

ACPV ARCHITECTS
ANTONIO CITTERIO PATRICIA VIEL

CODE OF CONDUCT ANTI-HARASSMENT

**FOR THE PROTECTION OF THE DIGNITY OF
PERSONS**

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1. INTRODUCTION

ACPV ARCHITECTS S.r.l. (hereinafter "ACPV"), has conformed its business policy to the values of legality, trust, loyalty, fairness and transparency.

This Anti-Harassment Code of Conduct defines the general and essential principles of reference and outlines the conduct that is not tolerated, in order to ensure a work environment free from gender discrimination, violence and harassment, within a unitary framework of policies adopted on Human Rights and to complete the provisions of the Code of Ethics , in the **Internal Regulations, model 231** and in the **Whistleblowing Policy**.

The document also intends to implement the regulatory provisions contained in Law 4/2021 ratifying and implementing the International Labour Organization Convention 190/2019 (so-called ILO Convention 190) on the elimination of violence and harassment in the workplace, given that such conduct *"represents a threat to equal opportunities and is unacceptable and incompatible with decent work"*.

2. SCOPE OF APPLICATION

Compliance with the provisions of this Code of Conduct must be considered an essential part of the obligations of ACPV Persons, regardless of the role and function exercised, including the members of the Board of Directors, as well as of anyone who, even if external to the company, works, directly or indirectly, for the same.

The **Recipients** of this Code of Conduct are:

- employees, regardless of contractual status, apprentices - including trainees and apprentices - and candidates entering the ACPV selection process;
- freelance collaborators;
- the members of the Board of Directors;
- those who perform representative functions or are invested with particular attributions or delegations by ACPV;
- ACPV members;
- the statutory auditor and SB
- external consultants;
- customers;
- suppliers.

3. GENERAL PRINCIPLES

ACPV ARCHITECTS cares about social and environmental sustainability, in line with 11 of the Sustainable Development Goals (SDGs) defined by the UN in the 2030 Agenda.

In particular, ACPV respects the principle of legality in terms of anti-corruption policies, undertakes to cultivate and maintain a relationship of trust with stakeholders and to operate with loyalty, fairness and transparency towards all its people. In guaranteeing the excellence of its services in terms of quality, it safeguards safety, respect for health and environmental protection.

ACPV does not allow any form of harassment or violence in the workplace and is committed to protecting its collaborators from any form of violation.

The adoption of the Code of Conduct is intended to constitute a valid and effective tool for combating and preventing such harmful phenomena and is based on the following essential principles:

1. ACPV's professional culture is based on respect, professionalism, non-discrimination and equal opportunities.
2. ACPV Persons are called upon to respect and promote the principles contained in this Code of Conduct; people with a role of responsibility have the task of promoting a culture that combats violence and harassment at work and ensuring the availability of appropriate reporting channels for the timely management of situations, as well as the task of monitoring compliance with the Code, disseminating its principles and adopting measures to prevent, identify and report potential violations.
3. Protected Persons have the right to a workplace free from gender discrimination, violence and harassment and the responsibility to collaborate to create a work environment based on respect, to support those who report harmful conduct or episodes and to cooperate in the related investigative activities.
4. Protected Persons are invited to report, in good faith and without fear of retaliation, episodes of **gender discrimination, violence or harassment** at work of which they are victims or which they have witnessed, following the reporting channels described in the dedicated section.
5. It is forbidden to commit any act of retaliation or secondary victimization against Reporting Persons or Witnesses.
6. Protected Persons have the right to **confidentiality**: information reported and emerged during a possible investigation will remain confidential.
7. The Protected Persons also have **an obligation** of confidentiality on the facts that are the subject of the report and on the persons involved, also in order to protect the image and reputation of ACPV.
8. The conduct carried out by ACPV Persons who, following an investigation, is established falls within the definition of gender discrimination, violence or harassment at work referred to in this document, will be subject to appropriate measures to ensure the interruption of the conduct and will be sanctioned, if necessary, in accordance with the

provisions of the applicable regulatory instruments, including disciplinary ones, or through the termination of the professional collaboration contract.

