

ETHICS AND ANTI-CORRUPTION POLICY

Eurotermo S.r.l. bases its activities on the principles of integrity, transparency, and responsibility, fully convinced that ethical conduct is both a foundational value and a key factor for long-term sustainable competitiveness.

In line with this vision, the Company has adopted an Organizational, Management, and Control Model pursuant to Italian Legislative Decree 231/2001, a Code of Ethics, and a series of policies (environmental, safety, sustainable procurement) which together define the reference framework for all corporate activities.

This Policy forms an integral part of this system and applies to all **Addressees**: directors, employees, collaborators, consultants, suppliers, and anyone operating in the name or on behalf of Eurotermo S.r.l.

Core Principles:

Eurotermo S.r.l. is committed to operating in accordance with the following principles:

- **Legality and Regulatory Compliance:** Comply with all applicable laws and regulations in every area of activity, with particular reference to anti-corruption legislation (Italian Legislative Decree 231/2001, Law 190/2012, and applicable international conventions), antitrust laws, and personal data protection.
- **Anti-Corruption and Anti-Fraud:** Strictly prohibit any form of active or passive corruption, bribery, extortion, fraud, embezzlement, or money laundering, involving both private entities and Public Administration. It is expressly forbidden to offer, promise, or accept money, gifts, or benefits of any kind to obtain improper advantages.
- **Transparency and Traceability:** Ensure that every business transaction, accounting entry, and relevant decision is documented, verifiable, and consistent with actual facts, without ever resorting to false or misleading records.
- **Conflicts of Interest:** Require all Addressees to avoid situations where personal interests could interfere, even potentially, with corporate interests, with a mandatory duty to immediately report any such situations to the Board of Directors and the Supervisory Body (*Organismo di Vigilanza*).
- **Fair Competition:** Operate in the market in full compliance with competition rules, refraining from agreements or practices that could distort the free market.
- **Confidentiality and Data Protection:** Handle corporate information and personal data with the utmost care, in accordance with the GDPR and internal procedures, ensuring security and proper use.

Supply Chain and Partner Responsibilities:

Eurotermo S.r.l. expects all its suppliers, sub-suppliers, collaborators, and service providers to share and respect the principles outlined in this Policy. To this end:

- Ethical and anti-corruption requirements are an integral part of the contractual conditions with suppliers.
- Non-compliance with these principles may result in removal from the qualified supplier list and the termination of the contractual relationship.
- Suppliers are required to apply the same standards to their business partners, following the cascade responsibility principle along the supply chain.

Targets and Future Commitments

Furthermore, the Company commits to:

- Increasing meetings with trade union representatives to **at least twice a year**.
- By **2026, 100% of personnel** in sensitive roles will receive training on the new GDPR rules regarding confidentiality and data protection.

Whistleblowing and Control System

Eurotermo promotes a culture of accountability and openness, guaranteeing all Addressees the opportunity to report, in a confidential manner, any violation or suspected violation of this Policy, the Code of Ethics, or applicable regulations to the Supervisory Body (*Organismo di Vigilanza*).

Brescia, 24/07/2026

L'Amministratore

