Policy

Anti-Corruption

Adopted by resolution of the Board of Directors of Seanergy a Marine Interiors Company S.r.l on 22 July 2025

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1 INTRODUCTION

A key factor in the reputation of the Fincantieri Group (Fincantieri S.p.A. and its Subsidiaries, hereinafter also referred to as the "Group") is its ability to conduct its business with loyalty, propriety, transparency, honesty and integrity, in compliance with national and foreign laws, regulations and standards. Through this Policy, Fincantieri S.p.A. (hereinafter "Fincantieri" or the "Parent Company") and its Subsidiaries commit to the prevention and fight against all forms of corruption, in accordance with its "zero tolerance" principle prohibiting any conduct that conflicts with the Group's values and commitment as set out in this Policy, the Group Code of Conduct, the Supplier Code of Ethics, the Organisational, Management and Control models pursuant to Italian Legislative Decree no. 231/01 adopted by Fincantieri and its Italian Subsidiaries, and the Compliance Models on corporate liability[1] adopted by the foreign Subsidiaries of the Fincantieri Group.

In defining this Policy, the Group has taken into account the interests and expectations of stakeholders relevant to the anti-corruption management system. The Fincantieri Group has identified as stakeholders all parties that interact with the individual companies in the performance of their operations and may influence or be influenced by their decisions and conduct (e.g. employees, customers, suppliers, communities, etc.). Ongoing dialogue and engagement with such stakeholders allow the Group to understand their expectations and needs and to keep the Anti-corruption Policy aligned with shared ethical and transparency standards.

2 PURPOSE

The Fincantieri Group adopts this Policy with the aim of:

- Ensuring compliance with all applicable anti-corruption laws and regulations.
- Emphasising the Fincantieri Group's commitment to fighting all forms of corruption and to zero tolerance towards this phenomenon, and raising awareness of such commitment among all stakeholders.
- Setting out the values and principles of conduct to be upheld by the members of the Corporate Bodies of the Group Companies, all managers and employees, contractors and third parties in business dealings with the Group, in accordance with the provisions of the Group Code of Conduct and the Supplier Code of Ethics.
- Outlining the framework of reference for the principles, actions, commitments and tools adopted in anti-corruption matters, forming part of and integrating into the Group's broader Internal Control and Risk Management System.
- Ensuring that the anti-corruption system defined is subject to periodic review and continuous improvement, in keeping with national and international standards and guidelines.[2]

[1] Compliance Models on corporate liability as applied by foreign companies refer to models aimed at preventing the commission of crimes and offences and at safeguarding the company's integrity and reputation.

[2] The main reference is ISO 37001 "Anti-bribery Management Systems".

- Encouraging the reporting of any attempted, actual or suspected act of corruption through the established channels and procedures, ensuring both appropriate follow-up to assess credibility and implement effective countermeasures, and protection for the whistleblower against any form of retaliation.

3 SCOPE OF APPLICATION

This Policy has been reviewed and approved by Fincantieri's Board of Directors, and its adoption and implementation is mandatory for Fincantieri and all Group Companies, whether directly or indirectly controlled, based in Italy or abroad, which adopt it by resolution of their own Board of Directors. This Policy also applies to Third Parties engaged in business dealings with the Group (e.g. customers, suppliers, etc.) as well as to all Persons performing work within the Fincantieri Group, regardless of their contractual status, through the inclusion of specific contractual clauses setting out the commitment to comply with anti-corruption laws and with the principles and values of the Fincantieri Group.

4 REFERENCES

This Policy has been drafted in line with the Fincantieri Group's commitment to anti-corruption, primarily set out in the Code of Conduct, and in accordance with the applicable regulatory framework and with national and international standards and best practices.

Fincantieri is subject to Italian law and to the laws and regulations in force in the countries it operates in directly or through its Subsidiaries, including those ratifying international conventions prohibiting the corruption of Public Officials and corruption between private individuals. Such laws and regulations include but are not limited to:

- Italian Criminal Code, with particular reference to Articles 317 et seq.;
- Italian Civil Code, with particular reference to Article 2635 and Article 2635 bis;
- US Foreign Corrupt Practices Act ("FCPA") (1977);
- Anti-Kickback Act of 1986;
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997);
- Council of Europe Criminal Law Convention on Corruption (1999);
- Italian Legislative Decree 231/2001, which governs the administrative liability of entities for offences, including domestic and international corruption of Public Officials and private parties (even attempted) in Italy and abroad committed by their directors, employees or contractors in the interest or for the benefit of the entity;
- United Nations Convention against Corruption (2003);
- UK Bribery Act (2010);
- United Nations Sustainable Development Goals (2015);
- ISO 37001 "Anti-bribery Management Systems";
- Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019;

- United Nations Global Compact (2020);
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023);

and their subsequent amendments and additions.

