ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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FOREWORD

Lumson S.p.A. (hereinafter also "Lumson" or the "Company") is committed to pursuing a "zero tolerance" approach to any form of corruption, therefore operating with integrity, transparency and in full compliance with applicable anti-corruption laws and regulations.

This ANTI-BRIBERY AND ANTI-CORRUPTION Policy (the 'Policy') reflects the principles of fairness, honesty and transparency already expressed in the Code of Ethics and in the Organisation, Management and Control Model adopted pursuant to Legislative Decree No. 231/2001 (the “Model 231”), and represents a further step in consolidating the Company's system for preventing and combating corruption. The aim is both to raise awareness of the rules and behaviour to be adopted and to promote the core values that define Lumson.

This policy is also an integral part of our ESG commitment, particularly the Governance pillar, and is aligned with the European Sustainability Reporting Standards (ESRS),thus contributing to the transparent and accountable reporting of our ethical practices.

1. SCOPE OF APPLICATION

The Policy applies to all members of corporate bodies, employees at all levels, proxies, collaborators and, more generally, to all third parties with whom Lumson has business dealings or who act in the interest and/or on behalf of the Company (the "Recipients"). All Recipients are called upon to comply with current regulations on the prevention of corruption and to maintain conduct consistent with the principles and provisions set out in this document.

Through the competent company structures, the Board of Directors ensures the dissemination of the Policy by making it available internally through the Company Portal and publicly on the Company's official website (https://lumson.com). Compliance with the indications contained in the Policy is essential for Lumson’s organisation and operations, which requires from all Recipients a constant commitment to adopt responsible behaviour in compliance with anti-corruption principles.

2. LEGAL & REGULATORY FRAMEWORK

In most legal systems, corruption gives rise to offences, with liability and penalties becoming progressively more severe and incisive for natural persons, with an increasing tendency to extend this liability to legal persons as well.

In general, under Anti-Corruption Laws the promise, offer, payment or acceptance, directly or indirectly, of money or other benefits for the purpose of obtaining or retaining business or securing an unfair advantage are qualified as unlawful and, consequently, subjected to penalty.

In particular, within the meaning of Anticorruption Laws corruption consists in paying (or even only promising) money or other benefits (e.g. gifts, hospitality), directly or through an intermediary, to public or private persons in order to: **i)** influence an action or a decision, inducing them to do or not to do anything in accordance with or in breach of their legal duty or in any case to secure an unfair advantage, and **ii)** induce a public officer or a private person to use their influence with the entity for which they work in order to take (or not take, for example, a sanction) an action or a decision.

In addition to the active bribery described above, Anti-Bribery Laws also penalise private passive bribery, which may occur when a member of an administrative or supervisory body or an employee solicits or receives money or other benefits (or the mere promise to receive them) to perform or omit acts of their office in breach of their duty of loyalty to the company to which they belong.

It should also be emphasised that corrupt conduct is also sanctioned when the money (or other benefit) is intended for family members or persons connected to the public or private person (e.g., a company owned or participated by the latter), in order to influence their decisions.

In the Italian legal system, corruption offences are regulated in the Civil Code and the Criminal Code, and are also among the offences entailing the administrative liability of entities pursuant to Legislative Decree No. 231/2001. Moreover, through Law 190/2012 (the so-called "Anticorruption Law"), the Italian lawmaker enacted systematic legislation aimed at implementing a set of preventive measures and penalties against corruption and illegality in public administration.

Below is the main local and international anti-corruption legal framework, considered by the Company for the purposes of preventing corruption and by which this policy is inspired:

- United Nations Convention against Corruption issued in 2003 (so-called Merida Convention);
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions;
- Italian Criminal Code, with particular reference to Articles 317 et seq;
- Italian Civil Code, with particular reference to Article 2635 (private to private corruption) and Article 2635 bis (instigation to private to private corruption);
- Legislative Decree 231 of 8 June 2001 (on the administrative liability of entities);
- Law 146 of 16 March 2006 (Ratification and implementation of the United Nations Convention and Protocols against Transnational Organized Crime, adopted by the General Assembly on 15 November 2000 and 31 May 2001);
- Legislative Decree no. 165 of 30 March 2001, containing "General rules on the organisation of employment in public administrations";
- Legislative Decree 24/2023, implementing Directive (EU) 2019/1937 on "the protection of persons who report breaches of Union law and laying down provisions for the protection of persons who report breaches of national laws";
- Legislative Decree no. 36/2023- Public Contracts Code implementing Article 1 of Law 78 of 21 June 2022, which delegates the Government to legislate on public contracts;
- all other anti-corruption laws adopted by the many countries that have acceded to these international conventions.

The main regulatory references are as follows:

- UNI ENI ISO 37001:2025

3. THE ROLE OF LUMSON GOVERNANCE

Although specific regulations exist, it is essential that each organisation takes an active role in the prevention of corruption by implementing appropriate control tools and mechanisms.

