

Anti-corruption Policy

For the company CLARIMOND MANIFATTURA everything starts with values. There is no higher priority than being loyal, fair and honest.

It does not matter the territories in which we operate, nor our relationships with suppliers, customers, public administrations and other stakeholders: we must live our values such as respect for people, honesty, transparency and integrity.

Our commitment to integrity and compliance with ethical conduct is particularly important in the area of prevention and detection of corruption. Our attitude towards corruption is clear: the policy we apply is zero tolerance. We know we operate in difficult environments and in cultures where corruption can be widespread, but this can never be an excuse. It is essential to ensure that our people and those working on our behalf understand their responsibilities and behave according to our values.

It is the company's choice to comply with all laws, regulations and regulations on the fight against corruption, in Italy and in all the countries in which it operates. The company CLARIMOND MANIFATTURA is committed to conducting its business activities in a way that does not involve any type of corruption and does not facilitate or risk involvement in illegal situations: this is in relations with public subjects and with Private Subjects.

The Policy is aimed at anyone who works for the Company worldwide, regardless of location, function or level of seniority. The corporate policy on anti-corruption clearly includes the commitment to:

- Prohibit Corruption in all practices and transactions carried out by the company and by agents acting on its behalf;
- Establish the criteria and approve the procedures that Employees must adopt regarding the offer and / or acceptance of donations by third parties.
- Protect the reputation of the Company;
- Promote responsible practices among the main business partners;
- Support the communities in which it operates by offering their support to initiatives;
- Ensure compliance with all anti-corruption laws applicable to the Company;
- Strengthen international enforcement and awareness of anti-corruption laws;
- Prohibit corruption in all practices and transactions carried out by the company and by agents acting on our behalf;
- Protect employees from feelings or negative consequences for having identified good faith aspects related to corruption, for refusing to participate in bribery, or to make a facilitator payment where Facilitative Payments are prohibited, even if such behavior could cause losses to 'enterprise';

In particular:

- a) **Provision of monetary and in-kind benefits.** It is forbidden to grant benefits of any kind (money, promises of employment, etc.) in favor of representatives of the Italian or foreign Public

Administration, Partners, or their next relatives, aimed at acquiring favorable treatment in the conduct of any business activity or that can in any case influence the independence of judgment or induce to assure any advantage for the company.

b) Gifts. It is forbidden to distribute gifts and perform acts of courtesy and hospitality to representatives of public officials and public employees, in charge of public service and employees of Partners, if not within the limits of a modest value and in any case such as not to compromise the integrity or reputation of one of the parties and could not be interpreted, by an impartial observer, as aimed at gaining improper advantages.

c) Acceptance of monetary and in-kind benefits. It is forbidden to receive money, gifts or any other benefit or to accept the promise, from anyone who intends to enter into a relationship with the Company and wants to unduly achieve a more favorable treatment than the one due.

d) Commercial incentives. Any commercial incentive must be in line with the common market practices in the country of reference, must not exceed the limits of value allowed and must have been approved in accordance with the provisions of the internal rules. The recognition of any commission, discount, credit, and rebate must be granted in accordance with current legislation and officially granted to corporate entities, upon presentation of supporting documentation.

f) Performance. It is forbidden to perform services in favor of external collaborators and partners who do not find adequate justification in the context of the contractual relationship established with the same, as well as pay compensation in favor of the same that do not find adequate justification in relation to the type of task to be performed.

g) Cash use. No payment over € 3,000 can be made in cash both in Italy (where it is legal limit) and abroad.

i) Sponsorships. Sponsorship will be provided for the sole purpose of promoting the image and services provided by the company.

No employee will ever be penalized, not even by evaluation of the result, salary or any other method, for refusing to pay bribes. However, advance planning is part of a legitimate evaluation of an employee's performance; therefore, you should always plan ahead, so that you do not have to face a situation in which a bribe is claimed to speed up a request.

The Company applies a "zero tolerance" approach to violations of this Policy. All employees are required to uphold the ethical standards of the Policy and must take responsible action to prevent any violation of the Policy. The admonition and / or termination of the employment contract is foreseen for any intentional violation of this Policy or for the non-communication and for the violations of which it is known.

Infractions may also refer to law enforcement authorities and imply criminal proceedings. Corruption is a crime punishable by severe prison sentences.

ROMA, 10.07.2024