5 PROHIBITED CONDUCT AND ANTI-CORRUPTION COMMITMENTS

The Fincantieri Group operates in a framework of fair competition with honesty, integrity, propriety and good faith, in respect of the legitimate interests of its stakeholders, such as shareholders, employees, customers, commercial and financial partners, and the local communities it operates in, in accordance with the "Policy for managing dialogue with the shareholders and other relevant stakeholders" adopted by Fincantieri, which – also taking into account the commitments adopted by institutional investors and asset managers – describes the methods and contents of discussions between the Company and its shareholders outside shareholders' meetings on matters within the purview of the Board of Directors.

All persons working within the Fincantieri Group, without distinction or exception, are required to observe and enforce these principles in the performance of their functions and responsibilities. Under no circumstances may the belief that one is acting in the interest or to the advantage of the Company justify conduct that contravenes these principles.

In its capacity as Parent Company, Fincantieri prohibits all forms of corruption – whether giving or receiving, direct or indirect – with respect to public and private parties, regardless of who commits or attempts the act, or how it is carried out (e.g. unlawful favours, collusive behaviour, solicitation – directly or through third parties – of personal or professional benefit for oneself or others).

In general:

- It is prohibited to offer, promise, procure or pay – directly or through intermediaries – sums of money, valuable items or any other benefit to any person in order to improperly obtain or retain business or to secure an undue advantage in the conduct of business. More specifically, it is prohibited to pay undue advantages or provide any other benefit to obtain new contracts, retain existing contracts, expedite the performance of acts and measures (facilitation payments) or to unduly influence the actions and decisions of any person.
- It is prohibited to accept payments or valuable items in connection with conduct contrary to the principles set out in this Policy, in the Group Code of Conduct or in applicable procedures and laws.
- Since Fincantieri Group Companies may in certain cases be held liable for the corrupt conduct of Third Parties such as agents, intermediaries, consultants and business partners, each Group Company must engage only with counterparties of proven reputation. For this reason, each business partner is subject to a mandatory preliminary process to verify that they satisfy ethical requirements.
- Fincantieri and the Group Companies must maintain accurate accounting books and records: all transactions must be properly recorded and supported by reasonable detail. Even inaccuracies or omissions in documenting accounting records – even if not for corrupt purposes – constitute violations of this Policy. False records may give rise to tax and other legal liabilities.

Specifically, with regard to dealings with Public Administrations ("PA"), during any negotiation, request or business relationship it is prohibited to influence the decisions of PA Representatives in any way in an inappropriate, improper or unlawful manner. Accordingly:

- It is not permitted to promise, offer or provide to individuals belonging to the PA – even at their request or prompting, and whether directly or through third parties – sums of money or other benefits, goods and/or advantages, including in exchange for favours, compensation or other benefits for the Company, or in order to influence their independent judgement or induce them to unduly favour the Company's products.
- It is not permitted to give gifts or presents to PA representatives that could compromise the integrity and reputation of the parties involved or be regarded as intended to improperly obtain benefits, unless such gifts are of modest or symbolic value, in compliance with applicable laws and Fincantieri's internal rules. Any explicit or implicit requests for benefits from a public official or person providing a public service (except for customary business gifts of low value) must be rejected and immediately reported to the relevant function.
- It is not permitted to make payments or grant other benefits to contractors or third parties acting on behalf of the Company in dealings with the PA, unless such payments or benefits are duly justified under the contractual relationship.
- It is not permitted to promise employment or offer any kind of advantage to PA representatives, their relatives and in-laws or other persons recommended by them.
- It is not permitted to hire employees who are close to or recommended by PA representatives or by persons close to them, or to pay them more than what is owed or what is in line with market rates, in order to obtain any kind of advantage for the Company.
- It is not permitted to favour employees or contractors in procurement processes if they have been specifically recommended by PA representatives in exchange for favours, compensation or other advantages for oneself or for the Company.
- It is not permitted to provide the PA with false or incomplete information or to circumvent regulatory obligations, or the obligation to act in full compliance with applicable laws and regulations throughout the entire process, avoiding any improper conduct.

