

## Anti-corruption brochure

### Sector:

- Quality system management  
 Environmental system management  
 Health and safety system management

### Contenuti:

- A. Field of application
- B. Details description
- C. Terms and definition
- D. Reference

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## **A. Field of application**

### **1 GOAL**

The purpose of this Brochure is to explain the control measures adopted by Arcoprofil srl and Arcoprofil F&G (hereinafter: ARCO PROFIL) for:

- guarantee the complete absence of corruption and bribery in the Company
- prevent any "inappropriate conduct" towards external "private" Partners (even if only potentially such) or on the part of the latter, aimed at obtaining advantages for oneself or for one's Company
- with the ultimate aim of ensuring that corporate activities are conducted in a correct, transparent and socially responsible manner

### **2 APPLICATION**

This Brochure is applicable to all ARCO PROFIL activities and processes in which there is contact with the Public Administration and with "private" external Partners (Suppliers, Customers, Consultants, etc).

It must be respected by all ARCO PROFIL personnel, i.e. by senior managers, agents, permanent and non-permanent employees, trainees, interns, etc. (hereinafter referred to as "employees")

## **B. Details description**

### **1 PREMISE**

Corruption and extortion, nor "inappropriate conduct" (see Par.A.1 - PURPOSE) towards or from external "private" Partners aimed at obtaining advantages for oneself or for one's Company, are not permitted in ARCO PROFIL. The reason is linked to ARCO PROFIL's founding, profound values and to the need to keep its reputation high, on the territory as well as with its Customers and Partners in general. Through this Brochure, in line with the ARCO PROFIL Sustainability Policy and its Code of Ethics, the relevant company rules are officially issued; the intent is to provide each employee with a clear map of what can and cannot be done. In fact, reputation also depends, to a substantial extent, on the responsible behavior of all employees.

### **2 POLITICAL AND CHARITY CONTRIBUTIONS**

ARCO PROFIL does not make donations, either in cash or in kind, in support of political parties or candidates, since such action could be perceived as an attempt to obtain an improper commercial advantage. Employees may make political contributions on a personal level as long as they are not used to conceal an act of bribery and are lawful and ethical under Italian and regional laws and practices. Charitable support and donations are allowed, whether they are in-kind services, knowledge, time or direct financial contributions. However, any type of support and donation for charitable purposes must be coordinated with

the Company Management (contact the Human Resources Manager, Kety Andreose, or the same Management, Roberto and Giorgio Casolin). Employees must, however, take care to ensure that charitable contributions are not used to conceal acts of corruption. Only charitable donations are made that are legal and ethical under applicable laws and practices.

### 3 RELATIONS WITH THE PUBLIC ADMINISTRATION

In order to prevent the crime of Corruption in ARCOPROFIL (see Par.C – TERMS AND DEFINITIONS):

- No employee can act as a "corrupter"; to guarantee this, no Employee is authorized to offer a person who works in the public administration neither money (not even minimal sums: it would be a bribe) or other gifts
- Any Employee who becomes aware of a Corruption crime, whether personal or improper, must report it through the Whistle Blowing mechanism (see Code of Ethics)

In order to prevent the crime of Extortion in ARCOPROFIL (see Par.C – TERMS AND DEFINITIONS):

- No Employee must give in to pressure from a person representing the public administration or related to it
- To guarantee this, no Employee is authorized to act according to his or her own personal idea if he or she has been the object of an attempted extortion: he must immediately report the fact to Management (Messrs. Giorgio and Roberto Casolin) or to the Human Resources manager (Ms. Kety Andreose)

### 4 RELATIONS WITH "PRIVATE" EXTERNAL PARTNERS

In order to prevent "inappropriate conduct" in ARCOPROFIL aimed at obtaining advantages for oneself or for one's Company (see Par.A1 - PURPOSE), rules have been identified which establish the following:

- No Employee is authorized to offer or propose to external "private" Partners Gifts, even if of minimal value, according to their personal idea; the Employee must share any ideas and wishes in this regard with the Management (Messrs. Giorgio and Roberto Casolin) and proceed only if authorised, in the agreed manner
- With regard to Gifts that the Employee is offered by external "private" Partners, the Employee must:
  - ⇒ inform the Human Resources Manager (Ms. Kety Andreose) of each offer received, who keeps track of it
  - ⇒ observe the rules of the scheme below (distinction between Acceptable, Doubtful and Unacceptable Gifts):

<b>Not accepttable gifts</b>	<ul style="list-style-type: none"> <li>• Money, ALWAYS (any currency or amount)</li> <li>• Securities, ALWAYS (any type or value)</li> <li>• Precious, ALWAYS (any value)</li> <li>• THROUGHOUT THE YEAR: the 4th 'acceptable' gift and every gift whose value is NOT 'acceptable' ('acceptable' = values max € 50)</li> </ul>
<b>Doubtful gifts</b>	For any doubts regarding the gift you are dealing with, contact the management (e.g. in case of doubts about the value of the gift)
<b>Accepttable gifts</b>	Throughout the year: max 3 'acceptable' gifts ('acceptable' = values max € 50)

For any doubts, the Employee is invited to contact the Human Resources Manager (Ms. Kety Andreose) or Messrs. Giorgio and Roberto Casolin for clarification and support

## C. Terms and definitions

### 1 CORRUPTION

Corruption is a crime, and it has to do with the public administration

- Corruptor is the one who carries out the corruption, proper or improper
- Corrupt person is the one who accepts corruption, proper or improper
- Own corruption means paying a public official for contravening his duties (even if he has promised to pay and has not yet done so, or in the case that he is not an official, but a lower level employee of public functions)
- Example of own corruption: the case in which a financier (corrupt person) accepts money to turn a blind eye to the accounting irregularities of a manager (corruptor) – but it does not only apply to money, but also to other "gifts"
- Improper corruption □ paying a public official to carry out his duties "very well" (even if he has promised to pay and has not yet done so, or in the case that he is not an official, but a lower level employee of public functions)
- Example of improper corruption: the case in which a financier (corrupt person) carries out a tax assessment on a competitor of the corruptor "very well", detecting accounting irregularities - but this does not apply only to money, but also to other "gifts"
- Notes on Corruption:
  - ⇒ Corruption is a crime that sees citizens and public officials "equal", as each of the two obtains an advantage
  - ⇒ as a crime, it provides for prison sentences, both for the corruptor and for the corrupted person
  - ⇒ the penalties are lower in the case of improper corruption (milder crime)

## 2 CONCUSSION

Extortion is a crime, and has to do with the public administration

- Bribery is a public official abuses the power of his role to assert his authority over others and thus obtain an illegal advantage; these "others" face concrete threats if they do not respond to the request
- Example of bribery: the case in which a mayor (public official) puts pressure on a Sole Manager of a RSA to hire and place his brother-in-law in a certain role - if he does not do so, the Sole Manager will be removed and replaced by another person
- Notes on Concussion: La concussione è un reato che non vede "alla pari" cittadino e pubblico ufficiale, in quanto è soltanto il secondo a ottenere un vantaggio
  - ⇒ as a crime, it provides for prison sentences for the public official involved

## 3 GIFTS

For the purposes of this Brochure, they are referred to as GIFTS:

- all gifts and freebies, tangible or intangible (ie in kind) – for example valuables, holidays and trips, parties, dinners, etc.
- money or credit instruments (for example shares, bonds..) exchanged with:
  - ⇒ officials or other persons representing the Public Administration
  - ⇒ "Private" external partners, outside of any regular commercial transaction (purchase, sale, compensation for services received, etc.)..

## D. References