



ARGOMM

ARGOMM GROUP

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**ANTI-CORRUPTION
POLICY
OF ARGOMM S.P.A.**



ADDRESSEES:

- All our employees

APPROVAL:

- Human Resources and Social Responsibility Dept.

INDEX

1. SCOPE	4
2. APPLICABILITY	4
3. GENERAL PRINCIPLES	4
4. APPLICATION OF ANTI-CORRUPTION CONDUCT	4
4.1. Complimentary gifts	4
4.2. Invitations to events or entertainment.....	5
4.3. Values over €75.....	5
5. DONATIONS	6
6. TRAINING AND COMMUNICATION	6
7. SUPPLIER ETHICS	6
8. DISCIPLINARY FRAMEWORK	6
9. INTERNAL CONTROL	6
10. RESPONSIBILITY	7
11. MISCELLANEOUS	7
12. REFERENCES	7

1. SCOPE

To avoid and tackle corruption with the introduction of an anti-corruption culture and relative regulations within the organisation. Guidelines focused on the principles of transparency, honesty, fairness and integrity, ensuring clarity as regards to permissible conduct and compliance of the activities of Argomm Spa with relevant anti-corruption laws, as well as safeguarding the highest levels of integrity.

2. APPLICABILITY

The indications provided in these guidelines apply to the entire company, without distinction of role or responsibility.

3. GENERAL PRINCIPLES

The company intends to introduce measures that are reasonable and proportionate to its size, activities and the industry in which it operates.

Argomm acknowledges that the giving and accepting of gifts and hospitality or entertainment at events, are all part of standard business practices and relations, but it is convinced that such practices should not be carried out or accepted in order to exert inappropriate influence.

All Argomm employees are therefore prohibited from giving, promising, offering, requesting or receiving money.

Furthermore, the company requires maximum transparency and ethics when it comes to gifts or presents.

This rule applies to relationships with customers, suppliers pursuant to the purchase of goods and services, institutions, public officials and among Argomm personnel or relations in general.

Argomm does not endorse any form of bribery or corruption.

Therefore, employees must refrain from accepting or donating money, payments or gifts to customers, potential customers, suppliers, or Public Officials in order to obtain a business assignment, favour or advantage.

4. APPLICATION OF ANTI-CORRUPTION CONDUCT

Corruption is defined as:

Offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties.

4.1. Complimentary gifts

The company establishes that, in principle, it is admissible to offer gifts and hospitality with the primary intent of developing relations with business partners, suppliers, customers, and individuals. Occasional, relatively small gifts and hospitality are a valuable tool for encouraging positive collaborations, and are therefore admissible and acceptable.

It is not permitted to offer or receive gifts or hospitality that may compromise a decision or give rise to a sense of obligation in the choices to be made, and therefore be misinterpreted. We must therefore ask ourselves: "Is this too much?", "Is this a gift or attempted bribery?", "Hospitality or

persuasion?”, “Am I being influenced by somebody?” If such acts are not justifiable, one can assume they are not acceptable.

It is therefore permitted to accept gifts of a maximum value of around €75.00 (tax included) or an equivalent amount in foreign currency, without any form of reporting required.

The recipient may choose to distribute, share with colleagues, or donate the gift received to charity.

It is therefore permitted to offer gifts of a maximum value of around €75.00 (tax included) or an equivalent amount in foreign currency, without any form of reporting required, after informing and obtaining due authorisation from one's superior.

Under no circumstances is it permitted to offer or accept money, of any amount, or divide a gift into several parts to reduce its economic value.

It is the responsibility of the giver or receiver of the gift to use computer tools or other means to check the value in advance, or by contacting their superior or the Human Resources and Corporate Social Responsibility Department.

4.2. Invitations to events or entertainment

It is therefore permitted to accept invitations to events or entertainment for a maximum value of around €75.00 (tax included) or an equivalent amount in foreign currency, without any form of reporting required.

It is therefore permitted to offer invitations to events or entertainment for a maximum value of around €75.00 (tax included) or an equivalent amount in foreign currency, without any form of reporting required, after informing and obtaining due authorisation from one's superior.

For the sake of clarity, invitations to events or entertainment include: dinners at restaurants outside working hours, tickets to sporting, cultural and musical events.

The recipient may choose to distribute, share with colleagues, or donate the invitation received to charity.

It is the responsibility of the giver or receiver of the invitation to use computer tools or other means to check the value in advance, or by contacting their superior or the Human Resources and Corporate Social Responsibility Department.

