

ANTI-BRIBERY POLICY

REV.	DATES	PREPARED	CHECKED	APPROVED
01	30/10/2025	F. Piemonte C-QHSE COOR	L. Cogorno C-QHSE DIR	E. Barbiero CEO

ANTI-BRIBERY POLICY

The Eccher Group, including Rizzani de Eccher (hereinafter “RdE”) and all its affiliated companies, aware of the negative effects of corrupt practices on economic and social development in the areas in which it operates, adopts a firm and prohibitive approach towards any form of corruption.

The prevention of corruptive practices is therefore not only a legal obligation but also one of the principles that guide the Company's actions.

The definition of “Bribery” according to ISO 37001 takes the following meaning: offering, promising, providing, accepting or requesting an undue advantage of any value (which may be economic or non-economic), directly or indirectly and regardless of location, in violation of applicable law, as an incentive or reward for a person to act or omit to act in relation to the performance of that person's duties.

RdE recognizes the importance of these aspects, and in ensuring compliance with international and local regulatory requirements in the countries in which it operates, has adopted:

- a Code of Ethics, a Code of Conduct towards Public Administration, and an Anti-Bribery Code, which define the values and principles that inspire the Company and which it undertakes to respect in pursuing its activities.
- An Anti-Bribery Management System according to the UNI ISO 37001 standard;
- an Organization and Management Model pursuant to Legislative Decree 231/2001.

Applied to the RdE Business sector, i.e. the management of general contractor activities for the design and construction of civil and industrial engineering works, bridges, viaducts and infrastructure works for mobility, the following objectives (non-exhaustive list) have been defined by the Top Management:

- Prohibition of any corrupt behavior, prohibition of behaviors and practices that may even appear illegal or collusive, payments that may appear illicit, favoritism, solicitations, direct or indirect, of personal or career advantages for oneself or others;
- Assessment of the risks associated with the activities carried out in order to ensure appropriate prevention and protection measures;
- Promotion of a culture of integrity, basing operations on the principles of fairness, equity, integrity, loyalty, and professional rigor, both in internal and external relationships, focusing on full compliance with the law as well as compliance with company procedures, the code of ethics, and disciplinary regulations;
- Promotion of a culture of “Zero Tolerance,” prohibiting all forms of corruption, regardless of the circumstances or the individuals involved;
- Shared responsibility, through the involvement of all employees, collaborators, suppliers and business partners;
- Protection of whistleblowers, ensuring confidentiality and protection for those who report unlawful behavior and activating secure and anonymous reporting channels;
- Strengthening trust among employees, stakeholders, and customers.
- Regulatory compliance, through compliance with national and international laws (e.g., Legislative Decree 231/01) and adoption and compliance with its own Anti-Corruption Management System in accordance with ISO 37001 and company regulations (e.g., Code of Ethics and Organizational Model);
- Maintaining company certifications.

In order to achieve these objectives, the RdE Top Management is committed to promoting and disseminating, in a responsible and sustainable manner, what is necessary through a series of dedicated activities such as (non-exhaustive list):

- Develop dedicated awareness campaigns, promote specific staff training courses, and engage customers, partners, suppliers, and local media in awareness-raising activities to raise awareness among all stakeholders of the rules and behaviors that must be observed.

- Activities to develop workers' knowledge and skills, improving personal culture levels through dedicated programs;
- Implement zero tolerance towards those who operate in opposition to company policies;
- Clear definition of roles and responsibilities for identifying, implementing, and monitoring the preventive and protective measures to be adopted;
- Establishment of the Anti-Bribery Function, with specific responsibilities, independence, management autonomy and control of company operations;
- Establish an effective reporting tool to combat corruption and encourage reporting of suspected corruption through a whistleblowing procedure that governs the management and verification of reports, ensuring the confidentiality of the content of the reports, the identity of the reporting party and the person reported, and protecting the reporting party from possible discrimination or retaliation. To this end, the following certified email address has been activated for reporting to the Anti-Bribery function: rde@serviziosegnalazioni.it; this address is also published on the company website. In addition to the digital reporting channel, the reporting person may submit reports regarding the risks of corruption to the Anti-Bribery Function in writing, by regular mail, with a confidential letter addressed to: Rizzani De Eccher SpA's Anti-Corruption Function - Via Buttrio 36 – Pozzuolo del Friuli (UD) - 33050 – Italy.

In order to maintain the ongoing effectiveness of the company's Anti-Corruption Policy, Senior Management is committed to constantly monitoring the policy itself, ensuring periodic evaluation and any updates, when necessary.

The implementation of this policy is the responsibility of all RdE workers, starting with Top Management, which has identified its principles and promotes their dissemination and compliance.

The CEO

Enrico Barbiero

