



**ANTI-BRIBERY AND ANTI-CORRUPTION
POLICY**

IN ACCORDANCE WITH ISO 37001:2016

**APPROVED BY THE BOARD OF
DIRECTORS**

ON 29 JUNE 2022

	ANTI-BRIBERY AND ANTI-CORRUPTION POLICY	REV 0
		JUNE 29TH 2022

As of June 2022, COGNE ACCIAI SPECIALI S.p.A. has implemented a new management system for the prevention of corruption and bribery in compliance with ISO 37001:2016 standards, consistent with and adherent to all principles of the Organisation, Management and Control Model pursuant to the Legislative Decree 231/01.

The Anti-Bribery Management System for the Prevention of Corruption (known hereinafter as ABMS) is adopted in order to promote a culture of legality and to 'prevent, detect and respond to bribery and comply with anti-bribery laws and voluntary commitments applicable to all activities'¹.

The aims of this Anti-Bribery and Anti-Corruption Policy are as follows:

- prohibit any conduct that could constitute active or passive bribery, attempted bribery or inducement to bribery;
- ensure the complete respect and total compliance with current legislation regarding the prevention of corruption of all employees, consultants and companies that work on behalf of and/or in partnership with COGNE ACCIAI SPECIALI S.p.A.;
- identify potential risk areas and successfully implement suitable actions to mitigate such risks;
- be a guideline for the definition, revision and successful meeting of goals for corruption prevention;
- successfully fulfill the requirements of the anti-bribery management system, ensuring stable implementation in the pursuit of continuous improvement;
- encourage the reporting of suspicious behaviour in good faith or on the basis of reasonable belief, without fear of retaliation; and on the contrary, pursue reports made with the purpose of harming the person/s reported, in accordance with the current disciplinary regulations of COGNE ACCIAI SPECIALI S.p.A.;
- promote awareness among Business Partners involved in conflict-sensitive activities, requesting complete acceptance of the Anti-Bribery Policy and compliance to subsequent controls required by ABMS;
- promote ongoing training of personnel operating in conflict-sensitive processes and foster awareness of personnel and associates so that they are able to recognise corruption, or attempted corruption and bribery and may report such attempts in their own name or anonymously;
- educate staff and associates of the intricacies of Policy and the reporting system as stated above;
- appointing an Anti-Bribery and Anti-Corruption Prevention Officer to: oversee the design and implementation of the system, advise staff on anti-corruption matters, ensure compliance with ISO 37001:2016 standards, report to senior management and the Board of Directors regarding the performance of ABMS;
- ensure that this professional is independent, i.e. not involved in activities of the organisation exposed to a risk of corruption, and is in possession of the appropriate skills, status and authority to accomplish this role;
- require all personnel to report to the company's Anti-Bribery and Anti-Corruption Prevention Officer, for any issue related to the ISO 37001:2016 corruption prevention system;
- promote ongoing awareness among Business Partners whose level of corruption risk has been assessed as being above low risk;

	ANTI-BRIBERY AND ANTI-CORRUPTION POLICY	REV 0
		JUNE 29TH 2022

- inform that the non-acceptance of this Policy by Business Partners operating in processes, whose level of corruption risk has been assessed as being above low risk, may result in contractual variations or termination;
- pursue any and all conduct that does not comply with the Anti-Corruption and Anti-Bribery Policy through application of the current disciplinary regulations of COGNE ACCIAI SPECIALI S.p.A.

In accordance to the Zero Tolerance principle extended to the whole Group, COGNE ACCIAI SPECIALI S.p.A. expressly forbids the following:

- accepting the request, authorising someone to accept or directly or indirectly soliciting, a payment or economic advantage, utility or benefit of any kind to public or private parties in order to acquire undue advantage
- offering, promising, giving, paying or authorising someone to gift or pay, directly or indirectly, money, other economic advantages, utility or benefit of any kind to public or private parties in order to acquire undue advantage.

The Policy will be assessed at least once a year during the Anti-Bribery Management System Review, depending on results achieved and effective implementation; in the event of any variation, the aforementioned Policy will be submitted to the Board of Directors for approval and communicated to internal and external stakeholders.