

SAIPEM HUMAN RIGHTS AND MODERN SLAVERY STATEMENT 2022

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1. INTRODUCTION

In this statement Saipem aims to describe through its policies, processes and activities how the Company addresses human rights and modern slavery risks across its global operations and supply chain, in particular focusing on actions taken in 2022 and those planned for the current year.

The statement has been prepared in compliance with the "OECD Due Diligence Guidance for Responsible Business

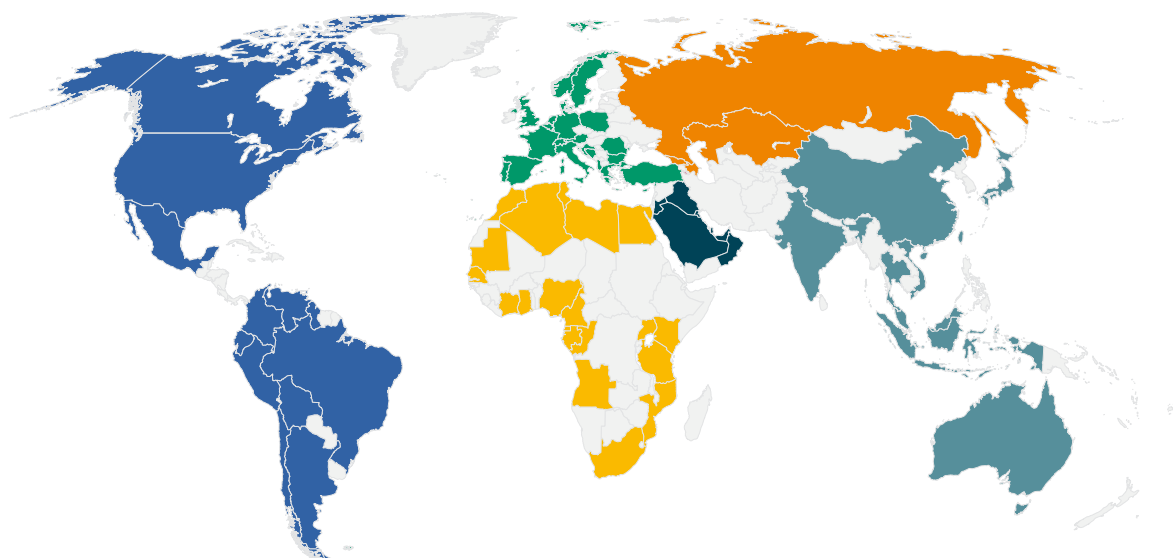
Conduct" guideline and the requirements of the 2015 UK Modern Slavery Act, the 2018 Australia Modern Slavery Act and the 2022 Norwegian "Transparency Act". For the scope of this statement, "Saipem" refers to the parent company Saipem SpA and its consolidated subsidiaries as identified in the 2022 Annual Report, including Saipem Ltd (a wholly owned UK based subsidiary), Moss Maritime, Saipem Norge and Saipem Drilling Norway.

1.1 SAIPEM ORGANISATION

Saipem is a global solutions provider within the energy and infrastructure sectors, specialising in the management of complex onshore and offshore projects, from design to decommissioning and including those in extreme environments, remote areas and deep waters. Saipem's operational sites include:

- > 9 fabrication yards;
- > 29 vessels, of which 26 owned and 3 owned by third parties but operated by Saipem;
- > 13 onshore drilling units, of which 9 owned by Saipem;
- > and various office facilities.

SAIPEM IN 2022



AMERICAS

Employees (No.)	2,666
Supply chain orders (€ mln)	874
Qualified Suppliers (No.)	1,094

AFRICA

Employees (No.)	6,682
Supply chain orders (€ mln)	1,982
Qualified Suppliers (No.)	924

MIDDLE EAST

Employees (No.)	8,674
Supply chain orders (€ mln)	2,873
Qualified Suppliers (No.)	1,464

FAR EAST AND OCEANIA

Employees (No.)	5,855
Supply chain orders (€ mln)	818
Qualified Suppliers (No.)	722

CIS

Employees (No.)	957
Supply chain orders (€ mln)	202
Qualified Suppliers (No.)	275

EUROPE

Employees (No.)	10,981
Supply chain orders (€ mln)	1,235
Qualified Suppliers (No.)	1,914

Our operations span over 70 countries, in the following locations:

EUROPE

Albania, Austria, Belgium, Bulgaria, Cyprus, Denmark, France, Germany, Greece, Italy, Luxembourg, Netherlands, Norway, Poland, Portugal, Romania, Serbia, Spain, Sweden, Switzerland, Turkey, United Kingdom

AMERICAS

Argentina, Bolivia, Brazil, Canada, Chile, Colombia, Ecuador, Guyana, Mexico, Peru, United States of America, Venezuela

CIS

Azerbaijan, Georgia, Kazakhstan, Russia

AFRICA

Algeria, Angola, Congo, Ivory Coast, Egypt, Equatorial Guinea, Gabon, Ghana, Kenya, Libya, Mauritania, Morocco, Mozambique, Nigeria, Senegal, South Africa, Tanzania, Tunisia, Uganda

MIDDLE EAST

Bahrain, Iraq, Israel, Kuwait, Oman, Qatar, Saudi Arabia, United Arab Emirates

FAR EAST AND OCEANIA

Australia, China, India, Indonesia, Japan, Malaysia, Singapore, Taiwan, Thailand, Vietnam

2022 HIGHLIGHTS

32,377
EMPLOYEES

6,951
PEOPLE HIRED

THROUGH EMPLOYMENT AGENCIES

129

WORKFORCE NATIONALITIES

10%

FEMALE EMPLOYEES (3,438)

€10.5 bln

TOTAL GOODS AND SERVICES ORDERED

22,311

ACTIVE VENDORS

72%

LOCAL EMPLOYEES

55%

LOCAL MANAGERS

50%

EMPLOYEES COVERED BY COLLECTIVE BARGAINING AGREEMENTS

Saipem's business is characterised by multicultural personnel and a highly complex global supply chain covering various geographical areas and industrial sectors.

In 65 years of business in numerous countries, Saipem has created a consistent and profitable network of partners and suppliers. Saipem has more than 22,000 active vendors, 6,393 of which qualified in 2022.

Saipem works with local vendors and contributes to developing their know-how and to fostering the expansion of local economies. About 64% of total purchases are from local vendors, i.e. vendors working in the same geographical area where the Company executes the projects.

1.2 MATERIAL HUMAN RIGHTS RISKS

Saipem is aware of the impacts that our organisation produces on the environment, people and economic structures. This is why understanding our impacts on society and the Planet is a fundamental pillar of our strategy and an enabler of our continuous progress to create sustainable value.

The Materiality Analysis helps to determine which ESG (environmental, social & governance) topics are most important for Saipem's internal and external

stakeholders in terms of how impacts are perceived along our value chain, and how they could transform into both risk and opportunities for the company business. Saipem strengthens the relationship and trust with the company's key stakeholders by ensuring that their views and priorities are considered and reflected in its business strategy.

