



FRAUD POLICY

Fraud is a deception aimed at harming another's right. Therefore, fraud is understood to be any unfair conduct to the detriment of others, more serious than bad faith, with the aim of creating one's own advantage.

Therefore, fraud occurs whenever a person engages in malicious conduct aimed at creating its own economic advantage and to the detriment of the investor.

To this end, the following are some indications, by way of example, but not limited to, adopted by the Manager to avoid the risk of fraud.

a) Fraud in financial transactions

The payment of the investment portion must be made exclusively by the investor in favour, as the case may be, of the payment account or of the tied current in the name of the Offeror. Therefore, in this context, all the anti-intrusion safeguards implemented by the payment service provider or the banking system used apply.

Moreover, the risk of fraud is reduced by the mandatory procedures on the basis of which the payment service provider or the banking system assesses the identification of the investor, carries out the anti-money laundering procedure and takes care of the collection.

b) Fraud related to the publication of information material related to the project

Ener2crowd will publish the offer on the portal only after having carried out a careful evaluation of the project, the feasibility plan, the business plan and the lawfulness of the initiative, based on the rules established regarding the evaluation of the deal flow of the Bidding candidates.

For this analysis activity, Ener2crowd makes use of the corporate structure, but also of external partners. This activity allows the company to carry out a correct and exact check on the contents of the published offer, which will faithfully represent the reality of the project, the real prospects of success, highlighting in detail the positive and negative aspects of the investment.



At the same time, checks will be carried out on the lawfulness and truthfulness of the documents provided during the selection process of the initiative and in the preliminary phase of the offer.

Ener2crowd also guarantees, through its computer system, intrusions by third parties, and therefore that the material published is actually that produced by the Offeror and verified by the Manager, and not documents illegally uploaded by third parties.

c. Fraud related to the Offeror's conduct

Ener2crowd will carefully monitor the Offeror companies, in this regard all the main information relating to the company in question will be examined.

In particular, the process of publication of tenders provides for ex-ante controls relating to at least:

- the shareholding structure of the Offeror;
- the deed of incorporation, the articles of association and any registration of the Offeror in the register of innovative start-ups or innovative SMEs at the relevant Register of Companies;
- the current corporate governance structure.

Ener2crowd will also carry out a careful examination of organizational notions such as the structure, the technology owned, any employees, the particular skills of the management and more.