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POLICY ANTI-HARASSMENT

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1. Introduction

The following Policy expresses Lumson S.p.A.'s strong commitment to preventing and fighting any form of sexual harassment to ensure full respect and maximum protection of the dignity of every person. It is inspired by the Principles of Human Rights, the values expressed in the Code of Ethics, the other internal Rules adopted by the Company and the provisions of the National Collective Labour Agreement applied.

Sexual harassment, in addition to being able to integrate the details of a crime, constitutes conduct seriously damaging to the dignity of the person, incompatible with the fundamental principles of respect and protection of the person in the workplace. Such behaviors can significantly compromise the psychophysical balance of the victim, negatively affect his professional motivation and undermine the relationship of trust towards the Company, particularly in cases where the latter has not adopted adequate tools to prevent and combat the phenomenon. Furthermore, the consequences of sexual harassment can extend beyond the individual person, generating a negative impact on the overall working environment, on the performance of work groups and on the reputation of Lumson.

2. Policy Objectives

Lumson S.p.A.'s (hereinafter also referred to as "Lumson") adopts a zero tolerance approach towards all forms of harassment.

This Policy was created with the aim of preventing and combating any harassing behavior or sexist act, both within company premises and in external contexts related to the work environment.

Lumson reiterates its commitment to ensuring a safe, respectful and inclusive working environment for all, acting firmly and promptly in the event of reports or non-compliant behavior.

Sexual harassment, whether carried out or attempted, constitutes a violation of the Human Rights Principles, the Code of Ethics and other internal Norms adopted by Lumson. Consequently, in cases of confirmed sexual harassment, Lumson adopts the consequent measures provided by the law and contract.

3. Scope

This policy applies to all parties operating in Lumson, regardless of their contractual or hierarchical position, as well as to all those who have professional relationships with the company, including:

- Members of the Board of Directors, supervisory bodies, and company management;
- All Lumson employees, regardless of the contract applied, job performed or location of assignment;
- External collaborators, freelancers, interns, apprentices;
- Suppliers, subcontractors, customers and visitors.

The Policy applies to every work environment: offices, production departments, common spaces, but also during trips, events, training courses, external company activities or in smart working.

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4. Prohibited conduct

4.1 Violence and harassment at work

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

- (a) in the workplace, including public and private spaces where these represents workplace or work-related places;
- (b) in places intended for coffee breaks or lunch breaks, or in places where sanitation is used or in changing rooms;
- (c) during business trips, training, events or activities, including social ones correlated to work;
- (d) during working communications;
- (e) during travel to work and back home

4.2 Violence and harassment

It constitutes violence or harassment, and is therefore prohibited, any unwanted conduct, attitude or behavior (whether expressed in physical, verbal or non-verbal form) or the threat to carry it out, on a single occasion or repeatedly, and having the purpose or effect of intimidating, degrading, humiliating, offending and violating the dignity of the person and causing physical, psychological or economic harm. By way of example and not limited to, they may constitute acts of violence and harassment, and therefore prohibited, the following conducts:

- (a) verbal or visual expressions that are abusive, offensive or otherwise characterized by unwelcome confidentiality that does not meet with the nature of any relationship;
- (b) verbal or visual expressions that are disparaging and offensive or otherwise refer to identifying elements of the person (ethnicity, nationality, religion, political affiliation, mental and physical diversity, health conditions, age and any other personal data);
- (c) acts of bullying, mobbing or behavior likely to cause a constant and permanent negative change in the work situation, likely to affect the right to health, or any other form of psychological manipulation or abuse;
- (d) pretend a trust relationship and emotional connection through which to manipulate, exploit or abuse another person;
- (e) physical violence or threat of physical violence;
- (f) digital/online harassment/stalking;
- (g) gender-based violence and harassment (defined below).

4.3 Gender-based violence and harassment

It constitutes violence or harassment, and is therefore prohibited, violence and harassment (as defined above) carried out against people due to their sex or gender, or which affects people of a specific sex or gender, including sexual harassment. By way of example and not limited to, they may constitute gender-based violence and harassment, and therefore prohibited, the following conducts:

- (a) violence perpetrated, in physical and/or psychological form, against a person for reasons related to his or her gender, gender identity or sexual orientation;

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- (b) the dissemination of intimate images;
- (c) sexual harassment (defined below) and sexual violence, whether attempted or actual.

