



ANTI-CORRUPTION MODEL

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## 1. PRINCIPLES FOR ANTI-CORRUPTION MANAGEMENT

The HERA Group rejects corruption in all its direct and indirect forms and adopts an anti-corruption management system integrated into the Organisation and Management Model in accordance with Italian Legislative Decree 231/01 (hereafter, the “231 Model”), whose foundation lies in the principles and values expressed in the Code of Ethics and in the Quality and Sustainability Policy adopted by the HERA Group. In particular, the Group adopts the principles of:

- **TRANSPARENCY AND TRACEABILITY**, undertaking to provide to all stakeholders, clearly, completely and promptly, information on the actions conducted at all corporate levels. For the HERA Group, being transparent means adopting management instruments conducive to dialogue with stakeholders with a view to responding to requirements for information and knowledge of the economic, social and environmental impacts of the corporate activities;
- **PERSONAL RESPONSIBILITY**, materialising in the commitment of the worker to build relationships of trust with colleagues, and, more generally, with all stakeholders. It is considered essential for Personnel to commit themselves with loyalty and effectiveness to achieving the company objectives in respect of their role and responsibilities;
- **COHERENCE**, translated into the commitment to implement, on a daily basis, the mission, values and operating principles of the company. These are the foundations of the strategic planning, company goals and operational management of the relevant activities.

As a measure of control of the anti-corruption management system, the anti-corruption compliance function is established (hereafter, the “Compliance Function”), coinciding with the Supervisory Board (or “SB”), having the following main responsibilities/functions:

- a) to supervise the planning and implementation of the anti-corruption management system;
- b) to provide consulting and guidance to Personnel<sup>1</sup> on the anti-corruption management system and on issues related to corruption;
- c) to guarantee that the anti-corruption management system is compliant with the requirements of the UNI ISO 37001 standard;
- d) to report on the functioning of the anti-corruption management system to the Board of Directors and to the senior company persons in the appropriate manner.

The senior company persons and management of the HERA Group are personally committed to respecting the anti-corruption model, also by adopting exemplary behaviours, performing awareness-raising activities and disseminating the principles of the rules aimed at preventing acts of corruption within its structures.

## 2. SCOPE OF APPLICATION

This Anti-Corruption Model concerns all persons who work for the HERA Group: Personnel at every level, agency staff, seconded personnel, volunteers, agents, contractors, external consultants, representatives of third parties and commercial partners, sponsors, or any other associated individual, irrespective of the geographical location.

This Anti-Corruption Model has been examined and approved by the Board of Directors of Hera S.p.A. and its adoption and implementation are mandatory for HERA S.p.A. and for all its subsidiary companies. In addition, the Group will use its influence, insofar as is reasonably possible in the circumstances, to ensure that the companies and entities in which the Group has a non-controlling investment and the Business Partners, as defined below, respect the standards defined in this Anti-Corruption Model, adopting and maintaining an adequate and coherent internal auditing system.

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<sup>1</sup> "Personnel" means employees of every level and persons to whom collaboration assignments are granted (including interns and apprentices).

### 3. BEHAVIOURS NOT PERMITTED - GENERAL ASPECTS

The HERA Group refrains from practices that are not permitted by the applicable law on corruption<sup>2</sup> (hereafter, the "Anti-Corruption Laws").

An "act of corruption" consists of promising, giving or offering something of any value (even not economic) or a benefit - directly or indirectly - to a person, in order to incite the latter or another person to perform a function or an activity improperly or with the expectation or hope of receiving a commercial benefit or remunerating an advantage already obtained for oneself or for others (active corruption).

It is also prohibited, as this forms part of "corruption", to accept, request or receive something of any value (even not economic) or a benefit, directly or indirectly, from a person with the intention of ensuring that a certain function or activity is performed improperly by the requesting person/recipient or by another person or in any case with the expectation or hope of obtaining a commercial advantage for oneself or for others (passive corruption).

The "benefit" subject to an "act of corruption" may also not necessarily be constituted by the payment of sums of cash but, with regard to the circumstances, it may be constituted, by way of example, by gifts, various forms of hospitality, contributions in kind (such as, for example, sponsorships), jobs, investment opportunities, etc.

It is also prohibited to implement threats or acts of retaliation against an individual who has refused to commit an act of corruption or who has reported the occurrence and/or suspicion that such an act has occurred; and, more generally, to undertake or accept the implementation in one's favour of any action that may be seen as an infringement of this Model.

