

ANTI-CORRUPTION POLICY

TECHNITAL S.P.A. has implemented an Anti-Bribery Management System in compliance with UNI ISO 37001:2016, defining and implementing this Anti-Corruption Policy.

The Company declares the absolute obligation to strictly comply with all laws, rules, and regulations on anti-corruption in Italy and in all countries where the Company operates

The Company is committed to conducting its commercial and business activities in such a way as to never be involved in any form of corruption, whether in dealings with public or private entities. It also commits to developing its business based on ethical principles and fair competition within the market in which it operates, countering any actions that distort it.

In particular, through the Anti-Corruption Policy, the Company :

- Prohibits any form of corruption or attempted corruption;
- Commits to compliance with Legislative Decree 231/01, UNI ISO 37001:2016, and national regulations;
- Ensures that the Anti-Corruption Policy is appropriate to its stated purposes and enables the achievement of anti-corruption objectives;
- Commits to meeting the requirements of the Anti-Corruption Management System;
- Commits to the continuous improvement of the Anti-Corruption Management System;
- Undertakes to raise awareness and train its employees on anti-corruption issues;
- Records any non-compliance with the Anti-Corruption Policy; specifically, each non-compliance is recorded, a corrective action (if necessary) is defined, and the application of the disciplinary system is monitored;
- Prohibits all employees or collaborators from offering, promising, giving, paying, or authorizing anyone to give or pay, directly or indirectly, money or any other economic advantage, utility, or benefit of any kind for illicit purposes; accepting, requesting, or authorizing anyone to accept or solicit, directly or indirectly, a payment, economic advantage, or other utility from public or private entities for illicit purposes;
- Requires company personnel to comply with the principles established by internal procedures and policies regarding gifts, gratuities, etc.;
- Encourages reporting, without fear of retaliation.

Regarding this last point, there is an obligation to report any act or behavior deemed non-compliant with this Policy through the dedicated internal reporting channel (whistleblowing), which also ensures protection against any form of retaliation against whistleblowers.

A third party's violation of the principles or provisions of this Policy may, based on specific assessments by the Company, result in the non-establishment or termination of contractual relationships.

The Company is therefore committed to defining appropriate measures to pursue the above principles, implementing all necessary procedures, and periodically verifying compliance with this Policy, the Organization, Management, and Control Model, the Code of Ethics, and applicable Anti-Corruption regulations.

Furthermore, an Anti-Bribery Compliance Function (ABCF) has been appointed, possessing the necessary competence, status, authority, and independence to perform the tasks required by UNI ISO 37001:2016.

This policy is made accessible to employees both on the Company website and through publication in corporate internal communication channels. Additionally, specific training activities are provided to all employees.



The Company is committed to communicating and sharing this Policy at all levels of the organization and among stakeholders, as well as periodically reviewing it to ensure its continued suitability in accordance with UNI ISO 37001:2016 and/or legislative changes.

Verona, 19/03/2025

Per TECHNITAL S.P.A.

Zeno D'Agostino

