

ANTI-CORRUPTION POLICY

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1. FOREWORD

This Company Policy of the Anti-Corruption Management System represents the commitment of **Havant S.r.l.** with regard to the principles and requirements enshrined in the voluntary standard ISO 37001:2016 as well as compliance with the Anti-corruption principles established by the Code of Ethics in accordance with the requirements established by Legislative Decree 231/2001 "Administrative liability of entities".

One of the key factors of the Company's reputation is the ability to conduct its business with loyalty, fairness, transparency, honesty and integrity, in compliance with the laws, regulations and guidelines on social responsibility.

Havant S.r.l. adheres to and promotes policies consistent with the laws and standards of legality for the prevention of corruption and transparency in business relations (hereinafter also Anti-Corruption Laws), at national and international level.

2. SCOPE OF APPLICATION

This Policy concerns all employees, directors of the Company, and, as far as applicable, suppliers, partners and more generally all those with whom **Havant S.r.l.** he comes into contact in the course of his activity.

3. GENERAL ANTI-CORRUPTION PRINCIPLES

The commitment of **Havant S.r.l.** prohibits the Recipients from requesting, promising, offering or receiving gifts, gifts or benefits, potential or actual, from or to persons outside the Company, whether they are public officials or persons in charge of public services, government representatives, public employees or private citizens, both Italian and of other countries, such as to determine unlawful conduct or, in any case, such as to be interpreted by an impartial observer, as aimed at obtaining an advantage, even non-economic, considered relevant by custom and common belief, also understood as facilitation, or guarantee of the achievement, of services in any case due in business activities.

Each Recipient is required to read, understand and apply the procedures and protocols of the anti-corruption management system and to behave in accordance with the provisions of the anti-corruption management system.

Zero tolerance, appropriate procedures, an active role of management, and effective communication constitute the framework for defining improvement objectives.

In compliance with the requirements of the ISO 37001 standard, **Havant S.r.l.** has established its own policy for the prevention of corruption in line with the purposes of the context in which it operates and therefore prohibits the following:

- offering, promising, giving, paying, authorizing someone to give or pay, directly indirectly, an economic advantage or other benefit to a Public Official or a private individual (active corruption);
- accept the request from, or solicitations from, or authorize someone to accept or solicit, directly or indirectly, an economic advantage or other benefit from anyone (passive corruption) when the intention is to:
 - induce a Public Official or a private individual to improperly exercise any function of a public nature or in any case focused on good faith in the exercise of their responsibilities entrusted to them in a fiduciary manner, in a professional relationship also on behalf of private third parties, or to carry out any activity associated with a business by rewarding them for having carried it out;

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- influence an official act (or omission) by a Public Official or any decision in violation of an official duty even by private subjects;
- influence or compensate a Public Official or a private individual for an act of his office;
- obtaining, securing or maintaining a business or an unfair advantage in relation to business activities; or otherwise violate any applicable laws.

With specific reference to its employees and in accordance with the company organizational system based on the control and segregation of activities, **Havant S.r.l.** provides that the employee who maintains relationships or carries out negotiations with external public or private counterparts, may not alone and freely:

- enter into contracts with the aforementioned counterparties;
- access to financial resources;
- stipulate consultancy contracts, professional services;
- to grant benefits (gifts, donations, benefits, etc.);
- hiring staff (including pantouflage)

Havant S.r.l. adheres to and promotes policies consistent with the laws and standards of legality for the prevention of corruption and transparency in business relations, both nationally and internationally.

Havant S.r.l. therefore, it requires all its stakeholders to comply with the laws for the prevention of corruption applicable to its context, by signing the commitment to meet the requirements of the management system for the prevention of corruption and to promote the continuous improvement of the system.

4. OBJECTIVES OF THE ANTI-CORRUPTION POLICY

Havant S.r.l. promotes an anti-corruption policy pursuant to ISO 37001 because it wants to strengthen and consolidate the Anti-corruption principles established by the Code of Ethics, requiring all personnel and all third parties operating on its behalf to commit to compliance with the principles contained therein.

In order to achieve the objective of corporate management aimed at ensuring adequate anti-corruption safeguards,

Havant S.r.l.:

- prohibits corruption at all levels of its organization and requires its partners and suppliers to comply with the anti-corruption laws that are applicable to it;
- ensures compliance with anti-corruption laws applicable to the organization;
- encourages the reporting of suspicions in good faith, or on the basis of a reasonable and confidential belief, without fear of retaliation;
- is committed to the continuous improvement of the management system for the prevention of corruption;
- ensures the authority and independence of the compliance function for the prevention of corruption;
- sets out the consequences of non-compliance with the corruption prevention policy.

The corruption prevention policy:

- it is also available as documented information on the institutional website;
- it shall be communicated in the appropriate languages within the organisation and to business associates who pose a risk of corruption above the low level.