As a result of the Materiality Analysis, the material topics related to "human and labour rights" are:

2022 MATERIAL TOPICS



HUMAN AND LABOUR RIGHTS
ALONG THE VALUE CHAIN



HEALTH AND SAFETY
ALONG THE VALUE CHAIN

MAIN IMPACTS GENERATED

- > Increase in wellbeing, living conditions and wealth
- > Strengthening fair and ethical collaboration with institutions, partners and vendors
- > Potential harm to human beings

- > Increase in wellbeing, living conditions and wealth (training, HSE management systems, etc.)
- > Potential harm to human health

1.3 RESULTS AND OBJECTIVES RELATED TO HUMAN RIGHTS

As part of the "Energy for a sustainable future" 2022-2025 Sustainability Plan, the results related to human

rights-related aspects included:

2022 GOAL	2022 RESULTS
Human rights risk assessment on 100% of the main construction sites	The 19 main companies operating in high-risk countries mapped the risks on human and labour rights. In addition, another 17 companies operating in countries classified as non-high risk also completed the risk mapping.
Implementation and enforcement of a Vendor Code of Conduct	The Vendor Code of Conduct was published in March 2022. Requiring all vendors to undertake to comply with the Code in the qualification process.
Achieving SA8000 social accountability certification for Saipem SpA	Saipem SpA attained SA8000 certification in April 2022, reconfirmed by a periodic audit in October 2022.
Not exceeding a value of 0.42 Total Recordable Incidents Frequency Rate (TRIFR) and 0.97 for High Level event Frequency Rate (HLFR) for the Group (employees and subcontractors)	The Total Recordable Incidents Frequency Rate was 0.36 for 2022, while the High Level event Frequency Rate was 0.88.
Launch of a new initiative focusing on the mental health of employees	On the 2022 Global Mental Health Day, Saipem launched a programme entitled "Choose Life", aimed at increasing our people's awareness of health and wellness, to encourage them to make better choices with a greater positive impact on their lives. More specifically, the programme focussed on mental health, now critical in the reference industry. The initiative involved 7,000 people through workshops and e-learning.
Involvement of Top Management in a Leadership in Health & Safety workshop in 2022	100% of Top Management were involved in a workshop organised in December 2022 to align the new management on the values and philosophy of the Leadership in Health & Safety programme and to update the Health and Safety vision of Saipem.
Continuing information campaigns to support COVID-19 vaccination coverage among the Saipem population, with the aim of achieving coverage of 20,000 employees by 2022	More than 23,000 employees were vaccinated against COVID in 2022.
Continuing the weekly information campaign throughout the year until the end of the pandemic (target: 50 bulletins) and updating management guidelines and information material where necessary to ensure up-to-date management of COVID-19	50 bulletins were issued on COVID and 16 on monkey pox.
Continuing promotion of an inclusive culture through specific initiatives to develop skills, enhance diversity, and guarantee equal opportunities in order to attract candidates with diversified skills	Attainment of ISO 30415 - Human Resource Management Diversity and Inclusion attestation Issue of the "Diversity, Equality and Inclusion" Policy. 5 scholarships awarded to engineering students from Trieste University. Increase in the number of secondary schools involved in the Sinergia programme (4 schools). Partnerships finalised with 4 universities.

The new 2023-2026 Sustainability Plan has set the following goals with regard to human and labour rights aspects:

- > Increase awareness on human and labour rights issues with Saipem's main contractors (2023).
- > Conduct (desktop) audits on Saipem suppliers on human and labour rights (2023).
- > Strengthen skills on sustainability in the Supply Chain function through specific training (2024).
- > Strengthen the supplier qualification process on ESG issues when updating the company qualification system (2024).
- > Continue to support public health initiatives, for example those linked to preventing malaria and promotion and awareness of health topics (2023).
- > Definition of a set of KPIs on Diversity & Inclusion to guarantee the ongoing monitoring of that topic (2023).
- > Increase the number of women with STEM educational backgrounds employed by Saipem SpA by 2025.
- > Obtain Gender Parity certification in line with Italian Reference Practice No. 215:2022 (2023).
- > Maintain ISO 30415 -Human Resource Management Diversity and Inclusion attestation (2023).
- > Adopt a Gender Equality criterion in the recruitment process for structural positions (2025) [Incentive scheme].
- > Prepare a feasibility study for a "Global Employment Guideline" (2023).
- > Maintain a Total Recordable Incident Frequency Rate (TRIFR) and High Level Event Frequency Rate (HLFR) no greater than the 5-year average for each year until 2026. For 2023, the average of the last 5 years of the TRIFR corresponds to 0.43 and stands at 0.98 for HLFR.
- > Maintain a TRIFR and HLFR for subcontractors no greater than the 5-year average for each year until 2026. For 2023, the average of the last 5 years of the TRIFR corresponds to 0.32 and stands at 0.57 for HLFR.
- > Implement innovative actions to further strengthen the safety performance: such as the Fire Prevention Campaign (2023).
- > Launch initiatives for employee health on the following topics: mental health, cardiovascular risk prevention and healthy eating (2023-2026).
- > Extend application of telemedicine services (2023-2026).
- > Set-up Smart clinics for the Saipem Fano and Arbatax sites (2023-2026).

2. SAIPEM'S COMMITMENT TO HUMAN RIGHTS

Saipem undertakes to maintain and strengthen a governance system in line with international best practice standards that can deal with the complex situations in which Saipem operates and with the challenges it faces in pursuing sustainable development.

Saipem pledges to ensure respect for corporate values and integrity in company activities. In all our business relationships, Saipem is committed to always respecting and promoting the principles of loyalty, fairness, transparency, efficiency and openness to the market.

No form of discrimination, corruption, forced or child labour is tolerated and particular attention is paid to the acknowledgement and safeguarding of the dignity, freedom and equality of human beings, to protection of labour and of the freedom of trade unions association, of health, safety, the environment and biodiversity, as well as the set of values and principles concerning transparency, energy efficiency and sustainable development, in accordance with International Institutions and Conventions.

Saipem operates within the reference framework of the UN Universal Declaration of Human Rights, the Fundamental Conventions of the ILO, the OECD Convention, and the UN Global Compact principles.

Saipem became a UN Global Compact (UNGC) Signatory in 2016, incorporating their principles of respect for human and labour rights, environmental protection and the fight against corruption into our strategies, policies and procedures. Renewing our commitment to support the UNGC every year is concrete proof of our willingness to always run our business making this initiative and its principles part of our business strategy, day-to-day operations and organisational culture.

Saipem is aware that the promotion and protection of human rights in our business and our relationships, including those with vendors, are fundamental to achieve the SDG goals and company sustainability objectives. During 2020, to further confirm Saipem's commitment, the CEO signed a call to action for company leaders on human rights issues, by signing the Italian version of the "CEO Guide to Human Rights" drafted by the World Business Council on Sustainable Development (WBCSD).

2.1 SAIPEM POLICIES AND THE CODE OF ETHICS

Saipem's policies that address the human rights principles are part of the company regulatory system and are mandatory documents that define the rules of business conduct in all our operations including with regard to relations with our internal and external stakeholders, business partners and the supply chain.

The **Saipem Code of Ethics** rejects any form of discrimination, corruption, forced or child labour. The Code of Ethics promotes human rights and safeguards the dignity, freedom and equality of human beings including the protection of labour rights and the freedom of trade union association and health and safety. Saipem's Code of Ethics strictly demands that there shall be no harassment in the workplace and protects against any form of discrimination, based on gender, ethnicity, religious beliefs, age, marital status or any other aspect. The Code of Ethics applies to the entire Saipem population, as well as to third parties with whom Saipem collaborates.

