

	Gender Equality Management Manual	31 Marzo 2025 Rev. 00
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CORPORATE POLICY FOR THE PREVENTION OF WORKPLACE HARASSMENT

Italian law, and in particular the provisions of the Equal Opportunities Code under Article 26, considers harassment and sexual harassment as forms of discrimination.

Harassment consists of unwanted behaviors that violate the dignity of a worker and create an intimidating, hostile, degrading, humiliating, or offensive environment. Among these, sexual harassment refers to unwanted behaviors of a sexual nature, whether verbal or non-verbal, which further violate the dignity of a worker and create an intimidating, hostile, degrading, humiliating, or offensive environment.

At ICOM, the entire Management is committed to ensuring working conditions that protect the dignity and moral and physical integrity of employees and to taking initiatives to prevent sexual harassment in the workplace.

In this context, ICOM, recognizing the full right of its personnel to be treated with dignity and respect and to be protected in their personal freedom, ensures its commitment to implementing a zero-tolerance policy within the company. This approach is considered fundamental to guaranteeing the psychological and physical well-being of employees in the workplace.

ICOM is committed to:

- Identifying the risk of any form of physical, verbal, or digital abuse (harassment) in light of Workplace Health and Safety regulations;
- Preparing a Plan for the prevention and management of workplace harassment;
- Providing specific training at all levels, at a defined frequency, on "zero tolerance" toward any form of violence against employees, including sexual harassment in any form;
- Planning and conducting periodic surveys among employees to investigate whether they have personally experienced harassment or inappropriate behavior;
- Assessing work environments also from the perspective of violence and harassment;
- Ensuring constant attention to the language used, promoting communication that is as polite and neutral as possible;
- Preventing overbearing or persecutory behaviors that may cause discomfort and psychological distress, and taking action against them if confirmed, applying this policy to those responsible;
- Promoting organizational well-being through awareness-raising and training activities, and eliminating organizational causes, informational gaps, or management deficiencies that may favor conflicts and psychological distress, factors related to so-called organizational mobbing, understood as distress arising from structural, even unconscious, dysfunctions in work organization;
- Establishing a structured process for anonymous reporting of any form of violence;
- Providing timely and impartial assistance and support to victims of sexual harassment while ensuring maximum confidentiality.

This policy is made available to anyone who requests it.

Lanciano, 31/03/2025


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