



Diversity and Inclusion Policy: Harassment Policy

Snam believes that diversity and plurality are values that help create an open and stimulating work environment, with different perspectives and points of view that encourage innovative ideas and virtuous behaviours.

Through this Policy, Snam has outlined its commitment to promoting an organisational context that supports inclusion and values diversity, where people feel respected, valued and free to express their full potential in a serene and professional working environment, free from all forms of discrimination and harassment. Snam adopts a zero-tolerance policy on any form of harassment in the workplace.

The Policy is addressed to all Snam Group employees and disclosed to third parties. This document is inspired by the values set out in the Code of Ethics, and is an integral part of Snam's Diversity and Inclusion Policy. It provides guidelines for preventing, identifying, prohibiting and continually monitoring trends associated with physical and psychological harassment in the workplace.

People are a fundamental element of the company's existence. The dedication and professionalism of management and employees are key values and conditions for achieving Snam's objectives.

Snam is committed to developing the skills and expertise of management and employees, so that, during their work, the energy and creativity of individuals are able to unlock their full potential. It also undertakes to safeguard working conditions, both in terms of protecting workers' mental and physical integrity and respecting their dignity. Unfair pressure or undue discomfort is not allowed, as we seek to promote working conditions that enable the development of individuals' personality and professionalism.

In full compliance with the relevant laws and contractual provisions, Snam commits to offer all workers the same employment opportunities, ensuring that everyone benefits from a fair legislative and remunerative treatment based on criteria of merit and expertise, free from discrimination, while at the same time protecting the less represented gender.

The competent departments must:

- adopt criteria based on merit and expertise (strictly professional criteria) in all cases when making any decision relating to human resources;
- always select, hire, train, remunerate and manage human resources with no discrimination of any kind;
- create a working environment that is conducive to Snam People's peace of mind, where personal characteristics or orientations do not give rise to discrimination.

Snam asks that the Group's People, at every level, cooperate in maintaining a climate of mutual respect for a person's dignity, honour and reputation.

Snam will do its best to prevent attitudes that might be considered abusive, discriminatory or defamatory. To this end, behaviour outside of work that is particularly offensive to civil sensibilities is also considered relevant.

In any case, any conduct that constitutes physical or moral violence is prohibited without exception.



Snam encourages initiatives aimed at achieving working methods geared towards greater organisational well-being.

In line also with the provisions of the National Collective Labour Agreement, Snam prohibits harassment in both internal and external working relationships, as well as all attitudes, without exception, that may be in any way regarded as mobbing. The following are considered as such:

- creating an intimidating, hostile, isolating or otherwise discriminatory working environment for individuals or groups of workers;
- creating unjustified interference with others' work performance;
- hindering others' individual work prospects merely for reasons of personal competitiveness or the competitiveness of other employees.

In particular, harassment occurs when one or more individuals are repeatedly and deliberately abused, threatened and/or humiliated in a work context. Violence occurs when one or more individuals are assaulted in a work context. Harassment and violence may be exercised by one or more superiors, or by one or more workers, with the purpose or effect of violating the individual's dignity, harming their health and/or creating a hostile working environment.

Any form of violence or harassment, whether sexual or related to personal and cultural diversity, is prohibited. The following are considered as such:

- basing any significant decision regarding the individual's working life on their personal or cultural diversity or on the acceptance of sexual favours;
- persuading one's co-workers to accept sexual favours through the influence of one's role;
- proposing private interpersonal relationships despite an expressed or reasonably evident dislike;
- alluding to physical or mental disabilities and impairments or to forms of cultural or religious diversity or sexual orientation.

It is essential for the safety of both people and the working environment that all employees report any acts of harassment, bullying or sexually inappropriate behaviour. We therefore emphasise the importance of reporting such behaviour, supporting any victims or witnesses, and protecting them from any retaliatory acts if they do make a report.

Snam is committed to creating a working environment where all employees feel protected and free to make the necessary reports, without fear of retaliatory acts. It also undertakes to promptly and impartially handle reports of harassment and bullying, taking all necessary measures to ensure the confidentiality and discretion of the reports. To this end, Snam has adopted a whistleblowing process which is shared through the document "Guidelines on anonymous and non-anonymous reports received by Snam and its subsidiaries".

Any infringement of the principles contained in this policy is an infringement of the Code of Ethics and will be treated as provided for therein.

Snam reserves the right to take disciplinary action in line with the provisions of the relevant National Collective Labour Agreement, including by way of sanctions which have the effect of terminating the employment relationship.

Snam's harassment policy is communicated and disseminated within the organisation and among everyone dealing with Snam, with a view to transparency and collaboration. The policy is also made available to all interested parties on the snam.it website.



The Company promotes communication and information activities for employees to ensure the broadest knowledge and the most effective application of the principles of this Policy through training activities for all employees.