

Strategic political anti-bribery guidelines
ISO 37001

SELT S.p.A., which was founded in 2000, bringing together significant expertise in the field of transport and the distribution of energy and telephone networks, today represents one of the major Italian operators active both nationally and internationally, carrying out works related to

- the transmission and distribution of energy*
- the production of energy from renewable sources*
- the development of telecommunications networks*

The organisation's operational base is located in Sardinia, and it is on the island that the desire to network energy and people originated.

Cost competitiveness and reliability in the pursuit of objectives have enabled the company to forge strong links with major multinationals in the Mediterranean region and beyond.

Fully aware that the phenomenon of bribery represents a significant obstacle to the economic, political and social development of a country and a major distortion of the rules, competition and transparency of markets, with particular reference to that involving public works, the senior management of SELT S.p.A intends to formalise the corporate values and ethical commitment made by the Company in this document, to ensure that all activities are carried out according to the highest quality standards, in order to meet the needs and expectations of relevant stakeholders (customers, suppliers, employees, contractors, other stakeholders), in line with the corporate values of fairness, professionalism, transparency and in compliance with regulations.

The Management considers the effective application of an anti-bribery Management System in conformity with ISO 37001 a commitment that involves the entire organisation, and invites the directors, employees and contractors of SELT S.p.A. to comply with the requirements defined therein as far as the competence of each role and task is concerned, also by means of ongoing anti-bribery awareness-raising activities.

In addition to the quality of the work carried out and the services provided, along with the satisfaction of the needs of all relevant stakeholders, the SELT S.p.A. policy identifies bribery prevention as a permanent objective of primary importance. The directors, employees and contractors are committed to pursuing the principles of the ISO 37001 policy with a view to continuous improvement of the system and the performance of the organisation as a whole.

In fulfilling these commitments, the Board of Directors and the Chief Executive Officer of SELT S.p.A. have determined that, in accordance with the Code of Ethics adopted, the Anti-Bribery Policy is based on the following principles:

- an absolute ban on conduct that could amount to bribery or attempted bribery*
- strict compliance with current legislation on preventing and combating bribery, in Italy and in any other country in which the organisation operates, with the participation of all parties involved, i.e. each employee, manager and entity within the company, in addition to shareholders, contractors and all persons operating on behalf of and/or under the control of SELT S.p.A.*
- definition and provision of a framework for identifying, reviewing and achieving anti-bribery objectives*
- defining ways of reporting suspicions in good faith, or on the basis of reasonable and confidential beliefs, without fear of retaliation*
- commitment to the fulfilment of the requirements of the anti-bribery management system and its continuous improvement*
- presence of an anti-bribery compliance department, which is guaranteed full authority and independence*
- combating any conduct that does not comply with the anti-bribery policy*
- awareness-raising among business partners so that they adopt policies and actions to prevent bribery-related phenomena in the activities for which they are specifically responsible, in compliance with legal requirements and consistent with SELT S.p.A.'s objectives*

In the case of a transaction, project, activity or relationship with a business partner regarding which, as a result of due diligence, it is found that bribery risks cannot be addressed by the existing controls, SELT undertakes to take measures appropriate to the bribery risks identified to cease, discontinue, suspend or withdraw from it as soon as practicable.

Both the management body and the administrative body, each according to their respective roles, undertake competences and responsibilities, to implement, support and periodically verify the adequacy of the policy defined, to disseminate it internally and externally to the organisation, to make it publicly available to all relevant stakeholders and to verify the extent to which it is shared, implemented and adapted to the reference context.

Marrubiu, 5 November 2021

*Legal Representative
Mauro B. Ceffa*

A handwritten signature in blue ink, appearing to be "Mauro B. Ceffa", is written over a horizontal line.