6 SENSITIVE AREAS, PRINCIPLES AND ANTI-CORRUPTION CONTROL MEASURES

Fincantieri has established a structured risk assessment process aimed at identifying the areas within the Group's business activities that are most exposed to risks of corruption, and at assessing and monitoring the related risks and the control measures in place to mitigate them, in order to verify the overall effectiveness of the anti-corruption system and to implement improvement actions where needed.

The Fincantieri Group adopts preventive measures and control safeguards to combat corruption across its functional and geographical areas of operation. These are governed by the Group's internal regulatory framework (e.g. Management Guidelines, Global and Company Procedures) and are subject to periodic monitoring and updating in line with internal and/or external changes.

The following sub-paragraphs identify the sensitive areas and the related minimum principles and control measures that each Group Company must adopt.

6.1 MANAGEMENT OF RELATIONS WITH THE PUBLIC ADMINISTRATION

Activities involving interactions with Italian and foreign PAs are considered sensitive to corruption risks. These activities include but are not limited to the obtaining of certificates and permits, the execution of agreements, contracts and memoranda of understanding, participation in public tenders for the supply of products and services in both civil and military markets in Italy and abroad, high-level institutional relations, inspection visits to Group sites or operational units and so on.

All individuals working within the Fincantieri Group and/or acting in the name and on behalf of the Group Companies must comply with the following principles:

- Obligations towards the PA and the preparation of related documentation must be carried out in compliance with applicable laws, regulations and standards and with the utmost diligence and professionalism, in order to provide clear, accurate, complete, reliable and truthful information, while avoiding – and in any case reporting through appropriate channels – any conflicts of interest.
- Relations with individuals belonging to the PA must be based on propriety, transparency, cooperation, helpfulness and full respect for their institutional role, with timely and diligent compliance with all instructions and requirements.
- In the interest of transparency, personnel engaging with PA representatives must keep a record of meetings held, topics discussed and decisions or commitments made, to ensure traceability and enable verification by control functions.[3]
- All documentation intended for the PA must be prepared carefully and in clear, objective and comprehensive language. It must also be reviewed and signed by the relevant Function Managers or another individual with appropriate delegated powers, in compliance with internal authorisation levels and within the limits of the powers granted.

6.2 RELATIONS WITH THIRD PARTIES

As part of their business activities, Fincantieri Group Companies engage with third parties such as customers, suppliers, business partners, contractors and intermediaries. These relationships may potentially pose corruption risks for the Group or give rise to the risk that Group Companies could be held liable for corrupt conduct perpetrated by third parties acting in the name and on behalf of the Companies.

The Fincantieri Group plays an active role in promoting, coordinating and facilitating the application of the system of rules and principles described in this Policy, the Code of Conduct, the Supplier Code of Ethics and the Organisational, Management and Control Models pursuant to Italian Legislative Decree no. 231/01, and

[3] Including the Oversight Board envisaged under Italian Legislative Decree no. 231/01 for companies under Italian law, as well as similar bodies appointed by companies under foreign law.

more broadly the Compliance Models on corporate liability adopted by Fincantieri and the Group's Subsidiaries, by all those acting in the name and/or on behalf and/or in the interest of the Company, or otherwise engaged in business relations or collaborations with it (business partners).

Third parties with whom the Fincantieri Group intends to establish business relationships are subject to prior checks of their reputation, ethics and legal compliance. These checks, governed by the Group's internal regulatory framework, are proportionate to the potential risk posed by the third party. The areas of interest covered by these checks include but are not limited to:

- Checks of reputation and sanctions.
- Checks on the country of residence or registered office of the third party, with particular attention to any prohibitions or restrictions related to possible job assignments, and to the tax and regulatory framework.
- Checks on requirements of professionalism, experience, expertise and integrity.
- Checks on the economic and financial soundness of the counterparty.

Third parties are also required to issue specific declarations (e.g. absence of conflicts of interest, absence of objective or subjective incompatibilities, express commitment to comply with ethical principles and with the Organisational, Management and Control Model pursuant to Italian Legislative Decree no. 231/01 or the Company's Compliance Model on corporate liability and/or relating to dealings with the PA), with the activation of the related internal processes.