4. PREVENTION PROGRAM

ILO Convention 190/2019 recognises that violence and harassment at work *"have repercussions on the psychological, physical and sexual health, dignity and family and social environment of the person"*. To this end, the Convention requires that, among other initiatives, hazards be identified and risks related to violence and harassment at work assessed, and that measures be taken to prevent and possibly manage them.

To this end, ACPV establishes, on an ongoing basis, programs to combat and prevent violence and harassment at work.

ACPV Persons will be informed and trained on the contents of the Code of Conduct and the applicable regulations on the subject, as well as on their shared responsibility in promoting a work culture based on mutual respect and human dignity.

ACPV will include the contents of this document in the information and training programs that are regularly provided to all ACPV Persons, such as, but not limited to:

- training on the Code of Conduct for all ACPV people;
- specific training initiatives in order to increase awareness on the issue of gender discrimination, harassment and violence in the workplace;
- training programs in the field of Health and Safety as far as they are concerned;
- communication initiatives related to specific events/anniversaries (e.g.: International Day for the Elimination of Violence against Women, workshops on value issues).

Participation in these training sessions constitutes, for APCV Persons, the correct fulfilment of the contractual obligation of work or collaboration.

The Code of Conduct document will be made available on the Wikis – company intranet.

5. REPORTING PROCEDURE

5.1 Signalling

The Company recommends that ACPV People adopt a bias-free approach towards those who suffer gender discrimination, harassment or violence, capable of overcoming *individual and collective stereotypes and cognitive biases, to create a work environment in which people can confidentially and safely report any harmful episodes.*

Any Protected Person who feels that he or she is subject to conduct that may constitute **gender discrimination, violence or harassment at work** - like any Witness - is invited to report such circumstances through the channels made available by the firm and according to the reporting procedure described below.

The process of managing reports will ensure the fair protection of both the Reporting Person and the Reported Person: to this end, the reports must be sufficiently detailed to allow them to concretely, on the basis of the investigative tools available, to verify the validity or otherwise of the facts or circumstances reported, countering any instrumental use of the same.

In the event of manifestly unfounded reports - made for the sole purpose of discrediting one or more people or the firm in general, in agreement with the HR function, if not directly involved - the procedure for the imposition of a disciplinary sanction will be activated against the person who made the aforementioned unfounded reports, also in compliance with the labour law regulations in force, of the applicable National Employment Contract, or - if the conditions are met - the possible termination of the collaboration contract.

On the other hand, no action or sanction is envisaged against those who report in good faith facts that subsequent checks result in unfounded.

5.2 Reporting Channels

Anyone who believes they are a victim or witness of the inappropriate behaviour described in this Code of Conduct may initiate a reporting procedure by contacting the following channels alternatively:

1. to the General Manager;
2. to your Project Director, Heads of business functions and BIM Unit Leader
3. to the Human Resources (HR) function;
4. to the partner of reference for the project;
5. by activating the service of the Confidential Counsellor by writing to the e-mail address consiglieradifiducia.acpv@fondazionebellula.com

The way to start a whistleblowing interview is through a request for a meeting, including by telephone, or an email addressed to the person with whom the whistleblower intends to discuss and obtain a subsequent detailed meeting. A quick response will be given and in any case within the following 5 working days. The interview can take place in person or electronically.

For the initiation of formal and informal procedures, it is always necessary for the Reporting Person to give his/her consent.

5.3 Handling the report

The report forwarded through "internal" channels to ACPV - collected by: General Manager or Project Director, Heads of company functions and BIM Unit Leader or Partner - will be transmitted and taken over and managed exclusively by the HR function, which will evaluate in agreement with the Reporting Person and in collaboration with the Confidential Counselor, whether to initiate an informal or formal procedure, starting from the judgment on the seriousness of the facts reported and the danger of repetition of the same.

