

# Policy

Occupational Health & Safety,  
Environment, Biodiversity  
& Energy

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## INTRODUCTION

For Fincantieri Group (hereinafter Fincantieri or the Group), safeguarding health and safety, protecting the environment, protecting biodiversity and ecosystems and energy efficiency are essential values and fundamental conditions for sustainable development. To this end, Fincantieri promotes concrete actions to spread these values, with the aim of generating a positive impact on nature and protecting human health. These principles inspire strategic choices at every level of the organization, strengthening the link between industrial activities, territory and value creation, with a view to continuous improvement and maximum stakeholder satisfaction.

Fincantieri, in line with its Charter of Sustainability Commitments, Code of Ethics and Suppliers' Code of Ethics, defines its sustainable development priorities, with core values guiding all its activities. Of these, particular importance is given to:

- Continuous improvement of health and safety conditions in the workplace and promotion of workers wellbeing of workers.
- Reduction of environmental impacts and contribution to energy transition for a low-carbon economy.
- Application of circular economy principles in both product design and production cycle.
- Application of sustainability criteria (ESG) in supplier selection and qualification processes, as well as checking criteria through specific audits.
- Spread of awareness to limit negative impacts and actively contribute to the protection of terrestrial and aquatic ecosystems.
- Promotion of training for all personnel and awareness and information campaigns for suppliers.
- Support for technological innovation, also by initiating collaborations and partnerships with other players, institutions, universities and research sector in harmony with the environment, in the conviction that protecting and regenerating natural capital is not only an ethical duty, but also a strategic factor for ensuring the availability of resources to future generations.
- Pursuit of the highest levels of customer satisfaction and trust, including in the environmental and social fields.
- Periodic assessment of impacts, dependencies, risks and opportunities related to health and safety, nature and the environment.

### 1. PURPOSE

Fincantieri is committed to ensuring responsible and sustainable management of aspects related to safeguarding occupational health and safety, environmental protection, biodiversity and ecosystems protection

and energy efficiency, founding its actions on clear, shared principles oriented towards continuous improvement. The Group considers compliance with regulations, reference standards and international best practices a priority, promoting a corporate culture based on prevention, responsibility and value creation for all stakeholders.

Furthermore, Fincantieri is aware of the challenges associated with activities carried out in socially, environmentally and ecologically sensitive contexts, and therefore recognises the need to adopt specific and responsible approaches with the aim of ensuring that every operation, particularly in Shipyards or other operational contexts, respects the health of people, the safety of workers and the integrity of ecosystems.

The reference principles adopted by Fincantieri to manage these issues include:

- Strict compliance with relevant international, national and local legislation and standards.
- Focus on and pursuit of best practices and Best Available Techniques (BAT) as a guide for sustainable and responsible action.
- Continuous improvement of performance in the areas of occupational health and safety, environment and energy, promoted through the development of guidelines and the adoption of certified management systems in accordance with the regulations and reference standards adopted.
- Involvement of the necessary resources to ensure the systematic implementation of actions to improve energy efficiency and reduce environmental impacts.
- Promotion of a “safe & sustainable-by-design” model, in which the consumption of raw materials, environmental protection, biodiversity protection and the fight against climate change are closely interlinked and prioritised for the prosperity of present and future generations.
- Promotion of a nature-positive development model, in which not only negative impacts of business activity are reduced, but tangible benefits are generated to protect biodiversity and ecosystems.
- Promotion of awareness and engagement of employees and suppliers on the relevance of these issues, also through training and/or information activities.
- Fulfilment of stakeholder expectations and formal obligations undertaken by Fincantieri, as a fundamental prerequisite for value creation and promotion of sustainable development.

Therefore, Fincantieri is committed to integrating sustainability into every aspect of its activities, recognising the interconnection between occupational health and safety, environmental protection, biodiversity protection and energy efficiency. The Group promotes an integrated and systemic approach, in which the protection of people, ecosystems and natural resources is a priority.

In this perspective, Fincantieri focuses on the prevention of risks to workers' health and safety, as well as environmental risks, investing in technologies, training and a culture of environmental protection and safety,

while at the same time adopting innovative solutions, promoting climate change mitigation initiatives and developing concrete actions to restore ecosystems and foster the resilience of local communities.

## 2. SCOPE OF APPLICATION

This Policy applies to Fincantieri S.p.A. and the Group's Subsidiaries, directly or indirectly controlled, based in Italy and abroad, reflecting the Group's commitment to sustainability, transparency and responsibility.

Fincantieri Group is also committed to promoting and spreading the principles defined in this document to stakeholders that operate and collaborate with Fincantieri.