A person subject to this anti-corruption Model will be considered "aware" of the existence of an act of corruption if it is found that he/she has acted while knowingly ignoring

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<sup>2</sup> The "Anti-Corruption Laws" are to be considered the anti-corruption provisions contained in the Italian Criminal Code (Articles 318

et seq. and 346 bis), in the Italian Civil Code (Articles 2635 and 2635 bis), in the applicable international conventions (such as the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of 1997 and the United Nations Convention against Corruption, adopted by the General Assembly on 31 October 2003 and ratified in Italy with Italian Law no. 116 of 2009) and in the other applicable laws (therein including Italian Legislative Decree no. 231 of 2001).

the respective alarm signals or reasons for suspicion or has acted with gross negligence, for example by omitting to implement investigations adequate to the circumstances.

The personnel of the Group are also required to avoid (and to report) any situation that may constitute or determine a conflict of interest (actual or potential) between personal interests (economic

or otherwise) and the duties performed or role covered within the company structure, all in coherence with the provisions of the Code of Ethics of the HERA Group.

In particular, any situation that may constitute or determine a conflict of interest must be communicated promptly to the superior in a managerial position who may assess any involvement of the Central Personnel and Organisation Department (CPOD) and the Ethics and Sustainability Committee. Similarly, the person involved promptly refrains from taking part in the respective operational/decision-making process and the superior in the managerial position identifies the operational solutions suitable to safeguard, in the specific case, the transparency and correctness of the behaviours in conducting the activities.

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### 3.1 Facilitating and/or extortion payments

The HERA Group does not consent to paying, offering or accepting, directly or indirectly, payments and benefits of any type and amount with the aim of accelerating or facilitating the execution of performances in any case already due by its stakeholders.

Facilitating payments are sums of cash (or other utilities/benefits) paid/provided "under the counter" to guarantee or accelerate a service.

It is the duty of all persons involved in the company activities to avoid creating situations that involve the making or acceptance of a facilitating payment, or to infer its offer or acceptance. If any members of Personnel are asked to make a payment in the name of the HERA Group, they must pay the utmost attention, clearly identifying the reason why it is necessary and if the sum requested is proportionate to the goods and services received. Payments are made in respect of existing company procedures with regard to the authorisation and control phase of the performance carried out, as well as in coherence with the delegations granted.

In the event of a promise, offer or request for facilitations, employees must communicate this through the whistleblowing channels.

Extorting payments are payments of sums of cash (or other utilities/benefits) paid/provided (generally in favour of Public Officials, as defined below, or other persons, even private entities, who cover roles or functions with the exercise of authoritative or negotiation powers) and/or extorted by way of violence or serious and imminent threat to physical safety and personal security and that, therefore, could be made by the victim of the extortion only for the purpose of avoiding personal damage. These actions are prohibited and must be reported to the Central Legal and Corporate Department (CLCD) and the Compliance Function so that the respective actions may be taken.

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### 3.2 Donations, sponsorships, entertainment and hospitality expenses

#### 3.2.1 Gifts and benefits

The HERA Group does not permit any form of gift and/or donation in general that may appear or even just be interpreted by an impartial observer as exceeding normal commercial practices or courtesy or that is in any case aimed at acquiring favourable treatment.

In particular, any form of gift to Italian and foreign public officers, auditors, public officials and personnel belonging to Supervision and Control Authorities and Bodies is prohibited, without the prior authorisation of the Compliance Function.

The aforementioned prohibition, which does not entail derogations even in those countries where offering gifts of value (or other benefits, as described above) to Business Partners, as defined below, is customary, concerns both gifts promised and offered and those received.

Personnel of the HERA Group who receive gifts or benefits that are not permitted and who suspect the irregularity of the offer received must communicate this to the Compliance Function which will assess their appropriateness.

Donation and sponsorship activities are regulated by a specific 231 Protocol which dictates their methods of implementation, approval and traceability, in coherence with this Anti-Corruption Model.

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#### 3.2.2 Entertainment and hospitality expenses

Gifts, payments or other utilities, including hospitality, may be offered, implemented, accepted or received if they fall within the context of acts of commercial courtesy and they are unlikely to compromise the integrity and/or reputation of one of the parties and in any case are unlikely

to be interpreted by an impartial observer as being aimed at creating an obligation of gratitude or acquiring advantages improperly.