If, on the other hand, the Reporting Person intends to make use of the "external" service of the Confidential Counsellor, it will be this guarantor who will take charge of the matter, with the prerogatives provided for him/her, referred to in the following paragraph.

All interviews that will be held are bound to the confidentiality of the people involved.

For the initiation of formal and informal procedures, it is always necessary for the Reporting Person to give his/her consent.

5.4 The Confidential Counsellor

The Confidential Counsellor is a professional, external to the organisation, an expert in discrimination, violence and harassment in the workplace, duly contracted in order to provide listening, support and advice on all situations reported to him/her and referable to this Code of Conduct.

His consultancy activity is aimed at Reporting Persons and internal bodies of the company who request it.

The Confidential Counsellor(s) manages the reception interview for the Reporting Persons, evaluates the different cases and provides advice and assistance, preparing suitable intervention strategies.

In particular, the Confidential Counsellor, always subject to the explicit consent of the Reporting Person, has the right to:

- Meet informally – even several times – the Reporting Person, to collect all the necessary narrative elements;

- informally confront the Referred Person;
- Acquire any testimonies or documentation, subject to the authorization of the HR function;
- Facilitate the meeting between the Reporting Person and the Reported, as part of any mediation activities;

If he/she deems it necessary (and always subject to the essential consent of the Reporting Person), the Confidential Counsellor may interact with the HR function for any follow-up of competence or to implement, in synergy, an effective coping strategy.

The duties of the Confidential Counsellor also include:

- recommend referral to external parties (local services, Anti-Violence Centers, Judicial Authorities, Law Enforcement Agencies, Equality Counselors, other professionals), depending on the situation and the people involved;
- provide support to the internal bodies concerned from time to time, at their request, in the evaluation of appropriate actions aimed at promoting an organizational climate suitable for ensuring the equal dignity and well-being of people within ACPV;
- actively participate in the information and training initiatives promoted by the Company on the topics of this Code of Conduct.

The Confidential Counsellor guarantees the anonymity and protection of the privacy of the Reporting Persons.

The Confidential Counsellor(s) reports to the HR Department, on an annual basis, on the activity carried out, in compliance with the contractual obligation to guarantee the anonymity of the persons involved.

The document must illustrate:

- the number of cases handled,
- the number of cases resolved,
- the number of cases that have been withdrawn or are still ongoing,
- the subject of the reports,
- the type of measures adopted,
- any other information deemed useful and relevant, respecting the privacy of the people involved.

The name and contacts of the Confidential Counsellor are published on the company intranet Wikis.

5.5 Informal procedure

The informal procedure is launched for minor situations, attributable to mostly

unconscious behavior and resolvable through listening and counseling, or awareness-raising, or even conflict mediation.

In this case, the person handling the report (HR Function, Confidential Counsellor) following the interview with the Reporting Person, will evaluate together with him the subsequent actions to be taken.

Especially:

- 1) may informally hear the person indicated as the author of the harmful behavior and acquire any testimonies or documentation;
- 2) will take action to remedy the situation created, identifying the most suitable management solutions for the organizational context, specific to interrupt the conduct and the consequent discomfort, including a possible clarifying or mediation interview between the people involved.

In any case, any initiative must be agreed in advance with the Reporting Person.

The informal procedure must be concluded as soon as possible, in relation to the delicacy and complexity of the concrete situation, reasonably within 45 days, extendable for no more than a further 45 days and must provide, by those who managed it, for subsequent monitoring ("follow up") to verify its success.

If the reported behavior is repeated and/or retaliatory behavior is implemented towards the reporting person and/or the witnesses, the formal procedure can be continued.

5.6 Formal procedure

The formal procedure is initiated for situations deemed to be severe, attributable to serious gender discrimination, harassment of significant harm or violent behaviour or behaviour particularly harmful to the dignity of the person, or repeated or representing a high risk factor for the person and/or the organisation.

The formal procedure is managed exclusively by the HR Function, in compliance with the rules on disciplinary sanctions.

