

“INTEGRITY CHECK” GUIDELINES

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REVISIONS

REV.1 2017		
REV.2 2020	June	Simplification of the operation of periodic checks; extension of regulation application to the so-called Technical Partners; review of regulatory implementation in the procurement area.
REV. November 2022	3	Organisational reference update; clarification on regulatory application also to Developers and Counterparties in development and real estate transactions; review of regulatory application on vendors of goods and services.
REV. 4 2024	October	Introduction of the use of the GRC platform - 'integrity check' module; merging of annexes; deepening of the definition of counterparties to which the reputational assessment process does not apply; introduction "light" reputational assessment for counterparties with low reputational risk; supply of goods and provision of services: introduction of value range between 20 K€ and 50 K€ (light assessment); update Privacy Policy.
REV. 5, 2025	June	Update with the introduction of references to ISO 37001:2025

1. FOREWORD

The importance of reputation in the current economic scenario urges a reflection on the need for adequate counterparty risk management.

In a dynamic scenario characterised by extensive interactions with various parties, there are many company processes that require careful counterparty risk management, with different risk elements that vary according to the organisation's sector of operation, characteristics and functioning.

These Guidelines are therefore intended to provide support to the competent functions of Edison S.p.A. (hereinafter also the "Company") and/or the companies belonging to the Group (hereinafter also the "Group") in the process of assessing the reputations of their respective counterparties, in order to identify any threats and elements of risk, which represent a factor that is increasingly essential not only to protecting a company's reputation but also to its very survival.

These Guidelines are also developed in view of the control safeguards indicated in the Organisation, Management and Control Model adopted by Edison S.p.A. and its subsidiaries pursuant to Legislative Decree 231/01 (hereinafter also the "231 Model") and the regulatory *requirements* of ISO 37001:2025 and the related Corruption Prevention Management System.

These Guidelines are integrated into the Anti-Corruption Guidelines, the Group's Code of Ethics and company rules and procedures.

THE GROUP'S ANTI-CORRUPTION GUIDELINES

The Anti-Corruption Guidelines emphasise the Group's commitment to maximizing the professional ethics of its Associates and external counterparties, including through the adoption of internal policies and the creation and maintenance of an Integrated Management System in compliance with UNI EN ISO 37001:2025, that aim to guarantee – both at the national and international level – full and unconditional compliance with relevant regulations in the conduct of company activities.

All Associates of Edison S.p.A. and its subsidiaries are therefore required to comply with Italian laws and those in force in the foreign countries where they operate in addition to always (and in all cases) complying with the provisions of the Group's Code of Ethics, the protocols of the Organizational Model adopted by the Group companies for which they operate, and the provisions of the UNI EN ISO 37001:2025 standard, specifically regarding the principles and precautions pertaining to the prevention of corruption. The principles set out in the Anti-Corruption Guidelines shall also be observed by external counterparties - such as business associates, industrial or commercial partners, suppliers, subcontractors, service providers, joint-venture or grouping partners, agents/agencies/business brokers and all external counterparties to which the Group may resort to as part of its activities - to which the Anti-Corruption Guidelines shall be disseminated in the manner set out therein.

The Anti-Corruption Guidelines state that "The constant commitment provided by Edison S.p.A. and its subsidiaries to date has been expressed through the adoption and constant updating of the Code of Ethics, which defines the values and principles of conduct for the attainment of company purposes and objectives. In addition, Italian companies have adopted and periodically update an Organisational Model pursuant to the Legislative Decree. 231/01, through which the company assessed potential risk profiles for the commission of crimes of corruption, including corruption

between private parties, and implemented effective control measures. The Edison Group is committed to promoting the adoption of the Anti-Corruption Guidelines also in companies in which it holds a non-controlling interest, including foreign companies, which are required to implement an internal control system in line with anti-corruption principles".

THE GROUP CODE OF ETHICS

The Group's Code of Ethics is applicable to Edison S.p.A. and its subsidiaries and is valid both in Italy and abroad, taking into account the cultural, social and economic diversity of the various countries in which Edison operates.

In the section dedicated to "**Relations with partners**" the Code of Ethics states that "*In developing these initiatives, all Edison Associates must comply with the Ethical Principles expressed in this Code. In particular, they must:*

- *establish relationships only with partners or fellow shareholders who have an unblemished reputation, engage only in lawful activities and are guided by Principles of Ethics that are comparable with those adopted by Edison;*
- *ascertain that the joint venture or investee company operates in a manner consistent with this Code of Ethics;*
- *ensure that no partner is granted unjustifiably favourable treatment of their contribution (...)*".

In addition, in the section on "**Relations with Other External Parties**" the Code states that it is essential "*to select only counterparties with adequate professional qualifications and reputations*".

Finally, it should be noted that Edison S.p.A. has adhered to the Global Compact as of the year 2005, undertaking to respect ten principles pertaining to human rights, the protection of labour and the environment as well as the fight against corruption in all its forms, including extortion and bribery, thereby re-confirming its commitment to support the application of these principles and supplying evidence of its progress.

2. PURPOSE AND SCOPE OF APPLICATION OF THE GUIDELINES

Within the framework of the broader overall process of selecting Counterparties, these Guidelines set out operational and organisational rules of conduct providing detail on the process of assessing the integrity of the Counterparties with which Edison S.p.A. and its subsidiaries have business relationships of a commercial and professional nature, without prejudice to operations and controls of another nature provided for in internal rules and regulations on counterparty selection and conduct of relations with counterparties (such as due diligence, counterparty risk assessment, etc.).

These Guidelines apply to all Divisions / Departments / BUs / Functions of Edison S.p.A. and its subsidiaries that operate in Italy and abroad (hereinafter the "Addressees").

In accordance with the respective company authority and partnership constraints, the contents of this document governing companies subject to unbundling legislation, associated companies, and joint ventures represent a possible methodological reference potentially to be adopted and implemented internally.

3. DEFINITION OF A COUNTERPARTY

The term “Counterparty” used in this document refers to the following:

1. Sponsorships, partners and gratuities;
2. Project Partners: JVs, Consortia, Temporary Associations, Acquisitions, Disposals;
3. Intermediaries – business brokers – sales agencies – technical partners – developers;
4. Commodity Suppliers¹;
5. Consultants;
6. Suppliers of goods and services;
7. Counterparties in development and real estate transactions.

4. GENERAL REQUIREMENTS

All Addressees involved in identifying and assessing the Counterparties with which a business relationship is to be formed must ensure that the Counterparties in question meet the integrity requirements relating to corruption, money-laundering, financing for terrorism, organized crime, antitrust and human rights, as set out below.

5. ROLES AND RESPONSIBILITIES

For each category of Counterparty, a Function with Control Responsibility is designated for the integrity check and the other parties at Edison S.p.A. and/or its subsidiaries involved in the process in various capacities are identified.

More specifically:

- **Functions with Control Responsibility:** all company functions indicated in Annex 1 that, for each category of Counterparty, are responsible for: i) performing the integrity check; ii) ensuring the traceability of the control; and iii) storing the supporting documentation collected and/or produced;
- **Compliance Focal Point:** identified by Internal Communication 01/24 of 10 January 2024, on the indication of those responsible for implementing the 231 Model (see note 2 below), they support the Functions with Control Responsibility in verification activities and report to

¹ This category also includes counterparties relating to the purchase and sale of energy, fuel, environmental certificates and derivatives for business or risk hedging purposes.

the 231 Compliance & Ethics Function on all situations that have shown anomalies or critical factors;

- **Division Managers** of Edison S.p.A.: in their capacity as parties responsible for implementing the 231 Model², they are responsible for monitoring the effective performance of the integrity check on Counterparties and, in the event of critical situations, terminating the contractual relationship with them;
- **231 Compliance & Ethics Function:** responsible for:
 - providing technical support relating to the application of these Guidelines, where requested;
 - providing advice to the Division Manager to support the decision-making process in the event of critical issues detected during integrity checks, involving the Internal Audit Manager and the Ethics & Compliance Officer in advance in the most critical cases.
- **Ethics & Compliance Officer / Head of Internal Audit, Privacy & Ethics Department:** informed by the Functions in charge of Control in the event of critical issues detected during integrity checks.
- **Compliance Function for the Prevention of Corruption (CFPC)** identified in the heads of the *Internal Audit, Privacy & Ethics* Department and the *Legal & Corporate Affairs* Division: informed by the Functions Responsible for Control in the event of critical issues found in the field of corruption during the integrity checks.
- **GRC platform:** the Edison Group management platform aimed at automating the processes defined by the Edison Group Compliance Governance Model, in order to harmonise and standardise the various Compliance management processes.

The term "**criticality**" refers to the elements of attention detected by the internal process of verification and assessment of individual counterparties, such as, but not limited to, the presence of pending or final criminal proceedings, pending charges, adverse media, politically exposed persons (PEP), international sanctions, administrative sanctions and similar situations, as highlighted and outlined in the forms in use in these Guidelines (Annexes 3.1, 3.2, 3.3 and 3.4 depending on the type of Counterparty).

