

## ANTI-BRIBERY POLICY

### Adherence To The Requirements Of The Iso 37001 Standard

**Bonatti S.p.A. forbids any form of bribery** and believes such practice is an obstacle to the economic, political and social development of a country. It affects the rules, fairness and transparency of the markets, disrupting fundamental ethical principles and free competition.

All Those who work in the name and on behalf of the Company are aware that bribery behaviour and violation of the law on bribery shall be sanctioned at the criminal and administrative level, as well as at corporate disciplinary level.

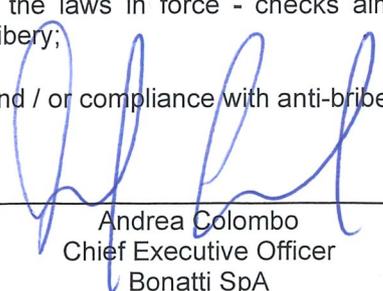
Therefore, Bonatti S.p.A. requires all personnel and business associates to comply with the standards / laws in force, Company's Code of Ethics and with this policy, on the basis of clauses which non-compliance implies the termination of the contract and/or any business relationship.

The Company pledges to ensure business and operational conducts exclusively based on criteria of transparency, correctness, fairness, integrity, loyalty and professional rigor aimed to prevent any bribery conduct. Even the mere attempts shall not be tolerated.

#### Bonatti spa policy:

- **prohibit any form of bribery at any company level** - absolute prohibition against engaging in conduct that could be configured as bribery or attempted bribery;
- **ensure strict compliance with current legislation** on the prevention and struggle against bribery in Italy and in any country where the company operates;
- **ask all workers - at all levels** - rigorously implement the provisions of the rules and laws in force on the prevention and struggle against bribery;
- **promote, develop and ensure ethical principles**, such as honesty and transparency in economic relations, to protect the market and its business;
- **implement a management system for the prevention of bribery in compliance with the iso 37001: 2016 standard**, as a barrier against bribery and for the continual improvement of its activities; implement, disseminate and keep updated the management system for the prevention and countering corruption ("anti-bribery");
- **ensure the Anti-Bribery Compliance Function due** authority (defined through the responsibilities appointed to the function itself) and independence (guaranteed by the non-involvement in the activities identified at risk of bribery). The function is formed by a single body and is entrusted to an external consultant;
- **prohibit in business relationships all behaviours and practices** that may even appear illegal or collusive, payments that may even appear as illegal or as direct or indirect favouritism or solicitation of personal and career advantages for oneself or for others;
- **encourage the reporting (Whistle Blowing) of any attempted bribery**, both ascertained or presumed, as long as they are based on suspicions or reasonable beliefs, without fear of retaliation and protecting the anonymity of the whistle-blowers and the confidentiality of the information;
- **terminate the employment relationship** with any employee or any type of contractual relationship with subjects internal and external to the organization - in the forms permitted by the laws in force - for which it has been ascertained non-compliance with the rules and laws on prevention and fight against bribery;
- **carry out** - in accordance with what is permitted by the laws in force - checks aimed at ensuring the effectiveness and efficiency of the prevention against bribery;
- **require business associates** to have a similar policy and / or compliance with anti-bribery regulations.

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Andrea Colombo  
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Bonatti SpA