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### 1. Premise

Lazzerini S.r.l. ("**Lazzerini**" or the "**Company**") has always been committed to providing a safe environment for all its employees free from discrimination and violence and/or harassment, both physical and psychological, including therein sexual harassment.

In light of the above, Lazzerini operates a zero-tolerance policy in relation to any form of violence and/or sexual harassment in the workplace.

The Company, therefore, undertakes to take all cases brought to its attention seriously, investigating any reports received in a timely manner and ensuring absolute confidentiality, as well as prohibiting any discriminatory treatment of victims, also in accordance with the provisions of the whistleblowing policy adopted by the Company on 11 July 2023 (the "**Whistleblowing Policy**"), which is fully referenced herein, as well as the grievance policy adopted by the Company on 11 July 2023, as respectively amended.

### 2. Definition of violence and/or sexual harassment

For the purposes of this policy (i.e. the "**Sexual Harassment Policy**"), any form of harassment and/or violence is prohibited, including that of a sexual nature, whether perpetrated within or outside Lazzerini's premises, including at social events, during business trips, training courses and/or conventions sponsored by Lazzerini.

Violence and/or harassment is understood as any behaviour – expressed either physically, verbally or non-verbally – as well as any threats and/or indications of engaging in said behaviour, whether on a single occasion or repeatedly, which aims for, causes or may cause physical, psychological or economic and/or moral damage.

Examples of conduct or behaviour that constitute violence and/or harassment include, but are not limited to:

- Verbal or visual expressions that are offensive, insulting or otherwise characterised by unwanted confidentiality that is not in line, and is inconsistent with, the nature of the relationship with the person
- Verbal or visual expressions that are denigrating or offensive or, in any case, which refer to personal identifiers (ethnicity, nationality, political affiliation, psychophysical diversity, health status, any other personal information)
- Acts of bullying, mobbing or behaviour resulting in a constant and permanent negative change in the work environment, capable of compromising the right to health or any other form of psychological manipulation or abuse.
- Building a relationship of trust or emotional attachment through which to manipulate, exploit or abuse another person
- Physical violence or the threat of physical violence
- Digital/online harassment and stalking

The violence and/or harassment defined above includes, specifically, (i) gender-based violence and/or harassment and (ii) sexual harassment and/or violence (which is a subset of gender-based harassment)

#### ***(i) Gender-based violence and/or harassment***

Gender-based violence and/or harassment refers to violence and harassment (as defined above) directed towards a person by way of their sex or gender. Gender-based violence and harassment<sup>1</sup> includes, by way of example but not limited to:

- physical and/or psychological violence perpetrated against a person on account of their gender, gender identity or sexual orientation<sup>2</sup>, including violence against women and LGBTQIA+ persons<sup>3</sup>
- acts of persecution, so-called “stalking”
- dissemination of intimate images.
- sexual assault, both attempted and real (see Point 2. (ii)).

Gender-based violence and/or harassment includes that arising from job interviews/recruiting procedures, as well as social activities outside the workplace in any way connected with the performance of work, as well as any communication exchanges outside working hours.

## ***(ii) Sexual harassment and/or violence***

As mentioned above, sexual harassment and/or violence are a sub-set of gender-based harassment and include any behaviour of a sexual nature – expressed either physically, verbally or non-verbally – as well as any threats and/or indications of engaging in said behaviour, whether on a single occasion or repeatedly, which aims for, causes or may be perceived as a violation of the dignity of the harassed person or the creation of an intimidating, hostile, degrading, humiliating or offensive environment.

Lazzerini acknowledges that sexual harassment is a reflection of power dynamics and frequently occurs within unequal workplace relations; therefore, the perpetration of sexual harassment, including implicit or explicit threats or blackmail, by hierarchical superiors or individuals capable of influencing the initiation, continuation and/or termination of the employment relationship (referred to as “harassment do ut des”) constitutes an aggravating circumstance.

