



ANTICORRUPTION POLICY

Eurotermo S.r.l. (hereinafter also Eurotermo or the Company) aims to conduct its activities with loyalty, fairness, transparency, honesty, and integrity, in compliance with laws, regulations, and international standards.

This policy, along with the Anti-Corruption Guidelines, is adopted by the Board of Directors of Eurotermo Srl in order to facilitate the implementation of anti-corruption regulations, in accordance with national and international legislation and internationally recognized best practices, and its application is mandatory.

The following are therefore outlined the general principles to be followed in carrying out work activities, the prohibited behaviors, and the measures identified by the Company against the risk of corruption.

This Anti-Corruption Policy is inspired by the principles of ethics, transparency, fairness, and professionalism - principles also mentioned in the Code of Ethics adopted by the Company – and It aims for the continuous improvement of all Company employees' awareness in recognizing corrupt phenomena and any other type of illegal activity, promoting active behavior aimed at preventing, repressing, and reporting possible violations of Anti-Corruption regulations.

In order to avoid the commission of corrupt conduct, the Company requests all its employees to adhere to the following general principles:

- **Segregation of roles and responsibilities** between those who execute, those who control and those who authorize.
- **Formalization of signing and authorization powers**, as well as corporate provisions suitable for providing at least general reference principles for the regulation of business processes and activities.
- **Clarity and simplicity**: the tasks and responsibilities of all parties involved in business processes, as well as the activities and their related controls, must be defined clearly and should include easily applicable mechanisms.
- **Absence of conflicts of interest**: all employees must operate with professionalism, impartiality, and transparency by promptly reporting any situation that may give rise to a conflict of interest
- **Traceability and archiving**: the functions involved and the information systems used by the Company must ensure the identification and reconstruction of the sources, the informational elements, and the controls carried out that support the formation and implementation of the Company's decisions and the management of financial resources.
- **Intermediaries (Agents, Brokers, etc.) and Consultants**: the business functions involved from time to time in operations aimed at maintaining or establishing a relationship with Intermediaries and Consultants must activate to obtain all relevant information about them, and the Company must ensure that the actions of Intermediaries and Consultants in the interest or for the benefit of the Company are carried out in compliance with the principles of loyalty, legality, and transparency.

Brescia, 03/07/2025

The Administrator