The **Sustainable Saipem Policy** enforces Saipem's commitment to promoting and respecting human and labour rights together with the protection of health, safety and personal security which are non-negotiable values for the Company and that suppliers, clients

and subcontractors must endorse to partner with our Company.

Furthermore, the **Saipem Human Rights Policy** defines specific commitments concerning the regard for human rights in the workplace for company employees, local communities, in security and business relations in our supply chain to promote and respect fundamental human and labour rights.

Saipem's commitment to diversity, equality and inclusion is illustrated by the adoption of measures aimed at creating a work environment that recognises and values uniqueness. In particular, in 2022, Saipem implemented the Diversity, Equity & Inclusion strategy into action (described in Section § 4.3.1) as evidence of its real commitment, formally and officially confirmed in November by the issue of the **Diversity, Equality & Inclusion Policy**.

In November 2022, Saipem obtained the attestation in accordance with the ISO 30415:2021 international standard on "Human Resource Management Diversity and Inclusion" demonstrating the effectiveness of the actions undertaken to create an inclusive environment at work.

2.2 VENDOR CODE OF CONDUCT

In 2022, Saipem issued the Vendor Code of Conduct, published also on the company website. This document, which is aligned with Saipem's Code of Ethics and company policies, is mandatory for all Vendors. It defines Saipem's expectations of its Vendors regarding business ethics and the protection of human rights, in accordance

with the Universal Declaration of Human Rights, to ensure that decent working conditions are applied consistently with local laws and principles defined by the International Labour Organisation (ILO), and that prohibit any form of child labour and forced or compulsory labour, human trafficking, slavery, discrimination and harassment.

2.3 SAIPEM'S COMMITMENT AGAINST MODERN SLAVERY

Modern slavery is an umbrella term covering forced labour, servitude, debt bondage and human trafficking for the purposes of labour exploitation.

Saipem supports the elimination of any form of modern slavery and human trafficking and is aware that the promotion and protection of the human rights and decent work in business relationships, including in those with vendors, are fundamental for addressing these issues. This commitment is expressed in Saipem's Code of Ethics and reiterated in company policies and procedures, including "Sustainable Saipem" Policy, Human Rights Policy, "Our partners of the value chain" Policy, and the "Health Safety, Environment and Security" Policy, which describes our approach in our relations with our business partners and our responsibility in guaranteeing a sustainable, fair, transparent, and long-term collaboration with them.

Since 2016, the Company has published an annual "Modern Slavery Statement" which describes the measures adopted to ensure that there are no forms of modern slavery, penal labour or human trafficking within the Company or in its supply chain, as required by the United Kingdom "Modern Slavery Act 2015 - Section 54".

Given the relevance of this issue, our company voluntarily decided to publish a Group Statement which considers the activities of the whole Saipem Group and not only the companies operating in the United Kingdom. The present statement has been prepared in compliance with guidelines and requirements of the 2015 UK Modern Slavery Act and the 2018 Australia Modern Slavery Act and will stand in for Saipem's new Modern Slavery Statement.

3. EMBEDDING HUMAN RIGHTS

3.1 TRAINING

Based on the commitments undertaken by the Group, and to raise awareness on human and labour rights issues, Saipem has implemented a human rights training and awareness raising programme, addressed to different Company functions.

3.1.1 SA8000 training of Saipem workforce

As part of the SA8000 certification process (described in section § 4.2.3), Saipem launched a training course addressed in 2022 geared to company employees working in Italy to inform them about the SA8000 requirements and the management system. The training programme concerns all the requirements of the SA8000 and allows to better understand human and labour rights issues in the workplace, their management and the whistleblowing reporting system in place. In 2022, a total of 2,877 employees were trained (51% of total enrolments).

3.1.2 Sustainable supply chain training course

Starting in 2016, a "Human rights and the supply chain" training programme was developed, addressed to Vendor Management and the Post Order function. The e-learning version of the training courses was released in 2018. The purpose of this course, structured into three modules, was to provide Saipem Post Order personnel with an understanding of the human rights risks that could be observed during Vendor site visits. The training includes a focus on international standards and Saipem policies, human rights risks and the actions that can be implemented. The training is delivered mainly via an e-learning platform which reaches the Saipem sites worldwide and, as of 2020, it has been available to all new Post Order employees. A total of 811 employees were trained between 2016-2022, covering the entire Post Order population.

3.1.3 Human and labour rights for HSE personnel

To guarantee the spread of Saipem's human and labour rights principles in operational projects, in November 2022, Saipem launched a training programme on human rights and decent work principles for the HSE trainers with the aim of sharing knowledge and awareness on these issues. The course included information regarding the existing and upcoming legislation on the topic, Saipem's Code of Ethics principles and commitments to promoting and protecting human rights, human rights risks and the impacts also on the health and safety of personnel.

The objective of this course was also to provide the HSE trainers with materials and information to enrich the HSE induction course they are providing to all personnel (including subcontractors) regarding Saipem's human rights principles and the whistleblowing process.

The course involved 22 participants from various operating sites in the United Arab Emirates, Saudi Arabia, Azerbaijan, Angola, India and Nigeria.

3.1.4 Training for security personnel

To further reinforce the importance of respecting human rights in the management of the security of people and assets, Saipem launched an e-learning training programme in 2020, specifically dedicated to people operating in Security functions. Training includes a specific focus on ethics and compliance, including the respect for and the promotion of human rights. Since 2020, 130 people have completed training (19 people in 2022), and the programme is expected to be continued in 2023 for the rest of the population involved.

3.1.5 Internal campaign on human rights

As part of the internal communication campaign on the UN Global Compact, a series of articles have been issued in "Orizzonti", the company's internal newsletter. The articles were written to raise awareness and inform colleagues about the principles of the Global Compact and how they are applied at Saipem. The first article was published in October on the anniversary of Saipem's admission to the UN Global Compact. In November and in December, two new articles about the environment and human and labour rights respectively were issued. This internal information campaign will continue in 2023 with other articles.

3.1.6 Vendor training

In order to share the ethical principles, inform and train vendors on Saipem's standards and requirements and how they should align with these, Saipem organises specific events, meetings or forums for vendors, both prior to qualification and during the execution of the contracts. Periodic training sessions with subcontractors are also organised to discuss HSE issues. A total of 1.2 million HSE training hours were organised for subcontractor personnel. Safety forums are organised involving the management of the main subcontractors working on the projects to discuss HSE performances, share lessons learned and commit to specific areas of improvement. In October/November 2022, as an example, Saipem organised a Safety forum for subcontractors for the Tangguh project (Indonesia). The forum was addressed to HSE supervisors/foremen to highlight their roles and responsibilities in terms of safety, the importance of their roles for creating a workplace free of incidents, and to explain how to encourage their teams to intervene in case of unsafe acts/conditions. More than 90% of the invited supervisors from 30 subcontractors took part in the 8 sessions of the forum.

A second Safety forum, the T7 Safety Leadership Workshop for Subcontractors, was organised for the NLNG T7 project in Nigeria to speed up the T7 Project Safety Culture Journey and give participants the opportunity to personally commit to ensuring the delivery of Saipem's goal for an Incident & Injury Free Project, and cascading this commitment to the workforce.

