

Anticorruption policy of G3 spa

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1 Definition and abbreviations

Term	Definitions
Risk of crime's activities	The process, the operation and the act i.e. the set of operations and acts which can expose the society to the risk of commit a crime
CCNL	The national collective contract of employment is applied to every employee of the company and, in particular the CCNL for the steel workers and the CCNL for the employee of the building companies and related pro tempore
Code of ethics and code of conduct	This document, official, required and approved by the managers of the society because it explain the policies of the company and it includes the general behaviour principles – i.e. recommendations, requirements and\or restrictions- to which every recipient must follow and the violations is sanctioned
Corruption	Corruption means any operations that could involve the giving the promising of money or other utilities to the managers, the general directors, the managers responsible for the financial statement, mayors and liquidators; so that they commit or omit actions in violation of the obligations related to their office or the obligations of fidelity, causing a damage to the society. The corruption is also present when subjects, after the dation or the promise of money or other utilities, for himself or for others, commit and omit acts in violation of the obligations related to their offices or to the fidelity obligations, causing injury to the corporate body for which they work.
Addressers	The bodies of the society (managers and mayors), employees outsources, representatives, prosecutors and all the other subject whit which the society comes into contacts during the relationships of business
Employees	All the physical people that entertain a relationship of subordinated job with the Society
Event	A work event, a social event or a mixture between them in which takes part also a recipient. This three categories of events are hereinafter described: the work events are aimed at the creation of a network, at the approach to the professional issues and the also approach business issues. The social events are aimed at the creations of new relations and at issues relating to the socializations such as meeting, sport events organized by the company , cultural events, leisure events or concerning every other type of interpersonal relation; the mixed events are aimed at the same time both at the creation of networks and at the discussion of work-related topics
The social bodies	The centre administrator and\ or the company board of auditors, according to the same process of reference

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Personnel	All the physic person that maintains a work relation with the society, included the employees, the collaborators, the interims, the interns and the liberal profession that has received an assignment from the company
Public administration or P.A	<p>With public administration in meant:</p> <ul style="list-style-type: none"> • <u>The state</u> (or the state administration) • <u>The public bodies</u>: the public bodies are identified by the law or by an authority subject to a system of public supervision, to the interference of the state or of other administrations for what that concern the appointment and dismissal of the administrations. It is characterized by the participation of the state or of other public administrations to the operating costs or by the directive power that the State boasts towards its organs; or by the institutional public financing or by the constitution of the public initiatives. To a not exhaustive title we can consider public administrations in a broad sense the following society; railroads of the State, Highways Spa, etc. • <u>Public official</u>; the person who practice "a public, judicial or administrative legislative function, ". The penal law says that " it is public the administrative function disciplined by the norms of public law or by authoritative acts. It is characterized by the formation and by the demonstration of the public administration's wish and by its conducted through authoritative powers." (Art 357 c.p9) • <u>Responsible for public service</u>; the person who provide "at any title a public service". Public service means "an activity disciplined in the same form as the public function is, but it is characterized by the lack of the powers typical of this last and with the exclusion of the performance of its simple duties of order and of working" (art 358 cp). Whit any title shall be read as "a subject who exercise a public function, also without a formal or regular investiture. It doesn't notice, in fact, the relationship between the P.A and the subject that expounds the service.
Present	Every kind of present, product or free benefit (included everything with a nominal values) which is donated or received. In this definition the economic benefit, the event or the representation expenses are not included . The gifs, the products and the benefit with an amount not exceeding 50 € Are considered as moderated values gifs
Society	G3 spa

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the representation expenses	The representation expenses are all the kindness adopted during the management of the usual working activities and it can include foods and drinks
Utilities	Everything with a value, every sort of included benefit, but not limited, to money, loans, obligations, contractual rights or affairs, immovable goods, personal goods, or other affairs that come from a job relationship, gifts, relaxations, lunches, representation expenses, contributions or donations, trips and relative expenses, discounts below the value of market, reimbursements, rebates, privileged treatments in the supply chain or the privileged access to opportunity of business, goods, services that don't have a reasonable commercial justification or an improper incentive. In the definition "utility" it is inclusive, besides, the offer of an employment.

