Suppliers' Code of Ethics

Adopted by resolution of the Board of Directors of Seanergy a Marine Interiors Company S.r.l. on 30 April 2026

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INTRODUCTION

Fincantieri Group (also referred to here as "Fincantieri", the "Group" or the "Company") views ethical and sustainable conduct as a conscious commitment to specific responsibilities: **towards the environment**, by fostering eco-friendly growth; **towards communities**, by generating social value and helping them thrive; and **towards its people**, by recognising their contribution as central to the entire production process.
At Fincantieri, we believe these principles should guide not only our own actions, but also those of everyone we work with. That is why we are committed to promoting them across the entire supply chain—because we are convinced that **real competitiveness goes hand in hand with environmental care and social responsibility**. We have formalised these principles in the **Suppliers' Code of Ethics** (the "Code"), developed with careful consideration of the interests and expectations of relevant stakeholders.

Every action, project, initiative, and decision is built on a few key foundations: complying with the law; protecting workers and the environment; and safeguarding the interests of shareholders, employees, customers, partners, and the wider public, including local communities. Our goal is to create value for all **stakeholders**.

1. PURPOSE

At Fincantieri, we believe that long-term business success is only possible when operations are conducted responsibly and ethically. Acting with integrity, honesty, and mutual trust is essential to building shared value.

This Code sets out the values and principles that guide supplier behaviour and practices across the entire value chain. It reflects a shared commitment to responsible, sustainable, and ethically sound conduct, laying the foundation for a transparent and reliable supply chain.

2. SCOPE OF APPLICATION

The sharing and observance of these commitments apply to all those working within Fincantieri, as well as to our business partners, starting with suppliers and contractors and including their subsidiaries, affiliates, and associated entities ("Suppliers"), as well as subcontractors and all other actors across the supply chain.

The Code applies to all Suppliers of Fincantieri S.p.A. and its Group companies, whether directly or indirectly controlled, and regardless of whether they are based in Italy or abroad. Suppliers are expected to comply with the provisions of this document in the course of their activities, in accordance with the terms set out in the relevant contractual clauses and/or formal declarations.

Furthermore, the Group requires Suppliers to actively promote the values and principles outlined in this Code throughout their own value chains, ensuring that, employees, sub-suppliers, and external collaborators are aware of and adhere to its commitments.

3. REFERENCES

This document aligns with all Group policies and draws upon the principles set out in the Code of Ethics, especially those reflected in Fincantieri's Charter of Sustainability Commitments. Through the Charter, we aim to foster increasingly sustainable and responsible development, expressed through tangible commitments across governance, people, economic progress, and environmental stewardship.

The Group operates in full compliance with the laws of the Countries in which it conducts business, in accordance with Italian, European, and International (United Nations) policies and regulations. These commitments are further reinforced by the ethical values embedded in the Company's existing policies and procedures. In this context, Suppliers are required to comply with all national, European and international standards and regulations in the Countries where they operate. They must also take all necessary measures to ensure ongoing compliance and responsiveness to changes in the regulatory landscape. By way of example, this document reflects the principles and provisions drawn from the following key sources:

- Universal Declaration of Human Rights (United Nations);
- International Covenant on Civil and Political Rights (United Nations);
- International Covenant on Economic, Social and Cultural Rights (United Nations);
- UNGP - United Nations Guiding Principles on Business and Human Rights;
- European Convention on Human Rights ;
- The Ten Principles of the United Nations Global Compact;
- International Labour Organisation (ILO) Conventions[1];
- Guidelines for Multinational Enterprises (OECD);
- United Nations Convention against Corruption — (UNCAC);
- United Nations Sustainable Development Goals (SDGs).

[1] This Policy is inspired by the ILO Conventions Nos. 29, 87, 98, 100, 105, 111, 135, 138, and 182, as well as by the Declaration on Fundamental Principles and Rights at Work. More specifically, Fincantieri Group is committed to upholding the four core labour standards established in the Declaration: freedom of association and the right to collective bargaining; elimination of all forms of forced or compulsory labour; effective abolition of child labour; elimination of discrimination in respect of employment and occupation.

