



POLICY FOR THE PREVENTION OF BRIBERY AND CORRUPTION

The high Direction of GIOVETTI firmly believes that his commitment to corruption and bribery prevention can influence his contractual relations, thus guaranteeing a progressive diffusion of principles and ethical values to a sphere of increasingly wider interest.

GIOVETTI formally assumes the commitment to:

- ✿ comply with all the requirements of the UNI ISO 37001 Standard;
- ✿ prohibit any form of bribery and corruption by adopting a zero tolerance approach towards it;
- ✿ observe the national laws, the other Laws, the Anti-Corruption Authority Guidelines and current anti-corruption and bribery requirements;
- ✿ implement and maintain the Anti-Bribery System in order to guarantee continuous improvement of its performance;
- ✿ to oversee the application of the internal Code of Ethics and of the Disciplinary Code regarding the regulation of business conduct;
- ✿ make this Policy public and accessible at all levels of the company through posting on the bulletin board, publication on the site and suitable training;
- ✿ encourage reporting of facts that, on the basis of a reasonable conviction or known in confidence, appear to be illicit or in any case in contrast with corporate behavior codes, without fear of retaliation;
- ✿ adapt this Policy to regulatory developments in the sector and the needs arising from the requirements defined in the Anti-Bribery management system with a view to continuous improvement.

GIOVETTI assigned the task of "conformity function for the prevention of bribery and corruption" RPCT to Geom. Elia Levoni; for this role, RPCT has the authority to act in the presence of any bribery and corruption and independence in order to be able to carry out the investigation of the case by relating directly to AU.

A Supervisory Body (OdV) has been appointed outside the GIOVETTI and independent in ensuring compliance with the requirements set by the Organizational Model and MOG Management in accordance with the provisions of D.Lgs. 231/2001.

To achieve its anti-corruption and bribery objectives, GIOVETTI expresses his willingness to involve and share the commitments for a widespread Anti-Bribery Policy to all the Stakeholders (employees, collaborators, business partners, partners, suppliers, etc...), punctually specifying the following requirements:

POLITICAL AIMS

It is the purpose of this Policy:

- ✿ to be aware of the internal responsibilities and those of those who work for GIOVETTI and maintain an irreproachable attitude in the face of incidents or attempts at bribery and corruption and in terms of transparency towards the public administration, partners, clients;
- ✿ provide information and assistance to those who work for GIOVETTI on how to recognize and manage aspects and behaviors related to bribery and corruption.

It is a CRIME to offer, promise, give, request or accept utilities of any kind to obtain advantages not due to the public administration or private individuals; the subjects considered guilty of this crime are punishable with imprisonment up to a maximum of ten years and/or with a pecuniary penalty.

An organization that is incapable of preventing bribery and corrupt behavior, in addition to the incalculable damage to reputation, may be subject to an unlimited sanction and exclusion from participation in public tenders.

For this, GIOVETTI, takes his legal responsibilities very seriously.

In this Policy, the term Stakeholder means any individual or organization with whom one comes into contact in the performance of one's job: actual and potential clients, business partners, suppliers, professional contacts, consultants and public bodies, including their consultants, representatives and officials, members and political parties, employees, partners, collaborators, etc...

This Policy is not part of the employment contract and may be changed at any time.



DEFINITION OF CORRUPTION

It is bribery to offer, promise, give or accept a financial or other benefit, to induce those who receive it, or another individual, to perform their functions improperly, or to recognize a reward of any kind for acting inappropriately, or again when the recipient of the benefit behaves incorrectly accepting the advantage.

The benefit includes money, gifts, loans, fees, hospitality, services, discounts, the assignment of a contract or any good of value.

There is talk of misconduct when an individual acts in an illicit manner, contrary to ethics or expectations of good faith or impartiality related to his position, or abuses his position of trust.

Incorrect behavior may relate to any business or professional activity, public functions, actions in the exercise of their work or any other activity performed by or on behalf of an organization of any kind.

There is talk of abuse of power when a public official abuses the power entrusted to him to obtain a private advantage.

The company's attention is directed to preventing even incidents of bribery and corruption among individuals.

Examples:

- ✿ offer a benefit: offer a potential customer tickets for an important sporting event, but only on condition that he accepts to conclude a deal with GIOVETTI.
This is an illegal behavior because the offer is aimed at obtaining a commercial and contractual advantage.
The responsibility for this behavior can also extend to GIOVETTI itself, as the offer was made to provide a business to the company.
Finally, the behavior of the potential customer who accepts the offer is also illicit.
- ✿ receive a benefit: a supplier gives a job to your nephew, but declares bluntly that in return he expects you to use your influence in the organization to get the contract renewed.
The supplier acting in this way commits a crime.
And the same applies to you if you accept the offer, as you will do so for the purpose of obtaining a personal advantage.
- ✿ promote a benefit to a public official: make sure that the company corresponds to a facilitating payment to a public official to speed up a practice, for example to obtain an authorization.
Corruptive behavior towards the public official takes place at the same time as the offer is formulated, as it is aimed at obtaining an advantage for the company; in a case like this, the company is also punishable.

NON-PERFORMING BEHAVIOR

No employee/collaborator/partner in business/partner etc.. is allowed or to anyone else acting on behalf of these:

- ✿ give, promise or offer money, gifts or hospitality with the expectation or in the hope of receiving a commercial advantage, or reward in any way a commercial advantage already obtained;
- ✿ to make or accept gifts or hospitality while commercial negotiations or tenders are under way, if such behavior can be perceived as a will to influence the result;
- ✿ accepting money, gifts or hospitality from a third party we know or suspect that he made the offer with the expectation of obtaining a commercial advantage in return for himself or for anyone else;
- ✿ accepting hospitality from a third party in exaggerated places or situations;
- ✿ offer or accept a gift to / from a public official or person in charge of a public service, or representatives of political parties, without the prior authorization of the Company Management;
- ✿ carry out threats or retaliation against an individual who has refused to commit an act of bribery and corruption or who has denounced its occurrence;
- ✿ take any action that could be considered a violation of this Policy.

Anyone in the performance of an activity finds a behavior that can be considered "corruptive", is authorized to refrain from performing it and to report it to RPCT or the OdV.

VIOLATIONS OF THIS POLICY

Employees who violate this Policy are subject to disciplinary sanctions that may lead to dismissal for misconduct as provided for by the Disciplinary Code and by the Corporate Regulations of GIOVETTI.



GIOVETTI has the right to interrupt relations with other individuals and organizations working on their behalf at any time if they are guilty of violating this Policy.

All reports in relation to the violation of this Policy may be transmitted either in confidential or in an anonymous form to the "RPCT Correction Prevention Correction Function" directly by e-mail to the address elia.levoni@emilogiovetti.it or through a special message box or to the Supervisory Board (OdV) at the following addresses: odv.giovetti@gmail.com and OdV GIOVETTI at Avv. Luigi Meduri, Via dei Montecchi n. 9 – C.A.P. 37122 Verona (VR).

GIOVETTI undertakes to protect the whistleblower from any form of retaliation, as well as ensuring his anonymity.

All personnel, if they have any doubts about how to behave in the presence of an alleged suspect, can request support at any time to RPCT, or to the OdV.

This Policy is made available to interested parties by publication on the company website www.emilogiovetti.it.

the Administrator

CAV. EMILIO GIOVETTI s.r.l.

LUCA CIONI

Il Legale Rappresentante