee, or a candidate during recruitment and selection, compared to another person in a similar situation, based on gender, nationality, ethnicity, language, age, disability status, sexual orientation, political, trade union, or religious beliefs, parental or family care needs, pregnancy status, or maternity or paternity rights, unless it pertains to essential requirements for carrying out the job, provided that the goal is legitimate and the means employed to achieve it are appropriate and necessary.

RETALIATION: adverse conduct directed at an individual following their refusal, reporting, or participation in the reporting and investigation procedures.

3. FUNDAMENTAL PRINCIPLES

ZERO TOLERANCE: any form of violence, harassment, and discrimination is prohibited and not tolerated.

All employees have the right to a workplace free from any form of violence and harassment, but they also have the responsibility to cooperate in creating a work environment based on mutual respect, support those who report incidents of violence and harassment as much as possible, and cooperate in the relevant investigations.

Every manager is responsible for overseeing compliance with these principles and for preventing, identifying, and reporting any violations.

PROPORTIONALITY: Ai Engineering takes actions, including disciplinary measures, that are proportionate to proven cases of violence, harassment, and discrimination, in accordance with legal and contractual regulations.

REPORTING: all individuals within the scope of this Code are encouraged to report incidents of violence and harassment, as defined above, of which they are victims or of which they become aware. These reports should be made in good faith, without fear of retaliation, and the reporter must be protected from any retaliation or discrimination resulting from the report.

RIGHT TO CONFIDENTIALITY: the information reported and revealed during subsequent investigations is confidential, subject to the right to be informed of any hazards present in the workplace.

PROHIBITION OF RETALIATION: any act of retaliation following reports of violence, harassment, or discrimination made in good faith is prohibited.

4. REPORTING PROCEDURES

Reporting channels have been set up for incidents of violence, harassment, and discrimination, as defined above, when they are known in connection with the work or business relationship with Ai Engineering.

Reports must be detailed and based on specific, consistent elements, concerning verifiable facts known directly by the reporter, and must contain all necessary information to identify the perpetrators of the wrongful conduct.



The reporter is required to provide all useful elements to verify the facts reported in order to allow appropriate checks.

Anonymous reports are accepted, but they must indicate how the reporter wishes to be contacted.

Reports can be made:

- a) for reports from third parties: orally during a meeting with the Steering Committee, by phone, in person, or via videoconference, which will be scheduled within a reasonable time. To use this method, the number +39 011-581.4511 can be used or an appointment with the Steering Committee can be requested by emailing comitatoquida@aigroup.it;
- b) for reports from AI Engineering staff: informally to the Gender Equality Steering Committee (for AI Engineering personnel only);
- c) for reports from anyone: by submitting this form, as per the instructions below.

Attachment

REPORTING FORM

INSTRUCTIONS FOR SUBMISSION

This form can be submitted, alternatively:

- by email, to the address comitatoquida@aigroup.it, indicating *Sending Report* in the subject line;
- by regular mail or registered mail to AI ENGINEERING s.r.l., corso Francesco Ferrucci 112, Blocco B, in a sealed envelope addressed to the attention of the Steering Committee;
- by using the designated reporting box at the company headquarters (for AI Engineering personnel only, recommended method for anonymous reports)

REPORTER'S DETAILS

Name	
Surname	
Job title or professional position	
Email address	
Phone number	
<input type="checkbox"/> THE REPORTER CHOOSES TO REMAIN ANONYMOUS If you wish to be contacted, please indicate the following methods (optional): <hr/>	

REPORT

<input type="checkbox"/> Physical abuse <input type="checkbox"/> Discrimination (gender, religion, sexual orientation, etc.) <input type="checkbox"/> Verbal abuse <input type="checkbox"/> Other violations of the Gender Equality Policy <input type="checkbox"/> Digital abuse <input type="checkbox"/> Sexual harassment	
Date of report	
Date of the event	
Location of the event	
Author(s) of the event	
Any other individuals involved	
Any other individuals who may provide information about the event	



DETAILED DESCRIPTION OF THE REPORT

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ANY EVIDENCE

Attached documentation:

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