

GENERAL MANAGEMENT

ANTI-CORRUPTION POLICY

TARGET

This document outlines the Corruption Prevention Policy, issued and supported by Elettronica S.p.A. ("ELT" or "the Company"), in implementation of the principles of the Code of Ethics adopted by Resolution of the Board of Directors of Elettronica S.p.A. on 23 July 2025. Elettronica S.p.A. considers the prevention of corruption as one of the key elements of its business strategy and affirms its defined and unequivocal commitment to the fight against any form of corruption, in clear and irremediable contrast with the founding values of the Company. ELT inspires its work on principles of legality, honesty, fairness, transparency and confidentiality, as well as on the principles aimed at ensuring the prevention of corruption. To this end, the Company has decided to adopt a Management System for the Prevention of Corruption in accordance with the international standardization standard UNI ISO 37001. All the requirements and principles set out in this Anti-Corruption Policy, as well as in the applicable regulations on the prevention of corruption, are binding on Elettronica S.p.A. and must be fully complied with by all subsidiaries, affiliates and companies belonging to the Elettronica Group, regardless of their legal form (subsidiaries, associated companies, investee companies with significant influence, joint ventures, branches or foreign branches) or geographical location.

POLICY GUIDELINES

The pursuit of corruption prevention is considered a priority, to which continuous and constant attention is paid in order to ensure the identification and compliance with the requirements and to comply with applicable laws and regulations. To this end, continuous training and updating activities for personnel at all levels are planned and implemented.

Personnel are required to comply, for the activities within their competence, with the provisions of the Manual of the Management System for the Prevention of Corruption, this Policy for the Prevention of Corruption and the documentation referred to therein. In cases of non-compliance, the disciplinary measures provided for, by the applicable Collective Agreements, by the relevant national legislation and any other Company Rules adopted by the Company will be applied. As part of its commitment to continuous improvement, with a view to preventing corruption, the Company defines the following essential and explicit commitments:

- prohibits bribery, understood as offering, promising, providing, accepting or requesting an undue advantage of any value (whether economic or non-economic), directly or indirectly, and regardless of location, in violation of applicable law, as an inducement or reward for a person to act or omit actions in relation to the service performed. In particular, it prohibits acts of inappropriate influence on the decision-making processes of the parties with whom Elettronica interacts, such as offering, promising or bestowing any valuable benefit to inappropriately influence a person in order to obtain a performance for ELT. or solicit or accept any benefit as compensation for an inappropriate action or inducement to act inappropriately for the assignment of an assignment by ELT. Instruments of corruption include money, gifts, acts of hospitality, expenses, mutual favors, funding of political parties or contributions to charitable organizations, as well as any other direct or indirect benefit or consideration.

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- ensures the verification of compliance with the legislative provisions (national and European, as well as the applicable international standards) of reference.
- It ensures that all its remuneration policies are managed with transparency, integrity and legality. The economic awards are awarded exclusively on the basis of criteria related to skills, competences and commitment, objective and documentable, in compliance with current regulations and internal anti-corruption provisions. In this way, the company intends to enhance merit, promote an ethical and responsible culture, strengthening the trust of collaborators, partners and stakeholders, creating a serene, participatory environment, oriented towards professional satisfaction and identification with the common values of the Company.
- ensures the review of the Company Policy (at least annually or with a shorter frequency if necessary) considering legislative changes and any other company requirements.
- ensures the verification of the adequacy of the Integrated Management System and the improvements to be made to the structure (at least annually).
- encourages the reporting of suspected cases of corruption in good faith, or based on a reasonable and confidential belief, by sending communication through the company's whistleblowing channels, ensuring that it does not proceed with disciplinary / sanctioning measures or retaliation of any kind.
- It ensures autonomy and independence, as well as the authority of the Function for the prevention of corruption, for the achievement of the objectives of the Management System, also through a dedicated budget.

GOALS

The objectives of the Anti-Corruption Plan are defined as follows:

- define in a precise manner the objectives of the Management System for the Prevention of Corruption to operate in compliance with the applicable legislation and regulations and the mandatory principles of the Code of Ethics and this Policy.
- maintain the active and continuously improve the Management System for the Prevention of Corruption, in accordance with UNI ISO 37001.
- guarantee a constant and adequate level of training and information to all personnel for the purpose of improving the Management System for the Prevention of Corruption.
- ensure the correct management of any Non-Conformities detected during the implementation of the Corruption Prevention Management System, including those relating to non-compliance with the Corruption Prevention Policy.

To this end, the Chief Executive Officer, in accordance with the direction of the Board of Directors, gives full mandate to the Head of the Management System for the Prevention of Corruption and to the Business Integrity Function, to pursue the objectives contained in this policy, by virtue of the authority and independence conferred on him to:

- supervise the design and implementation of the Management System for the Prevention of Corruption.
- provide guidance and advice to staff on issues related to corruption and the Management System for the Prevention of Corruption.
- ensure that the Management System for the Prevention of Corruption complies with UNI ISO 37001.

- report on the performance of the Management System for the Prevention of Corruption to the Management Body and Top Management in the most appropriate manner.
- Everyone is responsible for achieving adequate levels of corruption prevention. therefore, there is a strong desire that the Management System for the Prevention of Corruption be an integral part of the company's management and that this policy be disseminated to all personnel, to anyone working on behalf of ELT and to anyone who requests it in order to make employees/collaborators aware and inform all interested parties of the Company's commitment to minimizing the risk of corruption and the disciplinary consequences and in relations of business.

MANAGEMENT COMMITMENT

The Management is involved in respecting and implementing the principles referred to in this policy, ensuring and verifying that it is made operational and disseminated to all personnel. In particular, the Management undertakes to:

- communicate this Policy to all employees and disseminate it to all personnel.
- involve and empower management and staff in the activities envisaged by this Policy.
- promote all necessary initiatives to ensure the full implementation of this Policy.
- to direct the values, processes and controls also for the Subsidiaries, in compliance with functional autonomy.