² The heads of the following Divisions and Departments have been identified as the acting persons responsible for implementing Model 231: Internal Audit, Privacy & Ethics; Sustainability; Power Asset; Engineering; Gas Assets; Gas & Power Portfolio Management & Optimization; Gas & Power Market; Energy & Environmental Services Market; Finance; Legal & Corporate Affairs; Human Resources & ICT; Strategy, Corporate Dev. & Innovation; Institutional Affairs, Regulatory & Climate Change; External Relations & Communication. The Vice President of the Edison Foundation has likewise been identified as responsible for implementing the Model. For the purposes of the application of these Guidelines, the responsibilities assigned to those responsible for implementing the 231 Model of Edison S.p.A. are also extended to the legal representatives of the Italian and international subsidiaries, to the Management of the EOS Edison Orizzonte Sociale Foundation, and to the Independent Manager of the company Edison Stoccaggio Spa, in accordance with their independence and unbundling legislation.

6. DOCUMENT ARCHIVING

The Functions Responsible for Control (Annex 1) guarantee the traceability of all the checks carried out and are responsible for archiving all the documentation produced and analysed in the GRC platform (also through archiving within the management systems connected to the GRC platform, used by the Divisions/Departments Responsible for Control, such as - by way of example - the DIMP module used by the Procurement Department, the SDV Sales Force Portal used, where applicable, by the Retail Sales & Customer Solutions Department and the INTECK application adopted by the Market Design, Compliance & Business Support Department of the Gas & Power Portfolio Management & Optimisation Division).

The 231 Compliance & Ethics Function of Edison S.p.A. is guaranteed the possibility and the right to access the archived documentation for the purpose of supervising the verification activities carried out.

Counterparties whose ongoing, preventive or periodic reputational verification has already been previously archived (within the GRC platform or the management system in use by a Function with Control Responsibility), shall not be re-verified by other Control Functions responsible for initiating new business relations with the counterparties in question.

7. PROCESS FOR PERFORMING A COUNTERPARTY INTEGRITY CHECK

Integrity checks are to be considered complementary to the verification, approval, authorization and monitoring rules already established in the specific 231 procedures or protocols adopted by Edison and its various subsidiaries.

Before signing an agreement with a Counterparty³, a reputational reliability check must be carried out on the Counterparty by the Functions Responsible for Control (Annex 1), which includes:

- Compliance database screening and additional integrity searches.
- Self-certification by the Counterparty (Annexes 3.1, 3.2, 3.3 and 3.4 depending on the type of Counterparty)

All the documentation relating to the audit carried out with an indication of its positive or negative outcome must be filed within the GRC platform, also by means of archiving on the relevant management systems in use, by the Functions Responsible for Control (Annex 1).

The verification must be repeated periodically on an annual basis, as further detailed below, and the relevant documentation must be archived in the GRC platform.

³ In the context of audits of counterparties in development transactions, these may be carried out after the conclusion of the preliminary agreement, which must, however, provide for an appropriate formula conditioning the effectiveness of the contract on the successful outcome of the audit. Upon signing the preliminary agreement, it is advisable to obtain at least the simultaneous signing of the self-certification by the right holder concerned, as per Annexes 3.1, 3.2 and 3.4

The reputational reliability checks do not apply, in the opinion and under the responsibility of the Functions in charge of Control (Annex 1), to Counterparties whose institutional role (by way of example but not limited to Universities/Public Research Bodies, Trade Associations, Confindustria Bodies and Companies, Bodies in which Edison is represented on the Governing Bodies, Credit Institutions/Banks, Insurance Companies, Consumer Associations of the CNCU - National Council of Consumers and Users) and/or whose positive notoriety and national and/or international relevance reasonably allow the integrity of such Counterparties to be considered in the public domain and to exclude a reputational risk deriving from having relations with them.

On the GRC Platform, the Control Manager who assessed the exclusion requirements from the Counterparty assessment must indicate the excluded Counterparty for the benefit of other Control Managers.

In case of doubt as to the requirements for exclusion of the reputational assessment, the Head of Control issues a request for an opinion to the 231 Compliance & Ethics Function.

For counterparties such as local public bodies (Regions, Provinces, Municipalities, etc.), and private cultural and social welfare bodies of national importance (e.g. Think Tank, Foundations, Associations, Cultural Circles, etc.), the reputational verification is carried out through the Screening of the compliance database and further Integrity Search (white list, internet search, consultation of public information). The documentation proving the positive or negative outcome of the assessment will be filed by the Controller in the GRC platform.

All contracts must include a clause to the effect that failure to send or receive the documentation requested by the Company, duly completed and signed, and/or the submission of documentation, including the self-certification, containing false data, will entitle the Company to exercise the right to withdraw from the Contract, with immediate effect, without any penalty, and to take all actions to protect its interests.

In addition, the Company, reserves the right, subject to notification, to request any further documents in addition to, or in replacement of, those indicated and/or to modify the frequency with which the Undertaking will be required to send them.

In consideration of the nature of the data required by the Integrity Check process, the Function with Control Responsibility (Annex 1) must transmit to the counterparty together with the self-certification (Annexes 3.1, 3.2, 3.3 and 3.4 depending on the type of Counterparty) the Privacy Policy (Annex 2 and Annex 2INT for foreign counterparties).

The integrity check (preventive or periodic) process for each type of Counterparty is described below.

7.1 SPONSORSHIP PARTNERS AND CHARITABLE CONTRIBUTIONS

The integrity check must be performed in advance for all parties (natural and legal persons) that the Company intends to sponsor or award a charitable contribution and involves the **preventive controls** illustrated below.

Overview table:

Type of Transactions	Checks
Sponsorships/Charitable contributions of 20 thousand euros or less	<ol style="list-style-type: none"> 1. Counterparty self-certification (Annex 3.3) 2. Any additional integrity searches: white lists, Internet searches, consultation of public information 3. Archiving
Sponsorships/Charitable contributions of 20 thousand euros or more	<ol style="list-style-type: none"> 1. Compliance database screening 2. Counterparty self-certification (Annex 3.3) 3. Any additional integrity searches: white lists, Internet searches, consultation of public information 4. Archiving

➤ *Transactions of 20 thousand euros or less*

For transactions of 20 thousand euros or less, the Function with Control Responsibility (Annex 1), with the operational support of the Compliance Focal Point:

- a) sends the Counterparty the Counterparty Self-Certification form (Annex 3.3 together with Annex 2), aimed at certifying the established reputational reliability requirements, to the Counterparty so that it is duly signed;
- b) verifies the receipt of the signed self-certification;
- c) where there are critical elements in the signed self-certification, the Functions with Control Responsibility reports to the Division Manager, who decides, in consultation with the 231 Compliance & Ethics Function and, in the event of critical issues found in the field of corruption, the CFPC, whether to continue with the process of formalizing the contractual relationship, justifying the decision in writing, or whether to suspend the relationship with the counterparty and perform additional controls (*Compliance database screening and Internet search*⁴);
- d) archives on the GRC platform the documentation supporting the audit conducted with an indication of the outcome.

⁴ "Internet search" means verification of the presence of news articles mentioning the Counterparty using the main search engines (e.g., Google, Bing).

Solely where critical factors are identified will a courtesy copy of the documentation be sent to the Sponsorships, Contributions and Charitable Donations Steering Committee, along with the documentation in support of the transaction.

➤ *Transactions of 20 thousand euros or more*

In cases of transactions of 20 thousand euros or more, the Function with Control Responsibility (Annex 1), with the support of the Compliance Focal Point:

- a) performs the verifications using the compliance database;
- b) sends the Counterparty the Counterparty Self-Certification Form (Annex 3.3 together with Annex 2) for completion and signature;
- c) performs any additional integrity search verifications, such as Internet searches, consultation of public information and verification of the requested documentation sent by the Counterparty;
- d) if the outcome, with respect to the analyses carried out, highlights critical issues, sends all the documentation to the attention of the Division Manager who verifies the content and decides, after hearing the opinion of the 231 Compliance & Ethics Function (with the prior involvement of the Head of the Internal Audit, Privacy & Ethics Department, of the CFPC - in the event of critical issues found in the field of corruption - and the Ethics & Compliance Officer in cases of greater criticality), whether or not to terminate the relationship with the counterparty. If the Division Manager, in consultation with the 231 Compliance & Ethics Function, concludes that, despite the critical factors identified in the verifications, the Company may continue with the process of formalising the contractual relationship with the Counterparty concerned, they prepare a summary note explaining the reasons for this conclusion. This note is appended to all documentation attesting to the verifications performed;
- e) archives on the GRC platform all the documentation collected and produced in support of the audit conducted, with an indication of the outcome.

The documentation will be sent for information, only in the event of critical issues arising, to the Sponsorship-Contributions-Donations-Guidance Committee, the Head of the 231 Compliance & Ethics Function, the Ethics & Compliance Officer in the event of critical issues found in the field of corruption to the Compliance Function for the Prevention of Corruption and to the Head of the Internal Audit, Privacy & Ethics Department together with the documentation supporting the transaction.

7.2 PROJECT PARTNERS⁵: JVS, CONSORTIA, TEMPORARY ASSOCIATIONS (ATI), ACQUISITIONS, DISPOSALS;

Accordingly, integrity checks must be carried out for all *Project Partners* **both prior** to the formation of the relationship and **periodically** with annual frequency.

