

Interna  Group

interna[®]

ANTI-CORRUPTION
POLICY
2025

COMMITMENT TO THE PRINCIPLES AND REQUIREMENTS ESTABLISHED BY THE ITALIAN LEGISLATIVE DECREE 231/2001

1. Interna Holding Spa, through this policy, pursues to commit to the principles and requirements established by the Italian Legislative Decree 231/2001.

One of the key factors of the reputation of all the companies belonging to the group Interna is the ability to conduct their work with fairness, correctness, transparency, honesty, and integrity, in compliance with laws and regulations concerning social responsibility.

Interna Holding Spa demonstrates through its actions its full compliance with the laws regarding legality and the prevention of corruption, and promotes transparency and legality in all its relationships with employees, clients, and suppliers.

2. This policy applies to the owners, the directors, and all employees of Interna Holding Spa and constitutes a constant and essential reference for every relationship with clients, suppliers, and public administrations.

3. Interna Holding Spa commitment against corruption prohibits the recipients of this policy from requesting, promising, offering, or receiving gifts, presents, potential or actual benefits from or to internal or external parties to the company, whether they are public officials, people in charge of public services, representatives of public administrations, public or private employees, or private companies whether Italian or foreign, in a manner that would result in illicit conduct or aimed at achieving advantages, including non-economic ones considered significant by law, customs, and common understanding; this also includes facilitation or assurance of obtaining services due in the course of the activities of the company. Each recipient is required to read, understand, and apply the company procedures in compliance with this policy and therefore to act in full compliance with its provisions. Zero tolerance, clear and appropriate procedures, active and leading management, and clearness of communication constitute the framework for defining and maintaining objectives. In adherence to the behavioural standards outlined above, Interna Holding Spa establishes its policy for the prevention of corruption in alignment with the purposes of the context in which it operates and therefore PROHIBITS:

- a. offering, promising, giving, paying, authorizing, or causing someone to give, directly or indirectly, an economic advantage or other benefit to a public official or to a private individual (active corruption).
- b. accepting requests for, or authorizing someone to accept or solicit, directly or indirectly, an economic advantage or other benefits from anyone (passive corruption) when the intention is to:
 - induce a public official or a private individual to improperly perform any function in the exercise of their duties, including in a professional capacity conducted on behalf of third parties, or to perform any other activity in exchange for compensation for having performed it.
 - influence an official act (or an omission) implemented by a public official or any decision in violation of an official duty, even when implemented by private parties.

- influence or compensate a public official or private individual for an act implemented by their office.
- obtain, secure, or maintain an employment relationship or an unjust advantage in connection with business activities or, in any case, violate applicable laws.

With specific reference to its own employees and in accordance with its organizational system based on control and transparency, Interna Holding Spa stipulates that employees who engage in relationships or conduct negotiations with external public or private counterparts may not act independently to:

- enter into contracts or any other economic agreements with the above-mentioned counterparts.
- access financial resources.
- enter into consultancy or professional services agreements.
- grant benefits (gifts, gratuities, perks, etc.)
- hire personnel or promise hires.

Interna Holding Spa complies with and promotes policies consistent with laws and standards of legality for the prevention of corruption and transparency in business relationships, both nationally and internationally. Interna Holding Spa requires all its stakeholders to comply with the anti-corruption laws applicable to their context and to refuse all illegality.

4. Interna Holding Spa promotes its anti-corruption policy to strengthen and consolidate the principles of legality established by the Code of Ethics, requesting the commitment to respect the principles therein from all employees and from all third parties acting on its behalf.

To achieve the objective of corporate governance aimed at ensuring adequate anti-corruption safeguards, Interna Holding S.p.A.:

- prohibits corruption at all levels of its organization and requires its customers and suppliers to respect the anti-corruption laws applicable to it.
- ensures compliance with the anti-corruption laws applicable to its organization.
- encourages the reporting of suspected wrongdoing in good faith, or based on a reasonable, and confidential, belief, without fear of retaliation.
- commits to the continuous improvement of the prevention system.
- establishes the consequences of non-compliance with the anti-corruption policy.

The anti-corruption policy is disseminated within the organization and to business partners who pose a higher risk of corruption.

To promote the achievement of the above-mentioned objectives, Interna Holding Spa is committed to avoid organizational, ethical, and moral uncertainty through:

- a clear definition of its processes.
- a clear identification of corporate roles and functions.
- a clear and transparent system of proxies and powers of attorney.
- a consistent system of rules, values, procedures, and practices based on experience, promoting a clear decision-making process within the organization.
- a consolidated system for the procurement of goods and services that excludes fraudulent suppliers and supplies based on knowledge and periodic verification of qualifications.
- adequate internal control within the organization aimed at the behaviour of all its employees.
- an adequate external control system aimed at the procedures and morality of all suppliers and collaborators of the organization.
- encouraging the reporting of suspicious cases, ensuring the confidentiality of the whistleblower and the consequent absence of any form of retaliation.
- committing to continuously improving processes for the managing and preventing of corruption risks.
- punishing any form of non-compliance with corruption prevention procedures and the contents of this policy.

Company management assumes the functions of supervisory body, ensuring the necessary authority and determination.

Each employee, and in general, each recipient is responsible for achieving the necessary levels of corruption prevention; therefore, it is strongly recommended for it to be an integral part of company management.

Failure to comply with this anti-corruption policy and/or failure to comply with anti-corruption laws will activate the disciplinary system against its employees in line with the applicable National Collective Bargaining Agreement; as for suppliers, this will result in disqualification and subsequent termination of the contract.

6. The anti-corruption policy encourages the reporting of suspicious or anomalous events or events that violate the anti-corruption regulations and/or the requirements of Decree 231.

In confirmation of this, compliance with the following principles is of utmost importance:

- a. encouraging and enabling individuals to report, in good faith or based on reasonable belief, attempted, suspected, or actual acts of corruption, or any violation or shortcomings concerning the anti-corruption management system, to the anti-corruption body (the management).
- b. handling reports confidentially to protect the identity of the whistleblower and of others involved or mentioned in the report, except for what an investigation might require.
- c. allowing anonymous reporting, if sufficiently substantiated.
- d. prohibit retaliation and protect the whistleblower after their report, in good faith or based on reasonable belief, of attempted, actual, or suspected acts of corruption or a violation of the anti-corruption policy.
- e. allows employees to receive support from an appropriate person on what to do or report in the event of suspicious or confirmed finding of corruption.
- f. Interna Holding Spa ensures that all staff members have been informed about the reporting procedures, how to use them, and what their rights and protections are under these procedures.

Tavagnacco, 29th December 2025
The Management of
Interna Holding Spa