

ANTI-CORRUPTION POLICY

Fin Consorzio, specialised in the design, construction and management of major infrastructure work, **recognises the primary importance of conducting business with integrity, transparency and correctness.**

To this end, Fin Consorzio promotes an anti-Corruption policy as it wants to consolidate the principles of the Code of Ethics and actively support all initiatives aimed at strengthening the standards and principles that must be deeply-rooted in all personnel aimed at inducing irreproachable conduct, in such a way that no harm is done to the company, even solely in respect of the company image.

The company's Anti-Corruption System is based on the following principles:

- any kind of corruption is forbidden in any form, in any jurisdiction, even when such activities were in practice admitted, tolerated or not legally prosecuted;
- it is forbidden to offer/promise/authorise or accept/request gifts or other benefits that:
 - may induce a Public Official or a Public Service employee or a private individual, to carry out duties or any other activity improperly, or reward that person for doing so;
 - may influence an act (or an omission) or any decision by a Public Official or a Public Service employee or an individual in violation **of an official duty or obligation of fidelity;**
 - are aimed at obtaining an unfair benefit of any kind, not only in the interest and/or to the benefit of the Company, but also in the interests and/or to the benefit of individuals or family members or acquaintances;
- all transactions, in compliance with accounting principles, must be accurately accounted for in a complete and transparent manner so that all receipts, payments and in general all transactions can be tracked.

Fin Consorzio has established the appropriate measures for pursuing the principles set out above and applies all the procedures necessary for verifying compliance with this Policy, the Code of Ethics and anti-corruption laws.

The application of this Policy is the direct responsibility of all Fin Consorzio employees and all the Third Parties that collaborate with the Company. Each director and each manager is responsible for monitoring the compliance of its partners with the Anti-Corruption System.

An employee who refuses to behave in a way that is incompatible with this Policy and/or Anti-Corruption Law shall not be subject to disciplinary action or retaliation of any kind.

Any employee or partner who does not act in accordance with this Policy or who does not denounce known or suspected acts will be subject to disciplinary action, commensurate with the seriousness of the violation.

It is the duty of company executives to constantly review and monitor the contents of this Policy, and to make sure it is being applied.

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Fin Consorzio