Overview table:

Type of Check	Checks
Preventive	<ol style="list-style-type: none"> 1. Compliance database screening 2. Counterparty self-certification (Annex 3.1 or 3.2 or 3.4) 3. Any additional integrity searches: white lists, Internet searches⁴, consultation of public information 4. Archiving
Periodic (annual)	<ol style="list-style-type: none"> 1. Compliance database screening 2. Any additional integrity searches: white lists, Internet searches⁴, consultation of public information 3. Archiving

Preventive check

The Function with Control Responsibility (Annex 1), with the support of the Compliance Focal Point:

- a) performs the verifications using the compliance database;
- b) sends the Counterparty the Counterparty Self-Certification Form (Annex 3.1 or 3.2 or 3.4 together with Annex 2) for completion and signature;
- c) performs any additional integrity search verifications, such as control of the white list of the competent Prefecture, Internet searches⁴, consultation of public information and verification of the requested documentation sent by the Counterparty;
- d) if the outcome, with respect to the analyses carried out, highlights critical issues, sends all the documentation to the attention of the Division Manager who verifies the content and decides, after hearing the opinion of the 231 Compliance & Ethics Function (with the prior involvement of the Head of the Internal Audit, Privacy & Ethics Department, of the FCPC - in the event of critical issues found in the field of corruption - and the Ethics & Compliance Officer in cases of greater criticality), whether or not to terminate the relationship with the counterparty. If the Division Manager, in consultation with the 231 Compliance & Ethics Function, concludes that, despite the critical factors identified in the verifications, the

⁵ *Project Partners* are those partners with whom Edison Group companies may enter into relationships to establish JVs, Consortia, ATIs or relationships aimed at M&A projects, including any SPV or Company that is to be acquired if different from the M&A project partner. This category also includes LNG and CNG customers for whom the plant is supplied in addition to the supply of commodities managed by the Business Market Division of Edison Energia SpA, customers for whom - through the Energy & Environmental Services Market Division - ESCo and Tolling projects with a duration of at least five years or environmental services with a duration of at least 12 months are carried out, customers who are counterparties to agreements subject to the prior approval of Edison's Investment Commitments Committee pursuant to Edison's G.N. 01/20, and commercial partners of the Gas & Power Market Division.

Company may continue with the process of formalizing the contractual relationship with the Counterparty concerned, they prepare a summary note explaining the reasons for this conclusion. This note is appended to all documentation attesting to the verifications performed;

- e) stores all the documentation collected and produced in support of the verification performed on the GRC platform.

The documentation will be sent for information, only in the event of critical issues arising, to the Commitments and Investments Committee, to the Head of Function 231 Compliance & Ethics, the Ethics & Compliance Officer, the Compliance Function for the Prevention of Corruption - in the event of critical issues found in the field of corruption -, and the Head of the Internal Audit, Privacy & Ethics Department, together with the documentation supporting the transaction.

Periodic check

The Function with Control Responsibility (Annex 1), with the support of the Compliance Focal Point, monitors Project Partners with annual controls through the compliance database and other additional integrity searches, as described in the overview table set out above, and archives on the GRC platform all the documentation supporting the verification performed collected and produced with indication of the outcome.

7.3 INTERMEDIARIES – BUSINESS BROKERS – SALES AGENCIES⁶ – TECHNICAL PARTNERS⁷– DEVELOPERS⁸

Reputational reliability checks must be carried out for all Intermediaries, Business Brokers, Sales Agencies (and their sub-agencies/sub-agents), Technical Partners (and their subcontractors) and Developers **both prior** to the formation of the relationship and **periodically** with annual frequency.

Overview table:

Type of Check	Checks
Preventive	<ol style="list-style-type: none"> 1. Compliance database screening 2. Counterparty self-certification (Annex 3.1 or 3.2 or 3.4) including criminal record and certificate of pending charges of legal representative and sub-agents/subcontractors⁹ 3. Any additional integrity searches: Internet searches⁴, consultation of public information 4. Archiving
Periodic (annual)	<ol style="list-style-type: none"> 1. Compliance database screening 5. Counterparty self-certification (Annex 3.1 or 3.2 or 3.4) including criminal record and certificate of pending charges of legal representative and sub-agents/subcontractors⁹ 2. Any additional integrity searches: Internet searches⁴, consultation of public information 3. Archiving

Preventive check

The Function with Control Responsibility (Annex 1), with the support of the Compliance Focal Point:

- a) performs the verifications using the compliance database;
- b) sends the Counterparty the Counterparty Self-Certification Form (Annex 3.1 or 3.2 or 3.4 together with Annex 2) for completion and signature, including the Criminal Records and the certificate of Pending Charges of the legal representative and sub-agents/subcontractors;

⁶ This category also includes call centres that provide outbound teleselling services.

⁷ “Technical Partners” (natural persons and/or companies) include, for example, the network of installers, maintenance personnel and tradesmen that have a formal service agreement in force with Edison Energia SpA.

⁸ Developers are understood to be those third parties who, by virtue of contractual agreements, provide the technical-consultancy support requested by Edison (or other Group companies) in order to identify new business opportunities (e.g. through scouting activities and the preparation of feasibility studies for the construction of new energy plants from renewable sources or relating to the possible acquisition of third-party plants that have already been built) and to obtain the necessary authorisation permits for the construction of new energy plants from renewable sources.

⁹ In view of the nature of the data requested (e.g. judicial data), please note the need to provide appropriate privacy information to the counterparty (Annex 2).

- c) performs any additional integrity search verifications, such as Internet searches⁴, consultation of public information and verification of the requested documentation sent by the Counterparty;
- d) if the outcome, with respect to the analyses carried out, highlights critical issues, sends all the documentation to the attention of the Division Manager who verifies the content and decides, after hearing the opinion of the 231 Compliance & Ethics Function (with the prior involvement of the Head of the Internal Audit, Privacy & Ethics Department, of the CFPC - in the event of critical issues found in the field of corruption - and the Ethics & Compliance Officer in cases of greater criticality), whether or not to terminate the relationship with the counterparty. If the Division Manager, in consultation with the Ethics & 231 Compliance Function, concludes that, despite the critical factors identified in the verifications, the Company may continue with the process of formalising the contractual relationship with the Counterparty concerned, they prepare a summary note explaining the reasons for this conclusion. This note is appended to all documentation attesting to the verifications performed;
- e) archives on the GRC platform all the documentation collected and produced in support of the audit conducted, with an indication of the outcome.

The documentation will be sent for information, only in the event of critical issues arising, to the Head of Function 231 Compliance & Ethics, the Ethics & Compliance Officer, the Compliance Function for the Prevention of Corruption - in the event of critical issues found in the field of corruption -, and the Head of the Internal Audit, Privacy & Ethics Department, together with the documentation supporting the transaction.

Periodic check

The Function with Control Responsibility (Annex 1), with the support of the Compliance Focal Point annually:

- a) sends the Counterparty the Counterparty Self-Certification Form (Annex 3.1 or 3.2 or 3.4 together with Annex 2) for completion and signature, including the Criminal Records and the certificate of Pending Charges of the legal representative and sub-agents/subcontractors;
- b) performs verifications through the compliance database and additional integrity search verifications, such as Internet searches⁴, consultation of public information and verification of the requested documentation sent by the Counterparty;
- c) archives on the GRC platform all the documentation collected and produced in support of the audit conducted, with an indication of the outcome.

7.4 COMMODITY SUPPLIERS¹⁰

Integrity checks are considered complementary to the verification, approval, authorization and monitoring rules already set out in the existing Counterparty Risk Policies and Procedures.

Integrity checks must be carried out for all Commodity Suppliers **both prior** to the formation of the relationship **and periodically** with annual frequency.

Overview table:

Type of Check	Checks
Preventive	<ol style="list-style-type: none"> 1. Compliance database screening 2. Counterparty self-certification (Annex 3.1 or 3.2 or 3.4) 3. Any additional integrity searches: Internet searches ⁴, consultation of public information 4. Archiving
Periodic (annual)	<ol style="list-style-type: none"> 1. Compliance database screening 2. Any additional integrity searches: white lists, Internet searches ⁴, consultation of public information 3. Archiving

Preventive check

The Function with Control Responsibility (Annex 1), with the support of the Compliance Focal Point:

- a) performs the verifications using the compliance database;
- b) sends the Counterparty the Counterparty Self-Certification Form (Annex 3.1 or 3.2 or 3.4 together with Annex 2) for completion and signature;
- c) performs any additional integrity search verifications, such as Internet searches⁴, consultation of public information and verification of the requested documentation sent by the Counterparty;
- d) if the outcome, with respect to the analyses carried out, highlights critical issues, sends all the documentation to the attention of the Division Manager who verifies the content and decides, after hearing the opinion of the 231 Compliance & Ethics Function (with the prior involvement of the Head of the Internal Audit, Privacy & Ethics Department, of the CFPC - in the event of critical issues found in the field of corruption - and the Ethics & Compliance Officer in cases of greater criticality), whether or not to terminate the relationship with the counterparty. If the Division Manager, in consultation with the 231 Compliance & Ethics Function, concludes that, despite the critical factors identified in the verifications, the Company may continue with the process of formalising the contractual relationship with the Counterparty concerned, they prepare a summary note explaining the reasons for this

¹⁰ This category also includes counterparties relating to the purchase and sale of energy, fuel, environmental certificates and derivatives for business or risk hedging purposes.

conclusion. This note is appended to all documentation attesting to the verifications performed;

- e) archives on the GRC platform in the manner described in paragraph 6 "Archiving", all the documentation collected and produced in support of the verification performed and the related outcome.