Any benefit, gift, economic advantage or other utility, including hospitality, must have all of the following characteristics:

- not consist of a cash payment;
- be made in relation to legitimate business purposes and in good faith;
- not be motivated by the desire to exercise an unlawful influence or by the expectation of reciprocity;
- be of small value and in any case reasonable according to the circumstances;
- be of good taste and compliant with generally accepted standards of professional courtesy;
- respect the Anti-Corruption Laws and regulations applicable to the Public Official or private entity.

Anyone who receives offers of gifts, economic advantages or other utilities, including hospitality, which cannot be considered as acts of commercial courtesy of small value must inform the relevant manager, who will return them or give them to charity subject to liaising with the Compliance Function.

When the recipient of the gift, economic advantage or other utility, including hospitality, falls within the categories of Italian and foreign public officers, auditors, public officials and personnel belonging to Supervision and Control Authorities and Bodies, the personnel of the HERA Group who make the gift must obtain the prior consent of the Compliance Function.

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### 3.3 Relationships with Public Officials<sup>3</sup>

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<sup>3</sup>“Public Officials”, in accordance with this Model, are persons who exercise a public legislative, judicial or administrative role and who in any case contribute, in any capacity, to forming the will of an Italian, foreign and/or Local public administration (for example having decision-making, certification, attestation and/or control powers). The notion of public official also includes - for the purposes of this Model - civil servants. Public Officials also include, in accordance with this Model and for the purposes of applying the same, representatives of local communities.



Relationships of Group personnel with Public Officials (including Entities of the Public Administration, Local Bodies, Industry Authorities, Supervisory and Control Bodies) must be conducted in respect of the Code of Ethics, the 231 Model and this Anti-Corruption Model. Group Personnel must also act in respect of all legislative and internal requirements in that regard.

Relationships with Public Officials must be based on fairness, transparency and traceability of behaviours and they are held in coherence with the structure of delegations granted and with the responsibilities attributed via the company information and communication instruments (including Service Orders and Internal Communications).

Favours, collusive behaviours, and direct and/or indirect solicitations in relation to Public Officials in order to obtain benefits for the Group, for oneself or for others are prohibited.

When a negotiation, a request or any relationship with Public Officials is in progress, the Group's Personnel must not seek to influence improperly the decisions of Public Officials.

It is never permitted to pay or to offer, directly or indirectly, cash or gifts or any utility to Public Officials or their relatives, to influence or remunerate an act of their office, irrespective of whether or not the act is due. Appropriate written reporting, correctly archived, of relationships with Public Officials must be guaranteed and the activity must be traceable according to existing company procedures. The provisions of the protocol adopted in accordance with the 231 Model (hereafter, with reference to each of the protocols adopted in accordance with the 231 Model, the "231 Protocol" and, collectively, the "231 Protocols") - aimed at regulating the process in question - are understood to be cited here.

Contact by personnel with Public Officials, in the early stages of the negotiation or procedure, must involve at least two persons belonging, if possible, to different organisational units.

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### 3.4 Customer relations

The sales activity is carried out by the HERA Group in an ethical, fair, honest and transparent manner, in respect of the Code of Ethics and the provisions of the 231 Model aimed at regulating those processes. I

The 231 Protocols envisage specific and suitable controls to guarantee transparency and correctness in the sale process.

Customers are informed of the existence of this Anti-Corruption Model and the existence of reporting mechanisms via suitable methods.

Relationships with the sales network (agents, procurers, intermediaries) are compliant with the principles of this Anti-Corruption Model and the company procedures in force applicable to Suppliers and to other Business Partners.

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### 3.5 Relationships with Suppliers<sup>4</sup> and with other Business Partners<sup>5</sup>

#### 3.5.1 Suppliers

Purchasing and procurement activities are carried out by the HERA Group in an ethical, fair, honest and transparent manner, in respect of the relevant regulatory context, the Code of Ethics and the provisions of the 231 Model aimed at regulating those processes.

The 231 Protocols and company procedures envisage specific and suitable controls to guarantee transparency and fairness in the Supplier selection process (in accordance with the provisions of applicable rules of law), management and execution of the contract, until the phase of control of the actual performance and the correct payment.

The Supplier qualification process includes precise ethical and moral standards, in respect of existing regulations.

