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• 1. INTRODUCTION

The Anti-Corruption Policy represents the commitment of the Management of RAXY LINE S.R.L. to the principles adopted by the Company concerning the prevention of bribery and corruption.

One of the key factors contributing to the Company's reputation is its ability to conduct business with fairness, correctness, transparency, honesty and integrity, in compliance with applicable laws, regulations and relevant guidelines concerning social responsibility.

RAXY LINE S.R.L. adheres to and promotes policies consistent with laws and legal standards for the prevention of corruption and transparency in business relationships (hereinafter also referred to as the "Anti-Corruption Laws"), both nationally and internationally.

• 2. SCOPE OF APPLICATION

This Policy applies to all employees, Management, suppliers, partners and, more generally, to all people with whom RAXY LINE S.R.L. comes into contact during its activities and/or with whom it maintains business relationships.

• 3. GENERAL ANTI-CORRUPTION PRINCIPLES

RAXY LINE S.R.L.'s commitment against corruption prohibits recipients of this Policy from requesting, promising, offering and/or receiving gifts, presents and/or benefits, whether potential or actual, to/from external parties, whether public officials or persons performing public services, government representatives, public employees or private individuals, whether Italian or foreign, where such conduct may constitute unlawful conduct or may otherwise be interpreted by an impartial observer as being aimed at obtaining an advantage, including a non-economic advantage, considered significant according to customary practice and common understanding, including the facilitation or assurance of obtaining services that are otherwise due in the conduct of business activities.

Each recipient is required to read, understand and apply this Anti-Corruption Policy and to act in accordance with its provisions.

Zero tolerance, the active role of Management towards internal and external interested parties, and effective communication constitute the framework for pursuing the objectives of fairness, correctness, transparency, honesty and integrity.

RAXY LINE S.R.L. has established its policy for the prevention of corruption in accordance with the objectives and context in which it operates and therefore prohibits:

- offering, promising, giving, paying, or authorizing anyone to give or pay, directly or indirectly, a financial advantage or other benefit to a Public Official or a private individual (**active bribery**);
- accepting requests from, or solicitations by, or authorizing anyone to accept or solicit, directly or indirectly, a financial advantage or other benefit from anyone (**passive bribery**) when the intention is to:
 - induce a Public Official or private individual to improperly perform any public function or any function based on good faith in the exercise of responsibilities entrusted to them in a fiduciary capacity, within a professional relationship, including on behalf of third-party private entities, or to perform any business-related activity in return for compensation;
 - influence an official act (or omission) by a Public Official or any decision in breach of an official duty, including by private individuals;
 - influence or compensate a Public Official or private individual for an act carried out in the performance of their duties;

- obtain, secure or retain business or an unfair advantage in connection with business activities, or otherwise violate applicable laws.

With specific reference to its employees and in accordance with the Company's organizational system based on controls and segregation of duties, RAXY LINE S.R.L. requires that an employee who maintains relationships or conducts negotiations with external public or private counterparties may not, independently and freely:

- enter into contracts with the counterparties;
- access financial resources;
- enter into consultancy or professional service agreements;
- grant benefits (gifts, donations, benefits, etc.);
- hire personal.

RAXY LINE S.R.L. adheres to and promotes policies consistent with laws and legal standards for the prevention of corruption and transparency in business relationships, both nationally and internationally.

RAXY LINE S.R.L. therefore requires all its stakeholders to comply with the laws applicable to the prevention of corruption within their respective context.

• 4. OBJECTIVES OF THE ANTI-CORRUPTION POLICY

RAXY LINE S.R.L. promotes this Anti-Corruption Policy to involve, in compliance with the principles contained herein, its personnel and all third parties maintaining business relationships with the Company.

To achieve the objective of managing the Company in a manner that ensures adequate anti-corruption controls, RAXY LINE S.R.L.:

- prohibits bribery at all levels of its organization and involves its partners and suppliers in complying with applicable anti-corruption laws;
- ensures compliance with the laws applicable to the organization for the prevention of corruption;
- encourages its employees to report concerns in good faith, or based on a reasonable belief, confidentially and without fear of retaliation;
- continuously monitors the application of this Policy during Quality Management System reviews;
- establishes the consequences of non-compliance with the Anti-Corruption Policy.