Only in the event of critical issues arising, the aforementioned documentation shall be forwarded for information to the Head of Function 231 Compliance & Ethics, the Ethics & Compliance Officer, the Compliance Function for the Prevention of Corruption - in the event of critical issues found in the field of corruption - and the Head of Internal Audit, Privacy & Ethics, together with further documentation - if any - supporting the transaction.

Periodic check

The Function with Control Responsibility (Annex 1), with the support of the Compliance Focal Point, monitors the Commodity Suppliers with annual checks through the compliance database and any Integrity searches, as described in the summary table above and archives, on the GRC platform according to the methods provided, all the documentation collected and produced in support of the audit conducted as well as the related outcome.

7.5 CONSULTANTS¹¹

Integrity checks must be performed for all Consultants with which the Company intends to form/maintain a contractual relationship and involve **preventive and periodic controls**, annually.

The main types of consultants with which the Company and its subsidiaries interface are:

- A. Strategic¹²;
- B. Specialist Consultants for studies, analyses, simulations and proposals in various areas¹³;
- C. Professional¹⁴;
- D. Consultancy functional to managing relationship and authorisation processes¹⁵.

Overview table:

Type of Check	Checks
Preventive	<ol style="list-style-type: none">1. Compliance database screening2. Counterparty self-certification (Annex 3.1 or 3.2 or 3.4)3. Any additional integrity searches: Internet searches⁴, consultation of public information4. Archiving
Periodic (annual)	<ol style="list-style-type: none">1. Compliance database screening2. Any additional integrity searches: white lists, Internet searches⁴, consultation of public information3. Archiving

Preventive check

¹¹ Integrity checks relating to legal assistance, counsel and representation are managed directly by the Legal & Corporate Affairs Division. In particular, these Guidelines do not apply to lawyers admitted to the Bar Association subject to ongoing integrity checks in accordance with the legal principles applying to the legal profession (<https://www.consiglionazionaleforense.it/codice-deontologico-forense>). The same principles apply at the international level.

¹² Strategic Consultants are to be understood as including, without limitation, consultants in the areas of general, industrial and commercial business models, organizational and management development models, ICT system and network architecture, corporate / brand identity or offering strategy and company positioning, scouting and search for M&A opportunities and re-engineering of key processes.

¹³ Specialist Consultants are to be understood as including, without limitation, specialist consultants in the areas of studies, analyses and proposals relating to administrative, accounting, financial, insurance and IT matters, market analyses and research, ICT risk and security, business and compliance process assessment, legal and financial matters relating to M&A transactions, due diligence, impairment testing, design and/or measurement of the impacts of advertising initiatives, internal or external communications and company events.

¹⁴ Professional Consultants are to be understood as including, without limitation, consultants responsible for specific activities assigned to persons registered in professional registers for the conduct of activities that require their use, such as legal, tax and corporate opinions, technical and legal appraisals, accounting, studies and certifications of projects and technical activities, environment, safety and quality audits and certifications, etc.

¹⁵ Consultants responsible for relationship processes are to be understood as including, without limitation, consultants responsible for specific relationship activities, assigned to third parties for the representation of company interests, with the aim of supporting processes designed to obtain Authorizations, Permits and Concessions, in Italy and abroad, as well as relating to the company's positioning with respect to stakeholders.

The Function with Control Responsibility (Annex 1), with the support of the Compliance Focal Point:

- a) performs the verifications using the compliance database;
- b) sends the Counterparty the Counterparty Self-Certification Form (Annex 3.1 or 3.2 or 3.4 together with Annex 2) for completion and signature;
- c) performs any additional integrity search verifications, such as Internet searches, consultation of public information and verification of the requested documentation sent by the Counterparty;
- d) if the outcome, with respect to the analyses carried out, highlights critical issues, sends all the documentation to the attention of the Division Manager who verifies the content and decides, after hearing the opinion of the 231 Compliance & Ethics Function (with the prior involvement of the Head of the Internal Audit, Privacy & Ethics Department, of the CFPC - in the event of critical issues found in the field of corruption - and the Ethics & Compliance Officer in cases of greater criticality), whether or not to terminate the relationship with the counterparty. If the Division Manager, in consultation with the 231 Compliance & Ethics Function, concludes that, despite the critical factors identified in the verifications, the Company may continue with the process of formalizing the contractual relationship with the Counterparty concerned, they prepare a summary note explaining the reasons for this conclusion. This note is appended to all documentation attesting to the verifications performed;
- e) archives on the GRC platform all the documentation collected and produced in support of the audit conducted, with an indication of the outcome.

The documentation will be sent for information, only in the event of critical issues arising, to the Audit and Ethics Committee of Edison S.p.A. – Committee Consultancy session – the Head of Function 231 Compliance & Ethics, the Ethics & Compliance Officer, the Compliance Function for the Prevention of Corruption - in the event of critical issues found in the field of corruption -, and the Head of the Internal Audit, Privacy & Ethics Department, together with the documentation supporting the transaction.

Periodic check

The Function with Control Responsibility (Annex 1), with the support of the Compliance Focal Point, monitors consultants with annual controls through the compliance database and other additional integrity searches, as described in the overview table set out above, and archives on the GRC platform all the documentation supporting the verification performed collected and produced with indication of the outcome.

7.6 SUPPLIERS OF GOODS AND SERVICES

In general, integrity checks must be performed for all Vendors of goods and services with which the Company intends to form/maintain a contractual relationship and involve **preventive and periodic controls**, annually, differentiated for vendors of goods and vendors of services.

Exceptionally, reputational reliability checks do not apply if they relate to the following cases:

- a) procurements subject to the Procurement Code (for which the controls specifically prescribed by the Code apply);
- b) orders of less than 20,000 euros (on an annual basis with non-recurring suppliers).

For vendors of goods and/or services for orders of more than 20,000 euros and less than 50,000 euros (on an annual basis with non-recurring suppliers), preventive and periodic (annual) reputational reliability checks consist of screening through the compliance database and further Integrity Search with archiving of documentation on the GRC platform (via the DIMP module or the SDV Sales Force Portal).

Type of Check	Supplier type	Checks
Preventive	Vendors of goods and services > 50 K€	<ol style="list-style-type: none"> 1. Compliance database screening 2. Counterparty self-certification (Annex 3.1 or 3.2 or 3.4) 3. Any additional integrity searches: white lists, Internet searches⁴, consultation of public information 4. Archiving on GRC platform via DIMP Module or SDV Sales Force Portal
Periodic (annual)	Vendors of goods and services > 50 K€	<ol style="list-style-type: none"> 1. Compliance database screening 2. Any additional integrity searches: white lists, Internet searches⁴, consultation of public information 3. Archiving on GRC platform via DIMP Module or SDV Sales Force Portal

Overview table:

Preventive Control Transactions > 50 K€

The Function with Control Responsibility (Annex 1):

- a) performs the verifications using the compliance database;

- b) sends, through the “Supplier Qualification” Portal (for management and customer support Partners via the SDV Sales Force Portal), to the Counterparty Self-Certification form (Annex 3.1 or 3.2 or 3.4 together with Annex 2), aimed at certifying the established reputational reliability requirements, in order for it to be duly signed;
- c) performs any additional integrity search verifications, such as white lists, Internet searches, consultation of public information and verification of the requested documentation sent by the Counterparty;
- d) verifies receipt of the signed Counterparty Self-Certification and in the event of the absence of the signed self-certification and/or critical issues worthy of further investigation, reports to the “Supplier Qualification Team” (for Management and Customer Service Partners to the Head of the Retail Sales & Customer Solutions Department) which decides, after consulting the 231 Compliance & Ethics Function (with the prior involvement of the Head of the Internal Audit, Privacy & Ethics Department and the Ethics & Compliance Officer in the most critical cases), whether to continue with the formalisation process of the contractual relationship, justifying the decision in writing, or whether to terminate the relationship with the counterparty or possibly carry out further checks;
- e) stores on the GRC platform via DIMP Module or SDV Sales Force Portal the documentation supporting the audit conducted with indication of the outcome.

The documentation will be sent for information, only in the event of critical issues arising, to the Head of Function 231 Compliance & Ethics, the Ethics & Compliance Officer, the Compliance Function for the Prevention of Corruption - in the event of critical issues found in the field of corruption -, and the Head of the Internal Audit, Privacy & Ethics Department, together with the documentation supporting the transaction.

In cases where exceptionally, for reasons of absolute urgency, purchases have to be managed through phases different from the standard process, and regularised through the SAP system after the activation of the supplier, due to the fact that the relevant services have already been provided or are in progress, the responsibility for Integrity Checks lies with the organisational unit that requested the service in advance. The Procurement Department and the Retail Sales & Customer Solutions Department reserve the right to check that these controls are actually carried out.

Periodic Control Transactions > 50 K€

The Function with Control Responsibility (Annex 1) monitors vendors of goods and services with which the Company has ongoing relationships, with annual controls through the compliance database and other additional integrity searches, as described in the overview table set out above, and archives on the GRC platform via the DIMP Module or SDV Sales Force Portal all the collected and produced documentation in support of the verification performed with indication of the outcome.