All agreements and contracts are drawn up using templates that include specific clauses (e.g. compliance with the principles of the Organisational, Management and Control Model pursuant to Italian Legislative Decree no. 231/01 or Compliance Model, Supplier Code of Ethics, Code of Conduct and this Anti-Corruption Policy) binding the third party to comply with the Company's anti-corruption commitments. In the event of breach, the Group reserves the right to terminate the relationship or withdraw from the agreement or contract.

External collaborations and assignments to employees or former employees of Public Administrations

The use of external collaborations must be limited to cases where they are strictly necessary, and the engagement must be temporary and highly specialised. The selection and assessment of the potential collaborator must be based not only on the justified need for the service, but also on a prior evaluation of the collaborator's integrity, professionalism and eligibility. This includes verifying the absence of any prohibitions or restrictions on the assignment, checking the person's country of residence, performing due diligence and/or analysing their CV, track record and information accessible via the available IT systems. A declaration must be obtained from the collaborator regarding conflicts of interest, the absence of grounds for exclusion or incompatibility under applicable law, and a commitment to comply with the ethical principles and the Organisational, Management and Control Model pursuant to Italian Legislative Decree no. 231/2001, or for foreign companies the Company's Compliance Model on corporate liability. The contractual agreement must also include a defined duration, fair compensation, payment terms consistent with applicable laws and the delivery of specific outputs or verifiable progress. Moreover, professional external collaborations and

assignments to current or former PA employees (or of legal entities that employ former PA employees) are permitted only if specific conditions are met, such as obtaining formal authorisation from the PA (for current employees) or compliance with applicable legal requirements (for former employees). Depending on the subject, value of the service and type of counterparty, different levels of authorisation are required.

Commercial Assistance Agreements

As part of its business dealings, the Fincantieri Group may enter into relationships with third parties appointed to assist the Company in its commercial activities (Business Advisors) through the search for potential and/or pre-identified customers and/or the provision of commercial assistance and support services. Such relationships may potentially pose corruption risks. The identification of the Business Advisor follows these general criteria: i) the Business Advisor must reside in the country of the client or final user; ii) only one Business Advisor may be appointed for a given Territory or Commercial Campaign; iii) the bank account of the Business Advisor must be held with a bank located in the same territory as the Business Advisor's residence; iv) the contract with the Business Advisor may not exceed two years, and is renewable in accordance with the defined process; v) retroactive contracts are not permitted. During the preliminary review process the Business Advisor is required to formally commit to strictly comply with this Anti-Corruption Policy, with the legal provisions relating to the bribery of Public Officials under Italian law, the 1997 OECD Convention as implemented in Italy under Italian Legislative Decree no. 231/01 and the UN Convention against Corruption, as well as with the Code of Conduct and the Organisational, Management and Control Model pursuant to Italian Legislative Decree no. 231/01 or the Company's Compliance Model on corporate liability. The potential Business Advisor undergoes a structured due diligence process which, in addition to the checks already mentioned for external collaborations, includes assessments of the proportionality of compensation based on the duration, quantity, complexity and quality of the services offered and in relation to best practices and market standards. In certain cases, in the event of Red Flags, the relevant internal Committee is convened, whose opinion is binding for the continuation of the process. To ensure compliance with the conduct principles adopted by the Fincantieri Group, all agreements are drawn up using standard contract templates that contain non-negotiable clauses that reflect the founding principles of this Policy. The competent Functions monitor the performance of the contract through periodic reports, and ensure ongoing compliance with the requirements of professional integrity, suitability and integrity throughout the duration of the contractual relationship.

Suppliers of goods and services (including procurement contracts)

For the Fincantieri Group, a close, sustainable collaboration with its supply chain is essential to achieving its business objectives and to the success of its products in the market. As part of the Group's policy of synergistic development of Business Units / Subsidiaries, Fincantieri has established a unified, centralised Supplier management system. Indeed, a Group Vendor Register has been implemented, listing all potential suppliers deemed fit to meet the Group's needs for the procurement of goods and services. Supplier selection and the determination of the best purchasing conditions are carried out in compliance with the principles of fair competition, non-discrimination and equal treatment, and are based on a structured process of assessment and