If the report of the conduct immediately appears to be of high entity/danger and comes from the other reporting channels, they communicate the facts as soon as possible (within 24 hours) to the HR Function, which provides for the possible safety of the person who suffers the harmful behavior and initiates an investigation phase aimed at ascertaining the facts.

During the preliminary phase, the HR Function collects the statement of the Reporting Person in written form and takes all useful evidence available to start and carry out an investigation: documentation, email, messaging (including on private channels such as whatsapp chats), hearings of people informed of the facts and any other activity deemed appropriate for the purpose of ascertaining the validity of the report.

The preliminary phase must be carried out in the utmost confidentiality of all the people involved, including the Reported Person.

It will have to be concluded as soon as possible in relation to the delicacy and complexity of the concrete situation.

Following the outcome of the investigation, the appropriate disciplinary measures will be taken, in compliance with the law and the CCNL of the category, in the event that the author of the harmful conduct is an employee.

ACPV may, if necessary, terminate the Collaboration Agreement by law, pursuant to Article 1456 of the Italian Civil Code and in relation to the paragraph with the subject "*Withdrawal and Termination*" of the contract itself - without prejudice to the right to compensation for damages - in the event of conduct carried out by the professional, in violation of this Code of Conduct.

However, in the event that the Reporting Person does not intend to follow up on his or her initiative through a written document containing the names of the parties involved (reporting person and reported person), the procedure will end with a filing.

5.7 Confidentiality obligations

The Confidential Counsellor guarantees the absolute confidentiality of any information received and the anonymity of the persons involved, who have requested it.

Each reporting channel and any other functions involved undertake to keep confidential all information and data acquired as part of the collection and management of reports of violations received.

Specifically, the HR Function, and any other internal bodies involved, are required to maintain the confidentiality of the identity of both the Reporting Person and the Reported Person and any other information from which these identities may be derived, directly or indirectly, in accordance with the will of the Reporting Person.

As part of the formal procedure, the identity of the Reporting Person may be revealed only with the consent of the same and if the complaint appears to be well-founded and the application of a disciplinary sanction is necessary. In this case, in fact, the current legislation operates, which obliges a punctual contestation of the disciplinary charge, for the purpose of a full right of defense of the person accused of the offence.

In the event of refusal by the Reporting Person to consent to the disclosure of his/her identity, the HR Function will archive the report without further follow-up.

Finally, the reporting person is obliged to maintain confidentiality on the facts covered by the report and on the persons involved.

6. GLOSSARY

ACPV people: those who carry out their work for ACPV, regardless of the type of contractual relationship, such as employees, trainees, candidates, people in training, workers with whom the employment relationship has ceased with respect to episodes that occurred during the period in which they worked for ACPV, freelance collaborators, members of the Board of Directors, those who perform representative functions or are invested with particular attributions or proxies by ACPV, members of ACPV.

Third Party: any third party that collaborates or works in the interest of ACPV, such as external consultants, customers, suppliers, statutory auditors and SBs.

Protected Persons or Recipients: persons to whom this Code of Conduct is addressed, i.e. ACPV Persons and Third Parties.

Reporting Person: person who makes a report with reference to one or more discriminatory conducts (with regard to gender) or one or more episodes of violence or harassment at work.

Witness person: person who is informed of the facts, because he is present at them.

7. DEFINITIONS

7.1 Gender discrimination

*"Direct discrimination **shall be** any provision, criterion, practice, act, agreement or conduct, as well as an order to carry out an act or conduct, which produces a detrimental effect by discriminating against male and female candidates, during the selection of personnel, male and female workers on the basis of their sex and, in any case, the less favourable treatment compared to that of another worker in a similar situation.*

*Indirect discrimination **occurs** when an apparently neutral provision, criterion, practice, act, agreement or behaviour, including organisational or affecting working time, places or is likely to place candidates in the selection phase and workers of one sex at a particular disadvantage compared with workers of the other sex. except where they relate to essential requirements for the performance of the work activity, provided that the objective is legitimate and the means used to achieve it are appropriate and necessary." (Art. 25, paragraphs 1 and 2 of Legislative Decree 198/2006 so-called CPO)*