In the event of circumstances not expressly provided for in these Guidelines that give rise to interpretation and/or application doubts or that require exceptions to the application of the Guidelines, the Addressees may request advance guidance from the 231 Compliance & Ethics Function of Edison S.p.A. and, if necessary, in the event of critical issues in the field of corruption, to the Compliance Function for the Prevention of Corruption.

7.7 COUNTERPARTIES IN DEVELOPMENT¹⁶ AND REAL ESTATE TRANSACTIONS¹⁷

Reputational reliability checks must be carried out for counterparties in development and real estate transactions **both prior**¹⁸ to the establishment of the contractual relationship and **periodically** on an annual basis¹⁹.

Overview table:

Type of Check	Checks
Preventive	<ol style="list-style-type: none"> 1. Compliance database screening 2. Counterparty self-certification (Annex 3.1 or 3.2 or 3.4) or certificate of the legal representative/right holder's pending charges²⁰ 3. Any additional integrity searches: Internet searches⁴, consultation of public information 4. Archiving
Periodic (annual)	<ol style="list-style-type: none"> 1. Compliance database screening 2. Counterparty self-certification (Annex 3.1 or 3.2 or 3.4) 3. Any additional integrity searches: Internet searches⁴, consultation of public information 4. Archiving

Preventive check

The Function with Control Responsibility (Annex 1), with the support of the Compliance Focal Point:

- a) performs the verifications using the compliance database;
- b) sends the Counterparty the Counterparty Self-Certification Form (Annexes 3.1 or 3.2 or 3.4 together with Annex 2) to be completed and signed, or requests the certificate of the legal representative/right holder's Pending Charges;

¹⁶ Counterparties in development transactions are understood to be natural and legal persons (excluding public administration bodies) holding property or surface rights (excluding real rights of easement and short-term leases functional to "servant"/building sites) to the land/property on which the energy plant will be located, with which agreements of significant value are entered into, i.e. the amount of which exceeds 100,000 euros (contractual, one-off or annual total).

¹⁷ Counterparties in real estate transactions are defined as natural and legal persons (excluding Public Administration entities) with whom it is intended to enter into agreements of significant value, i.e. the amount of which exceeds 100,000 euros (contractual, one-off or annual total), for the acquisition/disposal or lease (active or passive) of real estate managed directly or indirectly by the Real Estate & Environmental Remediation Function (pursuant to the "Protocol for the Management of Real Estate Assets" to which reference should be made for details).

¹⁸ In the context of audits of counterparties in development transactions, these may be carried out after the conclusion of the preliminary agreement, which must, however, provide for an appropriate formula conditioning the effectiveness of the contract on the successful outcome of the audit. Upon signing the preliminary agreement, it is advisable to obtain at least the simultaneous signing of the self-certification by the right holder concerned, as per Annexes 3.1, 3.2 and 3.4

¹⁹ Only where the contractual relationship is multi-year and where, in the course of that contractual relationship, a change in the economic operator's corporate structure and/or beneficial owner is ascertained or duly notified.

²⁰ In view of the nature of the data requested (e.g. judicial data), please note the need to provide appropriate privacy information to the counterparty (Annex 2).

- c) performs any additional integrity search verifications, such as Internet searches⁴, consultation of public information and verification of the requested documentation sent by the Counterparty;
- d) if the outcome, with respect to the analyses carried out, highlights critical issues, sends all the documentation to the attention of the Division Manager who verifies the content and decides, after hearing the opinion of the 231 Compliance & Ethics Function (with the prior involvement of the Head of the Internal Audit, Privacy & Ethics Department, of the CFPC - in the event of critical issues found in the field of corruption - and the Ethics & Compliance Officer in cases of greater criticality), whether or not to terminate the relationship with the counterparty. If the Division Manager, in consultation with the 231 Compliance & Ethics Function, concludes that, despite the critical factors identified in the verifications, the Company may continue with the process of formalising the contractual relationship with the Counterparty concerned, they prepare a summary note explaining the reasons for this conclusion. This note is appended to all documentation attesting to the verifications performed;
- e) archives on the GRC platform all the documentation collected and produced in support of the audit conducted, with an indication of the outcome.

The documentation will be sent for information, only in the event of critical issues arising, to the Head of Function 231 Compliance & Ethics, the Ethics & Compliance Officer, the Compliance Function for the Prevention of Corruption - in the event of critical issues found in the field of corruption -, and the Head of the Internal Audit, Privacy & Ethics Department, together with the documentation supporting the transaction.

Periodic check

The Function with Control Responsibility (Annex 1), with the support of the Compliance Focal Point annually:

- a) performs verifications through the compliance database and additional integrity search verifications, such as Internet searches⁴, consultation of public information and verification of the requested documentation sent by the Counterparty;
- b) sends the Counterparty the Counterparty Self-Certification Form (Annex 3.1 or 3.2 or 3.4 together with Annex 2) for completion and signature;
- c) archives on the GRC platform all the documentation collected and produced in support of the audit conducted, with an indication of the outcome;
- d) if the outcome, with respect to the analyses carried out, shows criticalities, refer to the procedure envisaged in the preventive control phase.

8. REPORTING VIOLATIONS

In order to ensure that these Guidelines are fully effective, whenever an addressee becomes aware of behaviour that may be indicative of conduct not in accordance with the principles of the Guidelines, or that may otherwise constitute a breach of the principles of the Code of Ethics, Organizational Model or Protocols, and therefore concisely referenced in this document, they must immediately report it to the Oversight Board set out in the Organizational Model, in the manner indicated therein.

The Oversight Board will assess the report received and carry out all necessary inquiries, including with support from the HR Department, upon the conclusion of the preliminary phase, and, where breaches of these Guidelines are identified, will formally notify the Board of Directors so that the resulting necessary measures may be taken.

In particular, in the event of breaches of these guidelines by the “Addressees” of the document, the penalties set out in the 231 Organizational Model will apply, adjusted for the party that has committed the breach and the severity of the breach. In the event of breaches by “third parties” – i.e. those subject to integrity checks – the Company reserves the right to terminate the contract or – in the precontractual phase – not to enter into the contract, particularly in cases of false, untruthful or incomplete declarations in questionnaires and self-certifications, in addition to cases of failure to satisfy the required integrity requirements.

For Group companies that are not subject to Italian law and thus to the provisions of Legislative Decree 231/01 and that are therefore without an organisational model, the report must also be submitted to the Company’s control body or (in the absence of such a body), to its governing body, or to the direct hierarchical superior, in the manner indicated in the relevant disciplinary system.

Moreover, the Compliance Focal Points are required to report every six months to the 231 Compliance & Ethics Function of Edison S.p.A. and, in the event of critical issues in the area of corruption, to the Compliance Function for the Prevention of Corruption, all situations in which the reputational reliability checks have revealed anomalies.

Annex 1 – Functions with Control Responsibility

<u>Type of Counterparty</u>	<u>Function with Control Responsibility</u> ²¹	<u>Party responsible for approval (in case of critical issues)</u> ²²	<u>Committees</u>
<u>Sponsorship Partners and charitable contributions</u>	<u>Proposing Department/Function</u>	<u>Division Manager</u> ²³	<u>Sponsorship, Contributions and Charitable Donations Steering Committee.</u>
<u>Project Partners: JVs, Consortia, Temporary Associations, Acquisitions, Disposals</u>	<u>Proposing Department/Function</u>	<u>Division Manager</u>	<u>Commitments and Investments Committee</u>
<u>Intermediaries – business brokers – sales agencies – technical partners – developers</u>	<u>Proposing Department/Function</u>	<u>Division Manager</u>	
<u>Commodity Suppliers</u> ²⁴	<u>Proposing Department/Function</u>	<u>Division Manager</u>	<u>Risk Committee</u>
<u>Consultants</u> ²⁵	<u>Procurement Department, activated by the proposing Division/Department/Function</u>	<u>Division Manager</u>	<u>Advisory Committee</u>
<u>Suppliers of goods and services</u>	<u>Procurement Department</u> ²⁶	<u>Manager of the Procurement Department</u>	<u>Supplier Qualification Team</u>
<u>Counterparties in development and real estate transactions</u>	<u>Compliance Function transversal processes of the power asset division for development operations</u> <u>Real Estate Function of the Legal & Corporate Affairs Division for real estate transactions</u>	<u>Division Manager</u>	

²¹ All the Functions with Control Responsibility in the table operate with the support of the Compliance Focal Point.

²² In the event of critical issues identified during the verification of the Counterparty's reputational reliability, the involvement of the 231 Compliance & Ethics Function and of the Compliance Function for the Prevention of Corruption is also envisaged according to the methods indicated in these Guidelines.

²³ See note 22.

²⁴ This category also includes counterparties relating to the purchase and sale of energy, fuel, environmental certificates and derivatives for business or risk hedging purposes.

²⁵ Integrity checks relating to legal assistance, counsel and representation are managed directly by the Legal & Corporate Affairs Division.

²⁶ For the category of service providers such as labour agencies the function responsible for control is the Human Resources & Organisation Department, for the category of Service Providers such as Customer Management & Support Service Partners the function responsible for control is the Retail Sales & Customer Solutions Department.

