The Organization is fully aware that corruption represents an obstacle to economic, political, and social development, as well as a serious distortion of the rules, fairness, and competitiveness of markets.

To prevent, detect, and address this phenomenon, the Organization adopts and maintains an Anti-Corruption Management System (AIMS), based on risk assessment, the involvement of personnel and business associates, training, and the effectiveness of controls.

In application of this commitment, Top Management establishes an Anti-Corruption Policy, consistent with the purpose and context of the Organization, based on the following principles:

- Rigorous compliance with applicable regulations regarding the prevention and combat of corruption, both in Italy and in the countries where the Organization operates, as well as any other anti-corruption requirements subscribed to;
- The absolute prohibition of any form of corruption, active or passive, direct or indirect, including attempts at corruption and behavior carried out through intermediaries or other third parties;
- The promotion, at all levels, of a culture of corruption prevention characterized by integrity, legality, transparency, accountability, and ethical conduct, including by setting an example from Top Management;
- Analysis of the context and the needs of interested parties, the identification and periodic reassessment of corruption risks, including in relation to organizational changes and climate factors where relevant;
- The definition and review of anti-corruption objectives consistent with this Policy, as well as the planning of actions necessary to achieve them and verify their effectiveness;
- The prevention, detection, disclosure, and management of actual, potential, or perceived conflicts of interest that could compromise the impartiality of decisions;
- The adoption of financial and non-financial controls proportionate to risks, with particular attention to the selection and verification of business associates, relations with third parties, gifts, hospitality, donations, and other benefits;
- Raising awareness and involving business associates, suppliers, and collaborators so that they comply with applicable provisions and adopt behavior consistent with the Organization’s anti-corruption commitments;
- Periodic training and awareness-raising for personnel on corruption risks, prohibited behaviors, individual obligations, and the tools of the Anti-Corruption Management System;
- Raising awareness and training employees on the impacts of climate change on the Organization, including from an anti-corruption perspective;
- The availability of channels to report, in good faith or based on reasonable belief, violations and suspicions of corruption, in compliance with confidentiality, whistleblower protection, and applicable regulations;
- The prohibition of retaliation, discrimination, or penalties against anyone who makes protected reports or refuses to participate in corrupt acts, even when this may result in the loss of business opportunities;

- The assignment to the Anti-Corruption Function of adequate authority, independence, competence, and resources, with the ability to report directly to the governing body and Top Management, where appropriate;
- The monitoring of controls, the management of non-conformities and corrective actions, periodic review, and continuous improvement of the adequacy and effectiveness of the Anti-Corruption Management System.

All recipients of this Policy are encouraged to promptly report, through the established channels, facts or behaviors that may constitute violations, even alleged ones, of the Anti-Corruption System. The Organization guarantees the confidentiality of reports and protection from retaliation in accordance with applicable regulations and internal procedures.

Violations of this Policy by personnel and collaborators will be evaluated and sanctioned, where grounds exist, in accordance with applicable legal, contractual, and disciplinary provisions, in a manner proportionate to the severity of the facts.

Violations by business associates, partners, or suppliers may result in the application of contractual measures provided for, up to the termination of the relationship, in compliance with applicable regulations.

The Organization communicates this Policy to its personnel and relevant business associates, makes it available to interested parties, promotes understanding of it, and periodically verifies its adequacy.

Top Management confirms its commitment to complying with the requirements of UNI ISO 37001:2025, promoting an effective anti-corruption culture, and pursuing the continuous improvement of the Anti-Corruption Management System.

La Direzione