4.3. Values over €75

Accepting gifts or invitations to events and entertainment of an approximate value of over €75.00 (tax included), or an equivalent amount in foreign currency, will require a 35-RUC form to be submitted. The form will need to be authorised and countersigned by one's superior. It is the duty of one's superior to deliver the form to the Human Resources and Corporate Social Responsibility Department. It is the duty of the Human Resources and Corporate Social Responsibility Department to manage the completed forms and inform the Chief Executive Officer, who is required to review and control them.

Before offering gifts or invitations to events and entertainment of an approximate value of over €75.00 (tax included), or an equivalent amount in foreign currency, a 35-RUC form must be submitted to one's superior to receive due authorisation. The superior in question can decide whether or not to authorise the gift or invitation: if authorisation is granted, the superior shall sign the form; if authorisation is denied, the superior will not sign the form.

Upon receiving authorisation from one's superior, the applicant is permitted to offer the gift or send an invitation to events or other entertainment.

Without receiving authorisation from one's superior, the applicant is not permitted to offer the gift or send an invitation or other entertainment.

Regardless of whether or not authorisation has been granted, the superior shall send the 35-RUC Form to the Human Resources and Corporate Social Responsibility Department.

It is the duty of the Human Resources Department to manage the completed forms and inform the Chief Executive Officer, who is required to review and control them.

5. DONATIONS

Donations to charitable organizations (non-profit organizations, sports associations, benevolent organizations in compliance with applicable legislation) are permitted provided that they are not made with the intention of obtaining personal, financial or political advantages for any customer, supplier or third party. Ultimately, donations shall not be made with the purpose of influencing the recipient appropriately or in exchange for benefits.

6. TRAINING AND COMMUNICATION

All Agromm employees are made aware of the contents of the Anti-Corruption Policy and Code of Conduct; the company reserves the right to disseminate the Code of Conduct using all means of information and communication media deemed appropriate. Adequate information shall be guaranteed to all new recruits during the application of the specific new employee Entry Procedure.

7. SUPPLIER ETHICS

Argomm has defined its guidelines and policies regarding ethical and anti-corruption requirements in its Supplier Specifications.

8. DISCIPLINARY FRAMEWORK

Compliance with relative decisions is in agreement with the obligations established for employees under art. 2104 of the Italian Civil Code:

Art. 2104. Diligence of the service provider.

The service provider shall must use the due diligence required by the nature of the agreed service, the interests of the undertaking and the superior interests of national production. The same shall also comply with the rules on the performance and discipline of the work assigned by the owner and his collaborators towards whom he is hierarchically dependent.

He shall also comply with the provisions of the relevant CCNL (National Collective Bargaining Agreement) concerning Disciplinary Measures.

9. INTERNAL CONTROL

Compliance with this Code of Conduct shall be monitored annually by QAS during the internal audit of the Quality System.

The Human Resources and Corporate Social Responsibility Dept. shall draw up an annual report tracking both the gifts or invitations received and the requests (authorized and unauthorized) to give

gifts or invitations, so as to ensure review and control by the Board of Directors, in the presence of the Board of Statutory Auditors.

10. RESPONSIBILITY

It is the responsibility of those who receive or intend to offer gifts or invitations to events/entertainment to verify their value beforehand, with the support of their superior or the Human Resources and Corporate Social Responsibility Dept.

It is the responsibility of those who intend to offer gifts or invitations to events/entertainments) of an approximate value equal to or below €75.00 (tax included) to seek the informal authorisation of their superior.

It is the responsibility of those who accept or intend to accept gifts or invitations to events/entertainments of an approximate value of over €75.00 (tax included) to read the contents of paragraph 4.3 of this procedure.

It is the responsibility of those who accept or intend to accept gifts or invitations with an approximate value of over €75.00 (tax included) to complete the reference form (FORM. 34-RUC or FORM 35-RUC).

It is the responsibility of the Purchasing Department to manage the procurement of the authorised gift or invitation to events/entertainments.

It is the responsibility of the Human Resources and Corporate Social Responsibility Department to provide complete and necessary documentation to the Chief Executive Officer.

It is the responsibility of QAS to carry out the audit.

11. MISCELLANEOUS

Although the Code Instructions are specifically aimed at relations with the Public Administration in order to oppose corruption, it refers to and is inspired by the Italian legislation envisaged by Law 190/2012 to determine its code of conduct, to the CCNL for the specific work category, the articles that govern Corporate relations and disciplinary measures.

12. REFERENCES

- FORM 34-RUC: RECEIVING GIFTS OR INVITATIONS TO EVENTS OR ENTERTAINMENT FORM
- FORM 35-RUC: REQUEST TO GIVE GIFTS OR INVITATIONS TO EVENTS OR ENTERTAINMENT FORM