monitoring of: i) adequacy of the corporate organisation and entrepreneurial capacity, including economic and financial soundness; ii) specific technical skills and requirements; iii) compliance with international Quality and HSE standards; iv) ethical and reputational aspects; v) conflicts of interest; vi) compliance with the requirements set out in the Public Contracts Code or in applicable legislation on selection procedures and public contracting (including meeting general and special requirements). Among the elements considered by the Fincantieri Group when establishing and/or maintaining a business relationship, examples of critical and blocking factors include: listing of the supplier on Italian, US, EU or UN sanction lists; existence (in Italy) of anti-Mafia interdiction measures or adverse findings by prefectures within the National Framework Tender Protocol related to the supplier or its corporate ownership chain; and negative media coverage of the supplier or its shareholders/directors. Moreover, Fincantieri has entered into a Memorandum of Understanding with the Italian Guardia di Finanza to strengthen the protection of the integrity of its supply chain and enhance the effectiveness of control and prevention measures. If any misconduct by suppliers in relation with a Fincantieri Group Company is identified – including corrupt conduct towards Group personnel – the information is reported to the internal Supplier Monitoring Committee, to the anti-corruption compliance function and to the supervisory bodies (in Italy, the Oversight Board) for appropriate assessments, investigations and countermeasures. Through specific contractual clauses, Fincantieri Group Suppliers commit to act in full compliance with applicable anti-corruption laws – that is, the anti-corruption provisions of national and international laws (for Italy, the Criminal Code, Civil Code and Legislative Decree 231/01) – and to comply with – and ensure their personnel and business partners (e.g. subcontractors) comply with – the principles contained in the Code of Conduct, the Organisational, Management and Control Model pursuant to Italian Legislative Decree no. 231/01 or the adopted Compliance Model on corporate liability, this Policy and the related policies and procedures made available on the institutional website. In the event of a breach, the Fincantieri Group reserves the right to terminate the relationship or withdraw from the contract.

Partnership Agreements, Joint Ventures and Extraordinary Transactions

Partnership agreements, joint ventures and extraordinary transactions (e.g. acquisitions, mergers) represent a sensitive area for the Group, and the associated risks are carefully and proactively assessed.

Before proceeding with such agreements or transactions, several assessments are carried out, including checks on the counterparty's financial and economic standing and on its integrity and reputation, with the aim of identifying any underlying risks. The results of these assessments must be submitted to the relevant corporate Functions, whose evaluations contribute to the overall decision on whether to proceed with the transaction. The finalised agreements include specific contractual provisions requiring the counterparty to comply with the Fincantieri Group's ethical and behavioural principles. In the event of a breach, immediate termination of the contractual relationship is envisaged.

Customers

The initiation of a business relationship with a new Customer may expose the Fincantieri Group to a range of regulatory breaches or criminal risks, such as corruption, money laundering, terrorism and terrorism financing

or violation of economic sanctions (especially European and American). To identify and mitigate such risks, a due diligence process is carried out consisting in the collection of information from open sources and through the use of IT platforms drawing on accredited open sources, and in the analysis of the collected information with the aim of identifying any red flags (e.g. listing in international blacklists or adverse media, presence of politically exposed persons or individuals performing a public function, international economic sanctions or trade restrictions). In certain predefined cases, the outcomes of this process are submitted to the Know Your Counterparty ("KYC") Committee for evaluation.

If the Company decides to submit a bid to a customer for a potential contract that includes an Offset obligation,[4] a general review of the type of agreement is conducted beforehand, and the Offset Committee is called upon to analyse the buyer government/company's Offset policy, review the applicable law and identify any related risks. Specifically, third parties involved in an Offset (suppliers, contractors, partners: collectively referred to as "Offset Partners") are subject to due diligence.

6.3 SELECTION, HIRING AND MANAGEMENT OF HUMAN RESOURCES

Within its internal regulatory instruments relating to the hiring process, the Fincantieri Group has established control principles designed to ensure that hiring is carried out in accordance with the principles of professionalism, transparency, propriety and legal compliance. Being hired within Fincantieri Group Companies requires that personnel comply with this Anti-Corruption Policy and the overall Anti-Corruption management system, and gives the Company the right to impose disciplinary sanctions in the event of violations. When hired, personnel receive a copy of this Policy and are required to attend relevant training within six months of joining the Company's workforce. The Fincantieri Group ensures that personnel are not subject to discrimination or retaliation for refusing to engage in potentially high-risk activities or for reporting any suspected incidents of corruption in good faith. Moreover, pursuant to ISO 37001, controls must be implemented for personnel in roles with a risk of corruption that is higher than low; the following controls are mandatory for certified Group companies and subject to appropriate adaptation for others:

- Due diligence at the time of hiring, transfer and/or promotion in order to reasonably ensure that the individual is fit for the role and that there are valid grounds to believe they will comply with the Anti-Corruption Policy and internal anti-corruption regulations.
- Periodic review of performance bonuses and any other incentive-based remuneration to ensure reasonable safeguards are in place to prevent them from becoming potential incentives for corruption.
- An annual declaration ("Annual signoff") must be signed by such personnel – as well as by the Governing Body, Senior Management and members of the Anti-Corruption function – confirming their

[4] The term "Offset" refers to any agreement entered into in connection with a contract between Fincantieri and a customer with the aim of generating employment or creating capabilities or economic value in the customer's country, where the authority in charge of the Offset may award "offset credits" or otherwise establish requirements for the fulfilment of the Offset obligation.

commitment to comply with their behaviour to the principles set out in this Anti-Corruption Policy and the relevant internal regulatory instruments.

6.4 DONATIONS, CONTRIBUTIONS,SPONSORSHIPS, GIFTS AND HOSPITALITY

As envisaged in the Group Code of Conduct: "*It is strictly prohibited to make or offer, directly or indirectly, payments and material benefits of any amount whatsoever to third parties, public officers or private individuals, to influence or reward an action of their office. Every employee receiving gifts or preferential treatment not directly attributable to normal complimentary relations must refuse them.... Gifts and complimentary acts of courtesy or hospitality in favor of governmental representatives, public officers and public employees may only be permitted when these prove to be of reasonable value and, as such, do not compromise the integrity or reputation of one of the parties concerned and could not be interpreted by an impartial observer as aimed at securing advantages in an improper form.*"

Fincantieri has established roles, responsibilities, operating procedures and behavioural principles for personnel of the Group Companies to follow in the management of donations, charitable contributions and gifts made by the Company to third parties – whether upon their request or at the Company's initiative – and sponsorships offered to the Company. Business courtesies are also regulated, with limits and authorisation criteria having been defined. As part of the principles of conduct that personnel of the Fincantieri Group Companies must strictly observe, note that:

- It is not permitted to promise or offer money, benefits, favours or other advantages, even indirectly through intermediaries (e.g. agents, consultants, etc.), to individuals – whether from Public Administrations or the private sector – for the purpose (even implicit) of obtaining favourable treatment for oneself or in relation to any activity connected with the specific Company and/or the Group.
- Employees must not request, solicit or accept money, gifts or other benefits for themselves or others, except for occasional gifts of modest value offered as part of normal courteous relations.
- Gifts may be given to individuals or entities, generally on the occasion of holidays or events, and in any case in line with the strategies defined at the central level (any gifts to people that fall outside the regulated categories and strategies must be subjected to a specific approval process and disclosed to Top Management and the Supervisory Bodies).
- It is the responsibility of each Fincantieri Group Company to be aware of the prohibitions or restrictions of the organisation the recipient belongs to before offering donations, charitable contributions, sponsorships, gifts or hospitality.
- It is not permitted to directly or indirectly provide or offer benefits of any kind with the purpose of expediting services that are otherwise already due ("facilitation payments") from parties with whom the Company has dealings.

Furthermore, the relationships of the Group Companies with political and trade union organisations are governed solely by applicable laws, regulations and agreements/contracts in order to ensure the highest standards of transparency and propriety. The Group refrains from providing any contributions – direct or indirect, in any form

– to political parties, movements, associations, committees or political and trade union organisations, or to their representatives and candidates, except where required or permitted by specific legal provisions.

6.5 CONFLICTS OF INTEREST

As set out in the Group Code of Conduct, Group Companies maintain a relationship of trust and loyalty with each of their employees. Employees have a duty of loyalty and allegiance, pursuing the interests and objectives of the Company and the Group. Employees must avoid any situation or activity that could lead to conflicts of interest or that could interfere with their ability to make impartial decisions in the best interest of the Company. Likewise, trust and transparency are essential foundations for building strong, lasting business relationships with partners or business associates. In keeping with these principles, any situation that could constitute or give rise to a conflict of interest must be promptly reported to the Fincantieri Group Companies in accordance with the procedures specified contractually and in its internal regulations so that its existence and severity can be assessed and the appropriate operational management procedure enacted.

