

Annex 1 - ISO 37001 Anti-Corruption Policy

Archiva is fully aware that the phenomenon of corruption is an obstacle to the economic, political and social development of a country and a heavy distortion of rules, fairness and market competitiveness.

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

In application of this commitment, senior management has determined that the organisation's prevention policy is based on:

- the strict and full compliance with current legislation on preventing and combating corruption, in Italy and in any country where the Organisation operates, with the involvement of employees, collaborators in any capacity, and all persons working for and/or under its control;
- the absolute prohibition of conduct that may amount to bribery or attempted bribery;
- carrying out an accurate context analysis that led to the identification, within the scope of Archiva's activities, of areas of potential danger and the identification and implementation of suitable actions to reduce/minimise these risks;
- 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 associates so that they adopt, in the activities for which they are specifically responsible, policies and actions for the prevention of corruptive phenomena, in compliance with legal requirements and consistent with the organisation's objectives;
- awareness-raising and training of their employees in the prevention of corruption;
- the provision of modalities for reporting suspicions in good faith, or on the basis of a reasonable belief, ensuring the anonymity of reporters;
- the prosecution of any conduct that does not comply with the policy for the prevention of corruption with the application of the organisation's penalty system;
- the appointment of a compliance function for the prevention of corruption, which is guaranteed full authority and independence in the task;

Recipients are encouraged to report any breach of the Anti-Bribery System of which they may have become aware, even indirectly, in the course of their activities, and whistleblowers are guaranteed protection against any form of retaliation, discrimination or penalisation, without prejudice to legal obligations.

Any employee or collaborator who fails to 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 fails to act in accordance with this Policy will be subject to contractual disciplinary sanctions. The company communicates this Policy to the addressees and periodically updates its contents.

Top Management believes that the most appropriate corporate strategy to achieve this Anti-Corruption Policy is the full implementation of the ISO 37001-compliant Management System for the Prevention of Corruption.