Lumson's Board of Directors reaffirms its commitment to comply with legal requirements and best practices in the industry, not only by adopting rules and principles of conduct, but also by monitoring their application and promoting the continuous improvement of its prevention measures.

The adoption of this Anti-Bribery and Anti-Corruption Policy further confirms the Company's determination to fight corruption, by providing an organic framework that integrates and harmonises rules, guidelines and minimum standards of conduct already in use. Lumson recognises the importance of consolidating the trust of its stakeholders and protecting its corporate reputation by promoting the values of legality and ethical

behaviour among employees, collaborators and third parties, in accordance with standards, principles and controls.

All recipients within the organisation are invited to understand and implement the provisions of this policy, acting in accordance with its provisions.

In order to ensure that the internal rules for the prevention of corruption are complied with, updated and constantly reviewed, the following responsibilities have been defined:

- Board of Directors: approves the Anti-Bribery and Anti-Corruption Policy and, as the Governing Body, ensures that the company's activities comply with the Policy provisions; represents a model of conduct inspired by the principles of fairness, transparency, integrity, truthfulness and compliance with national and international regulations.
- Designated Body: the Board of Directors entrusts the Anti-corruption function, with support of the Quality Assurance function and Control & Risk Committee, with the task of supervising the implementation and dissemination of the policy and reporting periodically to the Administrative Body on the results of the checks carried out.
- Department Heads: are in charge of ensuring the application of and compliance with the principles and rules of the policy in their respective areas of responsibility. They also undertake to promote an anti-corruption culture and disseminate the indicated values and principles of conduct.
- Whistleblowing Manager: is in charge of handling reports received through the internal reporting channels and carrying out the *investigation*. It regularly reports to the Administrative Body

4. GENERAL PRINCIPLES OF CONTROL

The general principles that must be complied with in order to ensure an adequate internal control and risk management system for corruption offences can be summarised as follows:

- Compliance with Regulatory Instruments: business activities must be conducted in accordance with the principles of conduct set out in the Regulatory Instruments and Internal Policies. To this end, contracts with Third Parties must expressly include a clause in which the Third Party attests that it is familiar with the content of the Code of Ethics, the extract from Model 231 and the Anti-Bribery and Anti-Corruption Policy and undertakes to comply with its provisions, as well as to refrain from conduct that may involve the Company in accordance with the provisions of the Anti-Bribery and Anti-Corruption Laws. Failure to comply, even partially, with these principles constitutes a serious breach of the obligations under the contract, which entitles the Company even to terminate the contract. In addition, Lumson is committed to obtaining and maintaining the certification of its management system for the prevention of corruption and in accordance with UNI EN ISO 37001:2016.
- Prohibition of unlawful practices: no objectionable or unlawful practice (including “facilitation payments”) may under any circumstances be justified or tolerated on the grounds that it is in the interest of the Company or that it is considered "customary" in the sector or countries in which the Company operates.
- Compliance with the Policy in business dealings: Lumson’s business dealings, whether involving a Public Sector Entity or a Private Entity, must be conducted with absolute transparency, in compliance with the Policy and, more generally, with all Anti-Bribery Laws.

- **Responsibilities of Lumson's People:** Lumson's People are responsible, within the scope of their respective authority, for compliance with the Policy. In particular, the heads of the various Corporate Departments must monitor compliance by their collaborators and promptly report potential violations.
- **Third Party Responsibilities:** Third Parties must comply (and ensure that their organisations comply) with the Policy and applicable Anti-Bribery and Corruption Laws.
- **Training of People:** specific training plans must be provided for People working at Lumson, with particular reference to those working in the activities most exposed to the risk of corruption.
- **Information to be provided to Third Parties:** the Policy must be made available to Third Parties (e.g., by publication on the website) and must be referred to in the contractual clauses.
- **Prohibition of retaliation:** No person working at Lumson or on Lumson's behalf will be fired, demoted, suspended, threatened, harassed or discriminated against in any way for refusing to violate the Policy or for reporting a violation.
- **Segregation of duties:** the performance of corporate activities must be based, where possible subject to the organisational structure, on the principle of segregation of duties, whereby the authorisation of a transaction must be under the responsibility of a person other than the person who operatively performs or controls that transaction. The segregation of duties must be guaranteed by the intervention, of several persons within the same process; it can be implemented through the use of computer systems that allow certain operations to be performed only by identified and authorised persons. Where segregation of duties cannot be guaranteed, however, alternative means of compensatory control are to be adopted.
- **Attribution and revocation of powers:** authorisation and signature powers must be: **i)** consistent with the organisational and management responsibilities assigned; and **ii)** clearly defined and known within the Company. The corporate roles that are assigned the power to commit the Company within certain transactions must be defined, specifying their limits and nature. The granting of powers for a specific type of acts must be comply with any specific requirements laid down by law for the performance of that act. The timely revocation of powers (and the blocking of the corresponding utilities) in the event of the beneficiary leaving the company or changing organisational role must be ensured (if necessary).
- **Transparency and traceability of processes:** every activity must be verifiable, documented, consistent and congruent with the Company's business. The proper storage of relevant data and information must be ensured, by means of computerised and/or paper media.

