

## Anti-Bribery Policy

Exprivia, in implementation of the values of loyalty, honesty, fairness, legality and professionalism has adopted: **Code of Ethics, Policy for the prevention of corruption, internal procedures, regulations** and aims to consolidate the relations with its stakeholders, in terms of:

- **Creation of economic value:** by inspiring business activities over time to the principles of sound and prudent management, also with the aim of safeguarding the consistency and integrity of its tangible and intangible assets. By creating wealth in various forms, to be distributed to stakeholders thanks to the greater value that goods and services acquire, as a result of the continuous improvement actions of the company's organisational, management and production activities.
- **Fairness and transparency:** to set up and establish relations with Stakeholders, both internal and external, in compliance with the principles of clarity, fairness, legality and transparency, pursuing the principles of preventing corruption, and meeting their legitimate expectations, guaranteeing correct and exhaustive corporate communication, cooperation and transparency with tax authorities, institutions, control bodies and the media, in the required timeframe and manner.

The following guiding principles are the foundation of our **improvement process**:

- **Identify** potential risks that could threaten organisational processes and mitigate them as far as possible in order to safeguard the interests of stakeholders and the company;
- **Disseminate** within and outside the Company a vision: of product/service quality; of safeguarding health and safety in the workplace; of social responsibility; of ethical behaviour in full respect of anti-corruption
- **Acting** according to the values of honesty and integrity in the management of fiscal activity
- **Operate** according to the principles of continuous improvement of company management systems, promoting the participation and consultation of stakeholders;
- **Design, organise and implement** services in such a way as to meet the needs and expectations of customers and other stakeholders;
- **Develop** appropriate control systems to monitor the quality level of the services provided, the risks for the Company's anti-corruption issues;
- **Develop and extend information and communication processes**, promoting dialogue with stakeholders, to ensure clarity and transparency in relations;
- **Promote** the professional growth of its collaborators, through staff training and qualification programmes;

The company's core business, being centred on the supply of goods and services for the public and private sectors, leads the company's staff and business partners to enter into working relationships with the public administration and private entities.

Exprivia Spa prohibits and is committed to fighting corruption in all its forms, requiring compliance with current anti-corruption laws. The company prohibits both active behaviour (offering, promising, giving, paying, authorising someone to give or pay, directly or indirectly, material benefits, economic advantages or other utilities to a Public Official, political parties, political foundations or private individuals) and passive behaviour (accepting, or authorising someone to accept, directly or indirectly, economic advantages or other utilities or requests or solicitations for economic advantages or other utilities from a Public Official, political parties, political foundations or private individuals). The Company also strongly condemns situations of 'maladministration' in which public administration or private company personnel may be improperly conditioned through facilitation payments, whether such action is successful or remains at the level of an attempt.

The Company is therefore committed to fulfilling the requirements of the management system for the prevention of corruption defined by the ISO 37001 standard with a view to continuous improvement, and representing this Policy as a framework for establishing, reviewing and achieving objectives for the prevention



of corruption. In addition, senior management has appointed the Manager for the Prevention of Corruption Management ('RGPC') with authority (understood as the set of responsibilities attributed to the function and made known to all company personnel) and independence (guaranteed by non-involvement in activities identified as being at risk of corruption), and operates under a direct mandate from senior management to:

- supervise the design and implementation of the Management System for the Prevention of Corruption;
- report on the performance of the Management System for the Prevention of Corruption to the Governing Body and Top Management as appropriate.

Exprivia also encourages the reporting, in good faith and on the basis of reasonable belief, of suspicions of attempted, presumed and actual acts of corruption, as well as of any violation or deficiency concerning the management system for the prevention of corruption. Reports can be made on the Exprivia website (Corporate Social Responsibility > Whistleblowing; ; at the following addresses: <https://www.exprivia.it/it-tile-5843-whistleblowing/> ).

In particular, all alerts will be handled in such a way as to ensure:

- the confidentiality of the identity of the whistleblower and the prohibition of retaliatory acts against him/her;
- conversely, the protection of the rights of the Company and of the persons involved in the report in the event that criminal or civil liability is ascertained for the reporting person in connection with the falsity of the statement;
- that the report be made completely anonymously.

Violation of this Anti-Bribery Policy and procedures by employees and senior management of the Company will result in the application of sanctions in accordance with the provisions of the OMC 231, the Code of Ethics, the collective labour agreement and other applicable regulations.

Breach of this Anti-Bribery Policy by Third Parties (any third party, not an employee, with whom the Company has or plans to establish any business relationship, such as customers, suppliers, any subcontractors, consultants, agents and business brokers, shareholders, investee and associated companies, legal persons identified as potential targets for the implementation of an extraordinary merger or acquisition transaction) shall entail contractual termination, without prejudice to any claims for damages.

Molfetta, 14/11/2022

Chairman & CEO  
Domenico Favuzzi