

## **Introduction**

Palladio Group operates its business with loyalty, fairness, transparency, honesty and integrity in compliance with the applicable laws, in the field of corruption prevention, in order to conduct its business in a lawful manner avoiding situations that could compromise the reputation of the Group.

This Policy:

- bans corruption in all its forms, including extortion and bribes;
- intends to consolidate and strengthen the behavioral principles provided for in the Group Code of Ethics that must govern our conduct, so as to comply with the applicable laws on the prevention of corruption at international level;
- integrates and collects all aspects related to the conduct of prevention of corruption contained in other policies and guidelines of the Group such as: Chart of Values, Suppliers Code of Conduct, Social Responsibility Policy;
- intends to communicate Palladio Group's expectations and commitments regarding corruption prevention. This policy is in fact communicated in the appropriate languages within the Organization and to all other interested parties.

## **Policy Scope**

This Policy applies to all Palladio Group employees and to those of affiliated or investee companies and also contractors who work on our Sites are required to comply with it. Furthermore, in relation to our Sustainable Procurement Policy, we promote the principles of this Policy to our suppliers.

## **Our commitment**

In general, it is forbidden to put in place, collaborate or give any reason to behaviors that, taken individually or collectively, integrate, directly or indirectly, the types of crime, while violations of the general principles set out in this Corruption Prevention Policy are also prohibited.

Especially:

### **a) Conflict of interests**

The utmost care must be taken to avoid situations in which the subjects involved in the transactions are, or may appear, in a conflict of interest.

In order to prevent this it is stated that:

- Any operation / activity must be undertaken only in the interest of the Company in a lawful, correct and transparent manner.

- Conflicts of interest must be avoided between personal (or family) economic activities and the tasks held in the Company.
- It is forbidden to carry out work activities (of any kind and also outside of working hours) at Customers, Suppliers and competitors of the Company.
- No personal favors, let alon money must be accepted from people or companies wishing to enter into business relations with Palladio Group.

**b) Competition**

Palladio Group bases its competitive ability in the quality of the products / services required, in technical assistance, in the professionalism and commitment of its collaborators, in technological and organizational innovation. It recognizes the value of free and fair competition by abstaining from illicit agreements and harassing behavior.

**c) Relationship with public institutions**

Any relationship with the Public Administration is inspired by the respect of the impartiality to which same is held and of the good progress of the relationships.

These reports are only for the functions and responsibilities delegated in this regard.

It is not permitted to promise and / or offer valuable objects, services or favors (to Managers, Officials or Employees of the Public Administration or to their relatives) to obtain an interest or an advantage for Palladio Group. The offer of gifts or other small-value utilities is allowed only if they fall within legitimate customs.

The recipients of the Code, in the face of checks and/or inspections by the competent public authorities, must maintain a behavior of maximum availability and collaboration.

Palladio Group does not finance parties, their representatives or candidates and refrains from any pressure (direct or indirect) against political exponents.

The Company may adhere to requests for contributions from non-profit organizations and associations with regular by-laws and contituent acts.

Sponsorship activities can concern social issues, the environment, sport, art and culture in general.

It is also specified that Palladio Group does not allocate grants or public funding for any other purpose other than that for which the contributions have been granted.

**d) Gifts**

Except for the presents, which can be classified as "acts of commercial courtesy", a gift means any kind of benefit in cash, in kind or in service.

Gifts that can be interpreted as a means of obtaining favorable treatment for any relationship / activity connected to the Palladio Group are not allowed.

The above applies to both gifts offered and those received.

The management of gifts offered is regulated by a specific company procedure.

For gifts received, a company provision is issued that sets the eligibility parameters.

Collaborators who receive gifts, for an amount greater than that indicated in the aforementioned provision, are required to communicate it to the Ethics Committee which assesses its appropriateness or otherwise (if necessary, it shall notify the sender of the Palladio Group policy on the matter).

**e) Accounting and corporate transparency**

Any operation or transaction, understood in the broadest sense of the term, must be legitimate and therefore must be: Authorized, Registered, Verifiable, Consistent and Congruous.

Accounting transparency is based on the accuracy, completeness and authorization of the basic information for the related accounting records.

For each operation the supporting documentation and traceability of the activity carried out is kept (each operation must reflect exactly what is shown in this documentation).

All company payments to be paid must be commensurate with the service and contractual arrangements and can not be made to a party other than the contractual counterparty.

Any kind of omission or falsification of which the Employees should become aware must be immediately reported to the Ethics Committee.

All subjects responsible for the formation of data and information contained in financial statements, reports or other corporate communications required by law are required to verify the relative correctness/truthfulness.

It is forbidden for the Directors of the Palladio Group to carry out any behavior aimed at causing any harm to the company assets or ,even potentially, a damage to creditors.

**f) Sanctions system**

The violation of this Policy, as well as the applicable laws relating to the prevention of corruption, may result in criminal and/or civil sanctions for both the Company and individuals involved.

Employees are required to scrupulously observe the rules and provisions that make up the code of ethics.

Failure to comply with the organizational and management model will be subject to sanctions proportional to the severity of the breach and prior contestation of the facts in accordance with the relevant contracts in force and laws/regulations in force in the country in which Palladio Group operates with its plants.

With regard to relations with external collaborators for whatever reason, the suspension/revocation of the assignment will be adopted.

For the contracting companies of works and services, for suppliers and in general for all external subjects that perform services and activities in favor of the Company, monetary sanctions will be applied, until the termination of the contract in the most serious cases or, in less severe cases, in case of repeated behaviors.

**g) Monitoring and Assessment**

The Management of Palladio Group ensures the implementation of control procedures (audits) aimed at ensuring the conduct of the commercial activity on a global level in compliance with the policies of Palladio Group, as well as all the applicable Laws and Regulations.

Such controls are carried out in order to constantly monitor and verify compliance with this Policy, related procedures and the laws and regulations referred to in it by employees.

**h) Notifications**

All directors, officers and employees of Palladio Group and its affiliates who suspect or are aware of violations of this Policy or of the laws and regulations mentioned above, must report to the Ethics Committee by adopting the Whistle blowing procedure.

**Chief Executive Officer**

*Dr. Mauro Marchi*