3.2 ENGAGEMENT

3.2.1 Collaboration with Building Responsibly

In 2021, Saipem joined Building Responsibly, a coalition of leading engineering and construction companies working together to raise the bar in promoting the rights and welfare of workers across the industry. This decision recognises the importance of collaborating with industry peers to ensure a better work environment for workers in the overall sector.

In 2022, Saipem participated in the Building Responsibly meetings, collaborating and sharing experiences and discussing the company lessons learned. In particular, Saipem described how the human rights risk register was implemented in company operations to identify human rights-related risks, the lessons learned from this process and the areas of improvement.

Furthermore, Building Responsibly working groups are aimed at developing strategies and tools to promote their principles and establish a common, global baseline on safety, security and welfare for all people working in the engineering and construction industry.

Saipem is committed to continuing to collaborate with Building Responsibly and its member companies and to including the Worker Welfare Principles in our company practices to share and increase the awareness on worker rights risks, especially along the supply chain.

3.2.2 Industrial Relations

During 2022, Saipem continuously engaged with Trade Unions. Accurate and constant updates were provided regarding specific discussion tables expressly set up, both on the progress of the competitiveness and efficiency recovery programme and on the capital increase.

Three meetings of the European Work Council (EWC) Select Committee and one plenary meeting took place, aimed at providing insights into the 2022-2025 Strategic

Plan and further information on the main corporate organisational changes.

Talks with foreign trade unions led to the start-up and partial completion of the renewal process of collective agreements concerning various countries (including, in particular, Angola, Brazil, Indonesia, Nigeria and Peru), in order to ensure a better alignment of salary levels with the evolution of reference market scenarios.

Saipem and the trade unions have also maintained an intense and constant dialogue on training, considered as an effective tool for increasing skills, essential for the development of the company and the employees.

In November 2022, Saipem and the Italian Trade Unions agreed on the strategic importance of training, a strong boost to the energy, digital and ecological transition and an absolute value to increase productivity and signed an important agreement to be able to obtain state subsidies for training through the "Fondo Nuove Competenze" launched by the Italian governmental authority.

Saipem is also the first company in the energy and oil sector to have set up, in the wake of the provisions of the renewed CCNL (Collective Agreement), a "Corporate Joint Institution" (IPA) to effectively share the company's needs in terms of training with the trade unions, making a very important step towards a radical cultural change.

This process of sharing and the bilateral vision on a national corporate level took shape during the second half of 2022 with the signing of trade union agreements concerning financed trainings for 2023, through access to inter-professional funds. Furthermore, the work of the two bilateral commissions (Companies/Trade Unions), set up following the provisions of two important trade union agreements signed in 2022, have started and they concern structural agile work and business trips of specific nature and duration.

4. HUMAN RIGHTS DUE DILIGENCE

4.1 SAIPEM'S APPROACH TO HUMAN RIGHTS DUE DILIGENCE

Saipem commitment for the protection and promotion of human rights is a fundamental part of company policies and procedures implemented in all the countries of operation and along our value chain. The Saipem human rights management process complies with ILO core conventions on human rights and UN guidelines related to the prohibition of child and forced and compulsory labour,

the right to the freedom of association and collective bargaining, prohibition of discrimination. As a member of Building Responsibly, Saipem applied also the BR worker welfare principles.

Saipem implemented a human rights due diligence approach taking into consideration the potential risks on the identified company risk-holders:



LABOUR AND EMPLOYMENT

Company operations can be labour intensive and involve a range of labour arrangements such as employment, contracting workers, or contracting labour through an Employment agency.



SUPPLY CHAIN

Based on a specific risk-based mapping, it is possible to identify the Company/project vendors that may pose a high risk for HLRs, in particular subcontractors and employment agencies.



LOCAL COMMUNITY

Community residents often live near the fence line or in the proximity of site operations, and as such can experience adverse impacts associated with the activities taking place in the area.



SECURITY

Security guards are used in some areas to protect the premises, assets and company personnel.

Saipem's human rights risk-based approach is based on the "OECD guidelines for multinational enterprises", aimed at identifying, preventing, mitigating and reporting potential

impacts of company operations and activities. The process of human and labour rights due diligence at Saipem is structured as follows:



COUNTRY HUMAN RIGHTS RISK ASSESSMENT

Methodology for assessing the country risks related to the potential violation of human and labour rights.



HUMAN RIGHTS DUE DILIGENCE AT OPERATIONAL LEVEL

Human and labour rights risk register to identify, assess and mitigate risks at operational level.



HUMAN RIGHTS IN THE WORKPLACE

SA 8000 certification for Saipem SpA; Industrial relations management; Control of employment agencies.



SUSTAINABLE SUPPLY CHAIN

Supplier Management Systems to assess and monitor compliance with the principles of Saipem's Code of Ethics and Company standards.



HUMAN RIGHTS AND LOCAL COMMUNITIES

Local community engagement and grievance management.



SECURITY MANAGEMENT

Selection of security providers, personnel training on human rights issues.

4.2 IDENTIFICATION AND ASSESSMENT OF HUMAN AND LABOUR RIGHTS RISKS

4.2.1 Country risk analysis on human and labour rights

Operating in more than 70 countries with different social, economic and cultural contexts, it is essential for Saipem to analyse the potential risks associated with activities in various local contexts. Therefore, for each country in which Saipem operates, a specific analysis is carried out based on a study of the legislation in force and the state of ratification of ILO fundamental conventions relating to: child labour, forced labour, non-discrimination in employment and occupation, freedom of association and collective bargaining. Further information on the country is taken from studies and analyses carried out by international organisations and NGOs (e.g. ITUC, Human Rights Watch) dealing with labour rights and human trafficking. Based on the results of the analysis, the countries are classified in relation to human and labour rights risks divided among four distinct risk categories: high, medium, moderate and low. Saipem uses this classification for the supplier qualification process, the identification of high-risk suppliers for possible audits, as well as for the operational human and labour rights due diligence as described in the following section.

Based on this analysis, 44% of Saipem's main operating companies are based in high-risk countries, while the remaining 56% are in medium-, moderate- and low-risk countries.

In addition, 44% of vendors qualified in 2022 are working in countries with a high risk of human and labour rights breaches.

4.2.2 Due diligence on human and labour rights at operational site level

Starting from 2021, Saipem has introduced a system to identify and assess human and labour rights (HLR) risks through a special register that allows for the identification and classification of the risks that the Company can generate during its operations and define actions to mitigate such risks. The risk register also integrates the

country risk assessment in order to highlight any risks. Following the first application of the register in 2021, the tool was revised in 2022 with a view to strengthening the methodology and alignment with the requirements of the "OECD Due Diligence Guidance for Responsible Business Conduct".

Compared to 2021, in 2022 the implementation of the HLR risk register started in all countries where Saipem's operating activities can generate a significant impact on the issue. The implementation of the tool was based on two criteria: the level of country risk and the significance of Saipem's presence, in terms of employees on site. A total of 43 Saipem companies and branches operating in 37 countries were invited to complete the register. To ensure the proper implementation of the process, a guideline was drawn up and training sessions were held with the support of the human resources functions of the operating companies and branches involved. A total of 46 meeting sessions were organised.