4. COMMITMENT AND GENERAL PRINCIPLES

In selecting its Suppliers, Fincantieri is committed to partnering with organisations that operate in full compliance with applicable laws, uphold high ethical standards, promote health and safety in the workplace, respect human rights and dignity, and actively contribute to environmental protection.

In this regard, the Group ensures that the requirements of Suppliers correspond, both during the selection phase and over time, to those required by the company's accreditation and qualification procedures, implementing a structured due diligence process aimed at verifying, among other things: aspects of economic and financial soundness; reputation and business integrity; health & safety and technical and professional suitability.The Group views its Suppliers as strategic partners, assets to be supported and strengthened through the development of **strong transparent, and long-term relationships**. To this end, it requires the sharing and upholding of the principles and commitments defined in this **Fincantieri Suppliers' Code of Ethics**. This Code reflects the foundational values of the Group's Code of Ethics and sets out clear expectations regarding the conduct and business practices that Suppliers are required to maintain.

By requesting Suppliers to subscribe to this Code, Fincantieri places an obligation on them to ensure that their employees, subcontractors, and external collaborators understand and adhere to its principles. Fincantieri decisions regarding the selection and continuation of contractual relationships are based on demonstrated compliance with the Code's provisions, which ultimately contribute to building a responsible, transparent, and ethically sound value chain.

In addition, the Code serves as a guiding framework for managing the impacts, risks, and opportunities associated with supply chain governance.

The following sections outline the commitments Fincantieri expects its Suppliers to subscribe to in relation to Labour and Human Rights, Environmental Stewardship, and Ethical Business Conduct.

5. LABOUR AND HUMAN RIGHTS

In line with the Group's *Human Rights Policy*, the Group believes that the protection and promotion of human rights are fundamental to any responsible business relationship.

The Group acknowledges its duty in ensuring human rights are respected, and it counts on the active engagement of its Suppliers to help uphold them across the entire supply chain. At its core, this principle is about respecting and protecting the rights of all employees and people who collaborate with Fincantieri and its Suppliers in any capacity. These individuals must be treated with dignity and respect and must never be subjected to harassment, cruel treatment, violence, intimidation, corporal punishment, physical or psychological coercion, verbal abuse, or discrimination in the workplace.

Fincantieri expects its Suppliers to share this approach, working together to build a sustainable supply chain that generates positive social impact and mitigates any adverse social consequences.

5.1. HEALTH AND SAFETY IN THE WORKPLACE

Fincantieri expects its Suppliers to actively promote safe, secure, and healthy working environments.

These aspects have long been considered essential for operating within the Group's facilities, and must be managed in full compliance with applicable national and international regulations, as well as occupational health and safety standards. Suppliers are encouraged to adopt certified management systems in accordance with ISO 45001 or equivalent standards.

Suppliers must also implement appropriate safety procedures and take all necessary measures to reduce the risk of accidents, injuries or exposure to toxic substances—especially in the presence of hazardous materials. Emergency plans and response protocols should be in place to minimise the impact of any dangerous situations.

By committing to this Code, Suppliers acknowledge that worker involvement and ongoing training are key to identifying and preventing health and safety risks in the workplace. It is therefore crucial that Suppliers oversee training activities on a continuous basis, ensuring that employees are properly informed and regularly updated, both during onboarding and throughout their employment, and are encouraged to raise any concerns or questions they may have.

5.2. FORCED LABOUR, MODERN SLAVERY, AND HUMAN TRAFFICKING

Fincantieri requires its Suppliers to uphold the right to freely chosen employment, firmly rejecting any use of forced, bonded, or compulsory labour—including work performed under conditions of modern slavery or captivity.

All regular and overtime work must be strictly voluntary and free from any form of coercion, including psychological pressure.

Suppliers also commit to preventing, throughout the entire supply chain, any form of cruel or degrading treatment, as well as any practice linked to human trafficking.

5.3. CHILD LABOUR

Fincantieri rejects the use of child labour in all its forms and prohibits the employment of individuals below the legal working age across the entire supply chain, as set out in the laws of the countries in which Suppliers operate.

Suppliers are required to act with the utmost diligence, ensuring full compliance with ILO Conventions and rejecting any form of child labour that may harm physical well-being or interfere with access to compulsory education.

5.4. DECENT WORKING CONDITIONS

Fincantieri requires its Suppliers to comply with all applicable regulations governing wages, working hours, allowances, benefits, and overtime.

