

ELENTM

— THE FUTURE IN A BEAM —

Anticorruption Policy





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ANTICORRUPTION POLICY OF THE EL.EN. GROUP

1. PREMISE

This document was adopted in November 2019 but, since its establishment, El.En. S.p.A. and subsequently all its subsidiaries, have attached fundamental importance to anti-corruption policies. The aforementioned policy aims to combat corruption in all its forms within El.En. Group, including extortion and bribery. El.En. Group respects, on a daily basis, its Code of Ethics where the commitment to these issues was already expressed, formulating precise anti-corruption measures to be adopted in working relations between colleagues, collaborators, subsidiaries, suppliers and consultants, and reaffirming the need to conduct business in accordance with the principles of legality, impartiality, honesty, fairness and transparency, confidentiality and equity. El.En. Group confirms its commitment to the fight against corruption by adopting this document, that bears the title “Anti-Corruption Policy” (hereinafter “Policy”). This Policy is fully aligned with the UN Convention against Corruption and sets specific targets for the prevention of corruption, going to supplement and complement the Group’s Sustainability Plan. In addition, the Policy is included in the Model 231 in subsidiaries that have adopted it. El.En. Group constantly monitors the corporate departments at greatest risk of corruption, identifying and/or periodically reassessing these areas through risk assessments.

This document is approved by the Board of Directors of the parent company El.En. S.p.A., and by the Group’s subsidiaries, translated if necessary, into the local languages and sent to all employees. This Policy is also available to all Group employees on the company intranet and/or notice boards as well as on the corporate website www.elengroup.com in the Governance/Ethics, Integrity and Compliance section.

In their behavior all of the Collaborators¹ who work in the name of or on behalf of one of the companies of the Group, regardless of where they are located, must adhere to the Anti-corruption Policy and to all of the anti-corruption legislation in force in the countries in which they are working if these laws are more restrictive. All the specific guidelines of a country must be in conformity with this Policy; no violations of federal, state or international laws will be tolerated.

2. GENERAL PRINCIPLES

“The Group is committed to taking all necessary action to prevent and avoid practices involving corruption and bribery. In fact, the Collaborators of the Group are prohibited from giving or promising to third parties, either directly or indirectly, money or benefits for the purpose of unduly favoring or promoting the interests of the Group or of others; nor may they accept for themselves or for another the promise of or the gift of money or other benefits for the purpose of promoting or unduly favoring the interest of the third party”. *(Paragraph 9.1 Ethic Code)*.

The El.En. Group prohibits the use of any form of bribe or illegal payment, whether it be in cash or any other form, for the purpose of obtaining an advantage, understood as the facilitation of a service or as a guarantee for the obtaining of a service. The prohibition is extended to the employees of the Group who intend to accept or offer a bribe for personal gain or for that of their

¹ “Collaborators” are defined as administrators as well as all those who work with the Group on a contractual basis, even occasional or temporary, at all levels of the organization.

family members, associates or acquaintances. In the case of the offer, promise or request of a bribe, employees are required to immediately notify their superiors and the person in charge by means of the channels which have been set up to receive reports of this type, as described in Paragraph 12 “Reporting” in this document.

3. GIFT

“We allow only the giving or receiving of gifts having a total value such as not to compromise the image of the Company and which cannot be interpreted as having the purpose of obtaining a favorable treatment which is not determined by the market regulations, assignable to promotions or gestures of hospitality or courtesy while respecting our corporate procedures”. *(Paragraph 9.1 Ethic Code)*.

In any case the El.En Group does not allow the payment, offering or acceptance, either directly or indirectly, of gifts or facilitations made for the purpose of obtaining favors or which could be construed as exceeding normal commercial practice or courtesy. In the event that such conditions occur, employees are required to immediately notify their superiors and the person in charge by means of the channels which have been set up to receive reports of this type, as described in Paragraph 10 “Reporting” in this document.

4. ISTITUTIONAL RELATIONS

“All relations with state or international institutions must be attributable exclusively to forms of communication aimed at assessing the implications of legislative activity for the Group, to answering informal requests and responding to inspections and interrogations, or disclosing the position of the Group on relevant issues.

To this purpose, the Group is committed to establishing, without any type of discrimination, stable channels of communication with all the institutional representatives at an international, national and municipal level and to represent the interests and the positions of the subsidiary companies in a manner which is transparent, rigorous and consistent and avoiding behavior of a collusive nature.

For the purpose of guaranteeing the utmost transparency in relations, all contacts with institutional representatives must take place only through persons who have received a specific mandate from the management of the Group”. *(Paragraph 9.2 Ethic Code)*.

