

LOCAL PROCEDURE

Focus on Non-Discrimination, Anti-Harassment, Preventing Slavery and Human Trafficking

(NORDIC & BALTIC REGION)

PURPOSE

The Nordic & Baltic Region (the Region) has a longstanding commitment to a work environment that respects the dignity and worth of each individual.

The purpose of this policy is to contribute to a healthy and safe working environment, in which all employees of the Region thrive and feel secure. Hence this policy governs non-discrimination and anti-harassment.

For preventative reasons and in order to contribute to a good tone of communication, it is important to the Region to establish staff policy guidelines on:

1. Zero Tolerance of Discrimination and Harassment
2. Preventing Slavery and Human Trafficking

All employees of the Region and particularly managers have a responsibility for keeping our work environment free of conduct violating this policy. Any employee or manager who becomes aware of an incident of behaviour towards another individual, which may violate this policy, whether by witnessing this incident or being told of it, must report.

1. ZERO TOLERANCE OF DISCRIMINATION AND HARASSMENT

1.1 Non-discrimination

It is the philosophy and policy of the Region that any discrimination against any employee or applicant on the basis of race, colour, sex, national origin, age, religion, marital status, the presence of a medical condition or handicap, height, weight etc. will not be allowed or tolerated.

This policy applies to all employment practices including but not limited to recruiting, hiring, pay rates, conditions of employment and termination.

1.2 Anti-harassment

The Region strictly prohibits any form of harassment, joking remarks, stories, nick names or other abusive language, gestures or conduct directed at employees because of their race, colour, sex, national origin, age, religion, marital status, the presence of a medical condition or handicap, height, weight, etc.

The Region prohibits sexual harassment of any employee. Sexual harassment is prohibited by law. It is intimidating, an abuse of power and is inconsistent with the policies, practice and management philosophy of the Region.

Sexual harassment is defined as unwanted verbal, non-verbal or physical conduct of a sexual nature by a manager or an employee (or any other person in connection with his or her employment), or a customer or a

client, with the purpose or effect of interfering with another person's dignity, in particular by creating an intimidating, hostile, offensive, humiliating or uncomfortable working environment. Sexual harassment can take the following forms:

- Sexual conduct that interferes with another person's work performance or creates an intimidating, hostile or offensive work environment.
- Personnel decisions (e.g. promotion, raises, scheduling) made by a manager based on the employee's submission to or rejection of sexual advances.
- Submission to a sexual advance used as a condition of keeping or getting a job, whether expressed in explicit or implicit terms.

Specific examples of sexual harassment include but are not limited to: sexual flirtations, advances or propositions, requests for sexual favors, verbal abuse of a hostile or sexual nature, unnecessary touching, the display of sexuality suggestive objects or pictures, sexually explicit jokes, physical assault, sexual bantering, jokes and teasing, off-color language or jokes, verbal commentaries about an individual's body, and using sexually oriented or degrading gestures or other nonverbal communications such as leers, gawks and the like.

Harassment in any form is prohibited in the Region, and breach of this policy may result in employment law sanctions for the harasser, including a warning, termination of employment or summary dismissal.

2. PREVENTING SLAVERY AND HUMAN TRAFFICKING

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labor and human trafficking. The Region has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains.

The Region also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labor in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labor.

However, the Region accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications

3. THE POSITION OF THE REGION

The Region considers any form of discrimination, harassment, slavery and human trafficking for unacceptable.

It is important to the Region to ensure a good and secure working environment, in which all employees thrive and prosper, and in which management and employees – and the employees between themselves – contribute to a constructive collaboration.

This policy not only prohibits any misconducts but also strictly prohibits any retaliation against an individual who has registered a complaint under this policy or who has cooperated in the investigation of a complaint.

Any individual who has been determined to have retaliated against another individual for utilizing the complaint procedure or cooperating in the investigation of a complaint will be subject to appropriate discipline up to and including termination of employment.

4. CONDUCT IN THE WORKPLACE

In the Region, it is important that people collaborate in a professional and respectful manner to ensure that everybody feels comfortable.

In the Region, we share knowledge, listen to each other and show readiness to help. We communicate openly and trustfully with each other, and we do not tolerate offensive or derogatory conduct, including offensive or derogatory humour.

Compliance with this and other staff policies is therefore a precondition to employment within the Region.

5. THE DUTIES AND RESPONSIBILITIES OF THE EMPLOYEES

5.1 Internal

All employees in the Region should protest if they feel that their boundaries have been overstepped. Any person displaying misconduct should be told unequivocally that his or her acts are unwanted. Hence, all employees must understand the aspects of the laws that apply to the performance of their jobs. If an employee observes a misconduct-related practice, he or she must report through the channels listed below.

Any employee who **feels subjected to or witness discrimination or harassment** by any superior, management official, other employee, customer, client or any other person in connection with his or her employment, is required to **report it by using one of the following channels:**

- a) filling in the web form in Cementir Group website <https://www.cementirholding.com/en/governance/ethics-and-compliance>
- b) sending ordinary mail to Cementir Holding, Internal Audit, Corso Francia 200, 00191 Rome, Italy
- c) emailing one of the following dedicated accounts:
 - o whistleblowing@cementirholding.it
 - o ethicscommittee@cementirholding.it
- d) contacting directly the Group Chief Internal Audit Officer.

Each above-mentioned channel is managed by the independent department of Internal Audit, who guarantees the highest standards of confidentiality and non-disclosure within the Group.

The employee can also refer to his / her competent HR to get proper advice on how to proceed in compliance with Group policies.

If anyone participating in an investigation or involved in opposition activity is subject to retaliation, he or she is required to report the retaliation by using the one of the channels listed above. We can only protect an employee from retaliation if we become aware of the employee's opposition to harassment or discrimination or aware of the retaliation of this is occurring.

Any questions about this procedure, should be addressed to the Ethics Committee (ethicscommittee@cementirholding.it). The same if an employee believe he or she has been subjected to or witnessed any discrimination, harassment or retaliation including but not limited to sexual harassment.

5.2 External parties

The prohibitions against unlawful discrimination and harassment set forth in this policy apply not only to your conduct towards other employees of the Region, but also with respect to the manner in which you interact with others who are not employees but with whom you come into contact in the course of your employment.

Hence, any employee has a right to respectful and non-discriminatory treatment from customers, suppliers etc. of the Region and any others having business with the Region. Consequently, if an employee feels discriminated against or harassed (sexually or otherwise) by someone who is not an employee of the Region, but with whom the employee interacts as part of his or her duties and responsibilities, the employee should **report it following the same instructions given above (5.1)**

6. CONSEQUENCES

Depending on the specific case, Ethics Committee, in conjunction with competent HR and Legal Departments, will assess whether to impose employment law sanctions on the insulter, for instance by issuing a written warning, relocation, termination of employment or summary dismissal. In addition Ethics Committee may also choose different sanctions, such as contacting the business partner to get the harassment to stop, terminating the business partnership or other measures.

In addition, the victim may be offered relocation or psychological counselling, depending on the situation.

False accusations about sexual harassment or other misconduct are obviously also completely unacceptable and may also have consistent consequences for the person making such accusations.