

IMPORTANT NOTICE



THIS DOCUMENT IS A TRANSLATION OF THE ORIGINAL DOCUMENT IN ITALIAN LANGUAGE, DONE FOR COMMERCIAL PURPOSES. IN CASE OF DIFFERENCES BETWEEN THE TWO, THE ITALIAN VERSION SHALL PREVAIL.

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The top management of G.M.A. S.r.l. is firmly convinced that its commitment to the prevention of corruption can influence its contractual relationships, thus guaranteeing a progressive diffusion of ethical principles and values to an ever-wider sphere of stakeholders. G.M.A. formally undertakes to:

- Comply with all the requirements of the UNI-EN-ISO 37001 standard;
- Prohibit any form of corruption by adopting a zero tolerance approach towards it;

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- Observe the national laws, the other anti-corruption laws and requirements in force;
- Implement and keep the "Anti-Bribery" System up to date in order to guarantee continuous improvement of its performance;
- Supervise the application of the internal Code of Ethics regarding the regulation of business conduct;
- Make this Policy public and accessible at all company levels by posting it on the bulletin board, publishing it on the site and suitable training;
- Encourage reporting of suspects in good faith, or on the basis of a reasonable and confidential belief, without fear of retaliation;
- Adapt this Policy to the regulatory changes in the sector and to the needs deriving from the requirements defined in the Anti-Bribery management system with a view to continuous improvement.
- In order to achieve its anti-corruption objectives, G.M.A. expresses its willingness to involve and share the commitments for a widespread Anti-Bribery Policy to all Stakeholders (employees, collaborators, business partners, , partners, suppliers, etc.), specifying punctually the following requirements:

1. Purpose of the policy

The purposes of this policy are:

- be aware of our responsibilities, and those of those who work for G.M.A., and maintain an irreproachable attitude towards corruption;
- provide information and assistance to those who work for G.M.A. on how to recognize and manage aspects and behaviors related to corruption.

It is a CRIME to offer, promise, give, request or accept "bribes". Individuals found guilty of this crime are punishable by imprisonment for up to ten years and / or with a monetary penalty. In addition to incalculable damage to reputation, the company that is unable to prevent corrupt behavior may be subject to an action and exclusion from participation in public contracts. For this, G.M.A. takes its legal responsibilities very seriously.

In this policy, the term "Stakeholder" means any individual or organization with whom you come into contact in the performance of your work: actual and potential customers, business partners, suppliers, professional contacts, consultants and public bodies, including their consultants, representatives and officials, representatives and political parties, employees, partners, collaborators, etc.

This policy is not part of the employment contract and can be changed at any time.

2. Subjects obliged to comply with the policy

This policy applies to all individuals who work for G.M.A. S.R.L. on behalf of G.M.A S.R.L. , in the broadest sense of the concept: employees of all levels, managers, officers, seconded staff, volunteers, trainees, contractors, external consultants, representatives of third parties and business partners, sponsors, business partners or any other individual associated with AMEC, wherever it is located.

3. Policy managers

Top Management is responsible for verifying that this policy complies with legal and ethical duties and is respected by all stakeholders.

G.M.A. 's ANTI BRIBERY COMPLIANCE FUNCTION (CF) was set up, with the task of supervising the design and implementation of the anti-corruption management system, implementing it, monitoring its use and effectiveness, resolving any matter related to it and constantly check the internal control systems and procedures aimed at contrasting possible corrupt acts. Management at all levels must ensure that all parties under its responsibility are aware of the policy and respect it, and receive adequate and constant training in the matter. Each employee is invited to express their opinion on the policy and in general on the Anti-Bribery management system and to suggest possible improvements. Any comments, advice and questions must be sent to the COMPLIANCE FUNCTION (CF).

4. Definition of corruption

It is corruption 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 a reward of any nature is recognized for having acted in a manner inappropriate, or even when the recipient of the benefit behaves incorrectly by accepting the advantage.

The benefit includes money, gifts, loans, fees, hospitality, services, discounts, the awarding of a contract or any valuable item.

There is talk of misconduct when an individual acts unlawfully, contrary to the ethics or expectations of good faith or impartiality related to his position, or abuse of his position of trust. The incorrect behavior can concern any business or professional activity, public functions, actions in the exercise of one's work or any other activity carried out by, or on behalf of, an organization of any kind.

5. Behavioral conduct

No employee / collaborator / business partner / partner etc. is allowed. or anyone else acting on their behalf:

- give, promise or offer money, gifts or hospitality with the expectation or hope of receiving a commercial advantage, nor reward in any way a commercial advantage already obtained;
- make or accept gifts or hospitality while commercial negotiations or tenders are underway, if such behavior can be perceived as a desire to influence the result;
- accept money, gifts or hospitality from a third party whom we know or suspect has made the offer with the expectation of obtaining a commercial advantage in exchange for itself or anyone else;
- accept hospitality from a third party in excessively expensive places or situations;
- offer or accept a gift to / from a government official or his representatives, or representatives or political parties, without the prior authorization of the Company Management;
- implement threats or retaliation against an individual who refused to commit an act of corruption or who denounced its occurrence; or
- take any action that could be considered a violation of this policy.