The Group is committed to continuously improving transparency in how the data are accessed and shared, promoting the adoption of responsible governance practices throughout the lifecycle of the data, in accordance with applicable standards and regulatory obligations.

5. RELATIONS WITH PUBLIC ADMINISTRATION AND OTHER RELEVANT SUBJECTS

“Relations between the members of the corporate bodies, employees, collaborators and the Public Administration, both Italian and foreign, as well as with EU Institutions, International Bodies and Agencies, and, in general, with public officials and public service officers, even if operating in the private sphere, must always be characterised by the principles of legality, loyalty, correctness and transparency.

For the purpose of guaranteeing total transparency, the Group is committed to a policy of avoiding any kind of undue advantage that might be derived from personal or family relationships with officials of the Public Administration or other relevant institutions.

In relation to legislative and administrative activity, in the sectors that are of interest for the Company, the Group adopts a correct and transparent conduct and avoids any attitude of a collusive or coercive nature with the institutions, offices and subjects that are conducting this activity.

With all of the authorities which inspect, superintend, regulate and guarantee, the Group maintains relations of complete and effective collaboration and immediately makes available to them all the information requested by these authorities in the fulfillment of their duties and in conformity with the regulations which have been issued". (*Paragraph 9.3 Ethic Code*).

6. REQUEST FOR, RECEIPT OF, AND MANAGING OF PUBLIC FINANCING

"All the information that is requested and/or presented to public institutions must be truthful and transparent. It is prohibited to present untruthful declarations to public, national or EU organisms for the purpose of receiving public financing or contributions or in order to receive concessions, authorizations, licenses or other administrative acts.

In particular collaborators must not promise or give money or other benefits or present declarations or certifications of requisites which are not truthful or that contain stratagems or tricks for the purpose of unduly obtaining concessions, licenses, contributions, financing, facilitations, social security or welfare payments or any other payments from the Public Administration or other relevant institution; hinder or obstruct the Public Administration or relevant institution in their functions of supervision and inspection; adopt fraudulent, misleading or disloyal conduct that could mislead the Public Administration or other relevant institution, during procedures of public evidence and other negotiating activities. It is prohibited to use sums that have been received from national or European public institutions intended as grants, allocations or financing for purposes other than those for which they are intended". (*Paragraph 9.4 Ethic Code*).

7. RELATIONS WITH POLITICAL PARTIES, LABOR UNIONS, ASSOCIATIONS AND OTHER REPRESENTATIVE ORGANIZATIONS

"The Group does not allocate funds directly or indirectly to political parties, groups or movements or to their representatives or candidates; moreover, the Group does not use any form of coercion aimed at obtaining special favors or treatment. The Group does not contribute directly or indirectly to labor unions or associations or other institutions which represent the collective or common interests, for the purpose of influencing their conduct in relation to jurisdictional proceedings on their behalf or with an aim to prevent any type of protest against its initiatives and activities. In any case, the Group may make contributions to the activities of political parties, organizations and associations and other representative institutions through the allocation of its financial resources, only in those cases and with the methods prescribed by law and, in any case, only as part of clearly identified specific projects and initiatives, respecting precise criteria of conduct, like the clear and documented recipient of the resources and the specific authorization from the administrative body". (*Paragraph 9.5 Ethic Code*).

8. CHARITABLE GIFTS AND SPONSORSHIP OF EVENTS

The El.En. Group is committed to sustaining the communities with which it enters into contact while conducting its business activities. For this purpose, the Group sponsors events and makes donations to charitable institutions which have strictly educational and social objectives. Although the Anti-corruption Policy does not prohibit legitimate donations and sponsorships, the Group must be sure that the funds directed to these specific activities are used for this purpose and are received by the specified recipients.

9. FINANCIAL AND SUSTAINABILITY REPORTING

"All of the transactions and operations which take place must be adequately registered in the financial reports and all of the related processes of decision making, authorization and implementation are subject to verification. For every operation there must be sufficient documentation so that at any time it is possible to run a check in order to determine the characteristics and motivations and identify the person that authorized, conducted, registered and verified the operation in question.

It is prohibited to make false or misleading reports in the account books or registers of the Group for any reason, and it is also prohibited to hide or to not register any fund or asset of the Group." (*Paragraph 6.6 Ethic Code*).

10. REGULATIONS RELATED TO THE MANAGEMENT OF THE FINANCIAL ACCOUNTING

"The Group requires total and complete dedication from all of its employees so that facts related to management and operations conducted as part of their activity are represented in the account books in a timely and correct way.