Identification, assessment and mitigation of the human and labour rights risks

The HLRs risk register allows the identification of the main human and labour rights risks at country level and at project operational level. The country HLR risks called systemic risks encompass ILO core convention ratification related to forced and compulsory labour, child labour, non-discrimination in employment and occupation, freedom of association and collective bargaining. The operational HLRs risks which could be generated by the project activities and through business relations, may have potential adverse impacts on labour and employment, on the supply chain and local communities, as well as the risks generated by security services responsible for the protection of company assets or people. Based on the HLRs risk assessment results, a series of actions have been identified to mitigate the potential negative impacts set out in the Action Plans for each Operating company.

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HLR RISKS IDENTIFIED
AND CLASSIFIED AS FOLLOWS
PER TYPE OF RISK GROUP IMPACTED
OR EXPOSED.



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RISKS COUNTRY SYSTEMIC

Saipem operates in countries identified as at high risk for HLR risks as per the Country risk analysis. To mitigate the potential risks, Saipem implemented policies and procedures to protect and promote human and labour rights, including the Whistleblowing mechanism which allows the workforce, including subcontractor personnel, to express concerns in case of potential violation of Saipem's Code of Ethics principles.



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RISKS LOCAL COMMUNITIES

The Company's operational activities may generate potential impacts related to welfare and health and safety of the local communities located near the area of our operations. To mitigate these impacts, actions were implemented such as employment of local resources, a community grievance mechanism, and health and safety management systems.



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RISKS SECURITY

Saipem operates in areas of political and social instability that may affect our personnel security with possible impacts on their safety. For this reason, the assessment of these risks is considered relevant and mitigation actions put in place are related to training security personnel and our company personal on proper behaviours to adopt in a risk area.



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RISKS LABOUR AND EMPLOYMENT

Saipem is hiring and employing local personnel to guarantee the contribution to social economic growth and guarantee local content. As per the impact analysis the potential risks identified related to the workforce are the risks related to overtime generated by project schedule activities. Among the measures implemented are the monitoring of personnel rotation to guarantee periodic leaves of personnel.



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RISKS SUPPLY CHAIN

Respect for human rights in the supply chain is an essential commitment for Saipem as expressed in the Code of Ethics and defined in the Vendor Code of Conduct. The assessment of the risks in the supply chain identified two critical areas concerning the risk of forced labour and lack of decent working conditions for vendor personnel. The actions defined to mitigate these risks are the periodic verification of manpower agencies to verify and ensure compliance with national labour laws and HSE training, the supervision of subcontractors, periodic HSE audits and inspections.

4.2.3 Human Rights in the workplace

Protection of the health and safety of workers

The health and safety of all Saipem personnel is a priority and strategic objective for the Company. The health and safety of people are constantly monitored, assessed and guaranteed through a management system that integrates aspects of health, safety, security and the environment, which meets the international standards and current legislation and covers all employees and subcontractors working in sites managed by Saipem for the execution of all operational projects. On the basis of the various organisational levels and the sampling established by the audit programme, Saipem's HSE management system is monitored annually, through internal audit activities, in order to verify the process performance and compliance with the reference standards applicable in safety and environment. In 2022, more than 100 internal safety and environmental audits were conducted to monitor Saipem's management system and that of subcontractors. The training on health, safety and the environment is an important part of the implementation of the HSE system in Saipem. The HSE training activities are preventive actions for reducing risks of accidents. In 2022, Saipem continued to invest significant resources in training the personnel on HSE issues through campaigns and ad hoc programmes, with the aim to increase workers' awareness of the risks associated with operational work activities. A total of 1.7 million of training hours on HSE were organised in 2022 involving Saipem personnel and subcontractors. Saipem has developed a continually evolving health management system, which is adapted to the work environments, integrates the most recent epidemiological studies and is designed to ensure the best health monitoring and medical services. For each site/project/asset, the management system requires that the risks linked to the health of personnel are identified and assessed (taking into consideration the frequency and potential impact), after which suitable preventive and mitigation measures are identified, implemented and periodically monitored. Activities implemented include, for example, an assessment

of the health risks, check-ups for the issue of fitness certificates, vaccinations and chemoprophylaxis, health information, monitoring of hygienic/sanitary conditions, programmes for the prevention of diseases and activities to promote health and physical activity. Such programmes are: Cardiovascular Disease Prevention Programme, Malaria Control Programme, Drug and Alcohol prevention programme and internal awareness health campaigns (World Heart Day).

SA8000 Certification

In April 2022, Saipem SpA obtained the Social Accountability (SA) 8000 certification confirming the application of a social responsibility management system in the context of human rights, workers' rights and their well-being within the company. The SA8000 certification, issued by DNV, a certification firm that is an international leader in the sector, is an international global ethical certification of a voluntary nature which commits companies to also monitoring their supply chains, triggering a virtuous circle throughout it. This certification guarantees compliance with the best international guidelines and ethical rules defined by leading world organisations on the protection of human and labour rights, such as the ILO (International Labour Organisation) and related UN conventions.

Obtaining the SA8000 certification represents an important confirmation of Saipem's commitment to sustainability in a process of continuous improvement, particularly in some essential areas such as respect for human rights, respect for labour law, protection against child exploitation and guarantees of health and safety in the workplace, freedom of association and the right to collective bargaining.

Control of Employment Agencies

Global Petroprojects Services (GPS AG) is a wholly owned subsidiary within the Saipem Group which has held, since 1994, a license for international recruitment and supply of personnel services, and is also an agent for Seafarer Recruitment and Placement Services in compliance with ILO MLC 2006. GPS AG is a human resources centre of

excellence providing a complex range of work-related services. GPS AG is supported by local employment agencies which are continuously monitored to verify how they manage sensitive processes such as hiring practices. This monitoring includes a documentary check of the technical capabilities in advance of the provision of services, inspections at supplier premises and/or remotely, as well as telephone interviews with personnel recruited through said agencies. In 2022, 2 audits were carried out on already qualified suppliers in relation to the contractual terms and conditions agreed for the provision of the service, and the documentary assessment of the technical capabilities of 240 potential new HR service suppliers were carried out. In addition, 26 international workers recruited with the support of agencies, but with an employment contract with GPS AG, were interviewed by telephone, outside their workplace, to gather their opinion on the management of their recruitment and other administrative practices. There were no reports of behaviour contrary to human and labour rights. In 2022, GPS AG created a further tool to monitor and understand the level of satisfaction of international staff in an agile way, with the intention of both establishing and facilitating communication with those workers who are less proficient in the English language, and possibly directing them towards the correct speaker. At the end of the first year of the implementation of the tool, a staff satisfaction level of over 97% was recorded. The provision of training to agencies via e-learning on Saipem's ethical principles also continued. During 2022, 10 agencies were involved.

