



Anti-bribery and corruption policy

In Novalca Srl bribing and corruption are strictly prohibited. The current company anti-bribery and corruption policy applies to the whole staff who is expected to comply with the highest standards in terms of behaviour and moral integrity. The management of Novalca Srl has decided to comply with all laws, regulations and standards issued and adopted in Italy and in all other countries where the company operates with the view to stop bribery and corruption. Novalca Srl operates so to avoid being involved in any episode of corruption and illegal affairs both when it comes to dealing with Public Bodies and Private Entities.

With regard to the Anti-bribery and corruption policy herein, Public Bodies are all officers and people in charge of providing public services and all individuals working for the Public Administration in Italy or in all other countries in which Novalca Srl operates; Private Entities are all individuals who act as representatives or work for customers, suppliers, partners or counterparts in general and people the company staff have to interact with during their working hours. More specifically, all of the following actions are strictly forbidden:

1. Offering, promising, giving, paying or authorizing someone else to give, grant or pay, directly or indirectly, money or any other financial benefit or utility or advantage to Public Bodies or Private Entities ;

2. Accepting the request or authorize someone to accept or request, directly or indirectly, any payment, financial benefit or utility from Public Bodies or Private Entities aimed at :

-pushing the counterpart to irregularly or improperly perform their function, whether private or public, in relation to the activity carried out on behalf of or for La Novalca Srl or with the aim to compensate any kind of activities performed vis-à-vis the company;

-affect the performance of any action or prevent people from performing such action to the benefit of Novalca Srl - obtaining, achieving or maintaining a given business or an unfair or unjustified advantage concerning the performance of the company activities.

3. All the Recipients are strictly forbidden to receive or obtain money or any other benefit for themselves or third parties, in exchange for the promise to carry out or omit actions of any kind in breach of the obligations deriving from their office or in breach of the obligation to be loyal to the company, leading to possible damages to Novalca Srl

All the aforementioned limitations refer not only to cash payments but also all other benefits such as: presents, contributions to associations or sponsorships; sales, offices and professional or consultancy contracts; investment opportunities; confidential information concerning the market or specific products; discounts or deferments of payments; courtesy expenses to the benefit of third parties such as accommodation, meals, transportation and entertainment.

The company Management shall circulate such Anti-bribery and corruption policy among all their staff, and shall make sure it is duly understood and enforced; therefore, such Policy shall be published online on the Corporate Server. Managers shall ensure their collaborators have duly understood the content of the Policy and, should it be deemed necessary, provide all the required clarifications.

The enforceability of such Policy shall be periodically monitored over time by the Management and, if necessary, it shall be duly amended.