

COURTESY TRANSLATION

Corruption Prevention Policy

SAET SpA is fully aware that the phenomenon of corruption represents a serious obstacle to the economic, political and social development of a Country and a serious distortion of the rules, correctness and transparency of the markets, with particular reference to that of public works. In this sense, the Organization prohibits corruption and fully warns the commitment to guarantee actions and behaviours based exclusively on criteria of transparency, correctness and moral integrity, which prevent any attempt at corruption.

In application of these commitments, the Board of Directors of SAET SpA has determined that the Organization's Prevention Policy, in accordance with the adopted code of ethic, is based on the following principles:

✓ **Management, responsibility and control**

The culture of integrity and compliance of company activities with regulatory provisions ("Compliance") originate from the top management of the Company.

Each Manager is required to fulfill their organization and control obligations, he/she is responsible for their collaborators and must earn their respect by adopting exemplary behaviour, demonstrating efficiency, loyalty and competence.

✓ **Respect for the law**

Compliance with the law and regulations of the national legal system and of each Country in which SAET operates represent a fundamental principle for the Company that each Employee must observe in carrying out his / her activity.

✓ **Respect, Honesty and Integrity**

Each Employee recognizes and respects the personal dignity, privacy and personality rights of any individual.

✓ **Protection of SAET's reputation**

SAET's reputation is determined substantially by the actions and conduct of each Employee. Therefore, the unlawful or inappropriate behaviour of even a single Employee can, in itself, cause significant damage to the Company.

In compliance with these fundamental principles, SAET SpA dictates the following guidelines in carrying out its activities to all employees, collaborators in any capacity and to all subjects operating in favour and / or under the control of the organization:

- ✓ Strict and full compliance with current legislation on the prevention and fight against corruption, in Italy and in any country where the Organization operates, with the involvement of employees, collaborators of any capacity, and all subjects operating in favour and / or under the control of the organization;
- ✓ The absolute prohibition of engaging in behaviour that could be considered corruption or attempted corruption;
- ✓ The identification, in the context of the activities carried out by the organization, of the areas of potential risk and identification and implementation of the appropriate actions to reduce / minimize the risks themselves;
- ✓ The provision of a clear reference framework to identify, review and achieve corruption prevention objectives;
- ✓ The commitment to plan and implement its policies and actions in such a way as not to be involved in any way in cases or attempts of a corrupt nature and not to risk involvement in illicit situations with public or private subjects;
- ✓ The full commitment to respect all the requirements of the management system for the prevention of corruption;
- ✓ Raising awareness among business partners so that they adopt policies and actions for the prevention of corruption phenomena, in compliance with legal requirements and consistent with the objectives of the organization, in the activities of specific competence;
- ✓ In the case of a transaction, project or activity or relationship with a business partner, which highlights, following due diligence, that the corruption risks cannot be addressed by the existing controls, SAET undertakes to adopt measures appropriate to the corruption risks to cease, interrupt, suspend or withdraw from it as soon as possible. The awareness and training of its employees on the issues of prevention of the corruption phenomenon;
- ✓ The provision of methods for reporting suspects in good faith, or on the basis of a reasonable belief, without fear of retaliation;
- ✓ The pursuit of any behaviour that does not comply with the policy for the prevention of corruption with the application of the organization's sanctioning system;
- ✓ The presence of a compliance function for the prevention of corruption, which is guaranteed full authority and independence;
- ✓ The commitment to continuous improvement of corruption prevention activities.

The Board of Directors believes that the most suitable corporate strategy for achieving this Anti-corruption Policy consists in the full implementation of the management system for the prevention of corruption in compliance with the **UNI ISO 37001: 2016** standard.

Place and Date: Selvazzano D. (PD) 16/04/2021

Legal Representative Signature