



## Anti- Corruption Policy

Novalca Srl enforces a zero-tolerance policy against any form of corruption, ensuring full compliance with applicable laws in Italy and all countries where it operates. All personnel are required to uphold high standards of integrity and fairness, avoiding any conduct that could lead to involvement in illicit practices, whether in dealings with public or private entities.

It is strictly prohibited to offer, promise, give, or accept money, economic advantages, or benefits of any kind with the intent of influencing decisions, obtaining undue advantages, or compromising the integrity of business relationships. This prohibition applies to direct and indirect payments, gifts, sponsorships, professional appointments, investment opportunities, or any other utility that may constitute a corrupt act.

The Management ensures the widespread communication of the anti-corruption policy, verifying that it is understood and implemented at all company levels. Compliance with these provisions is periodically monitored, and corrective actions are taken when necessary to maintain its effectiveness over time.

Novalca Srl operates with transparency, responsibility, and strict ethical standards, fostering a corporate culture based on ethics and legality.

The Management 04/02/2025