5.1. Facilitative payments or bundles

In G.M.A. we do not pay or accept facilitated payments or bribes of any kind.

Facilitated payments, or "bundles", are small sums of money paid under the counter to secure or expedite a service (generally by a public official). Bribes are payments made in exchange for a favor or commercial advantage.

In G.M.A. S.r.l., behaviors involving the making or acceptance by the staff or on behalf of the same, of a facilitating payment or a bribe, or which suggest the offer or acceptance, must be avoided. If you are asked to make an G.M.A. payment, pay close attention to why it is made and if the sum requested is proportionate to the goods or services provided. Always ask for a receipt containing the purpose of the payment. If you have any suspicions, concerns or concerns about a payment, submit the matter to the COMPLIANCE FUNCTION (CF).

5.2. Gifts, hospitality and expenses

This policy allows hospitality costs or entertainment events (whether offered or received) the support of which meets reasonableness criteria, aimed at:

- establish or maintain good business relationships;
- improve or maintain the company's image or reputation; or
- offer their services more effectively.

You are not allowed to accept or make a gift from / to a third party (if not of minor importance and with the consent of the Company Management).

It is allowed to make or receive to / from customers, suppliers and commercial partners, small promotional gifts, such as for example stationery items bearing the company name.

Reimbursing a third party's expenses, or accepting a refund offer (for example, costs incurred to attend a business meeting) is generally not considered to be corrupt behavior. However, an overpayment compared to the norm (such as an extended hotel stay) is not acceptable.

5.3. Donations

G.M.A. does not finance political parties.

G.M.A. eventually makes donations for charity, legal, ethical and in compliance with local regulations and practices. The offer or making of any donation is not allowed without the prior authorization of the Company Management.

5.4. Accounting registrations

G.M.A. has adequate internal and external controls capable of justifying any payment made to third parties.

Employees are required to declare and keep written records of all hospitality expenses and gifts, whether offered or received. These registrations will be subject to review by the COMPLIANCE FUNCTION (CF).

Requests for reimbursement of expenses incurred for hospitality, gifts or payments to third parties must be submitted as required by company policy, stating and recording the reason for the payment.

All reports, invoices and other records relating to transactions with third parties, including suppliers and customers, must be made in detail and with the utmost accuracy. The establishment of "black funds" aimed at facilitating or concealing illegal payments is not allowed.

5.5. Individual responsibilities

Each employee / collaborator / business partner / partner etc. is required to read, understand and comply with the provisions contained in this policy.

The prevention, detection and reporting of possible acts of corruption fall under the responsibility of all those who work for or under the control of G.M.A.. Any behavior that can be identified as a possible violation of this policy should be avoided.

Any Stakeholder can immediately contact the COMPLIANCE FUNCTION (CF) if he believes or suspects that a behavior is, or may be, in conflict with the provisions of this policy: for example, if a customer or potential customer offers you something in exchange for a commercial advantage, or expressly declare that a gift or payment is aimed at renewing a contract. Other examples of "alarm bells" to signal the risk of corrupt behavior are illustrated at the bottom of this Policy.

5.6. Reporting of suspected

Any Stakeholder can report any doubts or suspicions in relation to corrupt acts. Speak to your manager immediately if a bribe is offered to you or an illegal payment is requested, or if you believe or suspect that it has occurred or corrupt events may occur.

If you are not sure how to interpret a certain behavior, explain your doubts to the COMPLIANCE FUNCTION (CF).

6. Protection

In G.M.A dialogue is encouraged and anyone who expresses in good faith reasons of concern in relation to this policy is encouraged, even if they prove to be unfounded.

The Company Management ensures that no one undergoes discriminatory treatment for refusing to become an accomplice of corrupt acts or for having reported in good faith the occurrence or possible occurrence of such behavior. Discriminatory treatment means dismissal, disciplinary measures, threats or other punitive behavior following the report.

Anyone who believes to be a victim of this situation can promptly inform the COMPLIANCE FUNCTION (CF).

7. Training and communication

The update on this policy is part of the lifelong learning path for all individuals who work for G.M.A. and must be ensured constantly.

The attitude of zero tolerance towards corruption must be communicated from the beginning of the relationship to all suppliers, contractors and commercial partners and reiterated in the course of relations.

8. Violations of this policy

Employees who break this policy are subject to disciplinary sanctions that can lead to dismissal for misconduct as provided for in the G.M.A. Disciplinary Regulations.

G.M.A. has the right to terminate relations with other individuals and organizations operating on our behalf at any time if they are guilty of violating this policy.

The Top Management makes available all human and economic resources in order to allow the maintenance and achievement of the prevention objectives on corrupt acts in relation to company processes.