

DOCUMENT REGARDING THE POLICY ON THE PREVENTION OF CORRUPTION

1. INTRODUCTION

The governing body, together with the top management and the persons in charge of **OROPAN S.P.A.** are aware of their responsibilities towards stakeholders.

With this assumption, **OROPAN S.P.A.** adopts this document: "Corruption Prevention Policy" and/or "Ethical Commitment", in the belief that the objectives of growth, development and protection of stakeholders must and can be combined with the pursuit of the highest ethical standards, compliance with values at the basis of social life and with good governance implemented according to clear and shared rules.

1.1. GENERAL CONCEPTS

OROPAN S.P.A. confirms its commitment to the fight against corruption, creating a reference system according to the ISO 37001:2016 reference standard aimed at implementing a concrete anti-corruption policy implemented over time.

The fight against the phenomenon of corruption is at the highest level within **OROPAN S.P.A.** and focuses on a struggle aimed both at the hypotheses of the phenomenon as defined in the regulations, and at its connotation of administrative mismanagement. The Company repudiates and opposes all phenomena in any way linked to corruption. The relationship of **OROPAN S.P.A.** with the Public Administration in its various meanings and with other types of companies, is based on maximum transparency and correctness and is already included in its Code of Ethics.

OROPAN S.P.A. adopts a general prevention strategy towards all corruption phenomena, extending its scope of application not only to crimes against the Public Administration, but also to situations in which - regardless of the criminal relevance - the focus is a malfunction of its organisation due to the 'use for private purposes of the assigned functions, that is, the manipulation of the organisation *ab externo* (from the outside), whether this action is successful or whether it remains merely an attempt.

For these reasons, it is forbidden for the recipients of this policy and of the company's management system to give or promise money or other benefits to public officials and/or public service officers of any public administration as well as to directors, general managers, executives in charge of drafting accounting documents, statutory auditors, advisers, claims adjusters or people who are subject to the management or supervision of the latter, belonging to companies or consortia, partners, certifiers, consultants, service providers, suppliers in general, etc., from which a violation of duties of office and

loyalty on the part of the corrupt subject may derive and such as to cause harm to **OROPAN S.P.A.** or to the Administration, to the Body or to the third party company.

It is not permitted, either directly or indirectly, or through a third party, to offer and/or receive money, gifts or compensation, in any form, or to exert unlawful pressure, or to promise any object, service, provision or favour to executives, officials or employees of the Public Administration or their relatives or cohabitants for the exercising of their functions or powers or to induce the performance of any act contrary to the official duties of the Public Administration, carried out for the benefit of or in the interest of **OROPAN S.P.A.**.

Via the system for the management of Corruption Prevention, **OROPAN S.P.A.** intends to pursue the following **objectives**:

1. ensure maximum circulation of the anti-corruption policy and the ethical commitment of **OROPAN S.P.A.** to personnel and third parties;
2. ensure the constant updating of the document, in relation to its actual effectiveness and to the changing needs of the organisation and current legislation;
3. guarantee every possible cognitive tool and means of clarification regarding the interpretation and implementation of the rules contained in the document;
4. carry out checks on any sign of violation of the provisions of the document, assessing the facts and assuming - in the event of an ascertained violation - adequate verification regarding sanctions; guarantee that whistleblowers are not subjected to retaliation of any kind deriving from having provided information of possible violations of the document.

The objectives mentioned above will require continuous and measurable action by **OROPAN S.P.A.**, which will be based mainly on the following actions and objectives:

- a) Continuous and adequate staff training;
- b) Adequate communication to business associates and stakeholders regarding anti-corruption measures according to the ABMS or anti-corruption management system (or SGPC) as per the ISO 37001:2016 scheme.

2. COMMITMENT TO THE REQUIREMENTS

In compliance with the provisions of the ISO 37001:2016 standard, the Company commits itself to:

- a) Implementing, maintaining and adjusting an Anti-Corruption Policy and Programme;
- b) Communicating the Policy and the Programme to all personnel and to its partners and business associates (Stakeholders);

- c) Appointing a full-time **Compliance Officer for the Anti-Corruption System** to supervise and monitor the implementation of the Policy and the Programme, in particular, this person will be expressly delegated to:
- i. supervise the design of and implementation by **OROPAN S.P.A.** of the management system for the prevention of corruption;
 - ii. provide advice and guidance to **OROPAN S.P.A.**'s personnel regarding the anti-corruption management system and issues related to corruption;
 - iii. ensure, also through periodic checks or audits, that **OROPAN S.P.A.**'s management system for the prevention of corruption complies with the requirements of the ISO 37001:2016 standard.
 - iv. Report on the performance of the anti-corruption management system to the Top Management and other roles as appropriate.
 - v. The role of checking the compliance of **OROPAN S.P.A.**'s prevention of corruption plan must be adequately funded and always assigned to the person or persons having the appropriate skills, status, authority and independence.
 - vi. The role of checking the compliance of **OROPAN S.P.A.**'s prevention of corruption plan will have direct and prompt access to Top Management, should any concern or suspicion need to be raised in relation to acts of corruption or to the Anti-Corruption Management System.
 - vii. Top Management may assign some or all of the anti-corruption compliance roles to people outside the organisation. If so, the Top Management must ensure that the specific internal personnel are responsible for the parts of the externalised roles and have authority over them.
- d) ensuring the necessary activities to guarantee that subsidiaries and business partners, where present, have implemented appropriate anti-corruption procedures and checks (going as far as, where possible, to request that they activate any ISO 37001:2016 certification procedures).
- e) Checking that the staff behaves in accordance with the provisions of the Anti-Corruption Policy and the Anti-Corruption Management System in general.
- f) Managing and checking the activities related to gifts, hospitality, donations and other similar benefits, to make sure that they are not used for corruptive purposes
- g) Implementing appropriate financial and contractual controls in order to anticipate any possible anti-corruption activities, as much as possible.
- h) Implementing and maintaining management procedures of so-called Whistleblowing or reports concerning the occurrence of corruptive activities by any person attributable to **OROPAN S.P.A.**
- i) Investigating and appropriately dealing with any reports of corruption, even if only suspected corruption.

l) Applying appropriate sanctions, according to the procedures established by the Anti-Corruption Management System by the Code of Ethics and by the Disciplinary Regulations as foreseen by the National Collective Labor Agreement.

3. COMMITMENT TO INTERNATIONAL LAWS AND REGULATIONS

OROPAN S.P.A. undertakes to observe the national laws, the international regulations mentioned in the ISO 37001:2016 standard and the laws of the sector in force, committing itself to adopting the most restrictive standards.

4. COMMITMENT TO IMPROVEMENT

OROPAN S.P.A. also commits itself to pursue continuous improvement through the optimisation of the organisation, personnel training, constant checking of the system management and Risk Assessment and Review by Top Management.

5. DOCUMENTS AND IMPLEMENTATION

OROPAN S.P.A. is committed to guaranteeing the continuous updating of documented information (procedures, instructions, forms) to support the management and control of the Corruption Prevention system, involving personnel through sharing and training sessions.

6. AVAILABILITY

OROPAN S.P.A. undertakes to internally distribute the following documents: policy, system checks and Top Management review; moreover, it undertakes to circulate the Corruption prevention policy by publishing it on the website and sending it to interested stakeholders.

OROPAN S.P.A. undertakes to make the documents relating to the Corruption Prevention management system available to stakeholders, if they request them.

Altamura (BA), May 12th, 2023