

Anti CorruptionPolicy

Anti-bribery Management System

GO IMS n.05

Issuing function	Management System
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Reasons:	Anti-bribery Management System implementation		

InfoCert S.p.A. (hereinafter, for the sake of brevity, also referred to as the "Company") is aware that corruption is a widespread phenomenon, poses serious social, ethical, economic and political problems, jeopardises good administration, hampers development and distorts competition.

The Company, aware of the need for a vision of the organisation in which the aspect of 'quality' is integrated with Ethics, and is the foundation of all the other aspects that contribute to outlining the strategies themselves, defines this Anti-Corruption Policy.

The Policy is the commitment made to stakeholders: to fulfil this commitment, a Management System in accordance with UNI EN ISO 37001:2016 (Management Systems for the Prevention of Corruption) has been implemented.

The overall objective that underpins the Policy is the satisfaction of stakeholders and compliance with mandatory requirements by preventing possible corruption risks.

The objectives of the Anticorruption Policy of InfoCert S.p.A. are:

- to ensure behaviour based on the criteria of fairness, loyalty and moral integrity that prohibits corruption in any form;
- to comply with all laws, rules and regulations on anti-corruption matters;
- to conduct its activities in such a way as not to commit any act of corruption in any form, whether direct or indirect, and not to facilitate or risk involvement in unlawful situations, whether with public or private entities
- to provide a framework for the identification, review and achievement of anti-corruption objectives;
- to encourage the reporting of suspicions in good faith or on the basis of a reasonable belief, without fear of retaliation and ensuring that no whistleblower is discriminated against with effects on working conditions related to whistleblowing
- to pursue any conduct that does not comply with the policy for the prevention of corruption through the application of the company's disciplinary system
- to encourage all possible efforts to prevent bribery by related third parties, including joint ventures and parties up and down the supply chain (e.g. consultants, contractors, suppliers);
- to ensure that the 'Anti-Corruption Compliance Function' has the appropriate competence, status, authority and independence to exercise its role of overseeing the design and implementation of the system, advising staff on anti-corruption matters, ensuring compliance with the standard and reporting to senior management on the performance of the system;
- to create awareness that actions, behaviour and conduct that do not comply with this policy may result in the application of sanctions to both members of the organisation and its 'business associates'.

The Company undertakes to constantly verify the prevention of corruptive risks also through the implementation of the 'Organisation, Management and Control Model pursuant to Italian Legislative Decree No. 231/2001', also through the activity of the 'Supervisory Board', in compliance with applicable legislation, and the Code of Ethics, so that it is always relevant and appropriate with respect to the work activities performed by the Company.

The Policy as formulated for the pursuit of the set goals and continuous improvement, is activated to disseminate and make the organisational levels with functions of responsibility understand the motivations, reasons and assumptions, and the operational levels understand the aspects and the most relevant implications in line with their own duties. The awareness and involvement of all personnel concerning the objectives is achieved through meetings, internal communications, training meetings and anything else deemed appropriate and effective.

The Company, as part of Management Review, evaluates this Policy in order to ensure that it is appropriate to the corporate purposes, to define and review its objectives and for improvement and to ascertain its suitability.

The Policy is available as documented information, is communicated within the Company and to its 'Business Associates' who pose a bribery risk above the low level.

Furthermore, the Policy is available on the Company's website (for stakeholders).