Recipients of this document must ensure fair compensation and benefits for their workers, in line with current legislation and collective bargaining agreements. This includes regular payment of all insurance, pension, and social welfare contributions.

Weekly rest periods, annual leave, public holidays, parental leave (maternity and paternity), sick leave, and any other statutory entitlements must be guaranteed, as defined by law, collective agreements, and recognised industry standards.

Weekly working hours must respect the maximum limits set by current regulations. Overtime must not be routinely requested or required and may only be performed voluntarily and in full compliance with applicable rules.

Wages, benefits, and working conditions should support a decent standard of living for employees and their families.

5.5. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Fincantieri expects its Suppliers to foster open and constructive dialogue with their own employees and their representatives.

In accordance with local laws, Suppliers must respect the right of all workers to organise freely, join trade unions, be represented, participate in workplace committees, and engage in collective bargaining.

Employees who serve as worker representatives must not be penalised or subjected to any form of retaliation due to their role.

5.6. DIVERSITY, EQUITY AND INCLUSION

Fincantieri expects its Suppliers to treat all workers with fairness, dignity, and respect, ensuring equal opportunities in employment and working conditions. Discrimination of any kind—whether based on ethnicity, skin colour, gender, age, disability, sexual orientation, religion, political beliefs, nationality, or social background is not tolerated.

From recruitment to working conditions, remuneration, career development, and termination, the Supplier's employment practices must be grounded on principles of equity and equal opportunity, excluding any form of discrimination.

5.7. VIOLENCE, HARASSMENT AND BULLYING

Fincantieri requires its Suppliers to foster a work environment free from all forms of violence, harassment, and threats whether sexual, physical, psychological, or gender-based. Suppliers must also prevent all forms of bullying, understood as repeated verbal or physical behaviour that is threatening, intimidating, or humiliating. This includes acts of sabotage or obstruction that interfere with an individual's ability to perform their work effectively.

5.8. RIGHT TO PRIVACY

Fincantieri is committed to ensuring that personal data and confidential information relating to its personnel and stakeholders are properly used and securely stored.

Suppliers are required to uphold robust privacy standards, ensuring the protection of employee data and any third-party information acquired through business relationships.

5.9. RIGHTS OF LOCAL COMMUNITIES

Fincantieri expects its Suppliers to uphold the rights of local communities in the countries where they operate and to reduce the social and environmental impact of their production activities.

Accordingly, Suppliers must demonstrate responsible conduct within the local contexts in which they operate, fostering positive impact and contributing to the social and economic development of surrounding communities.

6. ENVIRONMENTAL STEWARDSHIP

As outlined in its environmental policy, Fincantieri is committed to protecting natural resources and has integrated environmental sustainability into its strategic choices and company processes, across short-, medium-, and long-term horizons.

In line with this commitment, the Group complies with applicable environmental regulations, placing particular emphasis on air emissions, energy efficiency, water stewardship, responsible waste management, and biodiversity protection.

The Group aims to set a benchmark for environmental excellence. To support this goal, it has implemented a binding environmental policy that applies to all personnel and external contractors working on its sites and actively encourages the adoption of certified environmental management systems, such as ISO 14001 or equivalent frameworks.

Suppliers are expected to align to with this approach, embracing Fincantieri's principles and commitments to environmental protection. The shared goal is to minimise environmental impact by fostering a sustainable supply chain.

6.1. ENVIRONMENTAL COMPLIANCE WITH LAWS AND REGULATIONS

Compliance with applicable laws is a foundational requirement for any business relationship with Fincantieri.

The standards outlined in Fincantieri's contracts explicitly reference all relevant legislation on environmental protection. Accordingly, Suppliers must obtain and maintain the necessary environmental authorisations to operate in full compliance with current regulations.

This compliance must be actively upheld and regularly updated, ensuring that processes, systems, and products consistently meet legal requirements and hold the appropriate certifications.

Fincantieri also expects its Suppliers to move towards a more eco-sustainable approach within their operations, for instance, by adopting certified environmental management systems, tracking and monitoring the environmental impact of their activities, promoting energy-saving measures, and using renewable energy sources.