ANNEX 2 - PRIVACY POLICY

- Annex 2 - Privacy Policy (Italian)
- Annex 2INT - Privacy Policy (English)

Annex 2 - Information on the processing of personal data pursuant to Articles 13 and 14 of Reg. 2016/679

Edison S.p.A. ("Edison") and the companies of the Edison Group inform that, pursuant to articles 13 and 14 of the European General Data Protection Regulation No. 2016/679 ("Regulation" or "GDPR") and of Italian Legislative Decree 196/2003 and subsequent amendments (Privacy Code), the personal data provided by you, relating to the Purposes of processing referred to in point 4, shall be processed in compliance with the provisions of the Regulation for the purposes set forth below.

1. **Source of data**

The personal data subject to processing are collected by the Controller either directly from the data subject or from the data subject's organisational structures (e.g. employer, etc.) during the contractualisation phases, or through digital databases.

2. **Addressees**

This Policy applies to counterparties subject to the reputational assessment process and in particular to natural persons (senior figures, members of corporate bodies, employees or collaborators, etc.) of the counterparty, including:

- Suppliers / candidate suppliers (including but not limited to commodity suppliers, consultants, suppliers of goods and services, etc.);
- Partners in sponsorship;
- Project Partners (JVs, Consortia, ATI, Acquisitions, Disposals);
- Intermediaries – business brokers – sales agencies – technical partners – developers;
- Counterparties in development and real estate transactions.

In the text that follows the aforesaid persons shall be referred to as "**Data Subject/s**".

3. **Type of data processed**

The data to be processed will be: personal data (personal details, contact details), data relating to criminal convictions (criminal record, pending charges), identification data (photographic images).

4. **Purposes, legal basis for Processing and data retention period**

The personal data collected will be processed for the purposes listed below:

A) **Processing purposes, the legal basis of which lies in the legitimate interest of the data controller:**

1. For the qualification and evaluation of the moral integrity of data subjects.
2. For transfer to other controllers in the case of prior due diligence transactions and for any subsequent sale of business units or Group companies to other companies outside the Edison Group

The provision of personal data for this purpose, including the photographic image, is compulsory and refusal will result in the impossibility of entering into the contract and the execution or continuation thereof.

For the different types of processing, a specific data retention period has been defined for the above-mentioned purposes of 10 years from the date of the last data update (in the event of non-contractualisation) and from the date of termination of the contract.

5. Methods of Processing

In relation to the above-mentioned purposes, the data will be processed both through IT and telecommunication tools and on paper media, both with telematic methods and in any case through tools suitable for guaranteeing their security, confidentiality, integrity and availability through the adoption of adequate security measures, as prescribed by the Regulation.

6. Categories of recipients of the data

Your personal data may be disclosed - within the limits of the above- to persons authorised and duly instructed by the Data Controller or Data Processors referred to in point 8, or to employees in charge of relations with the data subjects referred to in point 2, except as provided by law.

7. Dissemination of data

Without your specific authorisation, your personal data shall not in any way be disseminated outside the company perimeter and/or published on the company website, except as provided for by the law.

8. Data Controller and Data Processors

The Data Controller, i.e. the entity that determines the purposes of the processing, is Edison S.p.A. or the companies of the Edison Group with which negotiations and/or contractual relations are in progress. The Data Processors, i.e. the subjects who carry out the processing on behalf of the Data Controller, are the service providers appointed as such pursuant to Regulation 2016/679 by the Data Controller itself.

9. Data Protection Officer

This figure, envisaged by the regulation to protect the rights of data subjects, has been identified by Edison S.p.A; the DPO contact details are given in point 10.

10. Exercise of rights

Pursuant to Reg. 2016/679, Data Subjects are entitled to access their data, in particular to obtain at any time confirmation as to whether or not data concerning them exist and to be informed of their content, source and geographical location and to request a copy.

They are also entitled to verify the accuracy or request the integration, update, rectification, restriction of Processing, erasure, anonymisation or blocking of data processed in breach of the law, and to object to their processing. It should be noted that the objection to processing for the purposes described in point 4, exercised by automated means, also extends to traditional means, without prejudice, however, to the right to exercise this right only in part. Furthermore, Data Subjects are entitled to request data portability and to file complaints to the supervisory authority.

Data subjects may exercise their rights by writing to the attention of the Data Protection Officer (DPO) via:

- ordinary e-mail: privacy@edison.it

- Certified electronic mail: privacy.gruppoedison@pec.edison.it.
- Regular mail: DPO c/o Edison SpA, Foro Buonaparte 31, 20121 Milan

Annex 2INT - Privacy policy pursuant to articles 13 and 14 Reg. (EU) 2016/679

Edison Spa (“Edison”) and companies of Edison Group inform that, pursuant to Articles 13 and 14 of the European Regulation on Data Protection, n 2016/279 (“Regulation” or “GDPR” *General Data Protection Regulation*), and to Italian Legislative Decree 196/03 (“Privacy Code”) and subsequent modifications and additions, the personal data provided by the subjects indicated below in this text, with regard to the purposes of Processing under point 4 below, will be processed in compliance with the provisions set forth in the Regulation.

1. Source of data

The personal data subject to the processing are collected by the Data controller either directly from the Data Subjects or from the Data Subject’s organizational structures (e.g. employer, etc.) during the contract-preparation stages, and through digital databases.

2. Recipients of the privacy policy

This privacy policy applies to counterparties subject to the reputational assessment process and in particular to natural persons (top management figures, members of corporate bodies, employees or collaborators, etc.) of the counterparty, including:

- Suppliers/ candidate suppliers (including without limitation: commodity suppliers, consultants, suppliers of goods and services);
- Sponsorship partners;
- Project partners (JV, Consortia, ATI, Acquisitions, Disposals);
- Intermediaries, Brokers, Sales Agencies, Technical Partners, Developers;
- Counterparties in development operations and real estate transactions

In the following part of the privacy policy, the above-mentioned subjects are referred to as “**Data subjects**” of the processing of personal data.

3. Categories of data processed

Data subject to processing are: personal data (biographical and contact details), data relating to criminal convictions (criminal records, pending charges), identification data (photographic images).

4. Purposes, legal basis of Processing and data retention period

The personal data collected will be processed for the following purposes:

i) Purposes of processing, whose legal basis is the Controller’s legitimate interest:

- To qualify and assess the moral integrity of data Subjects;
- To transfer to other Data Controllers in the event of preventive due diligence operations and for any subsequent transfer of business units or companies of the Group to other companies outside Edison Group

For the above-mentioned purposes, the provision of personal data, including photographic images, is mandatory and refusal will result in the inability to enter into the contract and to execute or continue it.

For the above-mentioned purposes, each category of processing will be subject will be subject to a specific **data retention period** of 10 years since the date of the acquisition or update of above-mentioned data. If a contractual arrangement has been implemented, the “data retention period” start from the termination of the contract.

5. Processing methods

Regarding the above-mentioned purposes, data will be either digitized (IT and telecommunications tools) or processed on hard copy; in any case adequate tools will be used to guarantee safety, confidentiality, integrity and availability of the same data according to the requirements under the Regulation.

6. Categories of Recipients of the personal Data

Your personal data may be disclosed – within the limits stated above - to the authorized persons who have been properly instructed by the Controller or the Data Processors (point 8), or the employees responsible for dealing with the Data Subjects (point 2), except as otherwise provided by law.

7. Dissemination of data

Your personal Data will not be disclosed without your specific consent, except as otherwise provided by law.

8. Data Controller and Data Processor

The Data Controllers, namely the subjects determining the purposes of processing, are Edison S.p.A. and other Group companies, with whom data subjects are willing to negotiate a contract or already have a contractual arrangement.

The Data Processors, namely the subjects processing data on behalf of the Data Controller, are Edison Group companies as well as service providers who have been appointed by the Data Controller pursuant to Regulation 2016/679.

9. Data Protection Officer

The Data Protection Officer, who shall ensure the rights of data subjects pursuant to the Regulation, has been chosen to be a common reference point for all companies which are managed, coordinated or controlled by Edison S.p.A. or by other companies within its corporate scope. The contact details of the DPO can be found below in this note (article 10).

10. Exercise of rights

Pursuant to Regulation 2016/679, You shall be granted in any moment full access to your personal data, receive confirmation of their existence, have full knowledge of their content, origin, location, and you shall be able to request a copy.

Furthermore, you have the right to verify their accuracy, or to have incomplete personal data completed, updated or rectified; to the restriction, erasure, transformation into anonymous form of processed data, as well as to the erasure if personal data have

unlawfully been processed or to object to their processing. You shall also have the right to data portability and to lodge a complaint to a supervisory Authority.

It should be noted that objection to the processing related to the purposes under point 4, which is exercised through automated methods, also extends to traditional methods, without prejudice to the right to exercise the right only partially. In addition, you have the right to request data portability, and to lodge complaints with the supervisory authority.

You can exercise your rights by contacting the Data Protection Officer (DPO) at the following contacts:

- Certified e-mail: privacy@edison.it
- Ordinary e-mail: privacy.gruppoedison@pec.edison.it.

