

Approved by the Board of Directors on May 18, 2026

Board Oversight

This Policy has been approved by the Board of Directors of Westport Fuel Systems Italia S.r.l. ("Board") and is overseen at the Group level. The Board ensures that the Policy is consistent with the company's strategy and monitors its implementation through the relevant operational functions and the ESG Committee.

1. PURPOSE

The WFS Group is committed to preventing corruption and bribery in the conduct of its global operations and to strictly complying with the applicable anti-corruption laws and regulations of the local jurisdictions in which it operates, as well as with European and international laws. The WFS Group is also committed to acting transparently and ethically, ensuring that its business is conducted in the marketplace in accordance with fair, honest, and open competition.

The WFS Group does not tolerate corruption or other forms of bribery.

The purpose of these anti-corruption and corruption/extortion prevention principles is to ensure that requirements and prohibitions are clearly established for all individuals or third-party representatives involved.

This Policy reflects the principles of fairness, transparency, integrity, honesty, and the fight against corruption outlined in the Code of Conduct and in the Organization and Control Model pursuant to Legislative Decree 231/01.

2. SCOPE OF APPLICATION AND REGULATORY REFERENCES

The anti-corruption and corruption/extortion prevention principles set forth in this Policy apply to all affiliates and subsidiaries belonging to the WFS Group and include members of the Board, officers, employees, and third-party representatives (third-party agents, representatives, consultants, contractors, distributors, customers, suppliers, or intermediaries) who perform services for or on behalf of the Company and those who represent the Company's interests in any joint venture in such jurisdictions (collectively, "Affected Persons").

This Policy is based on and must be interpreted in accordance with the following principles:

- the anti-corruption laws in force in the countries where the WFS Group operates;
- the laws in force in the so-called "domestic" markets, in particular Legislative Decree 231/2001, the Italian Criminal Code, and the Italian Civil Code;
- the 2003 United Nations Convention against Corruption (the so-called Merida Convention);
- the relevant Council of Europe Conventions (Civil and Criminal Law Conventions on Corruption—1999);
- the OECD Conventions on Combating Bribery of Foreign Public Officials in International Business Transactions (1997);
- the U.S. Foreign Corrupt Practices Act (1977) and the UK Bribery Act (2010).

3. TERMS AND DEFINITIONS

When used in this document, the following terms have the following meanings:

"bribery" – an unlawful agreement between a private individual and a public official (or between private individuals in some cases), in which both parties derive a benefit;

"extortion" – occurs when a public official abuses their power to coerce or induce someone to give money or other benefits;

"conflict of interest" – a legal situation that arises when decision-making authority is entrusted to an individual who has personal or professional interests that conflict with the impartiality required by that authority, which may be

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compromised by those interests;

“public official” – any political party, political party official, or candidate for office; any appointed, elected, or honorary government official; any employee of a government or of a company owned or controlled by a government; and any employee of an intergovernmental organization, that is, an organization composed of sovereign states or other intergovernmental organizations. Intergovernmental organizations are established by treaty. The treaty serves as the charter under which the intergovernmental organization is created and provides it with international legal personality. Examples of intergovernmental organizations include the United Nations, NATO, and the European Union;

“government” – all levels and subdivisions of a government (e.g., local, regional, national, administrative, legislative, executive, or judicial, as well as royal or ruling families); any board of directors or corporation, commission, department, division, agency, court, or their political subdivisions controlled by the government; and any association, organization, or institution of which any of the entities listed above is a member;

“Gruppo WFS” – le società del Gruppo di cui Westport Fuel Systems Italia S.r.l. detiene il controllo;

“Affected Persons” – includes all members of the Board, officers, employees, and third-party representatives who provide services to or on behalf of the Company;

“facilitation payment” – these are generally payments made to a public official (often at a lower level of the hierarchy, but not always) with the aim of encouraging that official to perform, or refrain from performing, their duties, resulting in an economic benefit or advantage for the WFS Group;

“Third-party representatives” – agents, representatives, consultants, contractors, distributors, customers, suppliers, or third-party intermediaries who perform services for or on behalf of the WFS Group, and those who represent the Group’s interests in any joint venture in such jurisdictions;

“Company” – Westport Fuel Systems Italia S.r.l. and all its affiliates and subsidiaries;

“gifts and entertainment” – means anything of value or anything that should reasonably be considered of value to the recipient, including (but not limited to) event tickets, favors, cash or gift cards, discounts, travel expenses, services, and merchandise;

“WFS” – Westport Fuel Systems

4. POLICY OVERVIEW

4.1 REQUIREMENTS

All individuals involved must comply with these anti-corruption and anti-bribery principles, as well as all applicable anti-corruption laws and regulations in the local jurisdictions where the WFS Group operates.

