

## **POLICY FOR THE PREVENTION OF AND FIGHT AGAINST CORRUPTION**

Italgas has as its primary goal the conduct of its business according to the principles of loyalty, fairness, transparency, honesty and integrity, in compliance with laws, regulations, international standards and guidelines.

To this end, it has established an integrated management system for the prevention of and fight against corruption and bribery based on company policies and in compliance with the Code of Ethics and the model of organization, management and control pursuant to the Legislative Decree 231/2001 and in accordance with the requirements laid down:

- in the UNI ISO 37001:2016 standard "Anti-bribery management systems - Requirements and guidance for use", to which Italgas has decided to comply with, that requires "a commitment to meet the requirements of the anti-bribery management system" and "a commitment to the continuous improvement of the anti-bribery management system";
- in the tenth principle of the Global Compact, to which Italgas has adhered, pursuant to "companies undertake to fight corruption in all its forms, including extortion and bribes".

Italgas considers its own Management System as one of the main incentives for the involvement of its personnel in preventing and fighting corruption and for improving its internal processes.

In order to pursue this orientation, all Italgas Group Companies are required to formally adopt this Policy through an act taken by their administrative body and to take care of its proper implementation and disclosure in their organization in order to ensure full compliance with it.

All the requirements of the reference legislations are fully applied within the Management System.

The Italgas Policy is based on the following principles:

- I. to oppose without exception practices of corruption, illegitimate favours, collusive behaviour, solicitations, direct and/or through third parties, of personal and career advantages for oneself or others;

2. to manage activities in compliance with the Anti-Corruption Laws<sup>1</sup>, all other administrative provisions and the company provisions for integration and improvement;
3. to carry out checks, inspections and audits, to evaluate performance and conduct and review objectives and programs, periodically reviewing the policy to assess its effectiveness, adopting the requisite measures;
4. to promote the identification of risks, in a proactive manner, favouring coherent, informed and conscious decisions aimed at pursuing the prevention of and fight against corruption and bribery;
5. to guarantee, through appropriate procedural, management and organizational tools, the fulfilment of anti-bribery management system requirements;
6. to elaborate and activate all the organizational and procedural solutions necessary to prevent and fight the corruption and bribery phenomena;
7. to ensure the information, training, and awareness of personnel for an active and responsible participation in the implementation of the principles and the achievement of the objectives;
8. to select and promote the development of suppliers according to the principles of this policy, committing them to maintaining a behaviour consistent with it;
9. to encourage personnel to report suspects in good faith, or on the basis of a reasonable and confidential conviction, without fear of retaliation by making use of the specific procedure on the process of receiving, analysing and processing the reports sent or transmitted;
10. to pursue continuous improvement of its own anti-bribery management system, marking it with efficiency, through the control and management of risk factors;
11. to ensure adequate independence and authority to the compliance function for preventing and fighting corruption and bribery so that it can guarantee the functioning of the management system, assessing its adequacy over time and its effective implementation, also through a periodic update of the governing body and the top management;
12. to impose disciplinary measures and take any other legal action against Italgas Group Personnel operating in violation of the Anti-Corruption Laws, the principles of this policy for the prevention of and fight against corruption and bribery, as well as the Code of Ethics;
13. to submit the Business Partners who operate in violation of the Anti-Corruption Laws, the principles of this policy for the prevention of and fight against corruption and bribery, as well as the Code of Ethics, to contractual remedies, including the suspension of the execution and up to the termination of the contract, to a ban from dealing with the Italgas Group and to claims for damages.



This policy is communicated to stakeholders with a view to transparency and collaboration and is available to the public and to anyone who requests it.

March 23, 2023

The CHIEF EXECUTIVE OFFICER  
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