



Anticorruption Policy - Anticorruption Policy

The 'Zero Tolerance for Corruption' principle

R.I.ECO S.p.A. ('R.I.ECO') has zero tolerance for acts of corruption.

The personnel of R.I.ECO, the relevant *business partners* and anyone carrying out an activity for or on behalf of R.I.ECO must not be involved, even indirectly, in acts of corruption.

In line with the Code of Ethics, the Code of Conduct and the protocols of Model 231/01, R.I.ECO prohibits corruption, active and passive, direct and indirect, without exception.

In particular:

- It is prohibited to offer, promise, give, pay, authorise someone to give or pay, instigate someone to give, pay or receive, directly or indirectly, material benefits, economic and/or non-economic advantages, or other utilities to a Public Official/Public Service Employee, or to a Private Individual (active corruption);
- It is prohibited to accept, authorise someone to accept, or incite someone to accept, directly or indirectly, economic and/or non-economic advantages or other benefits from a Public Official/Public Service Employee or a Private Individual (passive bribery).

The prohibition includes the offer or receipt by R.I.ECO personnel, or by anyone acting on behalf of the Company, of an economic/non-economic advantage or other benefit in relation to the business activity.

The prohibition is not limited to cash payments, as corrupt conduct can also take place through:

- Tributes;
- Contributions in kind and donations;
- Public authorisations and permits;
- Jobs, businesses, investment opportunities;
- Reward offers;
- Consultancy assignments;
- Allocation of orders to 'flagged' suppliers;
- Discounts or personal credits;

R.I.ECO. S.p.A.

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- Expenses for attention to third parties, meals and transport, hospitality;
- *Facilitation payment*;
- Other advantages or benefits.

Recipients of this Policy and the Anti-Bribery and Corruption Manual will be obliged to provide justification if they act in ignorance of *red flags* or grounds for suspicion ('*red flags*'), or if they act with gross negligence or recklessness, for example by failing to conduct adequate *due diligence* according to the circumstances.

Anticorruption Policy

R.I.ECO is committed to proactively combating corruption in the context in which it operates.

To this end, the Company promotes integrity and corruption-free ways of doing business among all its stakeholders.

R.I.ECO is committed to being an industry model by implementing the best anti-corruption standards and practices and investing in the training of its employees.

R.I.ECO will make every effort to prevent corruption by third parties connected to it.

R.I.ECO reserves the right to refrain from doing business with a third party when there is any doubt that acts of corruption may have been committed.

Against this background:

- All of R.I.ECO's dealings with, or relating to, or involving a Public Official/Public Service Employee must be conducted in compliance with R.I.ECO's Anti-Corruption Manual and anti-corruption legislation;
- All of R.I.ECO's dealings with, or relating to, private individuals, deemed to be at risk of corruption, must be conducted in compliance with R.I.ECO's Anti-Corruption Manual and anti-corruption legislation;
- R.I.ECO personnel are responsible, each within their functional competence, for compliance with the R.I.ECO Anti-Corruption Manual and anti-corruption legislation;
- Under no circumstances can any questionable or illegal practice be justified or tolerated on the grounds that it is customary in the sector or territory in which R.I.ECO operates;
- No performance shall be imposed or accepted if it can only be achieved by compromising R.I.ECO's ethical standards;

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- Employees who violate the R.I.ECO. Anti-Corruption Manual or anti-corruption regulations will be subject to disciplinary action and any other legal action necessary to protect the interests of R.I.ECO;
- Recipients of the aforementioned sanctions and/or actions may also be those who, despite being aware of violations of the R.I.ECO. Anti-Corruption Manual or anti-corruption legislation, have not prevented their commission or, in any case, have not facilitated their emergence;
- *Business Partners* who violate the R.I.ECO Anti-Corruption Manual or anti-corruption regulations will be subject to contractual remedies and claims for damages;
- R.I.ECO personnel will not be dismissed, demoted, suspended, threatened, harassed, discriminated against in any way in their employment treatment, for refusing to make a prohibited payment, even if such refusal resulted in the loss of business or other detrimental consequence to the *business*;
- R.I.ECO encourages and allows, in line with the reporting procedure set out in Model 231/01, staff to report in good faith or on the basis of reasonable belief attempted, alleged and actual acts of corruption, or any violation of the *Anti-Corruption Manual*;
- R.I.ECO personnel are required to avoid and report any situation that may constitute or determine a conflict of interest between personal or family economic activities and the duties they hold within the Company. In particular, any situation that may constitute or determine a conflict of interest must be promptly communicated to the superior in a managerial position. The person involved shall promptly refrain from intervening in the operational/decision-making process.

The Supervisory Board ensures that reports are handled in accordance with the principles of protection of the confidentiality of the reporter.

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