

## ANTI-CORRUPTION POLICY OF SOLARIS ITALIA SRL

The management of SOLARIS ITALIA SRL, aware of the negative effects of corrupt practices on economic and social development in the area in which it operates, adopts a firm approach of absolute that prohibits all forms of corruption.

The prevention of corrupt practices is therefore not only a legal obligation, but also one of the principles on which the actions of SOLARIS ITALIA SRL are based.

As a concrete implementation of its commitment in this area, SOLARIS ITALIA SRL, in addition to this Policy, has defined:

- a Code of Ethics that defines the values and principles by which the companies of SOLARIS ITALIA SRL are inspired, and which they undertake to respect when pursuing their mission;
- a Management System for the Prevention of Corruption according to the UNI ISO 37001 standard;

and the intention to initiate the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001;

SOLARIS ITALIA SRL aims to base its operations on correctness, fairness, integrity, loyalty and professional rigour, and therefore prohibits any corruptive behaviour, requires compliance with the law, and undertakes to adopt and enforce the Management System for the Prevention of Corruption, also in order to increase the awareness of all Stakeholders on the rules and behaviour that must be observed.

Personnel, in the performance of their activities, must abide by principles of transparency, clarity, correctness, integrity and fairness; in business relations, conduct and practices that may even appear illegal or collusive, payments that may appear illicit, favouritism, solicitation, direct or indirect, of personal and career advantages for oneself or others are prohibited.

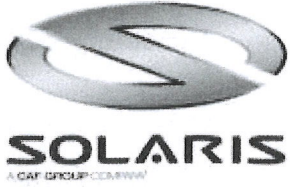
SOLARIS ITALIA SRL is committed to continuously improving its Management System for the Prevention of Corruption and guarantees the authority (defined through the responsibilities attributed to the function and made known to all company staff) and independence (guaranteed by the non-involvement in activities identified as being at risk of corruption) of the compliance function for the prevention of corruption, represented by the Anti-Bribery Responsible.

Those who work in the name and on behalf of each company of the CAF Group to which they belong, are aware that in the event of corrupt behaviour and violation of the law on corruption, they incur offences punishable not only on a penal and administrative level, but also on a company disciplinary level. CAF Group companies therefore require their 'business partners' to comply with the laws in force, the companies' codes of ethics and this Policy, on the basis of clauses whose non-observance implies termination of the contract.

SOLARIS ITALIA SRL, considering the reporting tool effective in combating corruption, encourages reports of alleged corruption through a "whistleblowing" procedure that regulates the management and verification of reports, to guarantee the confidentiality of the content of reports, the identity of the reporter and the reported person, and to protect the reporter from any discrimination or retaliation.

In order to facilitate the achievement of the objectives of this policy, the management of SOLARIS ITALIA SRL undertakes not to generate organisational, ethical and relationship uncertainty, through:

- A clear definition of their processes.
- An unambiguous identification of roles and functions and an effective system of delegation;
- A straightforward system of rules, values, and procedures to facilitate decision-making within the organization.
- Awareness-raising and training of its employees on corruption prevention issues.
- A system for managing the procurement of goods and services that excludes fraudulent suppliers and supplies through periodic monitoring actions for their qualification.
- An adequate internal control system aimed at fostering correct behaviour and regularity of business processes for all the Group's employees, suppliers, and collaborators.



Anti-Corruption Policy  
Rev.01  
22.12.2022

The Management shall disseminate this Policy as widely as possible, ensuring that it is understood and implemented by all employees; to this end, it will be made available on the corporate website.

Rome 22/12/2022

A handwritten signature in blue ink, appearing to be 'J. Iriarte Ibañez'.

**The Chief Executive Officer**  
**Javier Iriarte Ibañez**