7.2 Violence and harassment at work

*"The term **"violence and harassment"** in the world of work refers to a set of unacceptable practices and behaviors, or the threat of such behavior, whether on a single occasion or repeatedly, that are intended to, cause or are likely to result in physical, psychological, sexual or economic harm, and include gender-based violence and harassment." (Art. 1 Conv. ILO*

190/2019)

Violence and harassment at work, understood as violence and harassment that occurs against Protected Persons in the course of work, in connection with work or that arises from work, falls within the scope of this Policy. Therefore, violence and harassment at work are considered violence and harassment that, by way of example and not exhaustively, occur:

- in the workplace, including public and private spaces where these are a workplace or places connected with work;
- in places intended for breaks or lunch breaks, or in places where sanitary facilities are used or in changing rooms;
- during travel or business trips, training, events or activities, including social ones, related to work;
- as a result of or during business communications, including those made possible by information and communication technologies;
- during the commute to go to work and for the return from work.

7.3 Gender-based violence and harassment at work

"The term "gender-based violence and harassment" means violence and harassment against persons on the basis of their sex or gender, or disproportionately affecting persons of a specific sex or gender, including sexual harassment." (Art. 1 Conv. ILO 190/2019)

Gender-based violence includes, but is not limited to:

- Violence perpetrated, in physical and/or psychological form, against a person on grounds related to their gender, gender identity or sexual orientation, including violence against women and LGBTQIA+ people.
- Micro-aggressions.
- The dissemination, including digital, of intimate images.
- Sexual violence, even in an attenuated form.

7.4 Gender-based harassment

"Harassment, i.e. unwanted behaviour, carried out for reasons related to sex, having the purpose or effect of violating the dignity of a worker and creating an intimidating, hostile, degrading, humiliating or offensive climate, is also considered discrimination." (Art. 26, paragraph 1 of Legislative Decree 198/2006 so-called CPO)

Gender, moral or psychological harassment is also considered conduct that may cause damage to the personal and/or professional image of the person.

By way of example and not limited to, gender-based harassment includes:

- Verbal or visual expressions that are abusive, offensive or in any case marked by unwelcome confidentiality and do not coincide with the nature of the relationship with the interlocutor.
- Verbal or visual expressions that are disparaging and offensive or in any case refer to identifying elements of the person, such as gender, identity and/or sexual orientation.
- Repeated gender-based harassment or behaviour that causes a constant and permanent negative change in the work situation, likely to affect the right to health.

7.5 Sexual harassment

"Sexual harassment is that unwanted behavior with a sexual connotation and any other type of discrimination based on sex, expressed in physical, verbal or non-verbal form, having the purpose or effect of violating the dignity of a worker and creating an intimidating, hostile, degrading, humiliating or offensive environment." (Art. 26, paragraph 2 of Legislative Decree 198/2006)

Sexual harassment, as discrimination on grounds of sex, violates the principle of equal treatment between persons. By way of example but not limited to, sexual harassment includes:

- Staring in a sexually evocative way or performing inappropriate sexual gestures.
- Use anecdotes, jokes or stories of a sexual nature, which make the interlocutor uncomfortable.
- Expressing evaluations of sexuality or physical attraction towards the person, or making sexual comments about appearance, clothing or body parts.
- Making derogatory or degrading comments about a person's sexual orientation or gender identity, or using insults with a gender/sexual connotation.
- Repeatedly contacting a person (e.g. phone calls or persistent messaging) for non-professional purposes, or insistently asking them for an appointment.
- Making unwanted sexual advances.
- Send sexually suggestive communications or share or display sexually inappropriate images or videos in any format, print or digital.
- Touching, pinching, stroking, or deliberately touching another person without their consent.

Promising benefits of any kind, or threatening retaliation or negative consequences if refused, in exchange for sexual favors.

