

## Anti-corruption Policy

The corporate group S.A.C.B.O. (hereinafter “Group” or “S.A.C.B.O.”) is inspired by principles of ethics and integrity and, aware of the legal obligations and the negative effects arising from corruptive practices in the socio-economic field, it is committed to preventing the occurrence of offences in the conduct of its business activities, counteracting any possible outbreak.

S.A.C.B.O. collects, in a comprehensive framework, the rules for preventing and combating corruption, by drawing up a dedicated Anti-Corruption Model to raise awareness of the prevention of corruption and by committing itself to carrying out the Model efficiently and to update it continuously.

The Anti-Corruption Model is part of the broader corporate governance system, through the creation of a specific Section dedicated to the prevention of corruption within the Organization, Management and Control Model pursuant to Legislative Decree 231/2001 (MOG 231) adopted by the Companies of the Group. The MOG231 makes it possible to classify and analyze, by assessing the risk, the types of corruption, in terms of “active corruption” (in the interests of the Group) and “passive corruption” (in disadvantage of the Group), both with regard to the Public Administration and between private parties.

Therefore, the Group complies with the regulatory framework, it prosecutes any corruptive behavior and commits itself to enforcing the system of prevention of corruption described within the Anti-corruption Model.

In order to confirm this commitment, the Anti-corruption Model is made up by this Policy and:

- The Code of Ethics of the Group;
- The Organization, Management and Control Model pursuant to Legislative Decree 231/2001 adopted by the parent company S.A.C.B.O. S.p.A.;
- The Organization, Management and Control Model pursuant to Legislative Decree 231/2001 of the S.A.C.B.O. S.p.A. wholly-owned Company BGY INTERNATIONAL SERVICES S.r.l.;
- The Anti-Corruption Procedure of the parent company S.A.C.B.O. S.p.A.;
- The Anti-Corruption Procedure of the wholly-owned Company BGY INTERNATIONAL SERVICES S.r.l.;
- The Whistleblowing Procedure of the Group.

Corporate boards, employees and external partners of S.A.C.B.O., who are part of the organization in any capacity, as well as all the third parties concerned, must comply with the principles of fairness, integrity, fairness and objectivity in the performance of their duties.

The business activities must be performed on a best efforts basis, and with utmost honesty, collaboration, loyalty and professional accuracy, in compliance with laws, procedures and corporate regulations.

Subjects who act in the name of and on behalf of S.A.C.B.O. S.p.A. and BGY INTERNATIONAL SERVICES S.r.l. should be aware of incurring in offences punishable in criminal, administrative, and disciplinary terms, in case of corruptive behaviors and breach of the anti-corruptive Laws.

S.A.C.B.O. also requires its business partners to comply with the applicable laws, the Code of Ethics of the Group and the Organization, Management and Control Model pursuant to Legislative Decree 231/2001 adopted by S.A.C.B.O. S.p.A. and BGY INTERNATIONAL SERVICES S.r.l., through the use of contractual clauses entitling the Companies to the termination of the contract, without prejudice to any further compensation, if the third party is involved in breaches and offenses pursuant to Legislative Decree 231/01.

S.A.C.B.O. considers the whistleblowing reporting tool an effective instrument to counteract the corruptive phenomenon and it gives the possibility to report unlawful conduct or violations of the Organization,

Management and Control Model pursuant to Legislative Decree 231/2001. It remains established that S.A.C.B.O. has decided not to take into account anonymous reporting.