4.2 GENERAL PRINCIPLES OF THE GROUP

The WFS Group must:

- reject and prevent corruption, in accordance with the “zero tolerance” principle;



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- ensure compliance with all applicable anti-corruption regulations;
- communicate and implement the principles of anti-corruption and the prevention of corruption and extortion set forth in our Policy; ensure compliance with this Policy and with local laws and regulations;
- ensure integrity in dealings with government agencies and private entities by conducting appropriate due diligence on third parties at risk of corruption and properly managing the relevant contractual relationship;
- prohibit “facilitation payments”;
- ensure the traceability of transactions;
- disclose any actual or potential conflict of interest as soon as it becomes known or if its existence is suspected.

4.3 PROHIBITIONS

The following is strictly prohibited and cannot be considered acceptable conduct for the individuals involved:

- accepting money, gifts, or other benefits (including those without monetary value) from customers, suppliers, or other parties with the intent to influence your decisions;
- offering gifts, favors, personal benefits, loans, or advantages to suppliers, customers, partners, or public administrations—or their employees (including political parties)—whether actual or potential, unless they are gifts of symbolic value that fall within the normal scope of hospitality between individuals collaborating professionally or within the framework of protocol;
- receiving or giving bribes (including those without monetary value), including an offer or promise to pay a bribe;
- using the services of third parties (e.g., agents or representatives) to indirectly bribe a public or government official (including a political party), a customer, a supplier, or a partner, or to pay, offer, or promise to pay third parties with items of value;
- offer bribes or illegal payments of any kind, in connection with a contract or a contractual payment, to employees, agents, or representatives of the other contracting party, including ministries, departments, or other government agencies;
- provide public or government officials (including political parties), customers, suppliers, or partners with hospitality or entertainment of an excessive or unreasonable nature that could reasonably give rise to the suspicion that the recipient might use their official position or influence to secure improper advantages for the Company.

Regardless of the customs of a particular country, all individuals involved must take care to strictly adhere to these principles of anti-corruption and the prevention of bribery, as well as to corporate standards and local laws regarding anti-corruption and the prevention of bribery in the conduct of business.

4.4 FACILITATIONG PAYMENTS

In some countries, such as the United States, Australia, and New Zealand, certain facilitation payments are permitted. In the European Union, however, facilitation payments are strictly prohibited and illegal. Since facilitation payments are not easily identifiable, there is a risk of unintentional violations of local laws: to ensure compliance, therefore, the WFS Group requires that all relevant individuals refrain from using or making



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facilitation payments even if permitted under local laws. For clarity, facilitation payments do not include payments available to all payers and the general public, such as an express or additional fee that payers may choose to pay to expedite a request or procedure. If you have any doubts or questions about whether a payment you intend to make on behalf of the Company is a facilitation payment, contact the Legal Department to discuss it before proceeding with the payment.

4.5 DUE DILIGENCE ON THIRD PARTIES

In the conduct of business activities, the relevant department must perform ethical and reputational due diligence on third-party counterparties, based on the counterparty's risk level and in accordance with company procedures, in order to assess (i) the integrity, professional reliability, and reputation of the potential counterparty, and (ii) possible risks of conduct inconsistent with the principles set forth in this Policy, the Code of Conduct, the 231 Model, and the provisions of applicable anti-corruption regulations. Compliance with these requirements is also monitored throughout the contractual relationship, in order to establish relationships solely with parties that enjoy a "good reputation," are engaged only in lawful activities, and whose ethical culture is aligned with that of the Company. Contracts with third-party counterparties include appropriate anti-corruption representations and warranties, and the criteria of competition, transparency, competence, cost-effectiveness, and fairness must be met.

4.6 CONTRACTS WITH GOVERNMENT OFFICIALS OR OTHER ENTITIES

Before contacting or entering into a contract with a foreign government official (at any level of the organization), a government entity, agency, department, or instrumental agency thereof, a state-owned entity, a public international organization, or an entity in which a foreign government official serves as an officer, director, or owner, the contract must be reviewed by the Legal Department for any potential corruption-related issues. The Legal Department, in collaboration with the head of the business unit responsible for the contract request, will conduct an appropriate due diligence review of the contracting party's background and reputation regarding corruption and bribery. In addition, the head of the business unit will also be responsible for investigating the contracting party's financial and commercial capabilities. The Legal Department will verify that the proposed contract includes adequate contractual safeguards, including anti-corruption and anti-extortion provisions and guarantees.

4.7 MEALS, GIFTS, AND ENTERTAINMENT

A modest gift can serve as a thoughtful token of appreciation, or a meal can provide an appropriate setting for a business discussion. However, if not handled carefully, the exchange of meals, gifts, and entertainment can, in fact, create—or give the appearance of creating—a conflict of interest or encourage or condone misconduct. This is especially true if it occurs frequently, or if the value of the meal, gift, or entertainment is high enough to suggest that it could improperly influence a business decision. In addition, accurate and complete records of such expenses must be created, maintained, and retained.