Suppliers are asked to respect the Anti-Corruption Laws and this Anti-Corruption Model to allow the HERA Group to adopt adequate remedies in the case of infringement, also for the purpose of preventing the company being attributed with corporate liability.

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<sup>4</sup> "Suppliers" in accordance with this Model are economic operators (including natural persons) potentially able to satisfy a certain requirement for the procurement of goods, works and services.

<sup>5</sup> "Business Partners" in accordance with this Model are external entities with respect to the HERA Group with which a commercial relationship is in progress or is planned to be established (including, Suppliers, as defined above, consultants, agents, partners of the HERA Group companies in joint ventures/Temporary Groups of Companies/Consortia).

If behaviours of Suppliers in infringement of this Anti-Corruption Model, the Code of Ethics and the 231 Model are ascertained, within the limits permitted by law, the HERA Group adopts the appropriate measures, therein including the termination of the contract.

All Suppliers must undertake to:

- a. respect the Anti-Corruption Laws, the Code of Ethics and this Anti-Corruption Model;
  - b. introduce an anti-corruption clause also into any sub-supply/subcontracting/agency contracts;
  - c. report promptly to the Compliance Function any request or demand relating to any undue payment of cash or other utility, received by the Supplier and/or by its subcontractors in relation to the execution of its performance;
  - d. to recognise the right of the principal - the HERA Group - to terminate the contract, to suspend its execution and to obtain compensation for damages in the event of an infringement of the obligations, declarations and warranties indicated above and/or a violation of the anti-corruption laws.
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### 3.5.2 Other Business Partners

The HERA Group requires in general all its Business Partners to respect the applicable laws, including the Anti-Corruption Laws. The Business Partner must enjoy an excellent reputation in relation to honesty and integrity. In that sense, a selection process of the Business Partner must be implemented, in coherence with existing company procedures, envisaging adequate due diligence. The Business Partner must undertake in writing to respect the provisions of this Anti-Corruption Model and declare the absence of conflicts of interest.

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### 3.6 Accounting records and keeping of accounts

The applicable laws and regulations on financial disclosure and tax laws require the HERA Group to keep detailed and complete accounting records of every business transaction. The records must be compliant with the applicable accounting standards and must reflect,

completely and transparently, the facts at the basis of each transaction. All costs and charges, receipts and collections, profits, payments and outlays must be inserted promptly among the financial disclosure, completely and accurately, and be equipped with adequate supporting documents, issued in conformity with all applicable laws and with the respective internal auditing system. All registrations in the accounting records and the respective disclosure documentation must be available to the external auditor for the auditing activities.

The payments and accounting transactions carried out must be registered carefully in the respective company books and registers, in order to reflect in detail and correctly the transactions and sales and purchases of goods. That principle applies to all transactions and costs, whether or not they are significant from the accounting perspective.

All transactions are registered in the accounting records truthfully and correctly and all documentation is made available to the external auditor, as reported in the letter of certification sent to the external auditor.

Adequate and sufficient accounting controls are also established and carried out to provide reasonable guarantees that:

- the transactions are executed only after general or specific authorisation from management;
- the transactions are registered as necessary in order to facilitate the preparation of the financial statements in conformity with generally accepted accounting standards or with any other criterion applicable to those financial statements; the accounting of all company assets is maintained;
- access to the assets is permitted only subject to general or specific authorisation from management;
- the value of the assets entered in the financial statements is compared with the assets actually existing, with reasonable frequency, and appropriate measures are taken in reference to any difference identified.

The HERA Group has activated a system of internal auditing on financial disclosure in order to provide reasonable guarantees of the reliability of the financial statements disclosure and the

preparation of the financial statements, in conformity with generally accepted accounting standards, therein including regulatory instruments that:

- concern the due keeping of the records, so that they reflect the transactions and the disposals of the assets of the issuer with reasonable detail, accurately and correctly;
- provide the reasonable guarantee that the transactions are registered so as to allow for the preparation of the financial statements in conformity with generally accepted accounting standards;
- provide the reasonable guarantee that any unauthorised acquisitions, use or disposal of assets of the issuer, which could have a significant impact on the financial statements, are prevented or promptly identified.