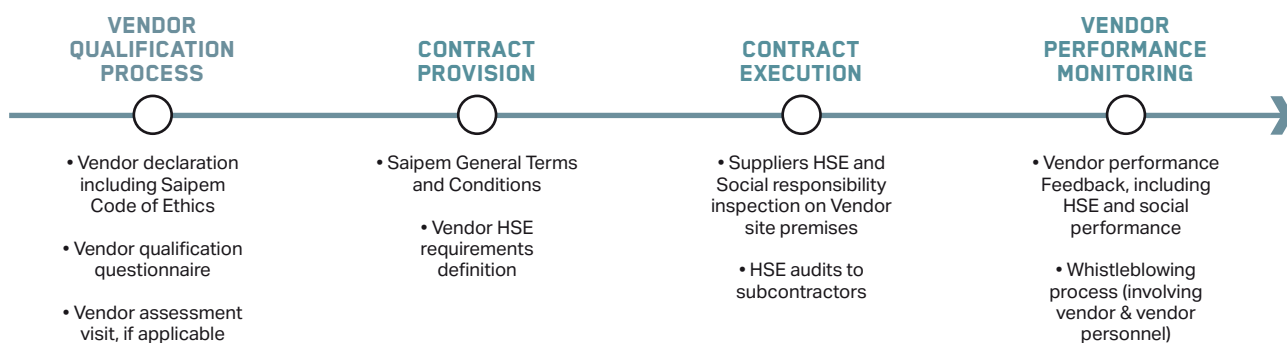
4.2.4 Human and labour rights in the supply chain

Saipem is conscious of the complexity of its operations, as well as the context in which it operates; therefore our engagement is to implement and manage systems that

allow the identification, assessment and mitigation of the potential human rights risks that could be generated in relation with our business partners or as result of our activities. To this end, respect for human and labour rights principles are included in every stage of the supply chain management, from the beginning of the process.

The supply chain management system is structured to guarantee that vendors have proven technical and operational skills, but also that they share Saipem's values and policies and principles related to human and labour rights. The management system includes some sustainable business elements such as ethical behaviour, respect for human and labour rights, including the protection of the health and safety of workers, and environmental protection. These sustainability risks associated to the supply chain management are specifically defined into the company procedures, at each phase being implemented specific analysis and verification tools (audits, questionnaire) to guarantee vendor compliance with Saipem's principles, procedures and policies.

Saipem's vendors are bound by contractual clauses to comply with the principles of the Code of Ethics and respect human rights in conformity with Saipem's policies and the Vendor Code of Conduct. Saipem also demands that they require respect for the same principles and standards from their own suppliers, thus guaranteeing safe and fair work conditions and the responsible management of environmental and social aspects throughout the supply chain. Failure to comply may result in the suspension of the vendor's qualification and/or termination of the contract. These aspects are integrated into Saipem's Supply Chain Management System and applies also to third party recruitment providers.



Vendor qualification

During the qualification process, the first step is to analyse vendor information to understand their capacities, reliability and ability to manage sustainability issues. We assess vendors during the qualification phase considering the level of risk associated with business ethics, human rights, health and safety, and environmental management. This includes assessing compliance with our principles and the Vendors' ability to manage these issues.

The level of risk linked to sustainability issues is determined by the country of origin of each vendor and the industrial sector and/or criticality of the supply. Vendors identified with a high sustainability risk level are subject to more in-depth investigations including specific HSE and human rights questionnaires.

Where necessary, social and HSE assessment visits are carried out on vendor site premises to assess the vendor capability to comply with Saipem's principles and how it addresses and manages the country norms and international standards.

2022 RESULTS

2,807

VENDORS QUALIFIED IN 2022 WORKING IN COUNTRIES WITH A HIGH RISK OF HUMAN AND LABOUR RIGHTS BREACHES

578

SUPPLIERS WERE ASSESSED ON HSE ISSUES

446

NEW SUPPLIERS WERE ASSESSED ON LABOUR RIGHTS ISSUES IN HIGH RISK COUNTRIES

4

QUALIFICATION AUDITS AND 1 AUDIT WITH A SPECIFIC FOCUS ON HUMAN AND LABOUR RIGHTS

Contract award and execution

Depending on the type of goods or services offered, vendors are also subjected to a Counterparty Risk Assessment ("VERC"), aiming also to verify their ethical conduct in terms of anti-corruption, unlawful conduct and human rights, as well as any other aspect which could directly damage the reputation of the vendor, and indirectly the reputation of Saipem.

Other more informal checks were carried out by the Post-Order function team, trained with a special e-learning course since 2016 on human and labour rights issues, by means of checklists prepared to collect any observations that emerged during visits to the plants of suppliers on child labour, forced labour, discrimination, compensation and hours worked, including overtime.

For goods and services deemed to be of high risk in terms of health, safety and environment (HSE) issues, specific assessments are carried out to check the vendor's ability to perform the contract in accordance with the relative international and Saipem standards and on the capacity to manage HSE aspects.

Furthermore, the contractual conditions applied to all vendors and all types of purchases include specific requirements that require the vendor to strictly comply with the Saipem Code of Ethics and to respect human rights.

2022 RESULTS

3,096

VENDORS WERE SUBJECT TO A COUNTERPARTY RISK ASSESSMENT ("VERC"): NO POINTS OF ATTENTION WERE REPORTED THAT INDICATED MODERN SLAVERY OR HUMAN RIGHTS INFRINGEMENTS WERE TAKING PLACE

101

NEW CHECKLISTS ON HUMAN AND LABOUR RIGHTS WERE FILLED IN BY THE POST ORDER FUNCTION DURING THE ASSESSMENT VISITS

Vendor performance monitoring and feedback

Vendor performance and compliance with contractual provisions are constantly monitored. All the Saipem functions involved in the various phases of the procurement chain management system are bound to provide feedback on the conduct of vendors, including on sustainability aspects, such as any incidents occurring during the execution of work, conformity with local HSE or labour legislation, or evidence collected during site inspections and audits. The feedback received guarantees the assessment of the vendor's overall reliability and, in the case of serious situations recorded, the possibility to terminate the contract or suspend the vendor's qualification.

2022 RESULTS

1,372

VENDOR PERFORMANCE EVALUATION SURVEYS ON VENDOR PERFORMANCE COMPLETED

81%

WITH A POSITIVE OUTCOME AND 9% WITH A NEUTRAL OUTCOME (NO POINTS OF ATTENTION WERE REPORTED THAT INDICATED MODERN SLAVERY WAS TAKING PLACE)

4.2.5 Local communities and human rights

Saipem strives to minimise any adverse impacts in the areas where Saipem operates and to contribute positively by implementing strategies that promote sustainable local development. Saipem's approach entails listening carefully to the demands and needs of local stakeholders. Saipem has a structured system for collecting and managing the needs of the local communities connected to our operations. Many of Saipem's important operations in different geographical locations (e.g., Nigeria, Indonesia and Mozambique) have implemented these systems to guarantee effective communication with local communities. Saipem's activities carried out together with local communities create long-term value and contribute to the local socio-economic development in the countries in which Saipem operates.

4.2.6 Security and human rights

Saipem is committed to adopting preventive measures aimed at minimising the need for a response from public/private security forces in the event of any threats to the safety of its people and the integrity of its assets. Saipem works to prevent security threats to citizens and assets by taking steps to reduce the need for public or private security forces to intervene.

Saipem manages relations with local security forces to ensure a shared commitment to human rights, as well as the adoption of rules of engagement that limit the use of force and the impact on local communities. Before signing a contract, due diligence is performed on suppliers of security systems and services to verify that there are no indicators relating to any violations of human rights. Saipem establishes provisions in our contracts with security providers that require them to follow human rights standards. Failure to follow these clauses will result in contract termination.

4.3 FOCUS ON ACTIVITIES CARRIED OUT TO MITIGATE HUMAN AND LABOUR RIGHTS RISKS IN 2022

4.3.1 Diversity & Inclusion initiatives

In 2022, Saipem continued to promote and support diversity and inclusion and various training activities in collaboration with the "Valore D" Association were carried out: these consisted of mentoring courses, training events, sharing labs and talks accessible to all its people.

