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Anti-Corruption Policy

Approved by the ESG Committee of Aquafil S.p.A.
on 15 September 2023

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1. OBJECTIVES

This policy aims to ensure compliance with current legislation and to provide a systematic reference framework for managing corruption prevention, by defining standards and rules of conduct that all recipients must follow to ensure adherence to Anti-Corruption Laws.

The Aquafil Group (hereinafter "Aquafil"), consisting of Aquafil SpA and its subsidiaries, rejects all forms of corruption, condemning and disapproving of any corrupt behavior and, more generally, any illegal or unethical conduct used to achieve economic goals.

Furthermore, in the fight against corruption, the company aligns its strategy and defines its priorities based also on the results of the periodic double materiality assessment. Aquafil adopts an approach aimed at impact mitigation, risk prevention, and opportunity evaluation.

2. CONTEXT AND REGULATORY FRAMEWORK

In developing its corporate policies, Aquafil has taken into account the following Italian regulations and those of the countries in which it operates:

- the Italian Criminal Code and Civil Code;
- law no. 190/2012 (Anti-Corruption Law);
- legislative Decree 231/2001 on the administrative liability of legal entities;
- anti-corruption laws;
- anti-money laundering laws;
- data protection and privacy laws;
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions;
- United Nations Convention against Corruption;
- U.S. Foreign Corrupt Practices Act (FCPA);
- UK Bribery Act.

Aquafil has also implemented various internal regulatory instruments to ensure that its activities are managed effectively, efficiently, and transparently, and in line with the principles and values expressed in this policy. Among these internal references:

- Code of Ethics;
- Organizational, Management and Control Model pursuant to Legislative Decree 231/2001(Aquafil S.p.A.);
- Quality, Environment and Safety (QAS) Policy;
- ESG Policy;
- Aquafil Group Enterprise Risk Management;
- Aquafil Group Privacy Management and Organizational Model;
- Whistleblowing Procedure;
- Other internal regulatory documents relevant to Aquafil's operational activities.

3. ANTI-CORRUPTION

To ensure compliance with applicable Anti-Corruption Laws, the Company prohibits corruption not only involving Public Officials but also between private individuals.

Corruption is defined as: offering, promising, granting, giving, authorizing, soliciting, inducing, or instigating (so-called active corruption), or accepting a promise or receiving (so-called passive corruption)—directly or indirectly and regardless of location—money, valuables, or other benefits with the intent to obtain an undue advantage of any kind (including non-financial ones), as an incentive or reward for a person to perform, omit, delay, or accelerate an act in connection with their duties, in violation of Anti-Corruption Laws.

<u>Definition of Public Official or Person Charged with a Public Service:</u>

a) anyone who exercises a public legislative, judicial, or administrative function;

b) anyone acting in an official capacity for or on behalf of:

- a national, regional, or local public administration;
- an agency, office, or body of the European Union or any national or foreign public authority;
- a company owned, controlled, or participated in by a public authority (national or foreign);
- an international public organization, such as the European Bank for Reconstruction and Development, the World Bank, the International Monetary Fund, the United Nations, or the World Trade Organization;
- a political party, party member, or candidate for public office (Italian or foreign).

c) anyone charged with a public service—meaning those who perform a public function under legal provisions but without the powers typical of public officials.

Under Anti-Corruption Laws, and especially case law interpretations, representatives of local communities are also treated as Public Officials.

Anti-Corruption Laws:

- prohibit payments made directly or indirectly—including payments made to any person with the knowledge that they will be passed on to a Public Official or private individual—as well as offers or promises of payments or other benefits made with corrupt intent. The Company and/or its Personnel may be held liable for offers or payments made by any third party acting on behalf of the Company in the course of business if the Company and/or its Personnel knew or reasonably should have known that such payments were improper;
- require companies to maintain accurate books, records, and accounts that, in reasonable detail, truthfully reflect operations, expenditures (even those not considered "material" in accounting terms), acquisitions, and disposals of assets, Inaccuracies in financial reporting—even for non-corrupt payments—can constitute violations. False records may also result in tax and other legal liabilities.

Consequences of Non-Compliance with Anti-Corruption Laws:

Individuals and legal entities violating Anti-Corruption Laws may be subject to severe penalties. Individuals may face imprisonment or other sanctions. Legal consequences may also include disqualification from contracting with public entities, confiscation of criminal proceeds, or claims for damages. Such behavior can severely damage the reputation of the Company and the Group.
As a result, the Company may not indemnify its personnel from liabilities arising under Anti-Corruption Laws.