5. PRINCIPLES OF CONDUCT WITH THIRD PARTIES IN GENERAL

As part of its business operations, Lumson may have business relationships with Third Parties (e.g., suppliers of goods and services, customers, collaborators), which could expose the Company to corrupt activities or in which it could be held liable for corrupt actions committed by persons performing activities in its name and on its behalf.

The Company, therefore, encourages Third Parties with whom it has business relations to adopt principles, procedures and conduct in line with this Policy and to comply with the relevant laws and regulations.

The process of selecting Third Parties and of entering into and performing contracts must be defined in compliance with the anti-corruption principles set out in the Policy, with particular reference to the selection phase (and the verification of ethical requirements), the awarding of contracts, the management of contracts

entered into, and the standard contractual protection clauses, including those committing to compliance with the Policy, the Code of Ethics, and the Model 231.

When engaging Third Parties, consideration must be given to the business needs, the reputation of the counterparty, its ethical conduct and the appropriateness of the fees due.

Not all Third Parties expose the Company to a corruption risk to the same extent, so not all of them require the same checks.

Right from the start of the business relationship, the Company will assess any elements as indicators of potential criticality. By way of example only, in addition to criminal convictions or ongoing corruption investigations, the following could be considered:

- false or insufficient information provided by the Third Party, either with respect to the corporate structure or to the skills, experience or availability of resources required for the type of activity;
- requests that are inconsistent with the activity performed, such as requests to make payments in a country that has no connection with the Third Party;
- refusal to sign the contract or to commit to comply with the Anti-Bribery Policy;
- request to enter into clauses that do not comply with applicable laws and regulations, or into agreements providing for unusual/not commonly applicable contractual terms;
- request for remuneration that is inconsistent with the type of service envisaged in the contract or for unusual forms of remuneration (e.g. payments in cash or to parties other than the counterparty or to different countries);
- requests that go beyond the business relationship (e.g., requests to hire staff without following internal procedures);

In the face of any risk elements that emerge, the Company shall timely adopt appropriate corrective measures, including, for example, refraining from activating the relationship or, in the course of the contractual relationship, ending the relationship with the Third Party.

Among the **Third Parties** considered **"relevant"** by the anti-corruption best practices, the following have been assessed as high or medium risk: Developers, Intermediaries/Agents/Business Brokers, Partners and Business Associates (high risk), Suppliers/Contractors (including any sub-contractors), Consultants, Counterparties in extraordinary transactions, Private Clients, Attorneys, Candidates for the office of director and member of the control bodies of the Companies (medium risk), Candidates for employment (medium risk) and Outsourcers (medium risk).

6. PRINCIPLES OF CONDUCT RELATING TO SPECIFICACTIVITIES

The following paragraphs identify:

i) the Company's activities defined as '**sensitive activities'** that, even if only in the abstract, may facilitate corrupt practices and

ii) the rules to be observed by People working for Lumson and anyone acting on its behalf, in addition to the general principles of control set out above.

6.1. Relations with Public Administrations and Authorities

Relations with Public Administrations, and Authorities in general, may represent potential risk situations, since the Company could be held liable for acts of corruption, undertaken or attempted, directly or through third parties, against Public Entities (so-called "active public corruption").

Therefore, the following rules must be complied with in the management of such relationships:

- persons authorised to deal with Public Administrations and Authorities must be formally identified by means of powers of attorney or proxies forming part of the system of powers;
- if the nature of the meeting, also in view of the stage of the relevant proceeding, was, in the opinion of the person in charge of the activity, relevant for the purpose of issuing an authorisation, measure or legislative/regulatory provision or in any case relevant in consideration of the relationship with the Public Administration, at least two Authorised Persons belonging to Lumson must attend the meetings (where appropriate also by means of remote communication that ensure the identification of the participants). If in the aforementioned cases the presence of at least two Authorised Persons is not possible, the participation of only one Authorised Person must be authorised in advance in writing by his or her superior;
- a report of the meetings held must be drawn up;
- it must be ensured that all documents, data and information transmitted to the Public Administrations and Authorities are accurate, truthful and up-to-date;
- prior to transmission/delivery, the documents prepared must be verified and signed, where necessary, by an Authorised Person;
- the proper performance of the obligations arising from the authorisations obtained must be ensured and controls must be in place to guarantee such performance.

It is important to specify that, for the purposes of this Policy, relations with Public Administrations and Authorities in general in countries other than the one in which the Company operates are also relevant.

In the context of the above, it is prohibited, in particular, to:

- make or promise gifts of money, including through an intermediary;
- distribute or promise, even through an intermediary, gifts or other benefits of any kind outside the scope of company practice (i.e. any form of gift offered in excess of normal business practices or courtesy, or in any case aimed at acquiring favourable treatment in the conduct of any business activity). In particular, any form of gifts to Italian and foreign public officials (including in those countries where the giving of gifts is a common practice), to their family members or to persons designated by them, aimed at influencing their independence of judgement or inducing them to secure any advantage for themselves, for others or for the Company, is prohibited. In any case, this type of expenditure must be authorised and properly documented;
- influence or attempt to influence by any means the decisions of the representatives of the Public Administration and the Authority dealing with or making decisions on its behalf.