Meals, gifts, and entertainment must meet the following conditions:

- are of modest value;
- are infrequent;
- are unsolicited;
- are not given or received with the intent to bribe;
- are consistent with our industry or common business practices;
- are reasonable and appropriate given your position and circumstances;
- comply with the recipient's company policies, to the extent that such policies are known or should



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reasonably be known;

comply with local laws and are accurately and transparently recorded in the Company's books and records. With specific regard to gifts and entertainment, all individuals involved must use good judgment in determining whether the gift or entertainment is reasonable. This assessment may also vary depending on geographic location. If in doubt, or if you believe a gift or entertainment may exceed a modest value or is in any way inappropriate, seek guidance and approval from your manager or a member of senior management. Keep a record of all approvals and refusals regarding gifts and entertainment, noting the purpose, the names of the parties, and the nature and value of the gift or entertainment. In addition, the Persons involved must report to the Legal Department any gifts and entertainment received that exceed 200 euros.

It is important that meals, gifts, and entertainment do not:

- take the form of cash or cash equivalents, such as gift cards;
- be requested or solicited;
- be offered as bribes or kickbacks;
- embarrass you or the WFS Group, including entertainment at establishments with a sexual theme;
- compel or give the impression of compelling the recipient;
- violate applicable laws;
- create the appearance of a conflict of interest or a potential or actual conflict of interest; or
- create a perception of or actual undue influence, including with respect to business or government decisions.

In particular, gifts and entertainment must never be accepted from a business partner with whom you are engaged in contractual or business negotiations.

In addition, all WFS Group Personnel must be mindful of meals, gifts, favors, or entertainment that may be reasonable for a private customer but not for a public official or government agency, even if such official is acting on behalf of a private customer. All WFS Group Affiliates must always exercise due care when offering or accepting meals, gifts, and entertainment to ensure continued integrity and compliance with all applicable laws and policies, and must act in the best interests of the WFS Group.

4.8 INTERACTIONS WITH PUBLIC OFFICIALS

Routine government payments made in the normal course of business are permitted and may include, for example, taxes, royalties, deposits, permits, and customs duties.

Non-routine payments made to a government entity or public official for a legitimate purpose, which do not and are not intended to cause such entity or official to modify, alter, or make decisions that would not otherwise be made, may be permitted provided they receive prior approval from the WFS Group Legal Department.

The following forms of payment to government entities or public officials are not permitted at any time or for any reason:

- bribes and kickbacks: "bribe" means any type of incentive or reward offered, promised, or provided to induce a person to act inappropriately or as compensation for having done so.
- illegal facilitation payments: generally, "illegal facilitation payment" means a payment to a public official intended to encourage that official to perform, or refrain from performing, their duties, resulting in an economic benefit or advantage for the Company.

The only exception that allows for an otherwise prohibited payment is when it is necessary to protect the health or



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safety of an affected individual. If such a situation arises, the payment must be made immediately and then reported to the Legal Department as soon as possible.

4.8.1 Political contributions

Individuals classified as “Involved Persons” have the right to voluntarily participate in the political process and may make political contributions in their personal capacity. However, these individuals must always make it clear that their personal opinions and actions do not represent those of the WFS Group, and they must never use Company funds for political purposes without proper authorization. Making political contributions on behalf of the WFS Group is not permitted.

4.8.2 Meetings with Government Officials

Meetings with government officials are permitted only where there is a legitimate business purpose and must comply with applicable laws. At the conclusion of such meetings, a report must always be prepared summarizing the key details, including, but not limited to, the date, participants, reason for the meeting, and topics discussed; this report must be attached to the monthly report submitted to the WFS Legal Department.

4.8.3 Third-party representatives

Where a third-party representative is engaged to conduct business with a government entity or public official on behalf of the Company, such representative must acknowledge this Policy and the WFS Group Code of Conduct in writing prior to performing the engagement in question. A copy of the agreement must be provided to the WFS Legal Department. Where the Company engages a third-party representative for purposes related to lobbying activities, in order to conduct such activities on behalf of the Company, the representative must also provide evidence demonstrating their registration as a lobbyist in the appropriate jurisdiction. All new and ongoing engagements with third-party representatives for activities involving a Government Entity or a Public Official must be reported monthly to the WFS Legal Department.