That internal auditing system is aimed at providing reasonable certainty that the risk of inaccurate accounting records, caused by errors or fraud, having a significant impact on the annual financial statements or on the interim financial disclosure, occurring and not being promptly identified is reduced to a low level (remote). The internal auditing system relating to financial disclosure envisages specific controls and pervasive controls, at different organisational levels, with different implementation methods.

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### 3.7 Personnel recruitment and granting of collaboration assignments

Preliminarily to the recruitment of Personnel (including the granting of collaboration assignments) (including internships and training apprenticeships), the Group obtains information on the previous professional experiences of the candidate insofar as is permitted by applicable laws, in respect of the anti-corruption provisions envisaged in the 231 Model.

The personnel recruitment process, in particular, involves controls on previous professional experiences and verifications on suitability for the role and on the absence of conflicts of interest.

The results of those verifications are assessed in relation to the role and duties that the person will have to carry out and in coherence with the contents of this Model. In the phase of recruitment or acceptance of the collaboration assignment, the persons selected are required to sign a declaration of commitment to respect the provisions of the Code of Ethics, the Quality and Sustainability Policy, the 231 Model and this Anti-Corruption Model.

#### 4. TRAINING AND COMMUNICATION

The Group implements training interventions, intended for all personnel, particularly thorough for personnel involved in processes at risk of corruption, aimed at guaranteeing the dissemination and understanding of the Code of Ethics, the anti-corruption rules and the 231 Model. The training is aimed at giving a clear understanding of the different offences (also for the purposes of the 231 Model), the risks, personal responsibilities and consequences for the company, the actions to be undertaken to prevent and combat corruption and any sanctions.

The training programme provides the necessary knowledge of the Anti-Corruption Laws, instructions to recognise so-called “Red Flags” and advice to avoid completing actions not coherent with the company's ethical values.

The principles, expected behaviours, controls and implementation methods are subjects developed in thorough training sessions provided according to the respective risk of corruption.

Personnel, with regard to their involvement in processes at risk of corruption, must receive timely training on the Anti-Corruption Laws.

The CPOD is responsible for planning and implementing the aforementioned training, monitoring the actual participation of Personnel in the training courses and the respective tracking of the same on the system.

The update of this Model forms part of the permanent training path of all individuals who work for the Group or collaborate with it, including Suppliers and Business Partners in general.

External stakeholders are made aware of the institutional website of the HERA Group, the useful documents to provide an understanding of the commitment of the Group for the purposes of anti-corruption and what is done by the Group to that end.

#### 5. REPORTS

Personnel and the directors of the Group are required to report any infringement or suspected infringement of this Anti-Corruption Model and the 231 Model to the SB, which has the role of Compliance Function for preventing corruption. Other stakeholders, such as Suppliers, Group collaborators or other third parties, are also invited to send their reports of infringement.

The report is aimed at protecting the integrity of the company and is also made by anyone who feels the moral obligation to report, in the public interest and with a view to promoting legality, ethics and correctness.

The subject of the report must consist of the reasonable and legitimate suspicion or awareness of unlawful conduct, even of corruption nature, or of an infringement of this Model and/or the 231 Model (which includes the 231 Protocols).

The report must be substantiated and therefore contain precise and concordant factual elements of which the whistleblower has become aware based upon the functions performed. The report must allow for the identification of factual elements reasonably sufficient to launch an investigation. Infringements of the Code of Ethics may be reported to the Ethics and Sustainability Committee as envisaged in the Code of Ethics itself.

There are periods of coordination and information exchange between the Ethics and Sustainability Committee and the Compliance Function, as part of their respective functions. The Internal Auditing Department ("IAD") of HERA is instructed by the Compliance Function to analyse the report, with the involvement of the competent company Departments, as regulated by the specific "whistleblowing" procedure. If the report is not anonymous, the author of the same is heard, communicating to him/her feedback on the outcome of the analysis.

The reports may be sent by the following methods:

- ✓ by e-mail to the address: [Presidente.OdV@PEC.gruppohera.it](mailto:Presidente.OdV@PEC.gruppohera.it);
- ✓ by letter addressed to: Supervisory Board - at the Internal Auditing Department of Hera S.p.A., Viale Carlo Berti Pichat no. 2/4, 40127 Bologna (BO).

In any case, the privacy of the whistleblower's identity is guaranteed, subject to legal obligations and the protection of the rights of the Company or the persons involved in the report.

Infringements of the Anti-Corruption Model and the 231 Model are reported to the competent company Departments and to senior company persons, for the adoption of the corrective actions in that field and the monitoring processes of the internal auditing system.