4.4 Sexual harassment

Sexual harassment, and therefore prohibited, is any unwanted statement, design or behaviour with a sexual connotation, of a lascivious or obscene nature, as well as any provocation, insult or outrageous act, based on gender and sexual identity expressed in physical, gestural or verbal form, having the purpose or effect of intimidating, degrading, humiliating, offending, violating the dignity of the Harassed Person. Sexual harassment may also be accompanied by implicit or explicit threats or blackmail by hierarchical superiors or persons who may otherwise affect the establishment, conduct and termination of the employment relationship. By way of example only and not limited to, they may constitute sexual harassment, and the following conduct is therefore prohibited:

- (a) making sexual observations regardless of the medium used; explicit and implicit;
- (b) making appreciations of someone's physical appearance;
- (c) seeking deliberate and inappropriate physical contact;
- (d) mimicking a sexual act;
- (e) engage in sexual blackmail;
- (f) staring sexually suggestively or making inappropriate sexual gestures;
- (g) make assessments of sexuality or physical attraction towards the person, or make sexual comments about appearance, clothing or body parts;
- (h) make derogatory or degrading comments about a person's sexual orientation or gender identity, or use insults with a gender/sexual connotation;
- (i) repeatedly contacting a person (e.g., insistent phone calls or messaging) or repeatedly asking them for an appointment;
- (j) making unwanted sexual advances;
- (k) send sexually suggestive communications in any format, or share or display sexually inappropriate images or videos in any format;
- (l) unwanted touching, including purposely pinching, stroking, rubbing, or touching another person;
- (m) promising benefits of any kind– personal or work– in exchange for sexual favours;
- (n) threatening retaliation or adverse consequences of any kind at personal or work– where sexual favours are not granted.

4.5 Psychological harassment

Psychological harassment, and therefore prohibited, are repeated actions that intentionally or even unintentionally deteriorate working conditions and at risk of influencing the physical or mental health of the subjects involved and damaging their professional development, even on the basis of gender.

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By way of example and not limited to, the following behaviors may constitute psychological harassment and are therefore prohibited:

- (a) treating someone unjustifiably for the purpose of harming or humiliating them;
- (b) use an aggressive and intentionally intimidating tone of voice, as well as vulgar language.

4.6 Sexist acts

Any act relating to a person is prohibited when, intentionally, it undermines gender dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. By way of example and not limited to, they may constitute sexist acts, and the following behaviors are therefore prohibited:

- (a) repeated jokes focusing on gender differences or having a sexual background;
- (b) considerations of the ability to perform certain activities according to gender and person;
- (c) sexist comments on parenting or family duties.

5. Committee for Prevention

Lumson, in full compliance with the principles of dignity, equality and protection of the individual, has established the Joint Company-Trade Union Committee with the aim of strengthening its concrete commitment to preventing and combating all forms of harassment, discrimination and behaviour detrimental to individual dignity in the workplace.

The Committee has the task of monitoring and verifying the implementation of company policies on anti-discrimination and prevention of harassment, proposing training and awareness-raising initiatives aimed at all staff (aimed at spreading an inclusive culture, mutual respect and collective responsibility in the prevention of inappropriate behaviour), collaborating in the management of reports relating to incidents of harassment or discrimination.

6. Prevention, Training and Awareness

Lumson actively engages in various areas to ensure a safe and respectful working environment for all its employees. First of all, the company promotes compulsory training courses for all staff, with the aim of raising awareness on crucial issues such as Human Rights, Diversity and Harassment, ensuring that each employee is adequately prepared and aware of the regulations and good practices in these areas.

Furthermore, Lumson is responsible for ensuring confidential and secure reporting channels, which fully comply with whistleblowing legislation. In this way, the company protects those who decide to report incorrect behavior, protecting them from possible retaliation.

Finally, Lumson actively promotes a culture of prevention, working in collaboration with trade unions and organizing awareness campaigns. These initiatives are designed to spread awareness and foster a working environment in which the rights of every individual are respected and protected.

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7. Reports

Reports of any harassing conduct can be made through different channels.

Interested parties can, preferentially, make a report via the whistleblowing reporting channel available on the company website, which offers confidentiality and protection to the whistleblower; for further information on how to manage reports, please refer to the relevant policy available on the company website.

It is also possible to make a report by contacting the Human Resources Department directly, contacting the HR manager, or by contacting the members of the Committee for prevention.

In any case, to guarantee confidential treatment compliant with Legislative Decree 24/2023, whether the report is made to the HR Director or to the Committee, the subsequent management of the same will take place exclusively through the whistleblowing channel, with the involvement of the manager of the reports referred to in the reporting management procedure.

8. Communication

This Policy is:

- given to all workers at the time of hiring;
- published on corporate platforms (SharePoint, HR portal, website);
- posted on company noticeboards;
- promoted through information moments in collaboration with the trade unions.

9. Monitoring and Continuous improvement

The Joint Committee will share to the Board of Directors of Lumson an annual report in reference to the implementation of company policies regarding inclusion, fight against discrimination, the effectiveness of the measures adopted, proposing possible improvements.

10. Updates and Review

The Policy is subject to periodic reviews and updates to ensure its adequacy and effective implementation in line with the evolution of international standards and regulatory requirements. All updates shall be submitted for approval to the Board of Directors to ensure alignment of the Policy with the core principles and strategic vision of Lumson.