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To help achieve the objectives of this policy, **Havant S.r.l.** undertakes not to generate organizational, ethical and relationship uncertainty, through:

- a clear definition of its processes;
- an unambiguous identification of roles and functions;
- a transparent system of delegations and powers of attorney;
- a linear system of rules, values, procedures and practices suggested by experience, to facilitate decision-making within the organization;
- a widespread procurement system of goods and services that excludes fraudulent suppliers and supplies through periodic monitoring actions for their qualification;
- an adequate internal control system aimed at the conduct of all its employees;
- an adequate external control system aimed at the processes of all the Company's suppliers and collaborators.

Also, **Havant S.r.l.**:

- encourages the reporting of suspicious cases in good faith, guaranteeing the protection of the confidentiality of the whistleblower and ensures the absence of any form of retaliation against the whistleblower for the mere fact of having reported;
- is committed to the continuous improvement of the processes for managing and preventing corruption risks;
- sanctions any form of non-compliance with the procedures for the prevention of corruption and the contents of this company policy;
- assigns to the Supervisory Body established pursuant to Legislative Decree 231/2001, ensuring the same the requirements of adequate authority and independence, also the role of Anti-corruption Compliance Function pursuant to ISO 37001.

For this purpose, **Havant S.r.l.** gives full mandate to the Anti-Corruption Function, in order to pursue the objectives contained in this policy, by virtue of the authority and independence conferred on it to:

- supervise the design and implementation of the Management System for the Prevention of Corruption;
- provide guidance and advice to staff on issues related to corruption and the Management System for the Prevention of Corruption;
- ensure that the Management System for the Prevention of Corruption complies with UNI ISO37001:2016;
- report on the performance of the Management System for the Prevention of Corruption to the Management Body and Top Management in the most appropriate manner.

Each employee and in general each Recipient is responsible for achieving adequate levels of corruption prevention, therefore there is a strong desire that the Management System for the Prevention of Corruption be an integral part of the company's management and that this policy be disseminated to all personnel, to anyone working on behalf of **Havant S.r.l.** and to anyone who requests it in order to make employees/collaborators aware and inform all interested parties of the Company's commitment to minimizing the risk of corruption.

5. MANAGEMENT OF NON-CONFORMITIES

Failure to comply with the Anti-Corruption Policy and/or any failure to comply with the Anti-

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Corruption Laws and/or the Anti-Corruption Manual and/or the Model 231, will activate the disciplinary system against its workers in line with the applicable CCNL, or, in the case of suppliers, will generate the process of disqualification and consequent termination of the contract.

6. REPORT MANAGEMENT

Havant S.r.l.'s **anti-corruption policy** encourages the reporting of suspicious/anomalous events/in contrast with the anti-corruption rules and/or the requirements of Decree 231, carried out in good faith.

As evidence of this, a specific chapter has been prepared within the Code of Ethics, in accordance with the requirements of the ISO 37001 standard and Legislative Decree 231/2001, taking into account the following principles:

- a. facilitate and enable individuals to report attempted, suspected and actual acts of corruption or any breach or deficiency concerning the corruption prevention management system to the Corruption Prevention Compliance Function (Anti-Corruption Function) or to the relevant personnel (either directly or through an appropriate third party);
- b. treat reports confidentially, so as to protect the identity of the reporter and others involved or mentioned in the report, except in a process required to proceed with an investigation;
- c. allow anonymous reporting, except for considering it only if it is sufficiently detailed;
- d. prohibit retaliation and protect whistleblowers from retaliation, after having, in good faith or based on a reasonable belief, raised or reported suspicions about attempted, actual or suspected acts of corruption or violations concerning the Prevention of Corruption Policy or the Management System for the Prevention of Corruption;
- e. Allow staff to receive support from an appropriate person on what to do when faced with a suspicion or situation that may involve acts of corruption.
- f. **Havant S.r.l.** ensures that all members of staff are aware of and are able to use the reporting procedures, and that they are aware of their rights and protections under these procedures.

7. POLICY COMMUNICATION

Havant S.r.l.' s **corruption prevention policy** it is available as documented information on the Company's institutional website and is communicated within the organization and to relevant stakeholders in deals that pose a risk of corruption above the low level.

Within the organisation, the dissemination of the Anti-Corruption Management Policy is implemented by the Management through the actions of the company management and in particular:

- training interventions on business aspects and management processes;
- training interventions on the Anti-Corruption Management System and 231;
- verification activities on the level of application of the Anti-Corruption System adopted.

8. POLICY REVIEW

The Anti-Corruption Policy is revised if necessary during the Review by the Management or in relation to events and the following elements:

- Results of internal or external audits;
- any changes dictated by changing circumstances;
- any regulatory updates in the sector.

Garbagnate Milanese (MI), 03.11.2022

The Board of Directors

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