



Anticorruption policy

of doValue S.p.A

doValue has built its success and reputation on the principles of ethics, legality and transparency. In order to ensure compliance with those principles and to prevent any form of active or passive corruption, doValue has adopted a management system for the prevention of corruption in accordance with the voluntary standard UNI ISO 37001:2016.

The management system for the prevention of corruption has been integrated into the more general corporate management system, and has been planned in order to consider aspects of Group governance, compliance, risk management and internal control with reference to international guidelines and best practices.

The corporate Policy of the corruption-prevention management system for the prevention of corruption is the expression of the leadership of doValue's Top Management and Governing Body to implement the measures needed to effectively meet the requirements of the ISO 37001 standard. The Policy applies to all internal and external stakeholders (directors, employees, collaborators, associated and affiliated companies, suppliers and business partners), defined as "recipients" of the Policy.

GENERAL PRINCIPLES

doValue's efforts in preventing all forms of corruption prohibit the recipients from requesting, promising, offering or receiving gifts or benefits, potential or actual, from or to persons outside the Company, whether they are Public Officials or persons in charge of a public service, government representatives, public employees or private citizens, whether Italian or from other Countries, such as to lead to unlawful conduct or, in any case, such as to be interpreted by an impartial observer as aimed at obtaining an advantage, including a non-economic one, considered relevant by custom and common belief, also understood as facilitating, or ensuring the achievement of services in any case due in the business activities.

In adherence to the requirements of the ISO 37001 standard, the doValue Policy for the prevention of corruption is consistent with the purposes of the context in which it operates. It therefore prohibits the following:

- offering, promising, giving, paying, authorising someone to give or pay, directly or indirectly, a financial advantage or other benefit to a Public Official or a private individual (active corruption);
- accepting a request from, or solicitation by, or authorising someone to accept or solicit, directly or indirectly, a financial advantage or other benefit from anyone (passive corruption) where the intention is to:
 - induce a Public Official or a private individual to improperly exercise any function of a public nature or in any case focused on good faith in the exercise of their

responsibilities entrusted in a fiduciary manner, in a professional relationship also on behalf of private third parties, or to carry out any activity associated with a business by rewarding them for having carried it out;

- influence an official act (or omission) by a Public Official or any decision in breach of official duty even by private parties;
- influence or compensate a Public Official or a private individual for an act of their office;
- obtain, secure or retain an unfair advantage or business in relation to business activities, or, in any case, violating applicable laws.

With specific reference to its own employees and collaborators and in compliance with the company's organisational system based on the control and segregation of activities, doValue establishes that the employee or collaborator who has relations or carries out negotiations with external public or private counterparties cannot freely and by themselves:

- enter into contracts with the foretold counterparties;
- access financial resources;
- stipulate consultancy contracts, professional services;
- grant benefits (gifts, gratuities, benefits, etc.);
- recruit staff.

doValue promotes and adheres to policies consistent with the laws and standards of legality for the prevention of corruption and transparency in business relationships, both nationally and internationally, wherever the Group operates. It therefore requires all stakeholders to comply with the laws for the prevention of corruption applicable to their country context, by signing a commitment to meet the management system requirements for the prevention of corruption and to foster the continuous improvement of the system itself.

OBJECTIVES FOR THE PREVENTION OF CORRUPTION

Zero tolerance, appropriate procedures, an active role for management, and effective information flows for monitoring and reporting provide the framework for setting improvement targets.

In order to achieve corporate management that ensures adequate anti-corruption controls, doValue:

- prohibits corruption at all levels of its organisation and requires stakeholders to comply with the anti-corruption laws applicable;
- ensures compliance with corruption prevention laws applicable to the organisation;

- encourages the reporting of suspicions in good faith, or on the basis of a reasonable and confidential belief, without fear of retaliation;
- is committed to continuous improvement of the management system for the prevention of corruption;
- guarantees the authority and independence of the Compliance Function for the prevention of corruption;
- establishes the consequences for non-compliance with the Corruption Prevention Policy.

To facilitate achieving the above objectives, doValue is committed to not generating organisational, ethical and relationship uncertainty, through:

- clear definition of its processes;
- unambiguous identification of roles and functions;
- a transparent system of proxies and powers of attorney;
- a linear system of rules, values, procedures and practices suggested by experience, to facilitate decision-making within the organisation;
- an adequate system of internal controls aimed at the conduct of all its employees and collaborators;
- an adequate external control system for processes and operations with external stakeholders, in particular with the Group's Italian and foreign subsidiaries and with suppliers.

Furthermore, doValue:

- encourages reporting suspicious cases in good faith, guaranteeing protection of the confidentiality of the reporter and ensures the absence of any form of retaliation against the reporter for the mere fact of having reported;
- is committed to the continuous improvement of processes for the management and prevention of corruption risks;
- sanctions any form of non-compliance with the corruption-prevention procedures and with the contents of the corporate Policy.