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ANTI-CORRUPTION POLICY

Fisia Italimpianti S.p.A., a company engaged in the design, construction, maintenance and management of desalination, water treatment and renewable energy plants operating at national and international level and part of the Webuild Group, recognises the primary importance of conducting its business in accordance with the law and with integrity, transparency and fairness in all countries in which it operates.

To this end, Fisia Italimpianti S.p.A. promotes an Anti-corruption Policy in line with the Code of Ethics and actively supports all initiatives aimed at strengthening the standards and principles *that must govern the conduct of all personnel, in accordance with applicable regulations, and so as not to harm either the image* or *reputation of the Company.*

Fisia Italimpianti S.p.A. has adopted a "zero tolerance" anti-corruption programme.

The Company's Anti-corruption System is based on the following principles:

- *any type of corruption, in any form or way, in any jurisdiction, involving not only Public Officials, but also private subjects is prohibited;*
- *any form of facilitation payment is prohibited;*
- *all transactions must be accurately accounted for in accordance with accounting principles, in a complete and transparent manner on order to trace all receipts, payments and all transactions in general.*

The Company has established appropriate measures to pursue the principles set out above, and applies all the procedures necessary to *verify compliance with this Policy, the Code of Ethics and applicable Anti-corruption Laws and constantly reviews and monitors the content of its Anti-corruption System, in accordance with the UNI ISO 37001:2016 principles.*

Application of this Policy is *the direct responsibility of the directors, statutory auditors, managers and employees of Fisia Italimpianti S.p.A. as well as all those who, directly* or *indirectly, permanently* or *temporarily, establish relationships with Fisia Italimpianti S.p.A., each in the scope of their functions and responsibilities (the "Recipients"). Each director and each manager is responsible for monitoring compliance with the Anti-corruption System by their staff.*

The Recipients are encouraged to always act in accordance with this Policy and Anti-corruption Laws, and will not be subject to *disciplinary sanctions* or *recriminations of any kind if they refuse to ignore them.*

The Recipients are encouraged to *report any breaches of the Anti-corruption System they become aware of, even indirectly, while carrying out their work, and whistleblowers are guaranteed protection from any form of recrimination, discrimination* or *penalty, without prejudice to legal obligations.*

Any employee or associate who does not act in accordance with this Policy shall be subject to disciplinary sanctions in line with the severity of such breach. Any partner or supplier that does not act in accordance with this Policy shall be subject to contractual disciplinary sanctions.

Fisia Italimpianti S.p.A. notifies the Recipients of this Policy and periodically updates its contents.

Genoa, 13 December 2024

General Manager
Matteo Buzzetti
Matteo Buzzetti