

## PURPOSE

As well as the **Code of Ethics** adopted by the Group, this Anti-Corruption Policy is inspired by the **United Nations** request to

<<embrace, sustain and realize those values fundamental the fields of human rights, work standards environment, and contrasting corruption>>

codified in the Universal Declaration of Human Rights, in the ILO Declaration on Fundamental Principles and Rights at Work, and in the tenth principle of the **Global Compact** pursuant to which

<<companies pledge to fight any form of corruption, including extortion and bribery>>.

Consistently with our Code of Ethics, therefore, the Companies belonging to our Group **must carry out their business with honesty, fairness, transparency, impartiality, reliability and integrity**, in compliance with all the applicable national and international laws.

This "Anti-Corruption Global Policy"

- expresses the Gi Group Holding's commitment to anti-corruption and compliance with applicable anti-corruption provisions;
- defines principles of conduct for the detection and prevention of potential corruption incidents in order to protect the integrity and reputation of the Group;
- communicates the anti-corruption principles to stakeholders both inside and outside.

## SCOPE

This Policy is issued by Gi Group Holding S.p.A. (hereinafter also the "Parent Company") and it applies to all the companies directly or indirectly controlled by it, or to its affiliates, in Italy and worldwide (hereinafter referred to as "Gi Group Holding" or simply the "Group's Companies"), which formally adopt it and implement it.

Each Group's Company adopts any other prevention and control tool in order to deal with its specific risks and to regulate the processes of its own activity, with specific regard to the applicable legal and operational context.

## GI GROUP HOLDING'S COMMITMENTS

The Group does not tolerate any kind of corruption, towards any person or entity, public or private, and in any Country in which it operates.

Therefore, the Group prohibits:

- offering, promising, giving, paying, authorizing a third party to give or pay, directly or indirectly, money, undue benefits, economic advantages of any value or other avails to any Public Officer, national or foreign, or to a private individual, with the intention of inducing him/her to perform (or omit) an act connected with his/her office or assigned tasks.
- requesting, receiving or authorizing a third party to request or receive, directly or indirectly, money, undue benefits, economic advantages of any value or other benefits from a Public Officer, national or foreign, or from a private individual, in order to perform (or omit) an act related to the assigned tasks.

The Policy also sets out the specific **rules of conduct in key corruption risk areas**, such as:

- gifts, hospitality and representation expenses,
- relations with the public administration,
- forbidden facilitation payments,
- contributions and relationships with trade unions and political organisations,
- entrustment of tasks, works and supplies to third parties,
- M&A and joint ventures,
- staff selection and recruitment,
- donations and sponsorships,
- accounting entries.

## ROLES AND RESPONSIBILITIES

The Policy clearly identifies roles and responsibilities for the implementation of commitments and actions required to:

- the Top Managers of Gi Group Holding S.p.A. and of the Group's companies;
- the Group Anti-Corruption Officer;
- the Local Anti-Corruption Officer at Country Level
- the Group Internal Audit Department.

In the performance of their duties, all Group Personnel are required to comply with the Policy, the Anti-Corruption Laws, the Code of Ethics and the supporting internal procedures.

## IMPLEMENTATION

Each Group Company adopts the Policy (including its attachments) and the Local Anti-Corruption Officer is appointed promptly, in order to ensure that respect for Anti-Corruption laws and regulations is always integrated in our activities, policies and decisions.

This Policy is brought to the attention of all Group Personnel through appropriate communication activities and made available on the Company intranet.

Each Group's Company promotes the knowledge of the Code of Ethics, this Policy and the local Anti-Corruption Laws and plans and manages training activities related to the Policy. Participation in the training activity is mandatory.

## GRIEVANCE AND DISCIPLINARY PROCEDURES

Gi Group Holding promotes a culture that does not admit any retaliation towards any reporting of breach (or suspected breach) of this Policy. Any violations of this Policy, even if only suspected, may be reported:

- to the Local Anti-Corruption Officer, or
- through the **Gi Group Holding Reporting Channel** available also on Group websites in line with the provisions of the "**Whistleblowing Global Policy**".

Violation of the Policy by the Group Personnel will result in the adoption of **disciplinary measures** in accordance with the provisions of the regulations and contractual provisions governing the specific employment relationship.