6.2. Management of inspections

Even relations with Public Administrations, and Authorities in general, within inspections, may represent potential risk situations, since the Company could be held liable for acts of corruption, undertaken or attempted, directly or through Third Parties, against Public Entities (“active public corruption”).

Therefore, the following rules must be complied with in the management of such relationships:

- persons authorised to deal with Public Administrations and Authorities must be formally identified by means of powers of attorney or proxies forming part of the system of powers;

- when representatives of the Public Administration or the Authority enter the company, the person responsible for receiving visitors must refer the official to the competent Authorised Person;
- Inspections must be attended, where possible, by at least two Authorised Persons from the Company. In the event of the participation of only one Authorised Person, the superior shall be notified in advance;
- it must be ensured that all documents, data and information provided to the Public Administrations and Authorities are accurate, truthful and up-to-date;
- during the inspections, all the People working for Lumson involved must maintain a correct, transparent and cooperative behaviour;
- at the end of the inspection, the inspection report must be signed by the persons present at the inspection and, if different, by the Authorised Person. In the event that, at the end of the inspection, no report is delivered, it will be the responsibility of the Authorised Person (who took part in the inspection) to draw up a memo containing the relevant information: i) date and place of the visit, ii) official of the Public Administration or Authority and the role held by him/her, iii) Authorised Persons taking part in the visit, iv) subject of the inspection, and v) outcome of the visit (with an indication of any prescriptions and/or sanctions against the Company);

In the context of the above activities, it is prohibited to:

- make or promise gifts of money, gratuities or other benefits of any kind, including through an intermediary;
- be represented by People working for Lumson, Suppliers, Contractors or Consultants who are in a position of conflict of interest;
- influence or attempt to influence by any means the decisions of the representatives of the Public Administration and the Authority dealing with or making decisions on its behalf;
- engage in conduct that materially prevents, through the concealment of documents or other fraudulent means, control by inspectors/verifiers.

6.3. Purchases of goods and services, consulting and professional services

The purchase of goods and services, consulting and professional services by the Company and the management of relations with the relevant providers (Suppliers, Contractors and Consultants) may represent potential risk situations both in the phase of selection of the Third Parties (Suppliers, Contractors and Consultants) and in the management of the contractual relationship: in this context, acts of corruption could be committed, both public (for example, by selecting a Supplier linked by family or economic relations to a Public Official - "active public corruption") and private (for example, by selecting a less economically competitive Supplier following the receipt of a sum of money or other benefit from an Employee - "passive private corruption").

Therefore, the following rules must be complied with in the management of such activities:

- adequate planning of purchases must be ensured, avoiding, as far as possible, recourse to "urgent" procurement (the "Procurement Plan");
- the annual Procurement Plan is subject to review and, if necessary, revision on a regular basis;

- the Suppliers, Consultants and Contractors used must first undergo a qualification and due diligence process (also in the case of Temporary Business Associations or Consortia) based on the rules defined in the supplier qualification procedure;
- the criteria to be applied for qualification purposes must be clearly defined and applied; Suppliers, Consultants and Contractors who pass the qualification process are included in the so-called "Lumson Vendor List";
- the process of qualification and maintenance on the Vendor List must involve different company departments, each for their area of competence (technical specifications, HSE, etc.);
- periodic checks on the maintenance of the necessary requirements for qualification must be provided for; the loss of the necessary requirements shall entail exclusion from the Vendor List and, where appropriate, blacklisting;

Creation/update of master data on Suppliers, Consultants and Contractors

- the necessary procedure for the creation and subsequent amendment of the personal data of each Supplier, Consultant, Contractor (name, VAT No., Iban, etc.) must be regulated, also using appropriate IT systems.

Purchase Request (PO) and Contract Request (CR)

- The persons authorised to issue and approve the PO/CR must be formally identified;
- the cases in which it is possible to proceed with the purchase of a good/service without having previously issued a PO/CR are provided for and regulated by a specific procedure;
- requests for direct allocations (without a comparison of offers) must be justified and must be authorised by the persons empowered to do so;
- the splitting of a single requirement into several POs (split orders), when not motivated by business needs, is prohibited;
- Authorisation to issue the PO must be given following verification of the actual need to proceed with the purchase by the relevant manager.

