

ANTI-BRIBERY POLICY

Trevi Group, a world leader in the field of underground engineering and construction, considers it a priority to promote a corporate culture inspired by **values typical of robust, intact and transparent governance** and is aware that the phenomenon of corruption represents an obstacle to economic, political and social development and a heavy threat to the rules and fairness of the markets.

In line with the principles contained in the Code of Ethics, in the Organization and Management Model pursuant to Legislative Decree 231/01, and in the Sustainability policies, Trevi S.p.A. and Trevi Finanziaria Industriale S.p.A. have voluntarily decided to adopt and implement their own **Anti-Bribery Management Systems** in accordance with the requirements of the **ISO 37001:2016** standard, as an effective control in the fight against corruption and for the improvement of their activities and processes.

These governance values guide the behavior and daily activities of the Group's people, with **the aim of preventing and countering the occurrence of any form of corruption.**

Therefore, Trevi Group pursues the maintenance of the following commitments:

- Comply with current legislation on the prevention and fight against corruption;
- Prohibit and prosecute, through the application of the company sanctioning system, any behavior that does not comply with this Policy and the principles of the Code of Ethics and standards, such as accepting bribes, and encourage the growth and reinforcement of a culture based on integrity and loyalty;
- Develop knowledge and awareness of individual obligations, the processes to which each stakeholder is a party, and the risks/opportunities associated with the activities and role assigned;
- Promote a rigorous process for the identification, selection and management of business partners and Third Parties, based on principles of fairness and transparency, including appropriate contractual clauses for adherence to the ethical values of business conduct adopted by the Organization;
- Conduct effective and context-consistent risk analysis for corruption prevention in order to identify and manage any critical issues;
- Carry out control and eventual *Due Diligence* activities on staff and relevant business partners, in order to minimize the risks of violation of the adopted Anti-Corruption Management System;
- Enhance the effectiveness and efficiency of processes, also through the definition of specific indicators for monitoring higher risk activities and measurable improvement objectives consistent with corporate policies;
- Encourage the reporting of alleged corrupt practices by providing internal and external stakeholders with appropriate reporting tools and protecting the whistleblower from retaliation;
- Establish and designate a Corruption Prevention Compliance Function which is granted full authority and independence, to design, manage and monitor the adequacy of the SG against the requirements of the standard and report on the performance of the SG to the Governing Body and Senior Management.

In this perspective, Trevi Group is committed to taking an active role in promoting and leading the fight against corruption, through specific training to be provided to internal personnel and through the dissemination at all levels and to all Group Companies of the concepts outlined above, the review and continuous updating of this policy and the set objectives.

All Trevi Group Companies, partners under its operational control and business partners, must manage aspects related to the prevention of corruption in line with this policy.

This policy was approved by the Governing Body of the Holding Company on 17/07/2025.

Top Management

Cesena, July 17, 2025



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