8. REGULATORY REFERENCES

8.1 Internal References

- Code of Ethics
- Rules of Procedure
- Whistleblowing Policy
- Model 231/2001 – general and special part
- Privacy Policy
- ISO 37001/2016, UNI PDR 125:2022, ISO 45001 certifications; ISO 14001

8.2 Italian legislation

- **Italian Constitution**, which recognizes and protects fundamental rights, including the principle of equality (Article 3)
- **Law 300/1970** (Workers' Statute), which establishes the fundamental principles of workers' rights and includes provisions on non-discrimination in the workplace
- **Law No. 125/1991** (Positive actions for the realization of equality between men and women in the workplace)
- **Legislative Decree no. 196/2003 and subsequent amendments** (Protection and processing of personal data)
- **Legislative Decree no. 198/2006 and subsequent amendments** (Code of equal opportunities between men and women), which also transposes the European directives on gender equality
- **Legislative Decree no. 81/2008 and subsequent amendments and additions.** (Consolidated Law on Health and Safety at Work) which underlines the importance of ensuring an inclusive, safe and discrimination-free work environment
- **Law No. 4/2021** ratifying and implementing the International Labour Organization Convention No. 190 on the Elimination of Violence and Harassment in the Workplace
- **Law 162/2021** on gender equality and the related UNI/PdR 125:2022 Reference Practice, which defines the minimum parameters to be respected in order to obtain gender equality certification

8.3 Industry references

- CCNL Commerce
- Interconfederal Agreement of 25 January 2016 – "Framework Agreement on harassment and violence in the workplace", signed by Confindustria and OO.SS.
- INAIL Guidelines – "Recognizing to prevent harassment and violence in the workplace" (2021)

- WEPs: Women's Empowerment Principles (and Gender-Based Violence and Harassment at Work Policy Template), UN Global Compact and UN Women, (2010)
- The 10 Principles of the UN Global Compact, with particular reference to Principles 1 to 6 that promote respect for Human Rights and Labour Rights
- The 17 Sustainable Development Goals (SDGs), and the 169 Targets that substantiate them, defined in the United Nations 2030 Agenda
- United Nations Guiding Principles on Business & Human Rights (UNGPs), related Gender Dimensions and the related Manifesto "Business for People and Society"
- Code of Ethics for Architects (2024)

8.4 International Standards

- United Nations Universal Declaration of Human Rights of 1948, which enshrines the fundamental principle of the equality of all people, without discrimination of any kind
- United Nations Conventions on Women's Rights, on the Elimination of All Forms of Racial Discrimination, on the Rights of the Child, on the Rights of Persons with Disabilities
- Declaration on Fundamental Principles and Rights at Work and the ten Fundamental Conventions of the International Labour Organization (ILO), which promote equal opportunities and fair treatment in the workplace
- Recommendation 92/131/EEC on mobbing and harassment at work
- Resolution A3-0043/94 of the European Parliament on the establishment of the role of Confidential Counsellor for the prevention and combating of gender-based harassment and sexual harassment in the workplace
- Charter of Fundamental Rights of the European Union (or Charter of Nice) 20/12/2000
- Directive 2000/43/EU on combating discrimination on the grounds of race or ethnic
- Directive 2000/78/EU to combat discrimination
- Resolution A5-0283/2001 on the implementation of policies to prevent bullying in the world of work
- Directive 2002/73/EU and Directive 2006/54/EU, both on equal treatment of men and women in matters of employment and occupation
- European Framework Agreement on Stress in the Workplace 08/10/2004
- Treaty of Lisbon 13/12/2007 "Charter of Fundamental Rights"
- Istanbul Council of Europe Convention of 11/05/2011 on combating and preventing violence against women
- Victims Directive 2012/29/EU establishing minimum standards on the rights, support and protection of victims of crime
- International Labour Organization Convention No. 190/2019 and its Recommendation No. 206/2019 on the Elimination of Violence and Harassment in the World of Work

- Directive on combating violence against women 2024/1385/EU which aims to guarantee the fundamental rights of equal treatment and non-discrimination between women and men