

ANTI-BRIBERY POLICY

ETS's Board is committed to driving the entire organization to achieve the expected performance for the prevention of corruption in accordance with the following guidelines:

- to guarantee a continuous commitment to carry out its activities in full compliance with regulatory obligations, constantly checking the correct and adequate application of the anti-bribery rules and the requirements of the Anti-Bribery Management System;
- to forbid any form of bribery and indeed encourage employees to report suspicions in good faith without fear of retaliation, and consider transparency and legality an added value for the customer, integrating the controls and improvement actions necessary to manage bribery prevention;
- take appropriate disciplinary or legal actions against the persons who have behaved illegitimately in conflict with the principles of this policy.

These guidelines are translated into operational goals defined in a specific document, monitored during the Management Review and communicated to the entire organization through the appropriate means and channels.

To guarantee compliance with the guidelines on the bribery prevention, ETS has appointed a Compliance Officer for the prevention of corruption (RCPC), reporting directly to the Top Management, in the person of Loredana Pungitore.

The manager has the adequate resources and the necessary independence for:

- supporting Process Managers in defining actions necessary to reduce the risk of bribery;
- verifying that the drafting and updating of the documents of the integrated management system meets the ISO37001 requirements and consistency with the control system defined within the company for the prevention of bribery;
- supervising the design, implementation and monitoring of the integrated management system, with reference to the system elements that are relevant with the prevention of bribery, with the RSIN, ensuring compliance with the requirements of the ISO 37001: 2016 standard;
- supervising staff training on bribery prevention issues, and set a reference point within the company to provide advice on bribery-related issues;
- carrying out the necessary due diligence on the staff, business partners and projects or transactions identified with high risk of bribery;
- collect and analyze reports of suspected bribery, managing any internal investigations relating to hypotheses of active or passive bribery;
- periodically reporting to Top Management on the performance of the bribery prevention system;
- carrying out the review on the suitability and effectiveness of the integrated system relating to anti-bribery issues, also providing all the useful information related to the prevention of bribery for the periodic review of the Top Management.

CEO

Domenico Chjaino



ETS S.r.l.