



Bribery prevention policy

SEA, aware of the negative effects arising from corrupt practices on economic and social development in the context in which it operates, is committed to preventing and combating the occurrence of illicit practices in the performance of its activities. As well as a legal obligation, the prevention of corrupt practices represents for SEA one of the principles on which the Company's actions are based, also considering the strategic importance of the sector in which it operates and the importance of the legal and social sphere in which its business is rooted.

As a concrete sign of its commitment in this area, SEA has already adopted:

- the Ethical System whose components - Ethical Vision, Value Diamond and Stakeholder Relationship Principles - have the nature of a strategic policy and are aimed at identifying the values and decision-making principles which the company abides by and respect to which it undertakes to be coherent in pursuing its mission;
- the Code of Ethics that identifies the principles and specific rules of conduct which the Company, its employees and collaborators, the members of its corporate bodies and, more generally, all its stakeholders must abide by;
- the Organisation and Management Model pursuant to Legislative Decree 231/2001.

As further confirmation of its commitment against illicit conduct, with the adoption of the Anti-bribery Management System according to the UNI ISO 37001 Standard, SEA intends to summarise and supplement the rules for preventing and combating bribery in an organic framework, with the aim of further raising in Stakeholders awareness of the rules and conduct that must be followed.

SEA therefore pursues with all means any corruptive conduct, requires compliance with the law and undertakes to enforce the Anti-bribery Management System according to the UNI ISO 37001 Standard.

SEA personnel, in carrying out their activities, adhere to principles of transparency, clarity, integrity and fairness.

More specifically, in business relations and contacts, conduct and practices that are even only potentially illegal or, for example, collusive, as well as attempts at corruption and favouritism, direct or indirect solicitations of personal and career advantages for oneself or for others and, more generally, acts that are contrary to the applicable regulatory provisions are prohibited.



SEA aims to base transactions, conducts and work methods, both in internal relations and relationships with third parties, on fairness, equity, integrity, loyalty and professional rigour, focusing attention on full compliance with law and with corporate procedures.

An ethical orientation (transparency, fairness and honesty in both external and internal conduct) is the essential approach for the credibility of SEA conducts towards shareholders/investors, customers and, more generally, the entire civil and economic context in which they operate, in order to transform the knowledge and appreciation of the values underlying the way the company operates into a competitive advantage.

SEA therefore undertakes to effectively implement and continuously improve its Anti-bribery Management System.

Those who operate in the name and on behalf of SEA, in the case of corruptive conduct and violation of the Law on bribery, are aware of committing offences which are punishable at the criminal, administrative and disciplinary (according to that provided for by the National Collective Bargaining Agreement) level.

SEA also requires its "Business Partners" to comply with current Laws, including Legislative Decree 231/01, the Code of Ethics and the Organisation and Management Model pursuant to Legislative Decree 231/01 – General Section, based on clauses whose violation implies termination of the contract.

The Company, considering reporting to be effective in counteracting the bribery phenomenon, encourages reports of alleged bribery phenomena through dedicated "whistleblowing" channels.

To this end, a specific company procedure is in force that regulates the management and verification of reports, guaranteeing confidentiality of the content of the reports, the identity of the person making the report and of the person reported and protecting the person making the report from any discrimination or retaliation.

SEA ensures that no employee is sanctioned, dismissed, demoted, suspended or discriminated against (i) for having refused to engage in illicit conduct, even if such refusal has resulted in detrimental consequences for the Company's business, or (ii) for having made a report in good faith regarding alleged bribery or violation of the SEA Anti-bribery Management System.

This version is a courtesy translation from the Italian text; in any case of discrepancy, the Italian version shall prevail.

The Italian version of this text has been approved by the Board of Directors on 22nd February, 2018.