2 The policy

The G3 spa has a position of absolute intransigence toward any form of office abuse and corruption, also toward the personnel of private companies. This position contribute to respect the commitments assumed by the society in a voluntary way through the adoption of its own Ethical code.

The whole Personnel is kept, in carrying out of the activities of job, to assume a stance of opposition to every behaviour that was put in place in violation of the obligations related to the office of the responsible subject.

The society and the addressers undertake to assure that every law and rule are intended to tackle the corruption.

3 The application

All the recipients must operate in accordance with the present procedure whenever they act in name or on behalf of the society

4 Rules and principles of conducts

In the following, they are defined the standards of behaviour that must be observe by the Society and by the Personnel in order to assure a “ zero tolerance” approach toward corruptive behaviours. From this point forward, we will intent for corruptive behaviours the behaviour described in the definition of corruption specified in paragraph 1 of the present anticorruption policy

4.1 Ban of corruption of every form

Every conduct, directly or indirectly corruptive is forbidden. The recipient must not:

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- Offer, directly or indirectly, money or other utilities to managers, general directors, administrators, managers responsible for the redaction of the bookkeeping documents, mayors and liquidators, or people submitted to the direction or vigilance of the abovementioned subjects of clients or supplier society, or other corporate body, in order to obtain an interest or an advantage in terms of business or in the name of the society
- Ask for or accept, in a direct or indirect way, money or other utilities from clients, vendors or other subjects. Moreover, they must not look for an advantage of every kind in return.

It is also forbidden any consistent behaviour, to a explicative and not exhaustive title, :

- to offer, to suggest, to authorize the offer or the payment of money or other utility with in order to induce or remunerate a corruptive behaviour of a public or private activity or function;
- to pay or to approve the payment of money or other utility in order to induce or remunerate the corruptive behaviours of a, public or private, function or activity;
- to accept or to encourage the payment of money or other utility in order to induce or remunerate the corruptive behaviours of a, public or private, function or activity;
- to use funds of which is known or is suspected an illicit origin
- to assist, to participate to any activities constituent Crime, also tried
- to establish, to knowingly define or to maintain trials or procedures or schemes in order to make illegitimate payments;
- to undertake any activities with consumers, clients, suppliers, commercial partner and other third parts that can constitute Crime.

To an explicative and not exhaustive title, the following activities can constitute corruption:

- the dation of money or other utility in order to get an opportunity of job
- the payment of money or other utility to an employee of a juridical person with the purpose of get confidential information;
- the acceptance of disproportionate gifts from a supplier of services.

It is forbidden elude these prescriptions using different type of help or contribute such as sponsorships, duties, consultations, publicities, pursuing the same finalities above forbidden.

Every recipient must immediately give up the deal pursued in the interest or advantage of the Society if he is involved in an activity that determines, also as an only attempt, the commission of a corruptive behaviours.

4.2 Representation expenses

The representation expenses must have an appropriate commercial goal, they must be connected with some form of working activity and they must have managed from the appropriate business Functions.

The organization of an event doesn't take part of the definition of representation expenses. It must be managed and recorded within the inside trials of expense (except for closing lunches or ending activities that can be considered as social events)

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4.3 Gifts, business entertainment and events

The recipients must not:

- give or receive gift
- offer or accept to participate to commercial entertainment, events or other hospitality forms of hospitality that would be able:
- to constitute a reason for influence or improper incentive, such as , the expectation to receive a business advantage or to get a thanks for an advantage already gotten.
- To constitute gifts and\ or participations in commercial events for friends or parents of the addresser
- to violate laws and rules or procedures of the Society. All the principles included inside the procedures of the Society must be observed (in particular the procedures and the preventive protocols of the Society in terms of relationship with the P.A, donations or other freedoms, sponsorship,)

when they offer and\or receive, and\or organise, and\or accept to participate in work entertainments and events they must respect the following principles:

- the motive behind the gift, the work entertainments or the event must tightly be correlated to the business (for instance: the development of the business relationship or the promotion of products and service of the society)
- they (the gift etc.) must have a modest and reasonable values, they must be appropriated for all the circumstances or likely to not compromise the integrity and the reputation of the Society. The value must be symbolic or, however, not meaningful (an amount not exceeding € 50,00), in order to avoid that they can be considered as performed with the purpose to practice pressure or an improper influence
- they must be coherent with the background of the business occasion and in accordance with the habitual company practices
- they must be transparent and openly discussed
- they must be temporally organized in appropriate way. In other words, they must not coincide whit the participation in a job office, or whit the acquisition process of a potential business or with evert decisional moment related to a business or a transactions.
- They must be coherent with all the requirement of this document and all the authorisations must be obtained (see below)

In order to avoid every doubt, giving or receiving present and organising or taking part in work entertainments and events is forbidden both if directly (in before person) done or indirectly done (through parts third), except for the express authorization the Direction.

For any reasons gift and events must be offered to managers, general directors, executives responsible for the editing of the society bookkeeping documents, mayors and liquidators or people submitted to the direction or to the vigilance of the mentioned subjects without the previous approval of the Direction, even

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if we speak about gift with a moderate value or they are provide for the commercial routines. (for example Christmas present)

4.4 Use of Third Parts

The recipients must pay attention when they selection or operate with third parts (agencies, brokerage firms, etc.). The Society, in fact, can be held responsible for corruptive behaviours committed by third subjects.

The employment of third subjects must be carefully evaluated in order to check the coherence with the following principles:

- the nature of the transaction and of the activities object of the relationship with the third subjects, on account of the local practices it must be coherent and conforming to the laws or to the applicable rules
- the employment conditions of these third subjects (in a particular way the assignment and the formalities of remuneration) are clearly defined and laid down in written agreement that foresee the clauses 231 and anti-corruption;
- the proposal remuneration must be coherent with the services that are made

No addresser must give or promise money or other utilities to a third subject, knowing that part or all the value will be transferred to one of the subjects above mentioned in violation of this procedure. The recipients must provide so that the documental evidences are recorded and saved (for example, contacts, financial documents, service agreements, bills) in order to justify the payments toward third.

4.5 Donations and sponsorships

Donations and sponsorships to associations or no profit organisations are allowed in respect of the ethics code and the business procedures in force.

However the donations and the sponsorships can take the form of actions prodromal at the corruption if they are improperly granted and without the respect of the limits provide for the procedure.

Donations and sponsorships of this kind are forbidden. The society only carry out ethics and legal donation and sponsorship

4.6 Funding for political parties

The potential founding in favour of political parties could happens in accordance with the relative discipline that foresee , by the way, the necessity that the donation act is adopted by the society body and it must be regularly budgeted

4.7 Roles and responsibilities

The society bodies and the personnel must assure to have read and observed the present documents, i.e. every procedure consistent with this document.

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The society or any addresser must not put in place forms of retaliation against whoever has refused to commit behaviours or actions in violation of the present document.

The recipients can obtain clarifications in relation to doubts around the applicability of the present procedure or in relation to the evaluation of the behaviours that may constitute corruptive behaviours directly turning to their hierarchical superior and\ or to the Direction.

The recipients must communicate to the Direction if they think they are responsible for a corruptive agreement, it has been asked him to do the agreement or they suspect it could happen in the future.

The addresser that refuse to accept or to propose a corruptive agreement, or those that raise question or that report an illegitimate fact made by another employee, they must not fear possible repercussions.

The society encourages the transparency and it will provide support to whoever rises suspicions in good faith and in according to the present code of behaviour.

Every society organ and the personnel must be aware of the commitment made by the society towards the struggle to the abuse of office and to the corruption. Every recipient must act in accordance with the respect of the laws, of the rules, Ethical Code, as well as of the present procedure.

4.8 Information and awareness

The society must:

- guarantee the Personnel 's knowledge of the present politics through an appropriate activity of communication.

The society, during the relations with third parts, when it is possible, will fill in the contracts special contractual clauses that inform on the politics and on the procedures adopted of the Society, as well as on the effects that behaviours against this documents can have with regard to these contractual relationships.

4.9 Reports

The addresser, as quickly as possible, must highlight to the direction the cases that are considered or they are suspected of, the present or future, violation of the present policy. The recipients must submit a specific and detailed report to the email address : WB@g3spa.it, in accordance with the modality governed by the whistleblowing policy document.