Selection of Supplier, Consultant and Contractor

- For the purposes of the selection, a single "technical specification" / request for tender must be prepared, on the basis of which the offers received from Suppliers, Consultants and Contractors must be evaluated;
- the choice must be based, where possible, on the comparison of actual offers from potential Suppliers, Consultants and Contractors and the objective comparison of these offers (centred on the above-mentioned and documented criteria);
- the evaluation of the offers received must be carried out by different Departments, each in its own field of competence (technical, HSE, economic evaluation, possible sustainability requirements, etc.);
- only pre-qualified Suppliers, Consultants, Contractors may be selected, unless specific exceptions are authorised in accordance with the specific procedure and the System of Powers;

Formalisation of orders and contracts

- orders/contracts must be formalised before the commitments contained therein are made operative;
- the subject of the purchase must be clearly and unambiguously defined;

- orders and contracts must expressly include a clause in which the Supplier, Consultant and Contractor attests that it is familiar with the content of the Code of Ethics, the extract from Model 231 and the Anti-Bribery and Anti-Corruption Policy and undertakes to comply with its provisions, as well as to refrain from conduct that may involve the Company in accordance with the provisions of the Anti-Bribery and Anti-Corruption Laws;
- with regard to the determination of the contract value, the congruity of the fees requested by Suppliers, Consultants and Contractors must be verified with respect to the performance and market conditions, excluding any abnormally low bids deemed unjustified;
- with regard to professional and Consulting services, appropriate criteria must be applied to determine remunerations, fees and rates in order to enure that they are consistent with the requested services and in line with the assignment (evaluation based on criteria o reasonableness and with reference to the prevailing conditions and practices within the market). In particular, the remuneration must be determined in such an amount as to adequately remunerate the professional performance required (if the remuneration also includes a variable part, the fixed component must be sufficient to remunerate the performance if the variable component is not paid due to the failure to achieve the performance targets predefined in the contract);
- where possible, a right to conduct audits of the Supplier, Consultant and Contractor (so-called *audit rights*) must be provided for, even contractually, to ensure compliance with the applicable regulations;
- purchase orders and contracts must be authorised in accordance with the System of Powers and within the limits of the approved budget. Any extra-budgetary purchases (not included in the budget or exceeding the limits already authorised) must be authorised by the relevant authority;
- Appropriate controls must be implemented on the respect of budget limits by those who have requested the services;
- any order/contract variants may only be formalised by the department responsible for managing purchases and must be approved in accordance with the System of Powers, given the overall value of the order/contract. Variations to the order/contract must be negotiated with the Supplier, Consultant, Contractor and involve a reassessment of the suitability of the latter to adequately fulfil the required services;
- the subcontracting of part of the work must be expressly authorised in the contract with the Contractor or at a later stage.

<u>With regard to professional services (e.g., external lawyers) and consultancy, in addition to the above, the following rules must be observed:</u>

- in determining the remuneration, account must be taken, as far as possible, of the professional reference scales in relation to the service required, where available;
- in any event, the remuneration must be determined in such an amount as to adequately remunerate the professional performance required (if the remuneration also includes a variable part, the fixed component must be sufficient to remunerate the performance if the variable component is not paid due to the failure to achieve the performance targets predefined in the contract);
- the work of the Consultant must be monitored, for example through the acquisition of periodic reports/documentation on the activities carried out;

<u>Acceptance of the performance of services/delivery of goods</u>

- technical and economic criteria for the validation of the supply of goods/services must be defined and correctly applied;
- the checks carried out for the purpose of acceptance must be properly documented/traced;
- all acceptances of services/delivery of goods must be entered into the system.

Settlement of payable invoices

- Prior to settling payable invoices, cross-checks must be made on the correspondence between purchase request/purchase order/invoice and the acceptance of the goods/performance must be verified. In particular, there must be checks (including automatic, by means of a computer system) on the correspondence between the person issuing the invoice and the person in whose name the contract (and therefore the service) was made, between the amount of the order and the amount of the invoice, between the IBAN indicated on the invoice and the IBAN communicated by the Supplier; the same correspondence check must be carried out on the Supplier's VAT number/tax code. Any discrepancies must be investigated and remedied;
- payments must be authorised in accordance with the System of Powers.

6.4. Gifts, Donations, Sponsorships and Representation Expenses

The offering of Gifts and Gratuities as well as the provision of Sponsorships and Entertainment Expenses could be perceived by a third party (e.g., a competitor, the press, an Authority) as being intended to bribe, even if the intent of the parties involved was not such. Consequently, the following rules must be observed in the context of this sensitive activity:

- Persons authorised to manage gifts, donations, sponsorships and entertainment expenses must be formally identified, authorised and endowed with specific spending powers;
- the criteria governing the management of gifts, donations, sponsorships and entertainment expenses, as well as the controls relating thereto, must be clearly defined and approved;
- it is forbidden to give or promise money, goods or other benefits, even through intermediaries, to public or private parties in order to influence their independent judgement or to induce them to secure any advantage for themselves, others or the Company. Allowed gifts and/or donations are always characterised by their modest value or by their being aimed at promoting charitable or cultural initiatives or the image of the Companies;
- it is forbidden to solicit, demand and/or receive money or other benefits that are not due, or to accept the promise thereof, even through an intermediary, in order to take or not to take an action, in breach of the obligations inherent in your role in the company or the obligations of loyalty related thereto;
- so-called "facilitation payments", i.e. unofficial payments of modest value, made for the purpose of expediting, favouring or ensuring the performance of a routine activity or that otherwise falls within the scope of the duties of the public or private entities with which the Company deals, are not permitted;
- expenses incurred for these activities must be within a specific budget approved at the beginning of each year. Any extra budget must be authorised in accordance with the System of Powers and communicated to the Risk and Control Committee

In addition to the above, specific rules of conduct relating to individual types of expenditure are set out below.

