

GENERAL MANAGEMENT

ANTITRUST GENERAL POLICY

1. PURPOSE

Elettronica S.p.A. recognises the paramount importance of ensuring compliance with obligations and principles governing competition and market integrity in all its operational activities. Aligned with its core values, articulated in the Code of Ethics and encompassing principles of Business Integrity, the Company commits unreservedly to conducting its operations in full conformity with all applicable competition and antitrust legislation in the jurisdictions where it operates. Accordingly, the Company establishes, maintains and enhances continuous improvement processes within its Organizational Management Model, Internal Control System and Risk Management Framework to:

- a. Foster a culture of transparent and ethical business conduct as a cornerstone for achieving competition law compliance and ensuring market fairness;
- b. Establish a comprehensive process for the identification, analysis and management of risks inherent to Elettronica's specific operational scope, encompassing both existing and prospective market sectors, with implementation of appropriate risk mitigation measures and due consideration of the internal and external operating environment;
- c. Develop and implement management processes designed to mitigate the risk of non-compliant conduct with competition law, integrated as essential components of business operations;
- d. Establish a robust monitoring framework comprising internal verification activities and third-party assessments, constituting an integral part of the ISO 37001 certification process and corporate reporting requirements;
- e. Actively promote the use of established mechanisms for voluntary and confidential reporting;
- f. Explicitly affirm that conduct in violation of applicable law, this policy and related procedures, in addition to constituting grounds for disciplinary action as provided for in applicable collective labour agreements, shall be taken into account in assessing the continuity of the fiduciary relationship in the employment relationship;
- g. Unequivocally communicate to agents, consultants and commercial partners that violation of competition and market rules will result in the immediate termination of business relationships on grounds of just cause;
- h. Engage with competent Authorities with full transparency, actively supporting and facilitating investigative and inspection activities as appropriate.

2. SCOPE

This Policy is applicable to:

- A. All employees, regardless of position or function;
- B. Agents, representatives and consultants who, whether under formal engagement or in any factual capacity, act on behalf of or in the interest of Elettronica S.p.A.;
- C. Commercial partners and external stakeholders engaged in preliminary and ongoing business development activities, to the extent they act in conjunction with the Company's commercial objectives and shall accordingly ensure compliance with the principles established herein.

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3. GENERAL PRINCIPLES

This Policy is designed to prevent and counter conduct that impedes or hinders the development of free and fair competition. The following categories of conduct are expressly prohibited:

- I. **Collusive Agreements between Competitors** – including but not limited to agreements concerning price-fixing, artificial market allocation, output restrictions or other arrangements that limit or affect competition;
- II. **Abuse of Dominant Market Position** – encompassing commercial practices undertaken by entities holding a position of market dominance that enables them to impose terms unfavourable to competitors or limit competitive market access by other undertakings. Similarly prohibited are arrangements involving the exploitation of another entity's dominant position;
- III. **Anti-competitive Business Combinations** – transactions that restrict competition through achievement of monopolistic or oligopolistic market concentration, effected outside authorised regulatory frameworks where applicable.

For the purposes of this Policy, "Competition Sensitive Information" (CSI) shall be understood to mean, by way of illustrative and non-exhaustive enumeration, any confidential information relating to the strategic commercial interests of the parties, including in particular:

- **Pricing Information:** including current and prospective pricing structures, pricing methodologies, discounts and rebates, price lists, special promotional offers and payment terms;
- **Profitability Data:** current or projected profit margins and related profitability metrics;
- **Marketing and Commercial Strategy:** marketing plans, promotional campaigns and market positioning strategies;
- **Cost Information:** production costs, acquisition costs and operating expenses;
- **Strategic Business Plans:** expansion initiatives, product and service development roadmaps and market penetration strategies;
- **Customer and Client Data:** client lists, purchasing patterns and preferences, existing and prospective contractual arrangements;
- **Research and Development Information:** research and development projects and programmes, prototypes, technological innovations and proprietary know-how not yet in the public domain;
- **Strategic Intelligence:** any information permitting the identification or inference of strategic commercial conduct, intentions or plans.

The Policy's objectives, reflecting the Company's fundamental values regarding ethical conduct, regulatory compliance and security principles, are articulated as follows:

- **Full Regulatory Compliance:** to ensure that all operations are conducted in complete and unqualified compliance with applicable competition and antitrust laws;
- **Risk Prevention and Mitigation:** to proactively identify and attenuate the risks of regulatory violation;
- **Transparency and Institutional Dialogue:** to establish an operating environment in which concerns regarding competition compliance may be raised, discussed and addressed in an open manner;
- **Individual Accountability:** to ensure that each individual understands their personal responsibility for comprehending and adhering to this Policy

4. OPTIONS, OBLIGATIONS AND PROHIBITIONS

Notwithstanding the universal and absolute obligation to comply with applicable legal standards and to conduct all relationships with competitors, customers and suppliers with integrity and fairness, while scrupulously avoiding any secret agreements or illicit commercial practices, the following constitute essential obligations under this Policy:

Knowledge of the legislation: All personnel, agents and consultants shall receive appropriate training and be kept informed regarding the antitrust and competition laws applicable to the Company's operational sectors, including prohibitions on restrictive commercial agreements and prohibitions relating to abuse of dominant position. Personnel and equivalent functionaries are expressly obligated to actively engage with training and awareness programmes implemented by the Company.

Reporting Obligations: all recipients of this Policy shall report any conduct, commercial agreements or practices that may constitute or evidence violation of antitrust regulations, whether encountered internally or in the Company's external relationships.

Cooperation with Regulatory Authorities: the Company is committed to conducting itself with complete transparency towards competent regulatory authorities, providing active cooperation and furnishing all information and documentation requested during regulatory investigations or inspections.

Protection of Confidential Information: Personnel, consultants and third parties operating within the Company's business sphere are obligated to implement measures to protect sensitive corporate information, ensuring that such information is not disclosed to competitors or external parties in a manner that could facilitate competitive abuse.

5. MANAGEMENT COMMITMENT

Top Management demonstrates explicit and active commitment to every initiative designed to realise the objectives of institutional transparency and market fairness, positioning such commitment as an integral element of the Company's overall management guidance, reference framework for sustainability policies and continuous improvement agenda. Such commitment is evidenced through documented activity including periodic policy review and reaffirmation. Senior Management is directly involved in ensuring compliance with and implementation of the principles articulated herein, guaranteeing that the Policy is operationalised throughout the organisation and disseminated to all personnel. In pursuit of these objectives, Management expressly undertakes to:

- Communicate this Policy to all employees and disseminate it to all external parties, including through publication on the Company's public portal, ensuring that all persons entering into working relationships or collaborations with the Company understand their obligation to comply with applicable regulatory requirements and antitrust compliance principles;
- Involve personnel in Policy implementation activities and ensure that individual accountability is established and maintained;
- Promote and implement all necessary initiatives to ensure effective, comprehensive implementation of this Policy and the Antitrust Compliance Program derived therefrom.