## 3. REFERENCES

This Policy has been developed in accordance with the following international standards and principles:

- International Labour Organisation (ILO) standards and conventions;
- EU-OSHA Strategy 2025-2034;
- ISO 45001, which defines the requirements for Occupational Health and Safety Management Systems;
- ISO 14001, which defines the requirements for Environmental Management Systems;
- ISO 50001, which defines the requirements for Energy Management Systems;
- European Green Deal, followed by the Clean Industrial Deal;
- European Framework for [Corporate Social Responsibility](#) and Corporate Sustainability Due Diligence.
- EU Biodiversity Strategy for 2030;
- Science Based Target Initiative (SBTi) Guidelines;
- Science Based Target Network (SBTN) Guidelines;
- Global Biodiversity Framework of Kunming-Montreal;
- Recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) for the reporting of financial information relating to climate change;
- Recommendations of the Task Force on Nature-related Financial Disclosures (TNFD) for reporting on nature-related dependencies and the impact of organizations on nature.

In pursuing its pathway to strengthen and consolidate its commitment to sustainability, Fincantieri also adheres to the United Nations Global Compact, actively contributing to the achievement of Sustainable Development Goals (SDGs), as outlined in the Global Agenda for Sustainable Development adopted by the United Nations.

## 4. COMMITMENT AND GENERAL PRINCIPLES

Fincantieri is committed to turn management principles into concrete actions aimed at continuous improvement and promotion of a sustainable culture. The commitment is divided into four distinct but closely related areas: i) safeguarding occupational health and safety, ii) environment protection, iii) biodiversity and ecosystems protection, and iv) rational and sustainable energy supply and use, adopting the “Do No Significant Harm” (DNSH) principle concerning the obligation to avoid significant harm to the environment or society in a development or investment context, placing innovation at the center to achieve these commitments.

### 4.1 SAFEGUARDING OCCUPATIONAL HEALTH AND SAFETY

Fincantieri Group undertakes to:

- Constantly assess risks regarding occupational health and safety, managing them with the aim of preventing occupational accidents, injuries and diseases, and regularly monitoring injury rates.
- Promote the development of innovative technological and organisational solutions to prevent or mitigate exposure to risks.
- Ensure all workers, involved in different capacities in production processes, the necessary training and information on accident prevention and emergency management.
- Promote the progressive improvement of working environments through the constant research for products and solutions conforming to ergonomic criteria which raise the standards of occupational health and safety.
- Pursue, through risk mitigation initiatives, the continuous improvement of occupational health and safety, defining specific targets for reduction in accident rates, aiming at the target Zero Accidents.
- Constantly recall, through awareness-raising and spreading initiatives, the attention of personnel working in its Production Units (Offices and Shipyards) to the importance of compliance with rules and procedures, stimulating the growth of a culture of prevention and protection, and increasingly responsible individual behaviour.
- Maintain a communication flow with the Top Management, extending up to the Board of Directors, regarding significant incidents, providing information on the identified corrective actions.
- Constantly monitor supplies in order to verify the compliance with the relevant regulations regarding substances of concern and very high concern for human health, aiming at reducing their presence in production cycles over time.
- Monitor noise levels within Production Units and surrounding areas, in compliance with the relevant regulations, promoting solutions that reduce impacts on people and the environment over time.

## 4.2 ENVIRONMENTAL PROTECTION

Fincantieri Group undertakes to:

- Assess and monitor risks and impacts on environmental aspects arising from its activities and processes, identifying and implementing initiatives and measures to prevent possible accidents.
- Implement improvement plans aimed at the containment and reduction of its emissions and the quality of the same in air, water and soil, at the continuous efficiency of energy performance, consumption of water resources, soil protection and management of waste, above all hazardous waste, with the aim of minimizing volumes.
- Develop plans and agreements to promote the recovery, reuse and recycling of raw materials and materials to reduce waste, promoting circular economy principles in its production processes.
- Lead the development of cutting-edge solutions capable of anticipating global challenges through the application of innovative technologies and by promoting the use of products with a lower environmental impact.
- Adopt design logics consistent with circular economy and sustainability criteria that pursue, also by suppliers, a responsible use of natural resources and the use of new raw materials in production processes.
- Contribute to the fight against climate change by promoting the development of innovative technological and organizational solutions, supporting the achievement of targets for the reduction in greenhouse gas emissions, with the aim of meeting zero-emission targets, such as the Net Zero Cruise ship.
- Implement improvement plans to contain the consequences related to the mobility of people, logistics and the supply of materials.
- Develop knowledge and increase the awareness of personnel, in different capacities involved in production process, on the importance of their contribution in reducing the impact on the environment, also through targeted awareness-raising initiatives.
- Periodically monitor with stakeholders the effectiveness of the Group's initiatives on environmental aspects.
- Pursue sustainable and efficient management of water resources in the areas where the Group is present, with particular attention to those subject to water stress, implementing initiatives and measures to curb consumption.
- Interact with and involve local communities, research institutions, universities and local associations to assist the ecological transition, including through initiatives promoted by the Fincantieri Foundation, in order to raise awareness of ecological transition and support innovative projects and initiatives in favour of environmental protection.