Giveaways

The term "Giveaways" is to be understood as unregistered movable goods (of a value exceeding 150,00 €, below which they fall into the category of gadgets of modest value) granted to public or private entities for the purpose of promoting or consolidating the image of the Company. A Giveaway, due to its characteristics and purpose, may also be received from third parties.

Persons working at Lumson are permitted to make or receive Giveaways subject to the following rules:

- the request to be allowed to make free gifts (with an indication of the recipients) must be addressed to the Authorised Persons, who shall assess its consistency with the criteria defined in the Internal Rules and verify the existence of the conditions necessary to be able to make the free gift;
- Giveaways may never consist in the giving of money or equivalent instruments;
- any purchase of goods to be used in this sensitive activity must comply with the rules laid down in the sensitive activity “purchase of goods and services, consulting and professional services”, to which reference is made;
- it is forbidden to make or promise Giveaways, to public or private parties, in order to influence their independence of judgement or induce them to secure any advantage for themselves, for others or for the Company;
- it is forbidden to make or promise Giveaways, to public or private Persons, as a result of pressure or undue requests, more or less explicit, aimed at this;
- Giveaways intended for third parties must be of modest value and may not exceed a unit cost of 150,00 € (per individual beneficiary); any exceptions must be formally authorised, in accordance with the Powers System, reported to the Control and Risk Committee and recorded in the special "Gifts and Representation Expenses Register";
- it is permitted to accept gifts of modest value not exceeding a unit cost of 150,00 € (per each recipient). Giveaways of higher amounts must be refused. In the event that accepting the giveaway can be reasonably considered to be in Lumson’s best interest (e.g. if the refusal could be considered offensive), the circumstance must be reported to the Control and Risk Committee and the giveaway must be noted in the “Gifts and Entertainment Expenses Register”;

Entertainment Expenses

"Entertainment Expenses" shall mean the expenses incurred for hospitality and courtesy treatment towards a Public or private Entity, on the occasion of business meetings, **(i)** that fall within the scope of one's duties (activities falling within one's area of responsibility and/or instrumental to the promotion of the Company), **(ii)** that are reasonable in relation to the objective of generating, even if only potentially, economic benefits for the Company and **(iii)** that are consistent with the commercial practices of the sector.

Persons working at Lumson are allowed to incur Entertainment Expenses, subject to the following rules:

- Entertainment Expenses must be limited to predefined circumstances (such as, without limitation, business lunches or dinners) and in any case serve promotional or public relations purposes;
- Entertainment Expenses must be adequately documented by providing evidence of the expenditure and descriptive elements (date, type of expenditure, amount, beneficiaries, specifying whether they belong to a Public Administration or to private entities);

- Entertainment Expenses must be accounted for in "expense reports" and must be authorised in accordance with the Powers System;
- Entertainment Expenses exceeding 150,00 € (for each beneficiary and for each transaction) must be reported to the Control and Risk Committee and recorded in the "Gifts and Entertainment Expenses Register";
- ex-post controls and reporting on the conformity of the expenditure incurred must be arranged;
- it is forbidden to make or promise Entertainment Expenses, to public or private parties, in order to influence their independence of judgement or induce them to secure any advantage for themselves, for others or for the Company;
- it is forbidden to make or promise Entertainment Expenses to public or private parties as a result of pressure or undue requests to that effect, more or less explicit.

Donations

The term “Charitable donations” is to be understood as the spontaneous allocation of assets in favour of a public or private Entity, free of charge, aimed at carrying out initiatives, even if not strictly related to Lumson’s business, which help to support the Company's commitment in the social sphere and consequently to improve its image.

Giving Donations, in fact, may present the risk that:

a) the funds or goods of value intended for them are misappropriated for the personal use or benefit of a public entity or a private individual; or

b) even if a public entity or a private individual does not receive a direct financial benefit, a legitimate charitable contribution, but made in exchange for obtaining or retaining business or for securing an unlawful advantage, may be considered an unlawful payment within the meaning of the Anti-Bribery Laws.