Situations constituting conflicts of interest include but are not limited to:

- Economic and financial interests of the employee and/or their spouse, relatives and in-laws to the second degree, cohabiting partners and individuals with whom they have close personal ties involved in the activities of suppliers, customers and competitors.
- In dealings with any Fincantieri Group Company, use by third parties of former Group employees who in the past 36 months have held key positions where they could influence technical and purchasing decisions.
- Use of one's position within the Company or of information acquired through one's work in a manner that creates a conflict between personal interests and those of the Company.
- Existing relationships between employees who are in a reporting line and are spouses, relatives or in-laws to the second degree, cohabiting partners or have close personal ties.
- Engaging in any type of work with customers, suppliers or competitors.
- Acceptance of money, favours or benefits from individuals or companies that are or intend to enter into business relationships with Fincantieri or Group Companies.

6.6 INTERNAL CONTROLS, ACCOUNTING PROCEDURES AND BOOKKEEPING

The Fincantieri Group's internal control system ensures specific financial and non-financial controls to prevent the risk of corruption in those areas of its processes deemed sensitive and potentially instrumental to the commission of offences of a corrupt nature. With regard to financial controls, activities relating to the management of financial flows (e.g. payments, collections, current account management, cash management, etc.) are governed by regulatory instruments that incorporate the provisions set out in the Organisational, Management and Control Models pursuant to Italian Legislative Decree no. 231/01 or in Compliance Models (for foreign companies).

Furthermore, as a listed company Fincantieri has established an internal control system for financial and non-financial reporting in accordance with Italian law no. 262 of 28 December 2005 "Provisions for the protection

of savings and the regulation of financial markets" and Italian Legislative Decree no. 125 of 6 September 2024 implementing Directive 2022/2464/EU on corporate sustainability reporting. The Manager responsible for preparing financial reportsmonitors and checks the implementation of administrative and accounting procedures and the controls put in place to deal with specific risks in order to document the adequacy and effective application of such procedures, which support financial and sustainability reporting, in compliance with the Internal Control System on Financial Reporting (ICSFR) and on Sustainability Reporting (ICSSR), both part of the Internal Control and Risk Management System adopted by the Fincantieri Group.

With regard to financial statements and corporate resolutions, the Fincantieri Group Companies must comply with the following behavioural principles:

- In managing accounting activities, the rules for accurate, complete and transparent accounting must be strictly observed in accordance with the criteria laid down by law, applicable accounting standards and reporting standards, so that each transaction and/or item of information is authorised, verifiable, legitimate, consistent and appropriate.
- The accuracy of the recording process and of the transactions and information contributing to the Group's reporting must be verified by the personnel responsible for the financial statement line item or sustainability topic, through the controls provided by the relevant reporting procedures.
- Accounting entries may only be made by authorised personnel, and authorisation levels are defined and revised in accordance with Company procedures.
- During audits and inspections by external auditors, the Board of Statutory Auditors, shareholders or other public supervisory authorities, transparency must be maintained and the utmost cooperation provided.
- Extraordinary transactions must be carried out in accordance with the provisions of the Italian Civil Code, applicable laws and company procedures.

7 TRAINING AND COMMUNICATION

When carrying out their duties and responsibilities, all Fincantieri Group personnel are responsible for complying with applicable laws and regulations, with this Policy and with the correct application of the internal Anti-Corruption regulatory instruments. This commitment is formalised by each employee at the time of hiring by signing a declaration confirming that they have read and understood the contents of this Policy and commit to comply with its provisions. In compliance with ISO 37001, the prevention system is strengthened through the "Annual signoff" process for personnel exposed to a risk level above low (see §6.3) – mandatory for certified Group companies and subject to appropriate adaptations for others – to maintain a high level of awareness of duties and responsibilities related to anti-corruption.

The Fincantieri Group also provides training and information to its employees based on the risk profile associated with the relevant function or activity. Training is a key component of the operational activities set out in the Anti-Corruption management system, as it supports the development of skills among Fincantieri Group personnel and fosters greater awareness and sensitivity to anti-corruption matters, including knowledge and awareness of: i) corruption offences; ii) corruption risks they may be exposed to; iii) criminal and administrative

liability of individuals and the Company; iv) actions to prevent and avoid corrupt acts; v) implications and potential consequences of unlawful conduct or in any case conduct contrary to the principles and rules set out in this Policy; vi) channels and procedures to be used for reporting risks or suspected unlawful practices. Managers play a key role in this context as they are expected to comply with and ensure compliance with internal anti-corruption regulations by their staff. Regularly scheduled training is targeted at employees identified according to their roles and their exposure to the risk of corruption, whether or not they hold representation or management roles within the Company. Training is provided upon hiring and when designated as a legal representative. To ensure ongoing understanding and awareness of the topics covered by the Anti-Corruption management system, refresher training is provided every three years, along with updates following changes to the system or to the risk profile, in coordination with training needs on corporate liability matters (e.g. Italian Legislative Decree no. 231/01). These courses are mandatory.

