

## ANTI-BRIBERY POLICY

01	October 2024	SGI POL 03	<i>Anti-bribery Compliance Function Leonardo Verna</i>	<i>MD Mirella Festosa Raffaele Pellegatta</i>
<b>REV.</b>	<b>DATE</b>	<b>CODE</b>	<b>PREPARED</b>	<b>APPROVED</b>

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## 1 SCOPE

This document stands as a general framework to establish, reexamine, and reach the goals for bribery prevention. It outlines the company's values, aiming to guarantee ethical management that is coherent and compliant with the law.

## 2 APPLICATION AREAS

This document is addressed to each subject entering and/or entertaining rapports and relations with HPC Italia S.r.l., hereinafter the Society.

Specifically, to be compliant with the requirements, the document should be read and understood by the following subjects:

- Business partners, administrators, and any other subject appointed a senior position
- Employees
- Any individual that, independently from the role/position, represents and/or works on behalf of the Society's interests
- Any individual that, directly or indirectly, permanently or temporarily, establishes relations and rapports with the Society or operates to achieve the Society's objectives.

## 3 GENERAL PRINCIPLES

The Society, being aware of the negative effects due to corrupt practices, both on an economic and societal level in the sectors wherein it operates, is committed to preventing and contrasting any crime during its activities.

In compliance with national, European, and international law, as well as the principles of loyalty, correctness, full transparency, honesty, and integrity, the Society prohibits any practice having a corrupt connotation, illegitimate favors, collusive behavior, or soliciting of an advantage for the individual or others.

Moreover, to protect the Society's interests, recipients of this document should avoid situations and/or activities that could lead to a conflict of interest or that could interfere with the capacity to make impartial decisions.

Adopting the above-mentioned behaviors is not justified in any case, even in those circumstances where the Society's interests and advantages seem to be the aim and/or the reason behind such behaviors.

The addressees are aware that the violation of the present document, or of the control system of which it is an integral part, will lead to disciplinary actions and/or termination of any existing agreement/contractual relationship.

## 4 CONTROL SYSTEMS

As proof of the Society's willingness on this matter, the Society's management has adopted an Organization, Management and Control Model as introduced by the Legislative Decree 231/2001, which includes both a Code of Conduct and an Anti-bribery management system, in compliance with ISO 37001 standards, and integrated into the Society's Management system.

Such measures constitute the control system's foundations, aiming to protect the Society's reputation and integrity.

#### **4.1 Anti-bribery management system**

The Society's management commits to both satisfying the Anti-bribery management system's requirements and actively promoting its continuous improvement through a periodical evaluation of the system's needs, objectives, and expected results.

Regarding this goal, the Society's management has adopted an Anti-bribery Compliance Function, of which the authority (defined by the given responsibilities and role within the Society), knowledge, and independence necessary to carry out such duties are guaranteed.

#### **4.2 Internal communication channel**

The Society encourages the reporting, also anonymously, of alleged bribery actions and behaviors through its internal communication channel, which can be accessed on the Society's website <https://hpcag.integrityline.com/>. The channel is managed and monitored by a qualified third party, Development Compliance Partners S.r.l.

The Society invites the interested parties to look at the Whistleblowing Policy, which regulates the management and verification of reports, to guarantee the privacy of the whistleblower, the reported person/crime, and the content, while also protecting the whistleblower from eventual discrimination or retribution.

The Whistleblowing Policy can be found on both the Society's website and server *T:\Sistema di Gestione\SGI\01.POLITICA-AAI-OBIETTIVI-DVR-DVRO*.