The following minimum standards of conduct must therefore be observed in making Donations:

- the request to make donations (with an indication of the recipients) must be addressed to the Authorised Persons, who shall assess its consistency with the criteria defined herein, and must be authorised in accordance with the System of Powers;
- all requests for donations from third parties must be made in writing and signed by the Legal Representative of the requesting party, expressly stating the nature and purpose of the individual contribution and its value, as well as the account to which the donation is to be credited;
- before proceeding with the donation, a Due Diligence of the requesting party must be carried out to detect possible conflicts of interest. In the event of risk greater than the low, the Anticorruption function must be involved in order to identify possible risk mitigation measures;
- payments to the beneficiary must be made exclusively to the account in its name and must be recorded truthfully and transparently in the accounting books and records of the Company;
- where possible, provision must be made, also contractually, for checks on the actual use of the Donation with respect to the purpose for which it was made (so-called audit rights);
- it is forbidden to make or promise Donations, to public or private parties, in order to influence their independence of judgement or induce them to secure any advantage for themselves, for others or for the Company;

- it is forbidden to make or promise Donations, to public or private parties, as a result of pressure or undue requests to that effect, more or less explicit.

Sponsorships

The term “Sponsorship” is to be understood as sponsoring or organising events with the aim of promoting the Company's image.

Sponsorships can also raise corruption issues. Therefore, all sponsorship activities must be conducted in accordance with the following minimum standards of conduct:

- requests for sponsorship must be made to Authorised Persons, who assess their consistency with the criteria defined by the Company (with reference to the risk’s level);
- Only in case of risk greater than the low, the Anti-Corruption Function must be involved before entering into the sponsorship contract, a Counterparty Due Diligence shall be carried out to detect any conflicts of interest and to identify possible risk mitigation measures;
- a sponsorship contract must be formalised for each initiative, verified by the responsible corporate departments and signed in accordance with the system of powers;
- it is forbidden to make or promise sponsorships, to public or private parties, in order to influence their independence of judgement or induce them to secure any advantage for themselves or others, or for the Company;
- it is forbidden to make or promise sponsorships, to public or private parties, as a result of pressure or undue requests to that effect, more or less explicit;
- evidence must be kept showing that the sponsoring activity actually took place;
- where possible, the right to verify the actual implementation of the sponsored activity (so-called audit rights) must be provided for, also contractually.

Register of gifts and entertainment expenses

All gifts and/or entertainment expenses not properly considered acceptable under this policy shall be recorded in the "Gifts and Entertainment Expenses Register", kept and duly updated by the Control and Risk Committee.

This committee is obliged to constantly monitor this Register and to inform the Lumson Supervisory Board of its contents at least twice a year (or more frequently upon request).

6.5. Political contributions

Financing or other types of aid offered, directly or indirectly, to political parties or individual representatives or candidates on behalf of the Company could be perceived as an attempt to obtain an illicit economic advantage and are therefore prohibited.

6.6. Treasury Management

The management of financial resources must comply with the principles of transparency, verifiability and relevance to the business activity.

In addition, the following rules must be observed:

Current Account Management

- the selection of credit institutions with which to do business must be based on predetermined criteria;
- the opening of bank accounts must be justified by operational needs and must be authorised in accordance with the System of Powers;

- the persons authorised to maintain relations with credit institutions, to open, manage and close bank accounts, etc., must be formally identified by means of powers of attorney or proxies forming part of the System of Powers;
- only licensed operators who certify that they are equipped to prevent money laundering should be used;
- periodic reconciliations between bank movements and the accounting of transactions on the systems must be provided for; any discrepancies must be verified and resolved by the Administration Department;
- items not reconciled in the system must be analysed and authorised in accordance with the System of Powers in order to be accounted for;
- with regard to all transactions relating to financial management, compliance with the principles of transparency, verifiability and relevance to the company's business must be ensured;
- there must be periodic checks on the actual terms and conditions applied by the credit institutions and their compliance with the contractually agreed terms and conditions;
- the performance of the credit institutions with which the Company maintains current account relationships must be periodically assessed, based on both qualitative elements and the contractual conditions applied;
- the opening and closing of bank accounts must be authorised in accordance with the System of Powers;
- it must be ensured that all current accounts opened with credit institutions are present in the company's accounting information systems.

Payment Management

With regard to payment management, the following rules must be observed:

- the persons authorised to intervene in the payment management process (authorisation, execution, control of payment) must be formally identified by means of powers of attorney or proxies forming part of the System of Powers;
- the presence of the Supplier, Consultant or Contractor in the company's systems and the completeness of the information necessary to proceed with the payment must be verified (master data of the Supplier, Consultant, Contractor in the management system, etc.);
- the presence of supporting documentation (such as, but not limited to, the purchase contract) and its correspondence to the payment to be made must be verified;
- the order amount must be checked against the invoice;
- the authorisation of payment must be arranged in accordance with the System of Powers, which normally provides for the intervention of two separate persons belonging to different business areas (except for payments below a certain threshold established by internal procedures);
- the secrecy and proper storage of remote banking system access accounts and passwords must be ensured in order to prevent their use by unauthorised persons;
- there must be a check on the bank accounts used for payments to Suppliers, Consultants, Contractors in order to verify that they correspond to the countries in which they have established their

legal/operational/commercial headquarters. In the event of a mismatch, this must be reported to the Risk and Control Committee;

- the correct debiting of ordered payments must be verified;

Cash Management

- each receipt must be matched to a specific accounting entry and must be adequately justified (by way of example only, invoice for the service rendered, financing contract with credit institutions, financing resolution);
- receipts deemed abnormal as to their counterparty, type, object, frequency or amount must be appropriately investigated and, where appropriate, blocked;
- a periodic check is made on the correspondence of each receipt with the supporting accounting and contractual documentation;
- transactions involving the use or deployment of economic resources (acquisition, management, transfer of money and valuables) or financial resources are always marked with an express reason, documented and recorded in accordance with the principles of proper management and accounting.