4. SCOPE OF APPLICATION

The ethical principles, values, and behavioral rules set out in this policy must guide the conduct of all individuals operating within or outside the scope of Aquafil's activities (hereinafter, the "Recipients").

The dissemination of this policy serves as an opportunity to raise awareness and meet the expectations of all stakeholders (shareholders, employees, customers, suppliers, investors, savers, etc.) with respect to ethics and anti-corruption practices. It also supports the implementation of monitoring activities needed to ensure respect for human rights throughout Aquafil's processes and operations.

The main initiatives related to all anti-corruption measures are defined by Aquafil's Chief Executive Officer and ESG Committee, which approves this policy and any revisions thereof.

Specifically, the following are considered Recipients of this policy:

- **members of the Board of Directors**, who are guided by the principles of this document when setting corporate objectives;
- **members of supervisory and control bodies**, who ensure compliance with the contents of the policy in the exercise of their functions;
- **managers**, who give substance to the values and principles contained in the policy, taking on responsibilities both internally and externally;
- **employees**, who, in accordance with current laws, align their actions and behaviors with the principles, objectives, and commitments outlined in the policy;
- **collaborators** operating on a continuous basis (e.g., consultants, agents), who are expected to act in accordance with the guiding principles of the policy;
- **registered suppliers**;
- **customers** with an active contract.

All Recipients are responsible, within the scope of their roles, for complying with this policy. In particular, all actions, operations, negotiations, and behaviors carried out by Recipients during their professional activities must reflect the principles and values expressed in this policy and be subject to audits and inspections in accordance with applicable laws and internal procedures.

Moreover, individuals with supervisory and coordination responsibilities must ensure compliance with this policy by their collaborators and adopt appropriate measures to prevent, identify, and report any potential violations.

5. FUNDAMENTAL PRINCIPLES

Aquafil strictly prohibits any form of corrupt practice, including unlawful favors, collusive behavior, and the solicitation—directly or through third parties—of personal or career-related advantages, for oneself or others.

First and foremost, it is forbidden to offer, promise, or provide anything of value to any individual—including Public Officials—with the intent to improperly obtain or retain business, or to secure an unfair advantage in conducting business operations. This includes payments made to gain new contracts, retain existing ones, expedite the processing of official documents (such as customs or environmental certifications), or improperly influence any party.

Secondly, it is strictly prohibited to accept payments or anything of value in connection with conduct that violates the principles outlined in this policy, in the Code of Ethics, or in applicable procedures and laws.

Aquafil must also maintain accurate, precise, and up-to-date books and accounting records: all operations must be properly recorded and supported by reasonably detailed documentation. Even unintentional omissions or inaccuracies in accounting—regardless of corrupt intent—constitute violations of this policy. False entries may lead to tax liabilities and other legal consequences.

These values represent the behavioral standard expected of all Aquafil employees and collaborators.

6. SENSITIVE AREAS

Aquafil As part of its risk assessment process, Aquafil has identified the following **Sensitive Areas:**

- issuance of authorizations and licenses, and submission of documentation and certifications to Public Authorities;
- gifts and representation expenses;
- events and sponsorships;
- donations and membership fees;
- procurement of goods and services;
- consultancies, intermediations, and relationships with Business Partners;
- joint ventures, acquisitions, and disposals.

6.1 Issuance of Authorizations and Licenses, and Submission of Documentation and Certifications to Public Authorities

In activities related to the request and issuance of authorizations, licenses, and permits—even when conducted through third parties—the following rules must be observed:

- all contracts involving Public Authorities, as well as all formal acts, requests, and communications addressed to them, must be managed and signed only by individuals with appropriate powers according to internal regulations;
- all interactions between Aquafil and Public Authorities must be transparent, documented, and verifiable;
- all documents, statements, and information submitted by Aquafil to obtain authorizations or permits must be complete and truthful.

6.2 Gifts and Representation Expenses

Without prejudice to the general prohibition of unduly influencing relationships with Third Parties in relation to Aquafil's business, any gifts and representation expenses (including meals, travel, or entertainment) offered to Public Officials or Private Individuals must, under all circumstances:

a. be related to legitimate business purposes;

b. be reasonable and made in good faith;
c. comply with applicable regulations and internal procedures, including the specific authorization process;
d. be properly recorded and supported by appropriate documentation, and may never consist of cash payments.