6.2. MINIMISING ENVIRONMENTAL IMPACT: RISK PREVENTION, ORGANISATION AND MANAGEMENT

The Group is committed to reducing or eliminating the impact of its operations on climate and the environment, engaging across its entire value chain, including its supply network.

Suppliers are encouraged to assess the environmental impact of their activities and supply chains, helping to mitigate negative effects and foster positive outcomes for local communities.

Resource preservation and climate protection must be consistently pursued through a structured approach that integrates proactive risk and opportunity management, continuous innovation, and the adoption of advanced technological solutions. This includes maintaining high standards in production processes and product design.

In this context, Suppliers are expected to contribute meaningfully to environmental protection and climate action by reducing polluting emissions and greenhouse gases[2], using resources more efficiently, protecting biodiversity[3], curbing deforestation[4], promoting recycling of materials (including packaging), and improving energy efficiency at their sites.

Suppliers are also expected to actively contribute to a circular economy by adopting sustainable practices. This includes recycling used materials, reusing resources where feasible, and reducing raw material consumption and waste. Production processes should be designed to minimise environmental impact by prioritising recycled

[2] Including the six primary gases identified in the Kyoto Protocol: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulphur hexafluoride (SF_6).

[3] Biodiversity protection means safeguarding the variability of living organisms—whether terrestrial, marine, freshwater, or part of broader ecological systems.

[4] In accordance with Regulation (EU) 995/2010 (EUTR)—currently being replaced by Regulation (EU) 2023/1115 (EUDR)—and in fulfilment of due diligence obligations within the supply chain, to ensure that products placed on the market are lawful and not linked to deforestation, forest degradation, or similar environmental damage.

materials and incorporating design solutions that support recovery and regeneration at the end of the product's life cycle.

Suppliers must manage any use of substances of concern or very high concern responsibly and in full compliance with legal requirements. This includes prohibiting the use of substances subject to specific national and international bans due to their harmful effects on people or the environment, and implementing appropriate measures for the handling, storage, and transport of substances of concern and very high concern.

To further reduce their environmental impact, the Group promotes traceability of nano-materials in products and encourages reduced use of rare earth elements.

Remediation and waste management and disposal activities—including waste-water treatment—must be carried out in accordance with applicable legislation and supported by the necessary technical expertise to establish standards and procedures designed to minimise environmental harm.

Suppliers must ensure that all materials, process residues, and waste—including hazardous by-products—are properly managed, stored, and disposed of using safe and legally compliant methods.

6.3. ENVIRONMENTAL RESPONSIBILITY: BUILDING ENVIRONMENTAL CONSCIOUSNESS

Fincantieri is committed to fostering a greater culture of environmental stewardship through targeted training, awareness-raising, and outreach initiatives. The Group is dedicated to fostering widespread environmental consciousness, guided by the belief that its activities should respect and engage the local communities where it operates, and that a networked, cooperative approach is key to addressing the environmental challenges they face.

Suppliers are expected to support this effort by promoting environmental awareness among their employees and encouraging responsible practices. Each employee, within the scope of their role, should be empowered to adopt behaviours that contribute to sustainability, such as reducing energy consumption, avoiding the misuse of materials, limiting single-use products, promoting responsible sourcing of minerals, minimising unnecessary water use, and reducing reliance on rare earth elements.

6.4. QUALITY, PRODUCT SAFETY AND SUSTAINABLE DESIGN

The Group operates in accordance with the highest standards of product quality and safety, promoting the adoption of certified management systems such as the international ISO 9001 or equivalent frameworks. Suppliers must ensure that all products and services meet contractual quality requirements.

Fincantieri expects its Suppliers to align with this approach, united by the shared goal of maximising product quality and fostering high levels of innovation. To support this, the Group encourages ongoing dialogue with customers, Suppliers, business partners, research institutions, and universities—consistent with the principles of *open innovation*.

In parallel, Fincantieri recognises the importance of eco-sustainability, beginning with design strategies that minimise resource use—including raw materials and water—and reduce the environmental impact of both processes and products.

Eco-sustainable design principles apply across the product life cycle: from development and construction to operational use and end-of-life disposal.

Suppliers must recognise their essential role in supporting and embodying this approach. They are expected to develop and implement solutions that reduce the environmental impact of manufactured materials, air emissions, energy consumption, and waste generation.

