

## ANTI-CORRUPTION POLICY

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### 1 SCOPE

Kab-lem SpA recognizes the primary importance of conducting its business in compliance with the law and with integrity, transparency and fairness in all countries in which it operates. The purpose of this procedure is to define the system for monitoring and guaranteeing all aspects relating to the fight against corruption and antitrust.

### 2 APPLICABILITY

This policy applies to Kab-Lem spa and to all companies of the Kab-Lem group.

### 3 GENERAL PRINCIPLES - INTRODUCTION TO ANTI-CORRUPTION POLICY

Kab-lem SpA is committed to respecting its own Ethics Code. For this reason, it asks its staff for honesty, transparency and fairness in carrying out work activities.

The same commitments are required of all group companies and direct suppliers.

It is part of the company policy that all directors, employees, consultants strictly comply with the convention on the fight against corruption of the Organization for Economic Cooperation and Development ("OECD Convention"). Violations of anti-corruption laws entail serious civil and criminal consequences jeopardizing the reputation and commitment of Kab-lem SpA and its employees.

## 4 ENGAGEMENTS

### 4.1 Bribes

Kab-lem SpA prohibits the use of any form of payment, in cash or other benefits <sup>1</sup>, in order to gain an advantage in relations with its stakeholders; advantage also intended as facilitation, or guarantee of the achievement, of services in any case due. The prohibition is naturally extended to employees who, by virtue of their role and activities, intend to accept bribes for the benefit of themselves or their family members, associates and acquaintances.

### 4.2 Contributions to Political Parties

Kablem SpA refrains from any direct or indirect pressure on politicians; it does not finance parties both in Italy and abroad, their representatives or candidates, nor does it sponsor congresses or parties that have the exclusive purpose of political propaganda.

### 4.3 Facilitations

Kab-lem SpA does not allow to pay, offer or accept, directly or indirectly, payments and benefits of any entity in order to speed up services already due by its interlocutors. A prohibited payment does not only include money, it can include anything of value such as:

- Gifts;
- Charitable contributions;
- Entertainment or entertainment tickets (except as permitted by "Permitted Limits");
- Offers of employment;
- Promises of cash payment;
- Remission of debts or other obligations;
- Holidays and / or entertainment.

### 4.4 Gifts, Freebies And Benefits

Kab-lem SpA does not admit any form of gift that can be interpreted as exceeding normal commercial or courtesy practices or in any case aimed at acquiring preferential treatment in the conduct of any activity connected to it. In particular, any form of gift to customers, suppliers and other subjects (Italian / foreign public officials, directors and statutory auditors of the companies of the Kab-Lem group) is prohibited, which could influence the independence of judgment or induce to ensure a benefit. The gifts offered must be managed and authorized according to company procedures and must be adequately documented (see "Permitted limits").

### 4.5 Antitrust

The competition law, or antitrust law (in the US terminology), guarantees the proper functioning of the markets and of the competitive game, protecting the business freedom of each operator and thus ensuring, in the final analysis, greater social well-being and of consumers. Competition law places serious and defined limits on the collusion between companies and on their individual or collective market power. The aim is to prevent companies from engaging in certain anti-competitive behaviors consisting of abuses of dominant position, establishment of cartels (or agreements otherwise restrictive of competition), or mergers capable of significantly hindering effective competition. These behaviors, in fact, ease the competitive pressure and, consequently, hinder the implementation of the dynamic process of rivalry between companies which forms the basis for an effective functioning of the market.

Kablem spa considers the principles of free competition to be of fundamental importance and places them at the foundation of its corporate culture. In carrying out their activities, the employees of the companies of the Kab-Lem spa group are therefore obliged to fully respect these principles and to act in compliance with the antitrust rules, otherwise exposing themselves to the risk of severe disciplinary sanctions.

### 4.6 Limits allowed

Reasonable entertainment expenses do not violate the law if the entertainment is provided with the intent of normal kindness or to enhance business relationships. Entertainment provided in order to influence the objectivity of any person in making decisions involving Kab-lem SpA and companies

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<sup>1</sup>Anything that represents an advantage for the person, material or moral, patrimonial or non-patrimonial, considered relevant by custom and common belief

of the Kab-Lem group is not permitted. Employees must ensure that entertainment costs are reasonable; the expense must not appear improper, that is modest and infrequent and in any case aimed at influencing the recipient himself. No hospitality must be provided to an external party when this is contrary to relevant written policies or rules; the entertainment must not conflict with the beneficiary's policies / procedures; entertainment expenditure must be correctly and accurately recorded in the Kab-lem books and records.

Small gifts or gadgets can be offered, in normal work activities, to external parties only if they are of minimal value, if they are given in a direct, transparent, good faith manner and considered reasonably adequate to the circumstances.

## **5 DIFFUSION AND TRAINING**

This policy is posted on the corporate notice boards of all the Group's plants and is available on the website [www.kablem.com](http://www.kablem.com).

Training interventions are carried out for all personnel aimed at ensuring the dissemination and correct understanding of this policy; the principles, commitments and methods of implementation are an integral part of specific in-depth training sessions for professional families.

## **6 CONTROL SYSTEM - PENALTY SYSTEM**

The commitment to fight corruption is assumed by all the resources of Kab-lem SpA and the Kablem group; more specifically, each organizational structure is responsible, for the parts within its competence, for the preparation of adequate control systems useful for the implementation of this policy (eg: Procurement management procedure; Whistleblowing policy; Code of ethics).

The recipients of this document are required to immediately report any violation of this policy to their Manager and / or HR; in cases deemed significant, the Group Board will be notified. Reporters are guaranteed protection from any form of retaliation, discrimination or penalization.

Violations by personnel of the principles contained in this document constitute a serious breach of contract and will be sanctioned - in compliance with the procedures, methods and timing provided for by the applicable contractual legal framework - promptly and immediately, through the imposition of adequate and proportionate disciplinary measures. the severity of the violation.