The same criteria apply to gifts and representation expenses (including meals, travel, or entertainment) offered by Third Parties to Aquafil employees or corporate officers.

Limits regarding the value and type of such expenses, as well as reporting procedures, are defined by internal policies and must be consistent with the provisions of the Code of Ethics.

6.3 Events and Sponsorships

Since events and sponsorships may potentially be used for corrupt practices, they must have a genuine connection to business purposes. All initiatives must follow principles of reasonableness and good faith, and comply with internal authorization procedures, registration and documentation obligations, and applicable financial limits.

6.4 Donations and Membership Fees

Donations may carry the risk that funds or valuable assets are diverted for the personal benefit of Public Officials or Private Individuals.

All donations must therefore comply with internal procedures and meet the following minimum standards:
They may only be made to entities with proven reliability and a reputation for integrity and ethical practices;
The authorization process must include a detailed description of the nature and purpose of the donation and verification of its legitimacy under applicable laws;
A validation process for the recipient entity must be in place;
Donations must be included in a budget based on criteria of appropriateness and reasonableness, and approved according to the internal authorization process.

6.5 Procurement of Goods and Services

The procurement process must comply with Aquafil's governance system, internal procedures, and organizational processes, and must be based on the following principles:

- Clear separation of roles and involvement of distinct individuals in different phases of the process;
- Cost-effectiveness, efficiency, and fairness in offer evaluation, including through benchmarking where appropriate;
- Transparency, competition, and equal treatment during the selection and validation of counterparties;
- Use of technical, economic, and ethical criteria in supplier selection;
- Overall evaluation of suppliers (vendor rating);
- Subcontracting must be authorized by the competent procurement function.

6.6 Consultancies, Intermediations, and Relationships with Business Partners

The selection of consultants (including agents, brokers, intermediaries, and Business Partners) must follow internal procedures and include appropriate due diligence to verify the counterparty’s reliability.

Before assigning a role, Aquafil ensures that the third party meets adequate technical/professional, ethical, and organizational standards. Any subcontracting must be subject to prior authorization by Aquafil.

6.7 Joint Ventures, Acquisitions, and Disposal

Joint ventures, acquisitions (including mergers), and disposals must be carried out in full compliance with internal procedures. Whenever an acquisition takes place, a plan must be implemented to ensure compliance with this policy as an essential part of the post-acquisition integration process.

6.8 Recruitment, Hiring, and Personnel Management

The recruitment, hiring, and employment process includes all activities necessary to establish and manage the working relationship between an individual and Aquafil. These activities may involve corruption risks or the potential for undue influence on third parties through the individual concerned.

All recruitment, hiring, and personnel management processes must comply with company procedures and applicable laws. Specifically, reputational checks and conflict of interest assessments must be conducted during the hiring phase. During the employment relationship, full compliance with applicable regulations is required, especially regarding remuneration and the definition/assignment of incentive systems.

For roles within Aquafil that, based on the risk assessment, are associated with more than a low risk of corruption, the Company implements enhanced anti-corruption controls, including:

- Periodic updates of conflict-of-interest evaluations, both potential and actual, including personal relationships with Public Officials;
- Acknowledgement and understanding of the Code of Ethics, the Organizational Model pursuant to Legislative Decree 231, and this policy by senior management and individuals who may represent Aquafil in dealings with third parties;
- Participation in targeted training programs or initiatives.

7. INFORMATION, TRAINING, AND MONITORING

This policy is distributed to all stakeholders through dedicated communications. In addition, Aquafil is committed to promoting the dissemination of its contents through specifically designed training activities and to monitoring their actual implementation via surveys and audits.

Aquafil fosters the respect of fundamental principles of honesty and moral integrity within its supply chain as well, and promotes training programs aimed at reaching the entire company population. These programs include both Top Management and individuals under their supervision and direction, with a particular focus on new hires, who are provided with appropriate training based on an evaluation of their roles and responsibilities.

8. POLICY APPROVAL AND REVIEW

Review	Description	Date	Approved by
1.0	Added definition of corruption	01/09/2024	CEO
2.0	Reference to double materiality	10/07/2025	ESG Committee

(1) managers who are beneficiaries of the Remuneration Policy as approved in due time by the Shareholders' Meeting.

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