7. BUSINESS ETHICS AND INTEGRITY

The Group is committed to acting responsibly, by upholding the highest standards of integrity, honesty, loyalty, and ethical conduct in all professional activities.

The Group operates in accordance with the principles of fair competition and good faith, with due regard for the legitimate interests of shareholders, employees, customers, business and financial partners, and the local communities in which Fincantieri operates.

It promotes a system of *corporate governance* and risk management grounded in legal compliance and the prevention of corruption within its sphere of influence.

The Group has adopted an integrated approach to ensure compliance with legal and regulatory requirements, while aligning with best practices for preventing both active and passive, direct and indirect, forms of corruption. Key measures include the adoption of the Code of Ethics and the Group's *Anti-Corruption Policy*; the implementation of frameworks such as the Organisation, Management and Control Model under Italian Legislative Decree No. 231/2001 (Model 231), or an equivalent Corporate Compliance Model for business liability; the establishment of an ISO 37001-compliant Anti-Corruption Management System; the delivery of specialised training to employees; and the provision of whistleblowing channels accessible to all stakeholders.

Adherence to the principles of this Code and compliance with the Code of Ethics and, where applicable, the Legality Protocol signed with the Ministry of the Interior, as well as the Memorandum of Understanding with the General Command of the Guardia di Finanza for Fincantieri S.p.A. are binding requirements for entering into any business relationship with Fincantieri.

Suppliers are expected to align with and put into practice the principles outlined in this section, operating in full compliance with the highest standards of integrity, honesty and ethical conduct.

7.1. FIGHT AGAINST CORRUPTION

Fincantieri has adopted and promotes a dedicated *Anti-Corruption Policy* addressed to its employees and business partners. This policy prohibits all forms of corrupt conduct, including bribery, unlawful payments, improper favours, collusive practices, and any form of solicitation whether direct or through intermediaries for personal or professional gain, for oneself or third parties. In this context, Fincantieri encourages its Suppliers to adopt programmes that reflect the commitments and principles of their own anti-corruption policies, and to implement management systems aligned with ISO 37001 or equivalent frameworks.

The Group expects all Suppliers and their sub-contractors to uphold a zero-tolerance approach to corruption and to commit to refraining from offering, promising, or granting money, gifts, or any form of benefit explicitly or implicitly in pursuit of preferential treatment or undue advantage over other prospective Suppliers. Any such solicitation must be promptly reported through the channels made available by Fincantieri.

As part of a comprehensive anti-corruption strategy, and specifically in relation to interactions with Public Administrations in the countries where they operate, Suppliers must refrain from offering, either directly or through intermediaries, monetary payments or any other form of benefit to public officials. Suppliers also undertake not to provide unlawful financial support to political candidates, parties, or organisations. Finally, Suppliers must avoid establishing preferential relationships intended to exert pressure on or improperly influence Public Administration representatives in the course of their duties.

7.2. CONFLICTS OF INTEREST

In the context of its business relationships, Fincantieri operates in accordance with the principles of transparency and good faith.

In keeping with these principles, any situation that may constitute or give rise to a conflict of interest whether actual or potential must be promptly reported to Fincantieri following the procedures outlined during Supplier accreditation or, in any case, during the relevant onboarding phase. This allows for appropriate assessment of its existence and severity, and the enactment of the appropriate operational management procedure. A conflict of interest is defined as any circumstance in which an individual's personal interests or business activities interfere, or appear to interfere, with the interests of the Group. Recipients of this Code also pledge to disclose, even during the course of the contractual relationship, any potential conflict arising from changes to previously submitted declarations.

7.3. ANTI-TRUST AND ANTI-MONEY LAUNDERING COMPLIANCE

Suppliers must conduct their business activities in accordance with the principles of fair competition and applicable antitrust legislation. They must refrain from engaging in practices such as collusive bidding, price fixing, discriminatory pricing, and any other unfair trade practices that may unlawfully distort market dynamics or restrict free competition.

Suppliers must not engage in, or be associated with, any activity that could be interpreted as linked to money laundering and are required to comply with applicable anti-money laundering regulations.

7.4. FINANCIAL COMPLIANCE: PROPER MAINTENANCE OF ACCOUNTING RECORDS

Suppliers must comply with all applicable legal requirements and industry standards and must maintain accurate books and records that demonstrate such compliance, to the extent permitted by law.

