



SNAM S.P.A. ANTI-CORRUPTION POLICY PURSUANT TO INTERNATIONAL STANDARD ISO 37001:2016

Snam S.p.A. ("**Snam**" and/or the "**Company**") is aware that the phenomenon of corruption represents, both nationally and internationally, an obstacle to economic, political and social development becoming a serious threat to the good performance and impartiality of public administration; causing a distortion in the rules of competition and market transparency. Therefore, the Company seeks to adopt a "zero tolerance" approach towards all corruptive practices when regarding relations with public and private interlocutors and assumes its commitment to ensure actions and conduct based exclusively on criteria of transparency, fairness and moral integrity with the intent of preventing any attempt of corruption.

Snam has adopted and effectively implemented an Anti-bribery Management System in accordance with International Standard ISO 37001:2016 ("**Anti-bribery Management System**") represented by the "Anti-Corruption Compliance Programme" of Snam, whose pillars are embodied by the Code of Ethics, the Anti-Corruption Guideline, the Organizational Model pursuant to Legislative Decree no. 231/2001 ("**Model 231**"), the Compliance Program for the Prevention of Offenses and the Risk Assurance & Integrated Compliance Model.

Snam is committed to ensuring compliance with the principles and provisions of its Anti-bribery Management System, reserving the utmost attention so that a similar commitment may be also ensured by the Company's interlocutors.

Snam's Top Management - identified, for the purposes of the Anti-bribery Management System, with the Chief Executive Officer and General Manager - is firmly convinced that Snam's commitment to prevent and combat corruption can positively influence the Company's relations with its stakeholders and business partners, thereby ensuring a progressive diffusion of Snam's ethical and social principles as well as its values to an increasingly broad sphere of stakeholders.

The Company therefore draws upon its own **Anti-Corruption Policy**, as consistently determined with its own vision and outline of primary ethical values in the Code of Ethics and the scope of the Anti-bribery Management System, but also taking into account the purposes and the context where the Company operates, the outcomes of the risk assessment as well as the strategic guidelines of the Snam group.

The Company formally undertakes the commitment to:

- define a strategic framework for establishing, reviewing and achieving the anti-bribery objectives;

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- adopt and implement its Anti-bribery Management System in accordance with the International Standard ISO 37001:2016, as a control instrument for the continuous improvement of corporate performance against corruption;
- scrupulously comply with the current anti-corruption legislation in Italy and in any country where Snam operates, involving employees, in any capacity collaborators, and business associates;
- adapt this document to any changes in the industry's regulations and context of Snam's organization, as well as the arising needs from the requirements and performance evaluations of Snam's Anti-bribery Management System;
- ensure the presence of a Compliance Function, appointed by senior management, for the prevention of corruption which is granted with autonomy and independence;
- prevent, in accordance with Snam's Code of Ethics, any conduct that may represent corruption or attempted corruption;
- encourage the reporting of potential misconduct in good faith, or on the basis of a reasonable belief in confidence, providing employees and stakeholders with tools to report conducts not in line with corporate policies while at the same time ensuring whistleblower's protection from any retaliation;
- promote the organizational and procedural solutions necessary to prevent and counteract the corruption phenomena;
- raise awareness by informing and training employees on anti-corruption issues;
- raise awareness of anti-corruption issues among all stakeholders by sharing with them appropriate information;
- prosecute any conduct that does not comply with this Policy and in general with the Anti-bribery Management System, according to the Company's disciplinary system.

This Policy is available to all internal and external stakeholders, including – where necessary – through translation into other languages, through publication on the Company's intranet and website.

To ensure proper and effective implementation of the Anti-bribery Management System, Snam has also established an Anti-Corruption Committee, which has been assigned with the responsibilities and necessary authority for the Anti-bribery compliance function as required by the ISO 37001:2016 standard, while at the same time ensuring the autonomy and independence necessary for the proper performance of the assignment.



Reports of improper conduct (so-called "whistleblowing"):

Snam encourages all parties affected by the application of the Anti-bribery Management System, both internal and external to the Company, to report any fact and/or conduct, including omissions, of which they have become aware by reason of their relations existing with the Company and which may have corruptive implications, even if only indirectly or potentially.

Snam is committed to promote awareness and adherence to the provisions of the Guidelines "Whistleblowing" that:

- allows personnel inside and outside the Company to report, directly or **anonymously**, in good faith or on the basis of reasonable belief, any attempted, suspected and actual bribery, or any violation of or weakness in the Snam's Anti-bribery Management System;
- provides the application of appropriate sanctions against those who violate the whistleblower protection measures as well as those who maliciously or negligently make reports that turn out to be unfounded;
- protects the confidentiality of the reporter's identity, prohibiting retaliation against, and therefore protecting, those who make reports in good faith.

For the submission of reports, including anonymous reports, Snam has activated the following channels:

- [IT platform](#), with access from the website of each Snam Group company
- e-mail: segnalazioni@snam.it
- P.O. Box: OMBUDSMAN SNAM - Piazza S. Barbara 7 20097 San Donato Milanese (MI)
- Direct meeting with the Internal Audit, at the request of the Whistleblower, to be fixed within a reasonable time.

Stefano Venier
Chief Executive Officer & General Manager