Mail address: DPO c/o Edison S.p.A., Foro Buonaparte 31, 20121 Milano

ANNEX 3 — COUNTERPARTY SELF-CERTIFICATIONS

- Annex 3.1 - Counterparty Self-Certification (Legal Persons)
- Annex 3.2 - Counterparty Self-Certification (Natural Persons)
- Annex 3.3 - Counterparty Self-Certification (sponsorships, contributions and donations)
- Annex 3.4 - International Foreign Supplier Declaration

Annex 3.1 - Counterparty Self-Certification (Legal Persons)

DECLARATION IN LIEU OF CERTIFICATION

(Art. 46, paragraph 1, Presidential Decree 28 December 2000 n. 445)

The _____ (name _____ and _____ surname) _____ born _____ in _____ Prov. _____ on _____ residing in _____ street/square _____ no. _____ as legal representative of the Company* _____ with registered office in _____ tax code _____ VAT no. _____

aware

of the criminal and administrative sanctions provided for in Article 76 of Presidential Decree 445/2000 in the event of false and/or reticent declarations, as well as in the event of the use and/or exhibition of false documents or documents containing untrue data,

HEREBY DECLARES THAT

under own responsibility

(PLEASE TICK THE BOXES BELOW ON "YES" OR "NO")

 Y NO

to have criminal convictions that have become final and/or to be the addressee of measures concerning the application of security and prevention measures (pursuant to Legislative Decree no. 159 of 2011) entered in the criminal record in accordance with the legislation in force and specifically (in the event of a positive answer, please provide details);

 Y NO

to be aware to be subject to criminal proceedings, namely (in the event of a positive answer, please provide details);

 Y NO

to be the entity it represents is subject to judicial orders applying administrative sanctions pursuant to Legislative Decree no. 231 of 2001, even if only as a precautionary measure and, specifically, that (in the event of a positive answer, please provide details);

 Y NO

to be aware that the entity it represents is subject to criminal proceedings pursuant to Legislative Decree No. 231 of 2001 and, specifically, to (in the event of a positive answer, please provide details);

*** In the case of a single Legal Representative of groups of Commodity Supply Companies, a single Self-certification may be issued indicating the companies represented**

 Y NO

that the entity it represents is in a state of bankruptcy and/or that it has applied for composition and, specifically, that (in the event of a positive answer, please provide details);

 Y NO

that there are no grounds for prohibition, disqualification or suspension provided for in Article 67 of Legislative Decree No. 159 of 2011 and subsequent amendments and additions and that there are causes of exclusion provided for by Articles 94 and 95 of Legislative Decree no. 36 of 2023 and subsequent amendments and, precisely, that (in the event of a positive answer, please provide details);

- Y NO to be subject to international sanctions and, specifically, to (in the event of a positive answer, please provide details);
- Y NO that in the corporate structure or in the control bodies, there are representatives of government offices or PEP (Politically Exposed Persons);
- Y NO that situations of conflict of interest exist on the part of members of the Board of Directors and/or shareholders of the company
- Y NO any anti-corruption certifications obtained, if any please indicate which ones;
- Y NO any actions taken in the fight against corruption, if any please indicate which ones.

and to be aware of the national legislation in force regarding the fight against corruption and money laundering, as well as regarding the fight against terrorism, and to undertake to comply with the provisions contained in said legislation, as well as to be aware of the Anti-Corruption Guidelines adopted by the Edison Group as part of the Management System for the Prevention of Corruption pursuant to the UNI ISO 37001:2025 Standard;

The undersigned also undertakes:

- to refrain from offering or promising money, goods or other benefits, directly or indirectly, to third parties, whether public or private, in connection with the services and activities covered by the contract between the parties;
- to promptly notify Edison and its subsidiaries of the occurrence of any conditions of impediment that may arise after the signing of this self-declaration (such as, for example, the notification of notices of indictment, etc.).

Making untrue statements and failure to comply with the commitments undertaken herein shall entitle the commissioning company to exercise its right to withdraw from the contract, as well as to take the appropriate legal steps to protect own interests.

Place and Date _____

Legible signature of declarant _____

- ANNEX:**
- **PHOTOCOPY OF THE DECLARANT'S IDENTITY CARD**
 - **CHAMBER OF COMMERCE CERTIFICATE**
 - **WHITE LIST WHERE PRESENT**

Annex 3.2 - Counterparty Self-Certification (Natural Persons)

DECLARATION IN LIEU OF CERTIFICATION

(Art. 46, paragraph 1, Presidential Decree 28 December 2000 n. 445)

The _____ undersigned _____ (name _____ and _____ surname)
_____ born _____ in _____
_____ Prov. _____ on _____ residing _____
in _____ street/square _____
_____ no. _____ tax code _____
aware

of the criminal and administrative sanctions provided for in Article 76 of Presidential Decree 445/2000 in the event of false and/or reticent declarations, as well as in the event of the use and/or exhibition of false documents or documents containing untrue data,

HEREBY DECLARES THAT

under own responsibility

(PLEASE TICK THE BOXES BELOW ON "YES" OR "NO")

Y NO

to have criminal convictions that have become final and/or to be the addressee of measures concerning the application of security and prevention measures (pursuant to Legislative Decree no. 159 of 2011) entered in the criminal record in accordance with the legislation in force and specifically (in the event of a positive answer, please provide details);

Y NO

to be aware to be subject to criminal proceedings, namely (in the event of a positive answer, please provide details);

Y NO

that there are no grounds for prohibition, disqualification or suspension provided for in Article 67 of Legislative Decree No. 159 of 2011 and subsequent amendments and additions and that there are causes of exclusion provided for by Articles 94 and 95 of Legislative Decree no. 36 of 2023 and subsequent amendments and, precisely, that (in the event of a positive answer, please provide details);

Y NO

to be subject to international sanctions and, specifically, to (in the event of a positive answer, please provide details);

Y NO

to be a PEP (Politically Exposed Person);

Y NO

that there is a conflict of interest with Edison and its subsidiaries on own part and/or on the part of family members;

and to be aware of the national legislation in force regarding the fight against corruption and money laundering, as well as regarding the fight against terrorism, and to undertake to comply with the provisions contained in said legislation, as well as to be aware of the Anti-Corruption Guidelines adopted by the Edison Group as part of the Management System for the Prevention of Corruption pursuant to the UNI ISO 37001:2025 Standard;

The undersigned also undertakes:

- to refrain from offering or promising money, goods or other benefits, directly or indirectly, to third parties, whether public or private, in connection with the services and activities covered by the contract between the parties;
- to promptly notify Edison and its subsidiaries of the occurrence of any conditions of impediment that may arise after the signing of this self-declaration (such as, for example, the notification of notices of indictment, etc.).

Making untrue statements and failure to comply with the commitments undertaken herein shall entitle the commissioning company to exercise its right to withdraw from the contract, as well as to take the appropriate legal steps to protect own interests.

Place and Date _____

Legible signature of declarant _____

ANNEX

- PHOTOCOPY OF THE DECLARANT'S IDENTITY CARD

Annex 3.3 - Counterparty Self-Certification (sponsorships, contributions and donations)

DECLARATION IN LIEU OF CERTIFICATION

(Art. 46 Presidential Decree 445 of 28 December 2000)

The undersigned _____
(name and surname)

born in _____ (_____) on _____
(place) (prov.)

residing in _____ (_____) Street/Square _____
(place) (prov.) e

as _____ of _____ the
(position) Company/Entity/
Non-profit Organisation

with registered _____ Via/Piazza _____
office in

with reference to the _____
sponsorship _____
contract/request for _____
contribution or donation:

Aware

of the criminal and administrative sanctions provided for in Article 76 of Presidential Decree 445/2000 in the event of false and/or reticent declarations, as well as in the event of the use and/or exhibition of false documents or documents containing untrue data,

HEREBY DECLARES THAT under own responsibility

that, with regard to the execution of the sponsorship contract/request for contributions or donations referred to above:

- there are no situations of conflict of interest between them and the company _____ and/or Edison S.p.A. and the other companies controlled by the same, nor any other circumstances in conflict with the provisions of Legislative Decree 231/01 and the rules contained in the Company's Code of Ethics;
- to have not been convicted of any criminal offence that has become final and to not be the addressee of measures concerning the application of security and prevention

measures (pursuant to Legislative Decree no. 159 of 2011), as well as civil judgments and/or administrative measures entered in the criminal record pursuant to the legislation in force;

- to not be aware of being subject to criminal proceedings;
- to be the entity it represents is subject to judicial orders applying administrative sanctions pursuant to Legislative Decree no. 231 of 2001, even if only as a precautionary measure;
- that there are no grounds for prohibition, disqualification or suspension provided for in Article 67 of Legislative Decree No. 159 of 2011 and subsequent amendments and additions;
- to not be subject to international sanctions;
- to have obtained the following anti-corruption certifications/ not to have obtained anti-corruption certifications;
- to have implemented the following actions for the fight against corruption...../not to have implemented actions for the fight against corruption

and to be aware of the national legislation in force regarding the fight against corruption and money laundering, as well as regarding the fight against terrorism, and to undertake to comply with the provisions contained in said legislation, as well as to be aware of the Anti-Corruption Guidelines adopted by the Edison Group as part of the Management System for the Prevention of Corruption pursuant to the UNI ISO 37001:2025 Standard.

With exclusive reference to sponsorship activities, the undersigned also undertakes:

- to refrain from offering or promising money, goods or other benefits, directly or indirectly, to third parties, whether public or private, in connection with the services and activities covered by the contract between the parties;
- to promptly notify Edison and its subsidiaries of the occurrence of any conditions of impediment that may arise after the signing of this self-declaration (such as, for example, the notification of notices of indictment, etc.).

Making untrue statements and failure to comply with the commitments undertaken herein shall entitle the commissioning company to exercise its right to withdraw from the contract, as well as to take the appropriate legal steps to protect own interests.