Financial, accounting, and management records must be based on precise, comprehensive, and verifiable information, and must reflect the company's organisational structure.

7.5. CONFIDENTIALITY, INFORMATION SECURITY AND DATA PROTECTION

Confidential information—including proprietary knowledge or data belonging to Fincantieri—must not be used, disclosed, or disseminated without the prior authorisation from Fincantieri.

Suppliers are expected to safeguard and responsibly manage the Group's confidential and proprietary information including industrial and intellectual property, know-how, and trade secrets and ensure that such information is used solely for authorised purposes. Access to this information must be restricted to personnel who require it for supply-related activities. Suppliers are also encouraged to adopt certified management systems aligned with ISO 27001 or equivalent frameworks. To protect information assets and mitigate increasingly sophisticated threats that may compromise the integrity and operational continuity of digital infrastructure, Fincantieri requires its Suppliers to implement a structured approach to cybersecurity that evolves with technological advancements.

The obligation of confidentiality remains binding even after the termination of the relationship with the Group, in compliance with applicable laws.

Where Artificial Intelligence systems or applications are used, and in line with the *Ethical AI Policy*, Suppliers must adopt a transparent approach and clearly disclose how such tools are applied, including any potential risks or impacts.

Finally, it is strictly prohibited and unlawful to engage in any direct or indirect form of financial market manipulation, exploitation, or use for economic gain, including direct investment or investment through intermediaries, based on confidential corporate information.

7.6. ETHICAL SOURCING

Suppliers must be committed to sustainable sourcing across the entire supply chain, prioritising the use of responsible, traceable and certified sources and, where feasible, recycled materials.

Regarding product safety, Fincantieri requires all Suppliers to establish robust quality control systems within their organisations and supply chains. Suppliers must ensure product traceability and verify that all materials supplied comply with applicable product regulations such as Regulation (EC) No. 1907/2006 (REACH) and Directive 2011/65/EU (RoHS II) as well as with the standards adopted by the Group and those governing product sale and approval for market entry.

Fincantieri requires Suppliers to submit all mandatory declarations with each delivery, such as safety data sheets for substances or mixtures and product-specific declarations. Where required by current regulations, additional documentation must also be provided (e.g.: "Asbestos Free Declaration" in accordance with SOLAS II-1, Regulation 3-5 and the related implementing circulars).

Suppliers are expected to provide evidence of the quality control and inspection measures undertaken, and to ensure full compliance with the standards set out in contractual agreements.

To reduce the environmental footprint of ships throughout their life cycle, Fincantieri adheres to the Hong Kong International Convention for the Safe and Environmentally Sound recycling of Ships[5]. In line with this commitment, the Group supports delivery with voluntary certifications such as *Green Passport*, *Clean Ship* or *Eco*. Accordingly, Fincantieri expects Suppliers to align with this approach and produce all necessary documentation for the proper management of substances of concern and very high concern.

7.7. CONFLICT MINERALS

Following the adoption by the United States Securities and Exchange Commission of the rule on "conflict minerals", as defined in Section 1502 of the "Dodd-Frank Wall Street Reform and Consumer Protection Act", and following the issuance of Regulation (EU) 2017/821 including its future revision, by the European Parliament and the Council of the European Union, Fincantieri, in line with its sustainability policy, is committed to implementing the provisions of the aforementioned regulations, aligning itself with international standards and committing to maintaining a responsible and conflict-free supply chain.

This commitment takes the form of promoting a responsible supply chain free of minerals originating from areas affected by armed conflicts, areas which have survived conflict or areas with precarious or non-existent governance or security, or generalised and systematic violations of international law, including human rights violations ("Conflict-Affected and High-Risk Areas, CAHRAs") such as the Democratic Republic of Congo (DRC) and surrounding countries, since their trade could lead to the direct or indirect financing of armed groups, encourage corruption and money laundering, and cause the violation of human rights through the exploitation of forced labour. Suppliers must therefore ensure responsible procurement of so-called "conflict minerals", i.e.

[5] Implemented through Regulation (EU) No. 1257/2013 "Safe and Environmentally Sound Recycling of Ships"

minerals or metals containing tin, tantalum, tungsten or gold ("3TGs"), ensuring that none of the products supplied to Fincantieri contain minerals from "conflict free" areas as defined above.

