

Strategic Political Guidelines for the Prevention of Corruption
UNI ISO 37001

SELT S.p.A., established in 2000 through the integration of extensive expertise in energy transmission, distribution, and telecommunications, is today one of Italy's foremost operators in the design and implementation of infrastructure projects, both nationally and internationally, in the following sectors:

- Energy transmission and distribution*
- Renewable energy generation*
- Development of telecommunications networks*

The Organization's operational headquarters is located in Sardinia, where the vision of connecting energy and people through networks was first conceived.

Cost competitiveness and a strong track record in achieving strategic objectives have enabled the Company to establish solid partnerships with major multinational corporations across the Mediterranean region and beyond.

SELT S.p.A.'s Executive Management, fully aware that corruption poses a serious obstacle to a country's economic, political, and social development—undermining fair competition, transparency, and the proper functioning of markets, particularly in the public works sector—has chosen to formalize in this document the Company's core values and ethical commitment. This initiative aims to ensure that all activities are conducted in accordance with the highest quality standards, in order to meet the needs and expectations of key stakeholders (including clients, suppliers, employees, collaborators, and others), while upholding the Company's principles of integrity, professionalism, transparency, and strict compliance with applicable laws and regulations.

*The Management considers the effective implementation of an Anti-Corruption Management System in accordance with UNI ISO 37001 to be a commitment that involves the entire Organization. It encourages the administrators, employees, and collaborators of SELT S.p.A. to actively engage in **identifying and monitoring risks related to corruption**, raising awareness on anti-corruption issues, and ensuring compliance with the defined requirements, as relevant to each role and responsibility.*

In this context, following the release of the new edition of ISO 37001 and fully aware that corruption undermines the fight against climate change by reducing the effectiveness of mitigation and adaptation policies, the Management of SELT integrates sustainability risk, along with its identification and assessment, into the internal processes established to prevent and counteract the risk of corruption.

The policy of SELT S.p.A., in addition to ensuring the quality of its work and services and meeting the needs of all key stakeholders, identifies the prevention of corruption as a permanent and top priority objective. The administrators, employees, and collaborators are committed to upholding the principles of the ISO 37001 Policy with a focus on the continuous improvement of the System and the overall performance of the Organization.

In line with these commitments, the Board of Directors and the CEO of SELT S.p.A. have determined that the Anti-Corruption Policy, in accordance with the adopted Code of Ethics, will be based on the following principles:

- Absolute prohibition of any behavior that could be considered as corruption or an attempt at corruption;*
- Strict adherence to current legislation on corruption prevention and combating, both in Italy and in any other country where the Organization operates, with the participation of all involved parties, including each employee, manager, governing body, shareholder, collaborators, and all individuals acting on behalf of or under the control of SELT S.p.A.;*
- Definition and provision of a framework to identify, review, and achieve anti-corruption prevention objectives;*
- Establishment of procedures for reporting suspicions in good faith or based on reasonable and confidential beliefs, without fear of retaliation;*
- Commitment to meeting the requirements of the anti-corruption management system and its continuous improvement;*
- Presence of a compliance function for anti-corruption, ensuring full authority and independence;*
- Opposition to any behavior that is not in compliance with the Anti-Corruption Policy*
- Raising awareness among business partners to adopt policies and actions for the prevention of corruption in their areas of responsibility, in compliance with legal requirements and aligned with the objectives of SELT S.p.A.*

In the case of a transaction, project, activity, or relationship with a business partner where due diligence reveals that corruption risks cannot be mitigated by existing controls, SELT is committed to implementing appropriate measures to address the identified corruption risks, including terminating, suspending, or withdrawing from the relationship as soon as possible.

Both the governing body and the administrative body are committed, each within their respective roles, competencies, and responsibilities, to implement, support, and periodically assess the adequacy of the defined Policy. They will also disseminate it internally and externally within the Organization, make it publicly available to all relevant stakeholders, and evaluate its level of understanding, implementation, and alignment with the relevant context.

Marrubiu, April 8, 2025

*The Legal Representative
Mauro B. Ceffa*