Every accounting operation therefore must be supported by a specific documentation demonstrating the activity which has been carried out in such a way as to allow:

- A facilitation of the registration into accounts;
- The identification of the provenance and/or creation of the documents;
- The financial and mathematical reconstruction of the operations;

It is the duty of every employee involved in the drawing up of the financial reports to make sure that the financial documents correspond to the above mentioned standards, can be easily traced and organized following logical criteria.

The law requires the application of principles of transparency, accuracy, and truthfulness in the financial statements and company reports and the Group imposes the adoption of these standards by its employees also with an aim to safeguarding the trust in the truthfulness of all the information contained in the documents that must be held by all those that receive them.

In particular, the employees who are involved in the drawing up of the annual financial report have the duty of verifying and promoting the verification of all the financial operations necessary for the creation of these sums, also with an aim to reducing the number of errors of interpretation". (*Paragraph 6.7 Ethic Code*).

11. RULES REGARDING THE MANAGEMENT OF SUSTAINABILITY DATA COLLECTION

El.En. Group is committed to providing accurate, complete and timely sustainability reporting in line with the applicable international and national standards. Transparency is a core value for the Organisation and can only be guaranteed through clear and accurate reporting on environmental, social and governance (ESG) performance, essential factors for the long-term success of the Group.

The Group requires from all employees a constant commitment to ensure that information on management and business operations is correctly and timely reported in sustainability reporting. Each employee involved in the preparation of the financial statements is responsible for ensuring that the accounting documentation complies with the principles of accuracy and transparency, is easy to find and is organised in a logical manner.

Those involved in the drafting of these documents must report true facts and not omit or alter any relevant sustainability information. All transactions must be supported by adequate documentation to prove the activity performed, allowing for accurate recording, reconstruction of the transactions and identification of the documents' origin.

Actions, transactions and negotiations relating to sustainability reporting must be guided by the utmost fairness in management, completeness, accuracy and transparency of information, the legality and clarity of accounting records, in accordance with the applicable regulations and internal company procedures.(Paragraph 6.8 Ethic Code).

12. REPORTS

For the submission of reports and for the procedure for managing them, please refer to the "Whistleblowing Procedure" available on the website www.elengroup.com in the *Governance\report handling/Whistleblowing* section.

The Group has established procedures to investigate promptly, independently, and objectively incidents related to the company's conduct, including cases of active and passive corruption.

The El.En. Group guarantees the privacy of the sources and the information it possesses, in compliance with the law. The Group will not tolerate any kind of retaliation towards persons who, in good faith, have reported violations, nor towards those who have refused to perform actions which are contrary to this document or the anti-corruption documents, even when, as a result of this refusal, there have been negative consequences for the business.

Therefore, any collaborator who becomes aware of a suspected or known violation of this Policy or of the relevant laws must immediately report it, even anonymously, Through the channels outlined in the Whistleblowing procedure, which currently are:

e-mail address: odv.elen@gmail.com

postal address: El.En. S.p.A. -c/o Organismo di Vigilanza -via Baldanzese 17, Calenzano (FI), 50041, Italia

13. DISCIPLINARY ACTION

In the case of violations committed by employees or collaborators of the Group, the relative disciplinary actions and the penalties imposed will be applied according to current laws. The disciplinary actions may include dismissal or the interruption of all business relations and the

employees and collaborators may be subject to both criminal and civil action in the relevant jurisdictions. The El.En Group will not tolerate, even when not intentional, the failure to observe this policy and the requirements established by law and reserves the right to sue for damages the person who has committed the violation. The El.En. Group, moreover, cannot be held responsible for the reimbursement of the penalties or legal expenses sustained by employees. The committee established to receive reports of this kind must be informed of any action taken as a consequence of a violation.

14. IMPLEMENTATION

The commitments taken on by El.En. Group in the fight against corruption are set out in the Sustainability Plan and compliance with these commitments requires the involvement of stakeholders.

- All Group subsidiaries have approved this Policy by means of a special resolution and have disseminated it to their employees;
- At least once every two years, specific anti-corruption training is conducted involving all Group executives and managers, as well as all employees in the purchasing and sales departments, in order to ensure adequate understanding of all topics contained in this Policy.

15. LIMITS OF THE POLICY

This Policy does not define totally and exclusively all of the procedures of the Group related to the behavior of their employees and collaborators in situations which regard the Anti-corruption Policy, nor does it supply a complete explanation of the laws applicable to the Group. Consequently, each individual should remain up-dated on the current laws and the Policies of the Group.

The President

Calenzano (FI), January 31th, 2025

Gabriele Clementi

