

## **Annex 1 – ISO 37001 anti-corruption policy**

Archiva is fully aware that the phenomenon of corruption represents an obstacle to the economic, political and social development of a country and a serious distortion of the rules, correctness and competitiveness of the markets.

In this sense, Archiva has put in place a management system whose aim is to keep the corruption phenomenon under control through constant training of its workers and the involvement of business partners.

Action is based on:

- rigorous and full compliance with current legislation on the prevention and fight against corruption, in Italy and in any country where the Organization operates, with the involvement of employees, collaborators in any capacity, and all subjects who operate in favor of and/or under its control;
- the absolute prohibition on engaging in behavior that could be considered as corruption or attempted corruption;
- carrying out an accurate context analysis which led to the identification, within the activities carried out by Archiva, of the areas of potential danger and the identification and implementation of actions suitable for reducing/minimising the risks themselves;
- full commitment to comply with all the requirements of the management system for the prevention of corruption 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 corruption phenomena, respectful of legal requirements and consistent with the organisation's objectives;
- raising awareness and training of its employees on the issues of preventing corruption;
- the provision of methods for reporting suspicions in good faith, or on the basis of a reasonable belief, ensuring the anonymity of the reporters;
- the pursuit of any behavior that does not comply with the policy for the prevention of corruption with the application of the organisation's sanctioning system;
- the designation of a compliance function for the prevention of corruption, which is guaranteed full authority and independence in the role;

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

Any employee or collaborator who does not act in accordance with this Policy will be subject to disciplinary sanctions, commensurate with the seriousness of the violation committed.

Any partner or supplier who does not act in accordance with this Policy will be subject to contractual disciplinary sanctions. The company communicates this Policy to the Recipients and periodically updates its contents.

The Top Management believes that the most suitable corporate strategy for achieving this Anti-Corruption Policy consists in the full implementation of the Management System for the prevention of corruption compliant with the ISO 37001 standard.