

Anti-Bribery Policy

Archiva S.r.l. (hereinafter “**Archiva**” or “**Organization**”) is fully aware that the phenomenon of bribery represents an obstacle to the economic, political and social development of a Country and a heavy distortion of the rules, fairness and competitiveness of the markets.

In this sense, Archiva has put in place a Management System that aims to keep the corruption phenomenon under control through constant training of its workers and the involvement of business partners.

In application of this commitment, the Top Management has determined that the Organization's Anti-Bribery Policy (hereinafter also “**Policy**”) is based on:

- strict and full compliance with current legislation on the prevention and fight against bribery, in Italy and in any Country where the Organization operates, with the involvement of employees, collaborators in any capacity, and all subjects who work for and/or under its control;
- the absolute prohibition of engaging in conduct that may constitute bribery or attempted bribery;
- the carrying out of an accurate context analysis that led to the identification, as part of the activities carried out by Archiva, of the areas of potential danger and the identification and implementation of the appropriate actions to reduce/minimize the risks themselves;
- full commitment to comply with all the requirements of the Anti-Bribery Management System by all company stakeholders;
- raising awareness among business partners so that they adopt, in the activities of specific competence, policies and actions for the prevention of bribery, in compliance with the provisions of the law and consistent with the objectives of the organization;
- raising awareness and training of its employees on the issues of preventing bribery;
- the provision of methods for reporting suspicions in good faith, or based on a reasonable belief, ensuring in any case the confidentiality of the identity of the whistleblower, the reported person and the third parties mentioned, admitting the report anonymously and ensuring protection from any retaliation;
- the prosecution of any conduct that does not comply with the Anti-Bribery Policy with the application of the organization's sanctioning system;
- the designation of a Compliance Function for the Prevention of Corruption, which is guaranteed full authority and independence in the role.

With the implementation of the Anti-Bribery Management System, Archiva intends to pursue the following objectives:

- the development and maintenance of an anti-corruption culture at all levels, supported by an active, visible and consistent commitment of the Governing Body, Top Management and department heads, and by the non-tolerance of conduct that compromises its effectiveness;
- raise awareness and train its employees, collaborators and business partners on the issues of prevention of corruption;
- encourage the reporting of possible corrupt actions, making available to employees, business partners and stakeholders, the tools to report conduct that is not in line with company policies and protecting whistleblowers from any retaliation;
- improve and strengthen the control capabilities of the Anti-Bribery Function;
- engage in the continuous improvement of bribery prevention activities.

Recipients are encouraged to report any violation of the Anti-Bribery Management System of which they have become aware, even indirectly, during their activity and whistleblowers are guaranteed protection from any form of retaliation, discrimination or penalization, without prejudice to legal obligations.

Any employee or contractor who fails to act in accordance with this Policy will be subject to disciplinary action, commensurate with the seriousness of the violation.

Any partner or supplier who fails to act in accordance with this Policy will be subject to contractual disciplinary sanctions.

This Policy is made available to all personnel and interested parties by publication on the institutional website and on display on the company bulletin boards. It is also communicated directly, with documented evidence of transmission, to newly hired personnel and new business partners in the languages appropriate to the recipients.

Top Management believes that the most suitable corporate strategy for achieving this Anti-Bribery Policy consists in the full implementation of the Anti-Bribery Management System in accordance with the ISO 37001 standard.