Anyone can be a victim of sexual harassment, regardless of their sex and the sex of the harasser. Lazzerini acknowledges that sexual harassment can also occur between persons of the same sex. What matters, is that the sexual conduct is undesired and unwelcome by the person towards whom it is directed.

Examples of sexual harassment may include, by way of example and not limited to:

- staring in a sexually suggestive manner, or making inappropriate sexual gestures and/or whistling
- telling anecdotes, jokes or stories of a sexual or wanton nature, making the counterparty feel uncomfortable
- making remarks about the sexuality or physical attractiveness of the counterparty and/or third-party colleagues, or making sexual comments on appearance, clothing or body parts
- making derogatory or degrading comments about a person’s sexual orientation or gender identity, or using insults with gender-based/sexual connotations.
- repeatedly contacting a person (for example, insistent phone calls or messages) or repeatedly asking them to meet
- making unwanted sexual advances
- sending sexually allusive communications in any form or sharing or displaying sexually explicit images or videos in any form
- unwanted touching, including pinching, stroking, rubbing or purposely brushing past another person
- promising – even implicitly – advantages of any type, whether personal or business-related, in exchange for sexual favours
- threatening – even implicitly – retaliation or negative consequences of any kind, whether personal or financial, in the event sexual favours are not provided.

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<sup>1</sup> “Gender” is understood as the set of socially constructed roles, behaviours, activities and attributes that a given society considers appropriate for people of a given gender; gender is to be distinguished from “sex”, i.e. the set of physical and biological characteristics that distinguish females and males. The gender identity of a given person (understood as the subjective experience of perceiving oneself as belonging to a gender), in fact, does not necessarily correspond to the sex assigned at birth: where one’s gender identity does not correspond to one’s assigned sex, one speaks of gender identity.

<sup>2</sup> “Sexual orientation” is understood as the physical, romantic and/or emotional attraction a person feels towards other people, including, by way of example and not limited to, homosexuality, heterosexuality and bisexuality.

<sup>3</sup> LGBTQIA+ is an acronym for lesbian, gay, bisexual, transgender, queer, intersexual, asexual. The “+” is an inclusive symbol indicating the term’s extension to all non “hetero-conforming” sexual orientations and gender orientations

### **3. Reporting procedures**

Without prejudice to the individual's right to activate any type of protection afforded by the respectively applicable laws (also by involving the Public Authorities), anyone who suffers harassment and/or violence, including of a sexual nature, has the right to submit a report in compliance with the provisions of the Grievance Policy and/or the Whistleblowing Policy in place at the Company, which are fully referred to herein.

### **4. Sanctions and disciplinary measures**

Any failure on the part of Company employees to fulfil their duties, which may emerge following a violation of the Sexual Harassment Policy, could result in the Company applying disciplinary measures in line with that provided for in the National Collective Bargaining Agreement applied by the Company, and in the disciplinary code adopted by Lazzerini on 11 July 2023.

The nature of the sanctions (which, in the most serious cases, expressly includes dismissal for just cause pursuant to Article 2119 of the Italian Civil Code), shall depend on the severity and magnitude of the harassment and/or violence.

### **5. Application of the Sexual Harassment Policy**

Lazzerini undertakes to disclose and disseminate this policy at all levels, making it available on the company intranet and on the relative website, at the following link: <https://www.lazzerini.it/it/environmental-social-governance>

All Company employees shall be duly informed and trained on the content of this Policy when they join the company.

Lazzerini shall require all employees to periodically attend a refresher course on the content of this Policy.

The Human Resources department shall ensure that all Lazzerini employees are aware of the Sexual Harassment Policy and each department manager shall ensure that it is carefully read by their subordinates, and that they participate in the relative training courses.

### **6. Monitoring and evaluation**

Lazzerini acknowledges the importance of monitoring this Sexual Harassment Policy on an annual basis and shall see to the anonymous collection of statistics and data as to how it is used and whether or not it is effective, in order to make any necessary changes.

Managers and supervisors shall report on compliance with this Sexual Harassment Policy.