<p>N.B.: <i>The declaration must be submitted by a representative (director and/or employee) of the public body and/or private individual and/or charitable association in whose favour the company intends to provide sponsorships, contributions or donations.</i></p>

Sincerely,

Place and Date _____

Legible signature of declarant _____

ANNEX:

- **PHOTOCOPY OF THE DECLARANT'S IDENTITY CARD**
- **CHAMBER OF COMMERCE CERTIFICATE (OR EQUIVALENT DOCUMENT SHOWING THE MAIN DATA OF THE COUNTERPARTY SUCH AS REGISTERED OFFICE, LEGAL REPRESENTATIVES, DIRECTORS, SHAREHOLDERS)**

Annex 3.4 - International Foreign Supplier Declaration

FOREIGN SUPPLIER DECLARATION AND UNDERTAKING

The undersigned _____, born in _____ on _____, residing in _____, as legal representative of _____ (the "Supplier"), having its registered address in _____, fiscal code _____, and vat code _____,

aware of

the criminal sanctions that may be imposed in case of producing false statements or showing false or misleading documentation,

DECLARES

under its own responsibility

(tick the box and, if applicable, complete)

1) To be aware of the laws and regulations applicable in Italy (including but not limited to Legislative Decree no.231/2001) and in the country of incorporation of Supplier in respect of combating corruption, money laundering and terrorist financing and confirms that it has not been convicted with final judgement in any of such matters in any jurisdiction.

2)

- That he/she and/or the Supplier, as applicable, **has not been** the subject of a conviction by final judgment for one of the following reasons:
- That he/she and/or the Supplier, as applicable, **has been** the subject of a conviction by final judgment for one of the following reasons:

(a) participation in a criminal organization, as defined in Article 2 of Council Framework Decision 2008/841/JHA²⁷

²⁷ Each Member State shall take the necessary measures to ensure that one or both of the following types of conduct related to a criminal organisation are regarded as offences:

- (b) corruption, as defined in Article 3 of the Convention on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union²⁸ and Article 2(1) of Council Framework Decision 2003/568/JHA²⁹ as well as corruption as defined in the national law of the contracting authority (including but not limited to Legislative Decree no. 231/2001) or the Supplier;
- (c) fraud within the meaning of the law applicable in Italy, in his/her country of incorporation or the country of incorporation of the Supplier;
- (d) terrorist offences or offences linked to terrorist activities, as defined in Articles 1 and 3 of Council Framework Decision 2002/475/JHA³⁰ respectively, or inciting or aiding or abetting or attempting to commit an offence;

-
- (a) conduct by any person who, with intent and with knowledge of either the aim and general activity of the criminal organisation or its intention to commit the offences in question, actively takes part in the organisation's criminal activities, including the provision of information or material means, the recruitment of new members and all forms of financing of its activities, knowing that such participation will contribute to the achievement of the organisation's criminal activities;
 - (b) conduct by any person consisting in an agreement with one or more persons that an activity should be pursued, which if carried out, would amount to the commission of offences referred to in Article 1, even if that person does not take part in the actual execution of the activity

²⁸ "The deliberate action of whosoever promises or gives, directly or through an intermediary, an advantage of any kind whatsoever to an official for himself or for a third party for him to act or refrain from acting in accordance with his duty or in the exercise of his functions in breach of his official duties shall constitute active corruption".

²⁹ "Member States shall take the necessary measures to ensure that the following intentional conduct constitutes a criminal offence, when it is carried out in the course of business activities:

- (a) promising, offering or giving, directly or through an intermediary, to a person who in any capacity directs or works for a private-sector entity an undue advantage of any kind, for that person or for a third party, in order to induce that person to perform or refrain from performing any act, in breach of that person's duties;
- (b) directly or through an intermediary, requesting or receiving an undue advantage of any kind, or accepting the promise of such an advantage, for oneself or for a third party, while in any capacity directing or working for a private-sector entity, in order to perform or refrain from performing any act, in breach of one's duties."

³⁰ Article 1

Terrorist offences and fundamental rights and principles

1. [...] offences under national law, which, given their nature or context, may seriously damage a country or an international organisation where committed with the aim of:

- seriously intimidating a population, or
- unduly compelling a Government or international organisation to perform or abstain from performing any act, or
- seriously destabilising or destroying the fundamental political, constitutional, economic or social structures of a country or an international organisation,

shall be deemed to be terrorist offences:

- (a) attacks upon a person's life which may cause death;
- (b) attacks upon the physical integrity of a person;
- (c) kidnapping or hostage taking;
- (d) causing extensive destruction to a Government or public facility, a transport system, an infrastructure facility, including an information system, a fixed platform located on the continental shelf, a public place or private property likely to endanger human life or result in major economic loss;
- (e) seizure of aircraft, ships or other means of public or goods transport;
- (f) manufacture, possession, acquisition, transport, supply or use of weapons, explosives or of nuclear, biological or chemical weapons, as well as research into, and development of, biological and chemical weapons;
- (g) release of dangerous substances, or causing fires, floods or explosions the effect of which is to endanger human life;
- (h) interfering with or disrupting the supply of water, power or any other fundamental natural resource the effect of which is to endanger human life;
- (i) threatening to commit any of the acts listed in (a) to (h).

Article 3

Offences linked to terrorist activities

- (a) aggravated theft with a view to committing one of the acts listed in Article 1(1);
- (b) extortion with a view to the perpetration of one of the acts listed in Article 1(1);
- (c) drawing up false administrative documents with a view to committing one of the acts listed in Article 1(1)(a) to (h) and Article 2(2)(b).

(e) money laundering or terrorist financing, as defined in Article 1 of Directive 2005/60/EC of the European Parliament and of the Council (37);³¹

(f) child labour and other forms of trafficking in human beings as defined in Article 2 of Directive 2011/36/EU of the European Parliament and of the Council (38)³²

- That he/she and the Supplier are not currently involved in any judicial proceeding in one of the matters listed in paragraph 2.
- That he/she and the Supplier are currently involved in any judicial proceeding in one of the matters listed in paragraph 2, specify for.....

3)

- That Supplier is not bankruptcy and that it has not submitted an application for arrangement with creditors.
- That Supplier is bankruptcy and that it has submitted an application for arrangement with creditors, specify for.....

4)

- That Supplier is not aware of being subjected to international sanctions.
- That Supplier is aware of being subjected to international sanctions, and more precisely to.....

³¹ "For the purpose of this Directive, the following conduct, when committed intentionally, shall be regarded as money laundering:

- (a) the conversion or transfer of property, knowing that such property is derived from criminal activity or from an act of participation in such activity, for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in the commission of such activity to evade the legal consequences of his action;
- (b) the concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership of property, knowing that such property is derived from criminal activity or from an act of participation in such activity;
- (c) the acquisition, possession or use of property, knowing, at the time of receipt, that such property was derived from criminal activity or from an act of participation in such activity;
- (d) participation in, association to commit, attempts to commit and aiding, abetting, facilitating and counselling the commission of any of the actions mentioned in the foregoing points."

³² "Member States shall take the necessary measures to ensure that the following intentional acts are punishable:

The recruitment, transportation, transfer, harbouring or reception of persons, including the exchange or transfer of control over those persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

A position of vulnerability means a situation in which the person concerned has no real or acceptable alternative but to submit to the abuse involved.

Exploitation shall include, as a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, including begging, slavery or practices similar to slavery, servitude, or the exploitation of criminal activities, or the removal of organs.

The consent of a victim of trafficking in human beings to the exploitation, whether intended or actual, shall be irrelevant where any of the means set forth in paragraph 1 has been used.

When the conduct referred to in paragraph 1 involves a child, it shall be a punishable offence of trafficking in human beings even if none of the means set forth in paragraph 1 has been used.

For the purpose of this Directive, 'child' shall mean any person below 18 years of age."

UNDERTAKES, in case of award of a contract,

- 1) To respect the above referred laws and regulations;
- 2) To avoid offering, authorizing, making or promising to make any payment, or give or promise to give anything of value to any third party – whether public officials or not – directly or indirectly in relation to the services or activities governed by the contracts awarded or entered into or to be awarded or entered into;
- 3) To avoid using any of the moneys paid by Edison S.p.A. or any of its affiliates in consideration for the services or goods provided or sold, to directly or indirectly finance illicit operations or activities;
- 4) To promptly notify Edison S.p.A. of any circumstances occurring after the execution of the present declaration that may affect the above declarations.
- 5) To be aware of the national and international legislation in force on the fight against corruption and money laundering, as well as on the fight against terrorism, and to undertake to comply with the provisions contained in said legislation, as well as to be aware of the Anti-Corruption Guidelines adopted by the Group as part of the Management System for the Prevention of Corruption in accordance with the UNI ISO 37001:2025 Standard;
- 6) to have obtained the following anti-corruption certifications/ not to have obtained anti-corruption certifications;
- 7) to have implemented the following actions to fight corruption / not to have implemented actions to fight corruption;

AND ACKNOWLEDGES

that the non-compliance with the undertakings or the breach of the representations included herein will entitle the addressee of this Declaration inter alia to avoid entering into the relevant contract and to undertake any other legal action to protect their interests.

[Date and place]

(legible signature)

(A copy of a passport or identity card of the signatory to be attached)