4.9 MERGERS, ACQUISITIONS, AND JOINT VENTURES

Before entering into a merger, acquisition, or joint venture agreement, the Legal Department and the responsible business unit must oversee a due diligence review. The Legal Department and the responsible business unit shall ensure that the counterparties to the merger or acquisition comply with and have agreed to comply with anti-corruption laws, regardless of whether such counterparties are subject to those laws. Any merger, acquisition, or joint venture agreement must contain appropriate contractual safeguards, including a provision that the counterparties agree to comply with the Anti-Corruption and Prevention of Bribery/Extortion Principles.

4.10 HUMAN RESOURCES

The human resources management process must be conducted in accordance with the principles of impartiality, transparency, autonomy, and independent judgment. Specifically:

- The recruitment process must be formalized and ensure the absence of conflicts of interest between the recruiter and the candidate, as well as compliance with the principle of segregation between the functions requesting the resource and those conducting the selection;
- the employee evaluation process must be based on objective and transparent criteria, and any bonuses must be awarded only upon the achievement of predetermined objectives.

It is prohibited to hire employees or contractors based on specific recommendations from third parties in exchange



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for favors, compensation, or other benefits for oneself and/or the WFS Group.

Employees' travel expenses are reimbursed within the limits and in accordance with company procedures that define the types of eligible expenses.

In particular, travel expenses are summarized in an expense report, with itemized reimbursement, approved by the head of the relevant department and reimbursed upon verification of validity, eligibility, and relevance.

It is prohibited to use funds and reimbursements for travel expenses for purposes other than those for which such funds or reimbursements are intended.

4.11 MAINTENANCE AND REVIEW OF ACCOUNTING RECORDS

All business and financial transactions are conducted in accordance with the principles of legality, integrity, and transparency; for this reason, every transaction must be properly authorized, verifiable, and supported by adequate documentation to enable verification of its nature and purpose.

The Company records all business transactions in its accounting records in a detailed, transparent, truthful, accurate, and timely manner, and in accordance with applicable accounting principles. In particular, costs, payments, revenues, collections, and expenditure commitments are promptly recorded as financial transactions and must reflect the information contained in the supporting documents, issued in accordance with applicable laws.

Transactions and business operations are appropriately tracked and documented, and this traceability is ensured by the Company's personnel and information systems. The relevant documentation is properly archived.

4.12 CONFLICT OF INTEREST

The individuals concerned are required to avoid situations and activities that could give rise to a conflict with the Company's interests or that could interfere with their ability to make decisions in the Company's interest in an objective, transparent, and impartial manner. In particular, the Persons involved are required to refrain from activities, conduct, and actions that are in any way incompatible with the obligations associated with their relationship with the Company and to avoid conflicts of interest between their personal and family financial activities and those of the Company.

Any situation that may constitute or give rise to a conflict of interest must be promptly reported to the WFS Legal Department or through the designated reporting channels.

5. IMPLEMENTATION OF THE POLICY

5.1 WHO TO CONTACT

Issues related to corruption are not always obvious. Determining when a payment, gift, or business promotion is permitted under these anti-corruption and bribery prevention principles may involve complex legal questions and an analysis that depends on the facts of a specific case. If a Person involved is unsure whether certain conduct may violate these anti-corruption and bribery prevention principles, they must first seek assistance from the Legal Department before taking any further action.

5.2 TRAINING

It is the responsibility of the Affected Person to ensure that they understand and comply with these principles of anti-corruption and the prevention of corruption and bribery. To support this, the Company will provide mandatory training to staff on an annual basis or at other reasonable intervals; this may take the form of in-person and/or online training.

The Legal Department may also require that certain Affected Persons receive additional specialized training due to the nature of their role and responsibilities on behalf of the Company. At any time, an Affected Person may request training from the Legal Department.

5.3 REPORTING A VIOLATION



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If you have any questions about this Policy, please contact a member of the WFS Group Legal Department at legal.office@wfsinc.com or compliance.office@wfsinc.com

Violations or suspected violations of this Policy must be reported promptly:

1. To your manager
2. by contacting the Legal Department at legal.office@wfsinc.com or compliance.office@wfsinc.com
3. by using the whistleblowing channels available at each local entity
4. by contacting alert@wfsinc.com

This includes reporting any indication that a payment, transaction, or proposed contract may violate this Policy. Where possible, the report should specifically identify the issue related to the payment, transaction, or contract.

Failure to comply with this reporting requirement constitutes a violation of the Policy and, as with any other violation of this Policy, may result in disciplinary action, up to and including termination.

The Company is required to investigate all reported violations. The Company will not tolerate any form of retaliation or harmful action by employees against anyone who reports a potential violation in good faith or based on reasonable suspicion or concerns. All individuals involved must cooperate with any investigation conducted pursuant to this Policy.

5.4 SANCTIONS

Any person involved who violates this Policy is subject to disciplinary action, up to and including termination of employment. Persons involved may also be subject to penalties under applicable anti-corruption laws, including substantial fines, potential imprisonment, and other penalties.