### 4.3 BIODIVERSITY AND ECOSYSTEMS PROTECTION

Fincantieri Group undertakes to:

- Promote a regenerative development model that not only limits negative impacts, but also actively contributes to biodiversity protection and the achievement of EU targets for the restoration and conservation of natural ecosystems in accordance with international agreements, guidelines and frameworks.
- Found its nature and biodiversity strategy on the principle of robust assessment of the dependencies, impacts, risks and opportunities arising from the Group's operations and interactions with ecosystems and the life in them.
- Recognise the centrality of sound management of natural capital and the need to adopt a responsible approach towards the environment, to ensure the resilience and sustainable growth of its business.
- Promote application of the mitigation hierarchy principle, which implies as a priority the avoidance of any unnecessary impact, followed by minimisation, restoration and, as a last resort, offsetting of adverse impacts on ecosystems.
- Encourage the sustainable use of natural resources, integrating innovative practices throughout the product life cycle.
- Avoid interventions in areas recognised as having high ecological, biological or cultural value, unless there are no viable alternative solutions and the intervention does not compromise the natural balance.
- Promote dialogue and interaction with stakeholders and supply chain partners, local communities, governments, NGOs, research institutions and universities, including through initiatives promoted by the Fincantieri Foundation, in order to raise awareness of safeguard of ecosystems and support innovative projects and initiatives for environmental protection and biodiversity conservation.

### 4.4 RATIONAL AND SUSTAINABLE SUPPLY AND USE OF ENERGY

Fincantieri Group undertakes to:

- Pursue the supply and rational use of energy sources, defining specific reduction targets in terms of both consumption and Greenhouse Gas (GHG) emissions;
- Develop production processes that favour energy efficiency through the application of the best management and technological solutions.
- Prioritise the purchase of energy-efficient and low-emission commodities, products and services, including the assessment of energy performance from the early design stage and in the criteria for awarding supplies.

- Define the objectives aimed at improving energy performance and ensure adequate information and resources for their achievement, carrying out constant monitoring.
- Increase the knowledge and responsibility of the personnel involved in different capacities in production processes, in order to improve their awareness and the importance of individual contribution in achieving the common objectives identified.
- Take action on the energy performance of the Group's various Production Units (Offices and Shipyards) with a view to continuous improvement and decarbonization.
- Implement innovative advanced energy-efficient technologies, promoting the use of energy from renewable sources and investments in self-generation facilities, aiming to ensure 100% of electricity consumption from renewable sources, in order to progressively reduce emissions in pursuit of decarbonization.
- Raise awareness and involve stakeholders on issues concerning the energy transition and the fight against climate change.

## 5. IMPLEMENTATION AND MONITORING

Fincantieri is committed to integrating the issues of safeguarding occupational health and safety, environmental protection, biodiversity and ecosystems protection, and energy efficiency into every aspect of company management, pursuing the creation of long-term value and ensuring compliance with ethical principles, transparency and accountability. To this end, the governance model adopted promotes consistency between the different company policies including specific instruments, aimed at transposing and implementing the commitments undertaken.

This Policy provides for the periodic reporting of company performance through the publication of sustainability reporting, which includes indicators and initiatives related to safeguarding occupational health and safety, environmental protection, biodiversity and ecosystems protections, and energy efficiency.

In addition, the Group's individual Production Units (Offices and Shipyards) may adopt a specific "Site Declaration of Commitment on Safeguarding Occupational Health and Safety, Environmental Protection, Biodiversity and Ecosystems Protection, and Rational and Sustainable Supply and Use of Energy", in line with the guidelines set out in this Policy, to meet specific local factors and ensure the uniform application of corporate objectives.

This Policy is made available to all employees through publication on the Company Intranet and can also be consulted by all stakeholders through Fincantieri Group's institutional website.

## 6. RESPONSIBILITY AND UPDATE

The Parent Company, through "Group HSE, Real Estate and General Services" of the "Human Resources and Real Estate" Department, "Sustainability" of the "Administration, Finance and Control" Department and "Operations, Investment and Industrial Asset Management" Department, is responsible for the implementation, monitoring and control of the Policy.

The Policy will be periodically reviewed and validated by the Sustainability Committee and, in order to ensure its effective implementation and adequacy, will be adapted to any changes in the external environment.

The Policy and subsequent revisions will be subject to approval by the Board of Directors.

*Policy approved by the Board of Directors on 22<sup>nd</sup> January 2026*