

## **ANTI-BRIBERY AND CORRUPTION POLICY**

The Ansaldo Energia Group (hereinafter also "Group"), being aware of the negative effects of corruptive practices on economic and social development in the areas where the Group is present, is committed to equip itself with tools and safeguards aimed at preventing all forms of corruption, active and passive, direct and indirect, public or private, involving the staff of the Group and each person who carries out activities on its behalf.

Therefore, Ansaldo Energia Group is firmly committed to combatting corruption, rejecting it in any context and in any form.

In this regard, as part of its commitment, the Companies of the Group have already adopted a Code of Ethics, which defines the values, which the Companies of the Group are inspired by to achieve their objectives, the relevant principles in the conduct of the activities and what is necessary to comply with the anti-corruption regulations of the countries in which they operate.

As further confirmation of its commitment, the Group has implemented this Anti Bribery and Corruption Policy according to the fundamental values of integrity, transparency and responsibility, regardless of the countries in which they operate, which the Board of Directors and the Top Management of Ansaldo Energia S.p.A. explicitly require Group Companies to adhere to, in order to promote a culture of compliance, of prevention and of integrity, based on "*tone at the top*", where corruption is never allowed or indulged.

The Group therefore has a zero-tolerance policy for acts of corruption and prohibits them from being perpetrated in any form, whether directly or indirectly. The Group expressly prohibits its employees or related third parties ("Business Partners") from being involved in acts of corruption. The Group also recognizes that conflicts of interest — whether actual, potential, or perceived — can increase the risk of corruption and therefore requires them to be promptly disclosed and properly managed in line with Group rules.

As part of its commitment to zero tolerance of corruption, the Group ensures that any breach of the principles of this Anti Bribery and Corruption Policy and any conduct constituting a suspected act of corruption will be assessed, where appropriate through a specific investigation, also applying disciplinary action, without prejudice to any sanctions provided for by applicable legislation. No Employee will be demoted, sanctioned or otherwise harmed for refusing to commit or indulge acts of corruption or for reporting attempted or actual acts of corruption, even if such refusal results in the loss of business for the Group.

The Group will therefore make every effort to prevent corruption by committing itself to:

- combatting it proactively, promoting integrity and way of doing business free from corruption among those who have relations with the Group;
- conducting its activities in full compliance with regulatory framework, prohibiting any act of corruption and constantly verifying the correct application of the anti-

bribery provisions and the requirement adequacy of the anti-corruption management system;

- refraining from having business relations with a third party when there is a reasonable doubt that acts of corruption may have been committed by the latter;
- encouraging employees and Business Partners to report circumstances / situations not in line with this Policy and with the Anti-Bribery AE Group internal regulations, in accordance with the provisions contained in the Group Directive "Reporting Management", published on the Ansaldo Energia website, without fear of reprisals;
- protecting the whistleblower in good faith from any form of retaliation;
- taking appropriate actions against those (employees and non-employees) who have acted contrary to the principles of this Policy and / or the anti-bribery management system;
- reviewing and improving the tools of the corruption prevention through periodic performance monitoring, management review, and the adoption of corrective actions, while also assessing the potential relevance of emerging issues, including those related to climate change and the sustainable transition, as possible drivers of the evolution of corruption risks; involving employees in training and raising their awareness on the anti-bribery and corruption system and Policy;
- informing Business Partners on the existing of Ansaldo Energia anti-bribery and corruption system and Policy;
- appointing:
  - a Compliance Officer of the Group, responsible for overseeing the implementation of the anti bribery and corruption system in Ansaldo Energia and in the Group, acting with appropriate authority, independence and resources, and having direct access to the Board of Directors and the Chief Executive Officer;
  - Compliance Officer for each Companies of the Group, among other things, responsible for providing clarifications to the Group's personnel and to the Business Partners about the tools and safeguards concerning the anti-bribery and corruption system and any related questions.

These general commitments are contained in working objectives communicated within the Group and constantly updated.

Each person, whether an employee or not, who acts in the name and on behalf of the Group is required to know the contents of this Policy and to behave in compliance with its provisions, aware that in the event of corrupt conduct he/she may incur in offenses that may be sanctioned not only on a criminal and administrative level, but also at corporate / contractual disciplinary level.

The Group also requires its Business Partners to comply with the applicable laws, the Code of Ethics and this Policy on the basis of clauses whose non-compliance entails the

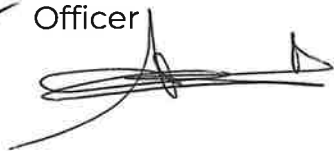
termination of the contract, and to disseminate this Policy as widely as possible, ensuring that it is understood and implemented by all employees; for this purpose, it is made available on the Ansaldo Energia website and intranet.

Carlo Alberto Giusti  
AEN Chairman of Board  
Of Directors



Genova, 29 April 2026

Fabrizio Fabbri  
AEN Chief Executive  
Officer



Chiara Piaggio  
AEN Corporate, Legal  
Affairs and Risk  
Management