Since July 2022, three e-learning courses have also been delivered, respectively on the following topics: Unconscious Bias, Gender Harassment and Disability. Further, seven articles were issued on the Diversity, Equity and Inclusion channel in the internal company magazine "Orizzonti". In 2022, more than 9,000 training hours on Diversity & Inclusion topics were organised. 4,798 Saipem employees completed the e-learning courses.

Saipem also wanted to demonstrate its commitment to fight violence against women by joining the UNESCO campaign "Orange the World: End violence against women now". Therefore, on November 25, the International Day for the Elimination of Violence against Women, Saipem launched the internal Wear Orange campaign, inviting all employees from the Italian offices to wear an orange item of clothing or accessory.

In support of the DE&I objectives and strategy, in line with the international scene (United Nations Global Compact's 2030 Agenda), Saipem participated in international working groups – including the Target Gender Equality promoted by the UN Global Compact D&I Observatory – with the aim of promoting a benchmark with international companies to define objectives to ensure the respect of gender equality and support of women's empowerment.

At the end of 2022, Saipem was included for the first time in Bloomberg's Gender Equality Index (GEI), an internationally accredited index for measuring gender equality in listed companies with over a one billion dollar market capitalisation. The inclusion in the index was obtained thanks to the score Saipem achieved in the evaluation of its commitment to promoting gender equity through the development of dedicated policies and strategies.

FRANCE

In 2022, Saipem put a strong emphasis on diversity and inclusion in France with the goal of creating an increasingly inclusive workplace. Initiatives implemented include: "Mission handicap" which aimed to retain disabled employees and support their wellbeing by preventing discrimination in the workplace and rethinking workspace layouts. This was facilitated by frequent internal newsletters and conferences, which addressed unconscious biases and prejudice attitudes. Also, thanks to this initiative, the employment rate of disabled individuals at the company has risen from 0.63% in 2019 to 4% at the end of 2022.

The "Job Academy" helps vulnerable people in France find employment. In 2022, a group of 9 volunteers from Saipem mentored 9 job seekers over the course of 4 months, offering guidance twice a month on their CVs and job search. The programme offered 4 workshops led

by internal facilitators covering topics such as CV writing, social networking, how to introduce oneself in 2 minutes, and interview simulation.

In January 2020, Saipem SA (Saipem's Operating Company in France) was awarded the AFNOR Committed Corporate Social Responsibility label in France, after having received a score of 510 points, which corresponds to the "confirmed level". This Label serves as a tool to raise awareness of diversity and, more in general, sustainability issues, encourage internal engagement, and promote good practices in corporate social responsibility. The CSR Label is based on the ISO 26000 international standard and encompasses 7 core subjects: governance, human rights, labour practices, the environment, fair operating practices, consumer issues, community involvement and development. Saipem SA's 2020 CSR action plan, which covers all seven subjects, placed a special emphasis on inclusion, diversity and disability from the onset. A follow-up assessment in 2022 confirmed that the recommendations from the initial audit report were implemented.

SAUDI ARABIA

In November 2022, Snamprogetti Saudi Arabia Co Ltd obtained the Mowaamah certification; the certification is part of the Ministry of Labour and Social Development's programmes of Saudi Arabia aimed at developing and supporting a work environment to promote the employment of people with disabilities so that they can better integrate in the labour market. The programme is a unique experience that strives to stimulate companies to give more attention to the work environment of people with disabilities such that it reflects positively on the company's performance. For Saipem this Certification represents further evidence of enabling people with disabilities in the Kingdom of Saudi Arabia to obtain suitable employment opportunities and education to ensure they benefit and integrate as active members of society, as well as providing them with all the facilities and tools that will help them to achieve success and independence.

INDIA

Saipem India Projects Ltd is committed to providing a safe, secure and harassment-free environment to its employees. In accordance with "The Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redress) Act, 2013" Saipem India Projects Ltd established an effective mechanism for the prevention and resolution of all cases of sexual harassment, by putting appropriate procedures in place and making them readily available to deal with the problem and prevent its recurrence. The "Prevention of Sexual Harassment" (POSH) procedure and the POSH members are listed on the company's Intranet portal for employees to contact in case of any grievances. Saipem also held awareness training on the Act and Saipem's related procedures for more than 150 employees.

4.3.2 Vendor assessments

The human rights risk register was created to analyse the potential risks associated with activities at the company operational sites that may have an impact on human

rights of internal and external rightholders. Since its first test in 2020 when was applied in Kuwait, the human rights risk register was implemented in 2021 in 23 countries (250 potential risks were assessed), and in 2022 the implementation covered a total of 36 countries, of which 19 countries classified as high risk (163 potential human rights risks identified) as described in § 4.2.2.

60 human rights risks related to vendor activities were identified. These risks were specifically related to workers' rights, health and safety issues and the grievance mechanism. Specific action plans were defined at operational level to mitigate these risks. Among the defined actions, audits and periodic control of vendors were identified.

A total of 3 human and labour rights audits were performed in 2022, of which 2 at subcontractors and 1 at a material supplier. The audits highlighted areas for improvement in the management of workers, working hours and training of staff on the internal grievance processes. Based on the results of the audits, specific corrective actions have been initiated.

KUWAIT

In February 2022, two audits were carried out on two subcontractors which provide services to Saipem projects

in Kuwait. The audits were carried out as per Saipem's procedure specification on Vendor Social audits and the client "Contractor Welfare" procedure. The audits were performed in two phases. The first phase consisted in interviews with the subcontractor Company management and verification of the subcontractor's procedures and evidence. The second phase consisted in visiting the site and interviewing the subcontractor employees. The findings of the audits and reports were shared with the Saipem management and Subcontractor management.

OMAN

The Saipem SpA Oman Branch put in place actions to mitigate the potential impacts generated by the project activities on personnel, given the large number of workers involved, the presence of migrant workers and the type of activities being conducted.

To guarantee the workers' right to express their concerns and safeguard their rights, Saipem implemented several measures to familiarise employees, including subcontractors, with grievance procedures and to facilitate the collection of feedback also through designated yellow boxes. The grievance mechanism was discussed during the Toolbox Talks from the beginning of the project

COMPLIANCE WITH LOCAL LEGISLATION

UNITED KINGDOM

Since 2016, the Saipem Group has published its Modern Slavery Statement every year, in compliance with the United Kingdom Modern Slavery Act 2015.

In 2022, Saipem UK Ltd prepared the "Human and labour rights risk register" aimed at identifying, assessing and mitigating the potential risks to people that could be generated by its activities. The identified risks are related to the workforce and supply chain and address issues such as working hours, minimum wage compliance, discrimination and harassment at work, and supplier workers' rights. The mitigation actions put in place emphasise the implementation of Saipem Ltd systems and procedures to guarantee the respect for country norms, awareness and training of personnel on company discrimination procedures and how to raise grievances on these issues, and the system to monitor vendor compliance with the Saipem Code of Ethics.

AUSTRALIA

In alignment with the 2018 Australian Modern Slavery Act, Saipem has prepared a "Modern Slavery Plan" for the recently-started Scarborough project. The plan defines responsibilities, actions and objectives aimed at protecting all personnel working on the Project scope from any form of forced labour and ensuring all principles of equal opportunity are applied; avoiding any form of illegal recruitment, mistreatment, forced or child labour and guaranteeing a fair minimum wage based on merit and expertise, without discrimination of any kind, and promptly taking actions and remediating against any form of modern slavery that is discovered. The Plan includes, among others, a risk assessment process on modern slavery risks, due diligence checks for labour providers, and training activities for employees and subcontractors. It will be implemented along the throughout project execution period.

