

ANTICORRUPTION POLICY

In Ghella we operate at the highest standards of behaviours and **ethics**, conducting business while maintaining our longstanding **transparency** and trustworthiness tradition.

This policy, together with the Anticorruption Guideline, aims at strengthening the principles outlined by the Code of Ethics and the relevant internal documentation, setting out principles for **anti-bribery** and **anti-corruption** in accordance with national and international laws and regulations, assisting Ghella's employees to recognize situations that must be avoided.

Ghella, in carrying out its activities, is committed to:

- conducting business with a high level of integrity;
- not tolerating any type of corruption or bribery in any form or by any method, directly or indirectly, regardless of the jurisdiction, within the Public sector or the private sector;
- not tolerating any action against or by third party aiming at promoting or favouring its own interests, securing a benefit or that could affect impartiality and independent judgement;
- guaranteeing its records are kept accurate, complete, transparent, in compliance with the relevant accounting principles, and applicable laws on such matter.
- guaranteeing that no employee will be subject to termination, demotion, suspension, threat or any disciplinary measure for refusing to make a prohibited payment or any other corruptive behavior.

As stated above, Ghella's provisions on such matters are not limited to monetary payments, but encompass also, inter alia, gifts, business hospitality and Public Relations events, political contributions, sponsorships, charity and donations, facilitation and extortion payments, selection and employment processes, extraordinary transactions.

Ghella determines adequate measures aimed at ensuring compliance with the above-mentioned principles, as outlined in the dedicated Global Anticorruption Guidelines, in the Code of Ethics and by the applicable national and international laws. Ghella's personnel and third parties, which, for various purposes, are involved in its business, are directly responsible for the implementation of the present document (including internal correlated documentation). Managers will be held responsible for ensuring its team applies such provisions.

This Policy is communicated to our employees and it is **available to all interested parties**.

It is assessed regularly during the Management System Review, with a view to continuous improvement and to ensure consistency with the company's mission and vision. Any employee who infringes this Policy with correlated internal documentation or avoids to report infringements, will incur in **disciplinary actions** including termination of employment.

Giandomenico Ghella
Chairman, July 2018