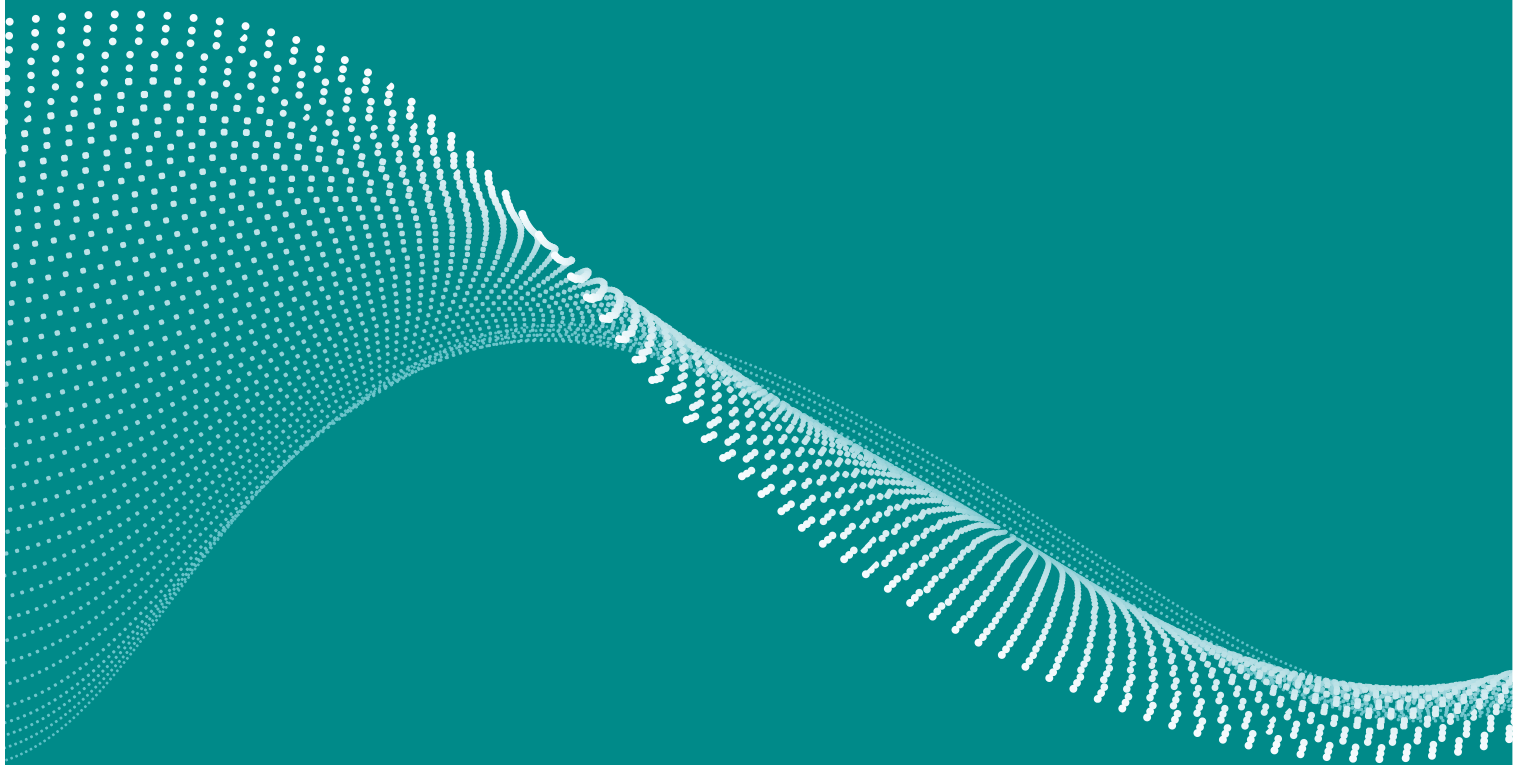


# POLIDORO

Policy for Preventing and Combating  
Corruption



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# 1 INTRODUCTION

The Board of Directors of Polidoro S.p.A. (hereinafter also referred to as the '**Company**') is firmly convinced that its commitment to the prevention of corruption can influence its contractual relations, thus guaranteeing a progressive dissemination of ethical principles and values to an increasingly broader sphere of stakeholders.

Polidoro S.p.A. formally undertakes to:

- comply with the fundamental principles laid down in the UNI-ISO 37001 standard;
- prohibit all forms of corruption by adopting a zero-tolerance approach to it;
- comply with all applicable national laws and anti-corruption requirements;
- encourage the reporting of suspicions in good faith, or on the basis of a reasonable and confidential belief, without fear of retaliation;
- make this Policy public, accessible and maintained at all levels of the company;
- share this Policy with the Addressees of the Policy as defined below.

