

Anti-Corruption Policy

SAET SpA is fully aware that corruption represents a major obstacle to a country's economic, political and social development and a serious distortion of the rules, fairness and transparency of markets, with particular reference to the public works sector. In this regard, the Organisation prohibits corruption and is fully committed to ensuring that all actions and conduct are based exclusively on criteria of transparency, fairness and moral integrity, thereby preventing any attempt at corruption.

In accordance with these commitments, the Board of Directors of SAET SpA has determined that the Organisation's Prevention Policy, in line with the adopted Code of Ethics, is based on **the following principles:**

✓ **Management, responsibility and control**

The culture of integrity and compliance of the Company's activities with regulatory provisions ("Compliance") originates at the highest levels of the Company. Each Manager is required to fulfil their organisational and control obligations, is responsible for their staff, and must earn their respect by behaving in an exemplary manner, demonstrating efficiency, loyalty and competence.

✓ **Compliance with the law**

Compliance with the law and the regulations of the national legal system and of every country in which SAET operates is a fundamental principle for the Company, which every Employee must observe in the performance of their duties.

✓ **Respect, Honesty and Integrity**

Every Employee recognises and respects the personal dignity, privacy and personal rights of every individual.

✓ **Protecting SAET's reputation**

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

In accordance with these fundamental principles, SAET SpA sets out the following guidelines for the conduct of its business for all employees, collaborators in any capacity, and all parties acting on behalf of and/or under the control of the organisation:

- ✓ Strict and full compliance with current legislation on the prevention and combating of corruption, in Italy and in any country where the Organisation operates, involving employees, collaborators in any capacity, and all parties acting on behalf of and/or under the control of the organisation;
- ✓ The absolute prohibition on engaging in conduct that could constitute corruption or an attempt at corruption;
- ✓ The identification, within the scope of the Organisation's activities, of areas of potential risk and the identification and implementation of appropriate measures to reduce or minimise such risks;
- ✓ The provision of a clear framework for identifying, reviewing and achieving corruption prevention objectives;
- ✓ A commitment to plan and implement its policies and actions in such a way as to avoid any involvement in acts or attempts of a corrupt nature and to avoid the risk of becoming involved in unlawful situations with public or private entities;
- ✓ A full commitment to complying with all the requirements of the anti-corruption management system;
- ✓ Raising awareness amongst business partners so that they adopt, within their specific areas of responsibility, policies and actions for the prevention of corruption, in compliance with legal requirements and consistent with the organisation's objectives;
- ✓ In the event of a transaction, project, activity or relationship with a business partner which, following due diligence, reveals that the risks of corruption cannot be addressed by existing controls, SAET undertakes to adopt measures appropriate to the risks of corruption to cease, discontinue, suspend or withdraw from it as soon as possible;
- ✓ Raising awareness and training its employees on issues relating to the prevention of corruption;
- ✓ Providing channels for reporting suspicions made in good faith, or on the basis of reasonable belief, without fear of retaliation;
- ✓ The prosecution of any conduct that does not comply with the anti-corruption policy through the application of the organisation's disciplinary system;
- ✓ The establishment of a compliance function for the prevention of corruption, which is guaranteed full authority and independence;
- ✓ A commitment to the continuous improvement of corruption prevention activities.

The Board of Directors considers that the most appropriate corporate strategy for achieving this Anti-Corruption Policy consists in the full implementation of the Anti-Corruption Management System in accordance with the **UNI ISO 37001:2025** standard.

Place and Date: Selvazzano D. (PD) 21/05/2026

Signature of the Legal Representative

