

In Ghella we operate according to the highest standards of behavior and ethics, maintaining our long tradition as for **transparency** and reliability in the business conduct.

This Policy, together with the Anti-Corruption Guidelines and in line with the Code of Ethics, is inspired by the "**zero tolerance to corruption**" defining appropriate measures to reinforce the standards and principles which rule the conduct of personnel, in compliance with national and international laws and regulations as well as with the principles expressed by **ISO 37001:2016** and the Organizational Model pursuant to Legislative Decree 231/2001.

Ghella, in carrying out its activities, commits:

- to conduct business with a high level of integrity;
- not to tolerate any kind of corruption, in any form or method, directly or indirectly, regardless of the jurisdiction, in public or private sector;
- not to tolerate any action, towards or by any third party, aimed to promote or favor its own interests, for obtaining an unfair advantage, or which may affect impartiality and independence of judgment;
- to ensure to keep to its accounting records accuracy, completion, transparency, in accordance with the reference accounting standards and applicable legislation;
- to ensure that no employee will be subject to dismissal, demotion, suspension, threat, or any disciplinary measure as for refusing to make a prohibited payment or any other corrupt behavior.

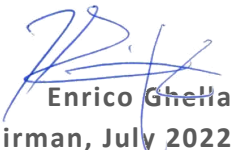
To enable the implementation of a suitable, adequate and effective Corruption Prevention Management System, Top Management has established the Conformity Function for Corruption Prevention endowed with competence, status, authority and independence.

Ghella's directors, auditors, staff and all third parties who are involved in the company's activity in various capacities, are directly responsible for the application of this document. Executives and managers are responsible to supervise on the compliance from their staff members with the provisions stated in this Policy.

All recipients of this document are encouraged to **report** any potential violation they become aware of, even indirectly, during their work activities. Ghella is committed to treat all reports in a confidential form to ensure the protection of those who whistleblower from any form of retaliation or discrimination. Any employee or third party who fails to act in accordance with this Policy will incur **disciplinary sanctions**, including the termination of working relationship.

**This Policy is communicated to our employees and, as for what necessary, to our partners and suppliers, as well as being available to all other interested parties.**

This Policy is reviewed regularly during the Management System Reviews, with a focus to continuous improvement and to ensure it is consistent with the company's mission and vision.



**Enrico Ghella**  
Chairman, July 2022