Polidoro S.p.A. guarantees that all actions, operations, transactions and, more generally, the conducts held and followed by its employees and collaborators, are centred on the utmost fairness, transparency and objectivity, in order to prevent any risk related to corruption.

With reference to the definition of corruption, the Company refers to the meaning attributed to it by the legislation in force, as well as to the corporate rules, policies and procedures it has adopted.

The Code is inspired by and must be interpreted on the basis of the principles expressed:

- current anti-corruption legislation and in particular Legislative Decree 231/2001 and the Italian Criminal Code;
- the Italian Civil Code (with particular reference to Article 2635 and Article 2635 bis);
- by the 2003 United Nations Convention against Corruption (the so-called Merida Convention);
- by the relevant Council of Europe Conventions (Civil and Criminal Law Conventions on Corruption -1999);
- best practices and international standards (UNI ISO 37001) on preventing and combating corruption.

# 2 GENERAL PRINCIPLES AND AIMS OF POLITICS

The values expressed by the Board of Directors of the Company, by means of this Policy, consistently with the Code of Ethics and the Polidoro Group's Code of Conduct, apply to directors, auditors, managers, employees, consultants, collaborators and in general to all those who operate in Italy and abroad on behalf of or in favour of the Company (hereinafter the "**Addressees**") or who have business relations with the same, each within the scope of their functions and responsibilities.

The Company reaffirms that its activities, in contrast to any and all forms of corruption, are characterised by the principles of integrity, transparency, honesty and fairness. In particular:

- rejects and stigmatises the use of illegitimate or otherwise improper conduct to achieve its economic objectives;
- shall not tolerate any kind of bribery of public officials, or any other party, in any form or manner, in any jurisdiction, even if such activities were in practice permitted, tolerated, or not judicially prosecuted; in particular
  - "Promising or offering to representatives of the P.A. (or to persons "close to" or "liked" by them) or any other party, money, gifts or other benefits in the name of and/or on behalf of the Company and/or in circumvention of corporate procedures;
  - " making unjustified entertainment expenses for purposes other than the mere promotion of the corporate image;
  - "promising or providing, even through a "third party", work/services of personal benefit;
  - "Providing or promising to provide, soliciting or obtaining information and/or documents that are confidential or otherwise likely to compromise the integrity or reputation of either or both parties;
  - " favour, in purchasing processes, suppliers and sub-suppliers as indicated by the Public Administration representatives themselves as a condition for the subsequent performance of activities.
  - "It prohibits the offering and receiving of gifts or other benefits that may constitute a breach of law or conflict with this Policy;
- stigmatises the pursuit of personal and/or third-party interests to the detriment of social interests;
- puts in place organisational tools to enable the prevention of violations of rules and principles of transparency, fairness and loyalty by the Addressees of this Policy;
- establishes the prohibition of contributions, advantages or other benefits to political parties and workers' trade union organisations, or to their representatives or candidates, without prejudice to compliance with any applicable legislation.

# 3 GOVERNANCE

It is the task of the Board of Directors, led by the President, to verify that this Policy complies with legal and ethical duties and is respected by all Addressees.

# 4 COMMUNICATION AND TRAINING

The Company promotes awareness of this Policy so that everyone understands, in relation to their role:

- the corruption risks to which it may be subject;
- the Corruption Prevention Policy adopted by the Company;
- preventive actions to be taken and reports to be made in relation to the risk or suspicion of malpractice.

The Policy is communicated to all Addressees in the manner defined by the Company.

# 5 REPORTS

## NON-CONFORMITY

Any violations of this Policy must be reported in the form and manner provided for in the operational **Whistleblowing** Rule.

Reports can be made through the external platform **Ethic Point** at the following link:

<https://ethicpoint.eu/polidoro-spa/>

In accordance with the highest international standards, the information you provide on the reporting page will be handled in a way that ensures maximum protection for those who send communications or requests for information and in accordance with applicable data protection laws. The information you provide will be handled to ensure maximum protection of the reporter and, if requested, handled completely anonymously and exclusively by EthicPoint's independent service.

# 6 MEASURES DISCIPLINARY MEASURES

In the event of any violation of this Policy, the internal procedures referred to herein and/or the applicable legislation, without prejudice to the liability arising from criminal and administrative proceedings, sanctions shall be applied against the persons responsible in accordance with the provisions of the law, collective and contractual agreements.

Violation by third parties of the principles contained in this Policy may result, on the basis of specific assessments by the Company, in the non-establishment or termination of business relations.

# 7 MONITORING AND IMPROVEMENT

It is the task of the Board of Directors to carry out constant monitoring of the correct application of this Policy to ensure its maximum effectiveness.

# 8 REVIEWS

Any amendments to this Policy are subject to the approval of the Board of Directors of Polidoro S.p.A.

The Company is committed to ensuring that the general requirements of its management system for the prevention of corruption are met, and is committed to the constant and continuous improvement of that system.

**POLIDORO S.P.A**

The President