Fincantieri also promotes awareness and observance of the Code of Conduct and this Policy among its stakeholders – including business and financial partners, consultants, contractors, customers and suppliers – by making both documents available for online consultation on the Company's institutional website. These documents are also referenced in specific contractual clauses. Targeted awareness initiatives on anti-corruption are also organised for third parties engaged in business dealings with Group Companies.

8 REPORTING SYSTEM FOR SUSPECTED VIOLATIONS

The Fincantieri Group encourages the reporting – in good faith or based on a reasonable belief – of attempted, suspected or actual acts of corruption, and of any violations of applicable anti-corruption laws, of this Policy or of internal Anti-Corruption rules through the channels made available and communicated by the Group Companies.

The whistleblower may either be an internal person within the Group Companies or an external party engaged in business dealings with them. Reports may be submitted anonymously, although non-anonymous reports are preferred as they facilitate fact-finding and the collection of additional information if needed. Reporting channels and their procedures for use are made known via announcements, internal regulatory instruments and in dedicated sections of the websites of Group Companies (where applicable). The confidentiality of sources and of any information provided is guaranteed, without prejudice to legal obligations. Moreover, the Fincantieri Group will not engage in retaliation or discriminate in any way against Company personnel or other parties identified by applicable law who in good faith report events or situations related to compliance with the Code of Conduct, the Organisational, Management and Control Model pursuant to Italian Legislative Decree no. 231/2001 or Compliance Model on corporate liability, the Anti-Corruption Policy, the Supplier Code of Ethics, Company procedures or any applicable laws or regulations. The Fincantieri Group guarantees all protections afforded by applicable law. For Europe, reference is made to Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law, transposed into Italian law by Italian Legislative Decree no. 24/2023.

With regard to the other Group Companies that have adopted Compliance Models, they must implement specific channels as required by local law and in line with the guidelines issued by the Parent Company as set out in the internal regulatory instrument on whistleblowing, or alternatively use Fincantieri's reporting channels where permitted by applicable law. Moreover, to ensure the objectivity, effectiveness and independence of investigations, the Fincantieri Group is committed to separating the responsibilities of those tasked with investigating cases of offering and accepting bribes from those responsible for managing the resulting violations.

9 DISCIPLINARY AND SANCTIONING MEASURES

The Fincantieri Group prohibits all corrupt practices and will sanction any unlawful behaviour perpetrated or attempted by its own personnel or by third parties with whom it has business dealings. The Group applies disciplinary measures in accordance with the "Rules on the application of disciplinary sanctions", which are also referenced in the Organisational, Management and Control Model pursuant to Italian Legislative Decree no. 231/2001 or in the Compliance Model on corporate liability adopted by Group Companies, and termination clauses to any person internal or external to the Group who is responsible for:

- Violations of anti-corruption laws.
- Violations of this Policy or of the relevant internal regulatory instruments.
- Failure to report breaches of the aforementioned laws or Company rules they become aware of.
- Retaliatory conduct against whistleblowers.

10 THE ANTI-CORRUPTION FUNCTION

Fincantieri has assigned responsibility for Anti-Corruption Compliance to the Group Compliance, Anti-Corruption and 231 Model Function, ensuring it has appropriate status, authority and independence, including through its organisational placement within the Legal, Corporate Affairs and Compliance Department, which reports directly to the Chief Executive Officer and coordinates with the Chairman, as person responsible for overseeing the Company's internal control and risk management system.

The Function is responsible for the design, implementation and continuous improvement of Fincantieri's anti-corruption management system, and for the direction and coordination thereof across the Group Companies. The responsibilities and activities of the Anti-Corruption Function are defined in internal regulatory instruments (a summary of key responsibilities is available on the institutional website at https://www.fincantieri.com). Each Group Company certified under ISO 37001 has a corresponding function.

11 RESPONSIBILITIES AND UPDATES

The Group Compliance, Anti-Corruption and 231 Model Function is responsible for monitoring and overseeing the Anti-Corruption Policy.

This Policy is subject to periodic review and validation by the Control and Risk Committee (CRC), and to ensure its effective implementation and continued adequacy it will be updated to reflect any changes in the external environment.

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

Version approved by the Board of Directors on 12 May 2025