The HERA Group undertakes to ensure that nobody suffers discriminatory treatment for having refused to be complicit in acts of corruption or infringements of the 231 Model or for having reported in good faith the occurrence or possible occurrence of behaviours of this nature. Discriminatory treatment means, by way of example, dismissal, adoption of disciplinary measures, threats or other punitive behaviours related to the report made.

## 6. ANTI-CORRUPTION MANAGEMENT SYSTEM

### 6.1 Risk assessment and control methods

The Compliance Function, with the support of the IAD, assesses the nature and extent of the corruption risk by way of the instruments of risk assessment in integrated form with the process and 231 offence risks, in respect of the "Group Risk Management Policy" guideline which provides the relevant context. The assessment of the risk for the HERA Group is approved by the Board of Directors of HERA on a three-yearly basis, with annual approval of the audit plan, subject to unexpected events which require a new issuance.

In coherence with the internal auditing and risk management system adopted by the HERA Group, this Anti-Corruption Model is subject to first level controls by all competent company Departments involved.

If the risk of corruption, fraud or 231 offences in the field of corruption is assessed as significant in relation to:

- specific categories of transactions, projects or activities;
- planned or current relationships with specific categories of Business Partners;
- specific categories of Personnel at risk of corruption;

the Compliance Function, with the support of the HERA IAD, performs specific auditing activity (followed by follow-up activity) of the implementation of this policy, particularly when events emerge that reveal the need for a prompt audit. Specific investigations are also activated at the outcome of whistleblowing reports.

All auditing activities involve follow-up activity consequent to the findings that emerge.



The IAD, at the assignment of the Compliance Function, prepares and updates the monitoring and reporting of the outcomes of the audits and reports and stores the original documentation of the same in line with legal and company provisions; it also guarantees the archiving of all supporting documentation acquired during the proceedings.

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## 6.2 Due diligence

Based upon the periodic risk assessment or following information of facts having significance for corruption purposes, or any reports (whistleblowing), the Compliance Function may deem it necessary to perform due diligence on Suppliers or Business Partners in order to assess the specific risk of corruption or to perform an update of the risk assessment. In that activity, the Compliance Function uses the collaboration of the competent company departments.

In the case of extraordinary operations that involve the HERA Group (such as, by way of example, acquisition of investments, mergers, joint ventures) the structures involved in the assessment and finalisation of the operation may request the support of the Compliance Function in order to identify the main risk factors. Preliminarily to formalising any binding deeds, and with regard to the specific nature of the transaction, information and declarations substantially compliant with those required for other Business Partners must be collected.

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## 6.3 Monitoring, Review and Improvements

The commitment to preventing corruption involves all Personnel of the Group. Every Department/Structure is responsible, for the parts under its remit, for preparing adequate control systems in relation to anti-corruption and the prevention of 231 offences (first level controls).

The initiatives applied to implement this Anti-Corruption Model are reported in the Sustainability Report, which is subject to external verification by an independent accredited Company.

The Compliance Function, which coincides with the natural persons of the HERA SB, has direct and timely access to the management body and the senior company persons, if necessary, and it has the expertise, statuses and opportune independence.

The anti-corruption management system, designed based upon the "PDCA" logic and integrated with the other management systems present, is assessed continuously by the Compliance Function and is subject to periodic review by the senior company persons in the perspective of continuous improvement.

## 7. DISCIPLINARY MEASURES

In the event of an infringement of the provisions of this Anti-Corruption Model, the Group applies to employees, including management Personnel, the sanctions envisaged by the company disciplinary code in respect of the collective labour contracts, the 231 Model, the procedures and the applicable regulations. Employees who infringe this Model may be subjected to disciplinary sanctions.

The following are infringements of this Model:

- actions in contrast with the anti-corruption laws, the anti-corruption Policy or the 231 Model;
- the lack of participation in anti-corruption training;
- the conduct of those who unreasonably omit to identify or report any infringements or who threaten or adopt acts of retaliation against others who report any infringements.

The Group will make all reasonable efforts to prevent any conduct that infringes the Anti-Corruption Laws, the Anti-Corruption Policy or the 231 Model by its Business Partners. The Group reserves the right to interrupt and sanction, at any time, relationships with Suppliers and Business Partners in general who are guilty of such infringements.