For the company, sharing and respecting principles and rules that belong to sustainable action are of fundamental importance. The principles adopted by Fincantieri as the basis and reference for the responsible management of 'conflict minerals' include:

- compliance with relevant international and national legislation and standards;
- strict observance of worker protection, environmental protection, safeguarding the interests of shareholders, employees, customers, business and financial partners, communities and local communities, creating value for all stakeholders;
- monitoring of the procurement process for responsible management of the supply chain in compliance with the duty of care of all those involved;
- meeting the expectations of stakeholders as a fundamental prerequisite for the creation of value and the promotion of a sustainable supply chain.

The principles stated above translate into a commitment undertaken by Fincantieri, that does not directly purchase 3TG minerals but believes that the procurement of systems and materials, managed as part of an extensive and well-structured supply chain, may indirectly result in the acquisition of products potentially containing minerals from CAHRAs. For this reason, it is committed to ensuring a 'conflict-free' supply chain through transposition, in the contracts signed with suppliers, of the logic and commitments of the Policy for the conscious and responsible control of the entire supply chain, from the extraction of the ore to the definition of the scope of supply.

8. WHISTLEBLOWING

The Group promotes a culture of transparency, integrity and accountability at all levels. It encourages all stakeholders, including Suppliers, to promptly report any behaviour, act, or omission that may constitute an actual or suspected violation of the Group Code of Ethics, this Code, applicable laws, Group policies or procedures, the Organisation, Management and Control Model pursuant to Italian Legislative Decree no. 231/2001, the Corporate Compliance Model on business liability, or any other contractual agreement with the Group.

Fincantieri has established secure and confidential whistleblowing channels in accordance with applicable legislation (e.g. Legislative Decree No. 24/2023 for Italy), accessible to both employees and external stakeholders, while safeguarding the confidentiality of sources and sensitive information.

To understand the operational procedures, active reporting channels, and protections available to whistleblowers and other individuals defined by applicable law, stakeholders should refer to the internal policies or guidelines of the Group company involved in the report.

Suppliers undertake not to engage in any retaliatory or discriminatory action against personnel who, in good faith, report events deemed unlawful or in conflict with the company's ethical principles.

9. COMPLIANCE WITH THE CODE

This Code must be formally endorsed and accepted by all Suppliers, who are in turn expected to promote its principles among their employees, affiliates, collaborators, and sub-contractors, thereby supporting its effective implementation.

Suppliers are also responsible for monitoring compliance with this Code within their own organisations and across their supply chains and must promptly report to Fincantieri any significant issues that conflict with or violate its provisions.

In a spirit of collaboration and full transparency, any corrective measures put in place to achieve compliance with this Code must also be communicated.

Fincantieri will actively monitor Supplier adherence to this Code and reserves the right to request documentation demonstrating compliance with its principles, where necessary. Independent audits may be conducted at Supplier sites in cases of suspected or confirmed non-compliance.

If the results of such inspections are unsatisfactory and the Supplier fails to implement the recommended corrective actions, Fincantieri may, at its discretion, suspend the existing contractual relationship until compliance is restored, or proceed with termination of the contract. Inspection findings may also be considered when evaluating future contract awards.

10. COMMUNICATION AND DISSEMINATION

The Code is shared with all employees and published on the corporate intranet. It is also accessible to Suppliers and other stakeholders on Fincantieri's official website: https://www.fincantieri.com

Requests for clarification regarding the interpretation of this document may be submitted to the Group Procurement and Supply Chain team at the following email address: suppliers@fincantieri.it.

11. RESPONSIBILITIES AND UPDATES

The Parent Company, acting through the Procurement and Supply Chain Department, is responsible for disseminating and monitoring the Suppliers' Code of Ethics, through the acceptance of the document and ensuring that it is updated as necessary.

To support the continuous improvement of its initiatives and adapt to the changing landscape in which the Group operates, this document will undergo periodic review and be validated by the Sustainability Committee to ensure its effective implementation and continued relevance.

The Code and subsequent revisions are subject to approval by the Board of Directors.

Policy approved by the Board of Directors on 22nd of January 2026