



**POLICY AGAINST HARASSMENT  
OF  
A.S. ROMA S.P.A. (THE "COMPANY")**

**In force from December 7, 2021**



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## 1. Purpose

- 1.1. The purpose of this "Sexual Harassment Policy" (the "**Policy**") is to ensure a work environment free from any form of sexual harassment or another type of harassment.
- 1.2. The Policy has in particular the purpose of preventing, identifying, prohibiting and constantly monitoring phenomena attributable to harassment as well as providing support to people who report such behavior, protecting them from any retaliation.
- 1.3. Compliance with the provisions of the Policy is required regardless of whether the behaviors referred to in it are prohibited or not by the applicable legal provisions.

## 2. Application

- 2.1. This Policy applies to all those who act in the name and / or on behalf of the company, including, by way of example, directors, auditors, employees, managers, officers, consultants and suppliers, athletes and registered staff, technical and medical staff and anyone else who lends their business to the Company and of the group headed by it (the "**Group**").

## 3. Policy

- 3.1. "*Harassment*" is any behavior - attempted, committed or even just perceived, isolated, repeated, verbal, non-verbal, psychological or physical - unwelcome, unacceptable, inappropriate or unwanted, carried out for reasons also related to sex, and having the purpose or the effect of interfering with the work performance, lifestyle habits or dignity of a worker, creating an intimidating, hostile, degrading or offensive working climate or a situation of fear or anxiety in the recipient, regardless of the identity of the recipient and the fact that such behavior occurs between colleagues or between superiors and subordinates.
- 3.2. "*Aggravated harassment*" is any harassment accompanied by threats, implicit or explicit, by hierarchical superiors or persons who may in any case affect the establishment, development and termination of the employment relationship.
- 3.3. The Company promotes within the Group the awareness that any "*harassment*" or "*aggravated harassment*" or behavior with connotations, including sexual, attempted, committed or even just perceived, isolated, repeated, verbal, non-verbal, psychological or physical, that offends the dignity of men and women at work is inadmissible and, as such, must be subject to repression by the Company according to the disciplinary provisions in force.
- 3.4. Each Recipient is required towards the other Recipients to: not attempt or engage in annoying or unwanted physical contact, not utter unwanted, verbal or non-verbal appreciation, inappropriate comments with references to the sexuality of each other Recipient, not to carry out gestures, proposals or jokes, even of a sexual nature, even if not directed towards a specific person, do not ask intrusive questions about personal relationships, do not transmit inappropriate images or e-mails, do not carry out intimidation, threats or blackmail for rejecting conduct aimed at sexual intercourse and, in general, not to attempt or carry out any type of "*harassment*" or "*aggravated harassment*".

- 3.5. Furthermore, the conscious and false attribution to other Recipients of a behavior contrary to the duties imposed by the Policy constitutes a violation of this Policy. False reporting will be punished according to the disciplinary provisions in force, without prejudice to the provisions of the applicable law.
- 3.6. The Company organizes updated mandatory training courses on the fight against harassment and inappropriate behaviors, including sexually, in which each Recipient can actively participate.

#### **4. Reporting and monitoring**

- 4.1. Each Recipient can and must report harassment suffered or witnessed to the Legal & Compliance Department, also by e-mail, and/or through the use of proper tools adopted from time to time by the Company. The Legal & Compliance Department and/or the tools adopted from time to time by the Company ensure in any case the confidentiality of the report, unless the disclosure of the identity of the whistleblower is required in accordance with the provisions of the law or on the basis of applicable policies. The Company will not tolerate any form of retaliation against anyone who has reported harassment; any violation of the prohibition of retaliation against reporting subjects will be punished according to the disciplinary provisions in force. Each Recipient may also contact the Legal & Compliance Department in order to obtain clarifications with reference to this Policy.
- 4.2. The Company periodically verifies the effective implementation of this Policy, also by evaluating the reports referred to in the previous paragraph.

#### **5. Dissemination and updating**

- 5.1. This Policy is communicated to all Recipients, also through proper and specific training sessions, and is made available on the company intranet site.
- 5.2. This Policy will be evaluated for the purpose of updating at least once every two years, also in the light of the evidence emerging from the reporting and monitoring activities referred to above.

#### **6. Procedure and other related documentation**

- 6.1. This Policy must be read and respected in conjunction with all the other internal procedures of the Company including in particular at least the following other procedures and related documents:
  - Code of Ethic;
  - Employee Handbook;
  - Disciplinary Policy;
  - Policy for Equal Opportunities.