NORWAY

Saipem is committed to complying with the Norwegian Act on Business Transparency which entered into force on July 1, 2022. The Act promotes and requires companies to respect human rights and ensure decent working conditions, in connection with the production of goods and the provision of services.

Saipem safeguards human rights considerations in all operations and takes the responsibility upon itself to maintain respect for human rights and decent working conditions. In the company operations in Norway, Saipem defined a programme to implement the Act's requirements which is in line with Saipem's human rights due diligence programme.

The programme foresees the implementation of the human rights risk register and the launch of a campaign to map the human and labour rights risks of the Company's most significant vendors through the use of a "Human rights due diligence - supplier questionnaire".

to ensure comprehension for all workers of different nationalities and cultures. Saipem Oman conducted 11 audits of the grievance system that also included random interviews with staff to identify and address any issues. Additionally, Saipem organised regular and random interviews with subcontractor workers to ensure their wages and payments met Omani labour laws for both local and expatriate workers and performs periodic verification of the proof of payment and employment documentation audits for the major subcontractors.

SENEGAL

In the Tortue project, which is located in the territorial waters between Senegal and Mauritania, the Saipem SA Senegal Branch relied on local employment agencies to hire local personnel and created a control system to ensure

that the agencies comply with local labour laws, applied right from the tender phase and with periodic checks, with the aim of preventing discrimination in recruitment and protecting workers' rights.

Furthermore, Saipem appointed two Welfare Officers to guarantee the welfare of offshore personnel in a multicultural work environment, collect their feedback, organise social events and facilitate communication between the workers and the site management. Another important aspect of the project was the company relationship with the local community. Fishing is a significant part of the local economy, so a community and fishing liaison officer was appointed to raise awareness among fishermen about the potential hazards of fishing in the project area, and to maintain ongoing communication with the fishing community.

5. ACCESS TO REMEDY

5.1 SAIPEM WHISTLEBLOWING SYSTEM

A fundamental part of Saipem's structured system for managing stakeholder complaints also in human and labour rights is the reporting management process ("whistleblowing") governed by a special Corporate Standard made available to all employees and external stakeholders, including community and supplier workforces.

Saipem has put in place various channels of communication as a way to facilitate the sending of reports, including, but not necessarily limited to, regular post, fax numbers, yellow boxes, e-mail, and communication tools on the intranet/internet sites of Saipem SpA and its subsidiaries.

The Internal Audit function ensures that all appropriate controls are in place for any facts that have been reported, guaranteeing that these are carried out in the shortest time possible and respecting the completeness and accuracy of the investigation and the utmost confidentiality with methods suitable for protecting the whistleblower.

Moreover, Saipem is committed to ensuring "*that no one suffers any retaliation whatsoever for having provided information on potential violations of the Code or of relevant regulatory documents*".

Whistleblowing reports in 2022

The following files were opened in 2022: 5 whistleblowing report files on discrimination issues, of which 2 are still open and the remaining 3 are closed; 1 whistleblowing report file on local community issues, already closed; 29 whistleblowing report files on workers' rights issues, of which 3 are still open and the remaining 26 are closed; 24 whistleblowing report files on mobbing/harassment issues, of which 10 are still open and the remaining 14 are closed. All 59 cases were transmitted to the pertinent company bodies (Board of Auditors of Saipem SpA, Supervisory Board of Saipem SpA and the Compliance Committees of the companies affected by the reports).

With regard to the discrimination issues, with reference to the 3 closed cases, in 2 cases the relevant Company bodies decided to dismiss them on the basis of the investigation carried out, deeming that there was no violation of the Code of Ethics with reference to the facts reported, however a violation was confirmed in 1 case. The corrective action identified consisted in terminating the employment relationship with the reported subject.

With regard to the issues of workers' rights, with reference to the 26 closed cases, in 19 cases the relevant company bodies decided to dismiss them on the basis of the investigation carried out, deeming that there was no violation of the Code of Ethics with reference to the facts reported, whilst violations were confirmed in 6 cases and in 1 case, though without violation, corrective action was taken. The corrective actions were as follows: evaluation of various disciplinary measures, regularisation of anomalous situations relating to remuneration, evaluation of measures taken on suppliers, awareness-raising activities for employees aimed at compliance with internal procedures and the review of procedures and internal forms.

It should also be noted that 2 workers' rights cases reported in 2021 were closed in 2022; they were still open at the time of the last reporting. Of the 2 report files closed, 1 was found to be without grounds and no corrective actions were taken, while 1 was confirmed as a violation. The corrective actions identified were the following: evaluation of various disciplinary measures, regularisation of the anomalous situation relating to remuneration and revision of internal forms.

In the area of mobbing/harassment, the relevant company bodies dismissed 7 of the 14 cases closed in the year on the basis of the investigations carried out, deeming that the events reported did not represent a violation of the Code of Ethics, while a violation was confirmed in 6 cases and corrective actions were

implemented even in the absence of violations in 1 case. The following corrective actions were taken: assessment of various types of disciplinary measures, awareness-raising activities in order to maintain a suitable work environment and to comply with, and set up yellow boxes also accessible to vendor employees.

Of the 12 cases that were closed, 6 were unfounded, while in 4 cases the violation was confirmed and in 2 cases, despite the absence of violations, corrective actions were identified. The following corrective actions

were taken: assessment of various types of disciplinary measures, awareness-raising activities in order to maintain a suitable work environment and attendance at leadership trainings.

As regards issues on the relations with local communities, with reference to the closed case, the relevant company bodies decided to dismiss it on the basis of the investigations carried out, deeming that there was no violation of the Code of Ethics with reference to the facts reported.

5.2 COMPLAINTS PROCEDURE FOR SEAFARERS

In addition to the Whistleblowing system implemented for the entire Saipem Group, Saipem adheres to the principles and the rights recognised to Seafarers promoted under the ILO Maritime Labour Convention of 2006 (MLC 2006). Seafarers also have the right to submit grievances in accordance with a structured process if a violation of their rights arises. To ensure Seafarers


are aware of their rights, all people working on offshore vessels receive a copy of the related procedure and all the forms necessary to submit complaints, together with a copy of their employment agreement. Complaints are examined by the Captain and/or the Company and are managed in compliance with Saipem's disciplinary procedures.

5.3 COMMUNITY GRIEVANCES

At project operational level, community grievance management procedures are applied for the proper management of the relations with neighbouring communities affected by the project operations. The objective of the Community Grievance Management

Procedure is to capture, manage and address grievances from the local community concerning Saipem activities at operational level. The community grievance process applies only for cases that do not fall within the processes regulated by the "Whistleblowing" process.

This statement was approved by the Board of Directors of Saipem SpA on June 27, 2023.


Saipem SpA
Chief Executive Officer
Alessandro Pelli



Società per Azioni
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Economic and Administrative Business Register
Milan, Monza-Brianza, Lodi No. 788744

Headquarters: Milan, Italy
Via Luigi Russolo, 5

Website: www.saipem.com
Operator: +39-0244231

Layout and supervision: Studio Joly Srl - Rome - Italy



SAIPEM SpA
Via Luigi Russolo, 5
20138 Milan - Italy

SAIPEM.COM