

ANTI-CORRUPTION POLICY 2026 EDITION

BELENERGIA S.P.A. — BELENERGIA GROUP

I. PREAMBLE AND CONTEXT

The Board of Directors of Belenergia S.p.A., its delegated bodies, supervisory bodies and senior management of the Belenergia Group are fully aware of the responsibilities that arise from their roles towards all stakeholders. In this context, Belenergia adopts this document as its Anti-Corruption Policy, based on the conviction that growth and development objectives must be aligned with the highest ethical standards and transparent, responsible governance.

The Group has implemented an Anti-Bribery Management System (ABMS) compliant with ISO 37001:2016. Combating corruption is an absolute priority: Belenergia rejects any form of corruption in its dealings with business partners, suppliers, consultants and public authorities.

2. GUIDING PRINCIPLES

The Group's policy is built on non-negotiable principles that guide every decision and behaviour within the company: a genuine commitment to lawfulness, quality and anti-corruption; the centrality of the client, the environment and sustainable development; an absolute prohibition of any form of active or passive bribery; transparency and integrity in all stakeholder relationships; protection of the whistleblower from retaliation, in full compliance with EU Directive 2019/1937; respect for national laws and ISO international standards; commitment to continuous improvement of the System; and personal data protection in accordance with the GDPR.

3. ANTI-CORRUPTION OBJECTIVES 2026

For 2026, Belenergia has defined seven operational objectives that translate the principles of this Policy into concrete, measurable and verifiable commitments. They reflect the maturity achieved by the System and Top Management's determination to progressively strengthen its effectiveness.

1. Dissemination of the Ethical Commitment and staff training

Belenergia ensures that the anti-corruption commitment is genuinely understood and internalised at every level of the organisation. Every member of staff — regardless of role — participates in mandatory training sessions, in-person and/or via e-learning, with attendance records kept. The Code of Ethics is updated by end of 2026 to reflect regulatory developments and lessons learned. The acceptability threshold is set at 90% of staff trained by 31 December 2026.

2. Continuous update of System documentation

The Anti-Bribery Management System is a living body: its effectiveness depends on the ability to adapt promptly to regulatory and organisational changes. Belenergia commits to continuously revising its Policy, Procedures and Operating Instructions, incorporating any new legislative development — in particular EU anti-corruption provisions — within 60 days of official publication.

3. Guidance tools and internal communication

Prevention is also built through the daily ability to address doubts, flag uncertainties and find guidance in ambiguous situations. Belenergia manages dedicated internal communication channels — FAQ, compliance helpdesk, corporate intranet — and organises at least two thematic sessions per year targeting roles with the highest risk exposure, fostering an aware and participatory compliance culture.

4. Management of reports and consequent measures

Every report of a potential violation is handled with rigour, confidentiality and speed. Belenergia ensures that all reports received via the whistleblowing channel are acknowledged within 30 days, that the facts are assessed by the Compliance Function, that — where a violation is confirmed — proportionate disciplinary measures are taken, and that the non-conformity register and corrective actions are systematically updated.

5. Whistleblower protection

Those who report a possible irregularity in good faith deserve protection. Belenergia guarantees that no employee, collaborator or stakeholder will suffer retaliation of any kind for having provided information about alleged violations. The whistleblowing platform is aligned with the requirements of EU Directive 2019/1937, and its effectiveness is verified annually. Staff, including the Anti-Corruption Compliance Officer and Top Management, receive specific training on this matter.

6. Periodic internal audits of the Anti-Bribery Management System

Independent, structured verification is the primary tool for improving the System. Belenergia conducts at least one complete annual internal audit cycle of the ABMS, carried out by qualified auditors — internal and/or external — capable of objectively assessing conformity with the requirements of ISO 37001:2016 and the effectiveness of operational controls. Each cycle concludes with a formal report documenting findings, non-conformities and corrective actions, the progress of which is tracked until closure.

7. Anti-corruption due diligence on suppliers, partners and third parties

Corruption risk does not stop at organisational boundaries: the supply chain and business partnerships are areas of exposure that Belenergia monitors with rigour. For every significant new collaboration and for the renewal of contracts with entities classified as high-risk, a structured anti-corruption screening process is carried out. Standard anti-corruption contractual clauses are included in all relevant contracts; buyers and procurement managers receive dedicated training.

4. TOP MANAGEMENT COMMITMENTS

Belenergia's Top Management commits to providing the resources, roles and processes necessary to fully implement this Policy.

Implementation and update

Maintain, adapt and communicate the Policy to all staff, partners and stakeholders.

Compliance Officer (RGI)

Appoint a full-time Compliance Officer to oversee the implementation of the ABMS.

Regulatory compliance

Observe national laws, adopted ISO standards and sector regulations, always applying the most restrictive norm.

Continuous improvement

Pursue improvement through training, audits, risk assessment and Management Review.

Documentation

Implement procedures, instructions and forms for managing the anti-corruption prevention system.

Public availability

Publish the Policy on the company website and distribute it to business partners and interested stakeholders.

5. CONSEQUENCES OF VIOLATIONS

Staff members who violate this Policy may be subject to disciplinary action and any other legal action necessary to protect the interests of the Belenergia Group. Business partners who violate this Policy will be subject to contractual remedies, including suspension of performance, contract termination, prohibition from conducting business with the Group and claims for damages.

Dott. Jacques Edouard Levy

CEO — Belenergia S.p.A.

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