

Anti-Corruption Policy

The "Zero Tolerance for Corruption" principle

Hydro Holding Group has a zero tolerance approach to acts of corruption.

Hydro Holding's personnel, relevant business partners and anyone performing an activity in favour of or on behalf of Hydro Holding must not be involved, even indirectly, in acts of corruption.

In line with the Code of Ethics and the protocols of Model 231/01, Hydro Holding prohibits active and passive, as well as direct and indirect corruption, without exception.

Specifically:

- It is prohibited to offer, promise, give, pay, authorise someone to give or pay, instigate someone to give, pay or receive, directly or indirectly, material benefits, economic and/or non-economic advantages, or other benefits to a Public Official/Public Servant, or to a Private Party (active corruption);
- It is prohibited to accept, authorise someone to accept, or instigate someone to accept, directly or indirectly, economic and/or non-economic advantages or other benefits from a Public Official/Public Servant or from a Private Party (passive corruption).

The prohibition includes offering or receiving, by Hydro Holding personnel, or by anyone acting on behalf of the Company, an economic/non-economic benefit or other advantages in relation to the business activity.

The prohibition is not limited to cash payments, as corrupt conduct can also result from:

- Gifts;
- In-kind contributions and donations;
- Public authorisations and permits;
- Jobs, business activities, investment opportunities;
- Reward offers;
- Advisory assignments;
- Order awarding to "indicated" suppliers;
- Discounts or personal credits;
- Attention costs for third parties, meals and transportation, hospitality;
- Facilitation payments;
- Other benefits or other advantages.

Recipients of this Policy and of the Anti-Corruption Code shall be bound to provide justification if they act by ignoring red flags or grounds for suspicion ("Red flags"), or if they act with gross negligence or recklessness, by way of example, failing to adequately conduct due diligence procedures, based on the circumstances.

Anti-Corruption Policy

Hydro Holding Group is committed to proactively combating corruption within the scope of their operation context.

To this end, the Group promotes integrity and corruption-free ways of doing business among all its stakeholders.

Hydro Holding Group is committed to being a benchmark in the industry by implementing the best anti-corruption standards and practices, and investing in the training of their employees.

The Group shall make every effort to prevent corruption by any connected third parties.

The Group reserves the right to refrain from doing business with a third party in the event of doubt that acts of corruption may have been committed. Within this scenario:

- All Hydro Holding's relationships with, or relating to, or involving a Public Official/Public Servant shall be conducted in compliance with this Anti-Corruption Code and anti-corruption legislation;
- All of Hydro Holding's relationships with, or referring to private individuals that are considered subject to the risk of corruption, shall be conducted in compliance with this *Anti-Corruption Code* and anti-corruption legislation;
- Hydro Holding's personnel shall be responsible, each staff member within his or her functional competence, for compliance with this *Anti-Corruption Code* and anti-corruption legislation;
- No questionable or illegal practice may under any circumstances be justified or tolerated on the grounds that it is customary in the industry or territory in which Hydro Holding operates;
- No service performance shall be imposed or accepted if the same can only be achieved by compromising Hydro Holding's ethical standards;
- Personnel who violate this *Anti-Corruption Code* or anti-corruption legislation shall be subject to disciplinary measures and any other legal action as may be necessary to protect Hydro Holding's interests;
- Recipients of the aforementioned sanctions and/or actions may also be those who, although aware of violations of the *Anti-Corruption Code* or anti-corruption legislation, have not prevented their perpetration or, in any event, have facilitated their occurrence;
- Business Partners who violate this Anti-Corruption Code or anti-corruption legislation shall be subject to contractual remedies and claims for damages;
- Hydro Holding's personnel shall not be dismissed, demoted, suspended, threatened, harassed, discriminated in any way in their work treatment, for refusing to make a prohibited payment, even if such refusal resulted in the loss of a business deal or any other detrimental consequence for the business;
- Hydro Holding encourages and allows, pursuant to the reporting procedure set forth in Model 231/01, their personnel to report - in good faith or on the basis of reasonable grounds - attempted, alleged and actual acts of corruption, or any violation of this *Anti-Corruption Code*;
- Hydro Holding's personnel shall be bound to avoid and report all situations that may constitute or result in a conflict of interest between personal or family business activities and the his/her tasks and duties within the Company. In particular, any situation that may constitute or result in a conflict of interest shall be promptly reported to the superior Manager. The person involved shall promptly refrain from intervening in the operational/

HYDRO Holding Spa

Via Provinciale Nord, 26/a - 40050 Castello d'Argile (BO)
Tel.051976635 - Fax 051976572 - www.hydro-holding.com
VAT No., Tax Code and Bologna Business Register No. 02937551204
REA Number: BO-479046 - Capital Stock: Euro 3,000,000.00 Fully paid

decision-making process.

The Supervisory Board shall ensure that all reports are handled in accordance with confidentiality and privacy principles aimed at protecting the reporting subject (whistleblower).

Global compliance commitment

Hydro Holding Group has an extensive geographical presence and is committed to complying with the laws and local regulations applicable in each country where it operates.

Castello d'Argile (BO) December 20, 2023

The Company Legal Representative

Mario Cerase