To facilitate the achievement of the objectives of this Policy, RAXY LINE S.R.L. undertakes to prevent organizational, ethical and relationship-related uncertainty through:

- a clear definition of its processes;
- an unambiguous identification of roles and functions;
- a transparent system of delegations and powers of attorney;
- a clear system of rules, values, procedures and practices based on experience, aimed at facilitating the decision-making process within the organization;

- a comprehensive procurement system for goods and services designed to exclude fraudulent suppliers and supplies through periodic monitoring activities for supplier qualification;
- an adequate internal control system concerning the conduct of all its employees;
- an adequate external control system concerning the processes of all the Company's suppliers and collaborators.

Furthermore, RAXY LINE S.R.L.:

- is committed to the continuous improvement of processes for managing and preventing corruption risks;
- sanctions any form of non-compliance with this Company Policy;
- continuously verify the correct application of the Anti-Corruption Policy through monitoring by the Quality Management Representative and the Management Representative for Quality.

For this purpose, RAXY LINE S.R.L. grants full mandate to the Management Representative for Quality to pursue the objectives set out in this Policy, by virtue of the authority and independence conferred upon them, to:

- supervise the integration and implementation of this Policy within the Quality Management System;
- provide personnel with support regarding issues related to corruption and compliance with anti-corruption laws;
- report on the correct application of the Anti-Corruption Policy to the Board of Directors of RAXY LINE S.R.L. during Quality Management System Reviews.

Each employee and, more generally, each Recipient is responsible for achieving adequate levels of corruption prevention. Therefore, it is strongly intended that this Policy forms an integral part of the Company's management system and is disseminated to all personnel, to anyone acting on behalf of RAXY LINE S.R.L., and to anyone requesting it, in order to raise awareness among employees/collaborators and inform all interested parties of the Company's commitment to minimizing corruption risk.

• 5. MANAGEMENT OF NON-CONFORMITIES

Failure to comply with the Anti-Corruption Policy and/or any failure to comply with Anti-Corruption Laws will trigger the disciplinary system applicable to employees in accordance with the applicable National Collective Labour Agreement (CCNL) or, in the case of suppliers, will initiate the process for their removal from the qualified suppliers register and the consequent termination of the contract.

• 6. REPORTING MANAGEMENT

RAXY LINE S.R.L.'s Anti-Corruption Policy encourages the reporting, in good faith, of suspicious, anomalous events and/or events that are contrary to anti-corruption rules.

As evidence of this commitment, a suggestion and reporting box has been provided within the Company in a designated area for reporting possible cases of corruption, while ensuring the confidentiality of the reporting person's identity.

a) reports shall be handled confidentially to protect the identity of the reporting person and of other people involved in or mentioned in the report, except where disclosure is required for the purposes of an investigation;

b) anonymous reporting shall be permitted, provided that anonymous reports will only be considered where they contain sufficient detail;

c) retaliation is prohibited, and people making reports shall be protected against retaliation after, in good faith or based on a reasonable belief, raising or reporting concerns regarding attempted, actual or suspected acts of corruption or violations concerning the corruption prevention policy;

d) personnel shall be permitted to obtain support from an appropriate person regarding what to do when faced with a suspicion or situation that may involve acts of corruption;

e) People shall be encouraged and permitted to report, in good faith or based on a reasonable belief, attempted, suspected or actual acts of corruption, or any violation of or deficiency concerning this Anti-Corruption Policy.

RAXY LINE S.R.L. ensures that all personnel are informed about the reporting procedures and can use them, and that everyone is aware of their rights and the protections provided by such procedures.

- **7. COMMUNICATION OF THE POLICY**

RAXY LINE S.R.L.'s corruption prevention policy is available as documented information to stakeholders on the Company's official website and to all personnel in the shared folder of the Quality Management System.

Within the organization, the Anti-Corruption Policy is disseminated by Top Management through the activities of Company management and:

- training activities concerning Company-related aspects and management processes;
- training activities concerning the Anti-Corruption Policy;
- verification activities concerning the level of implementation of the adopted Anti-Corruption Policy.

- **8. POLICY REVIEW**

RAXY LINE S.R.L. personnel are periodically trained on the importance of complying with this Policy, so that they clearly understand and are aware of the various risks, the personal and administrative responsibilities for the Company, and the actions to be taken to combat corruption, as well as any sanctions applicable in the event of a violation of the Policy and Anti-Corruption Laws.

The Anti-Corruption Policy is reviewed, where necessary, during the Management Review, or in relation to the following events:

- results of internal audits or second-party audits conducted by customers;
- any changes resulting from changing circumstances;
- any updates to applicable sector-specific legislation.

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Management

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