Finally, it is forbidden:

- to use bearer financial instruments for any collection, payment, transfer of funds or any other use of financial assets, with the exception of operations falling within those provided for by specific internal rules, as well as to use current accounts or passbooks anonymously or in fictitious names. Payments, collections and the use of financial resources in general made by means of cryptocurrencies and in any case with instruments that do not allow the traceability of transactions are also prohibited;
- to accept and execute payment orders from unidentifiable persons, who are not present in the database and whose payment cannot be traced (amount, personal name/company name, address and current account number) or for whom, after carrying out checks when opening/changing the database of Suppliers, Consultants, Contractors in the system, the full correspondence between their identification data and the header of the account into which the payment is to be made is not ensured;
- to maintain relations with unreliable Suppliers, Consultants, Contractors, included in international black lists or at risk of default;

Any exceptions must be justified and authorised in accordance with the System of Powers and at appropriate levels.

6.7. Obtaining and managing loans from credit institutions

The obtaining and management of loans from credit institutions must comply with the principles of transparency, verifiability and relevance to the company's business. In particular, the following rules must be observed:

- decisions relating to operational and strategic finance policies (e.g., raising/closing loans) must be authorised in accordance with the System of Powers;
- persons authorised to have relations with credit institutions (requesting the loan, obtaining the loan, etc.) must be formally identified by means of powers of attorney or proxies forming part of the System of Powers;
- the process for the selection of the credit institution must be based, as far as possible, on competitive procedures and provide for the comparison of offers from several credit institutions;

- when selecting the credit institutions with which to stipulate loans, the Company must turn to leading entities with a high rating recognised by the market and a high ethical profile;
- the selection of the credit institutions with which to operate must be based on an evaluation of the offers made, taking into account the proposed economic conditions and financing structure;
- financing contracts must be authorised in accordance with the System of Powers;
- transactions involving the use of funds received must be adequately justified, traced and authorised in accordance with the System of Powers;
- there must be periodic checks on the actual terms and conditions applied by the credit institutions and their compliance with the contractually agreed terms and conditions;
- with regard to all transactions relating to financial management, compliance with the principles of transparency, verifiability and relevance to the company's business must be ensured.

In the context of the above, it is prohibited, in particular, to:

- maintain relations with unreliable credit institutions included on international black lists;
- make or promise, also through intermediaries, gifts of money to representatives of credit institutions, their family members or persons designated by them, aimed at influencing their independence of judgement;
- distribute or promise, even through an intermediary, gifts or other benefits of any kind outside the scope of company practice (i.e., any form of gift offered in excess of normal business practices or courtesy, or in any case aimed at acquiring favourable treatment in the conduct of any business activity). In particular, any form of donations to officials of credit institutions, their family members or persons designated by them, which is aimed at influencing their independence of judgement or inducing them to secure any advantage for themselves, for others or for the Company, is prohibited;
- be represented by Persons operating in Lumson in a position of conflict of interest. In particular, kinship or business relations with representatives (with decision-making power) of a credit institution with which the Company has (or intends to have) relations may be considered conflicts of interest, even just potential;
- influence or attempt to influence by any means the decisions of representatives of the Credit Institution who negotiate or make decisions on its behalf.

6.8. Tax obligations

In the context of the relationship with Consultants that the Company may use in order to ensure proper tax compliance, reference must be made to the rules of conduct laid down in the sensitive activity “Purchase of goods and services, consultancy and professional services”.

As regards the management of inspections, reference must be made to the rules of conduct laid down in the sensitive activity “Management of inspections”.

In the context of any management of tax disputes, reference must be made to the rules of conduct set out in the sensitive activity “Management of Legal Disputes, Arbitration and Litigation”.

6.9. Contribution obligations

In the context of the relationship with Consultants that the Company may use in order to ensure proper contribution compliance, reference must be made to the provisions laid down in the sensitive activity "Purchase of goods and services, consultancy and professional services".

As regards the management of inspections, reference must be made to the provisions laid down in the sensitive activity “Management of inspections”.

In the context of any management of disputes, reference must be made to the provisions laid down in the sensitive activity “Management of Legal Disputes, Arbitration and Litigation”.

6.10. Management of occupational health and safety obligations

In the context of the relationship with Consultants, Suppliers and Contractors, which the Company may use for the management of occupational health and safety requirements, reference must be made to the rules of conduct laid down in the sensitive activity “Purchase of goods and services, consultancy and professional services”.

As regards the management of inspections, reference must be made to the rules of behaviour laid down in the sensitive activity “Management of inspections”.

6.11. Management of environmental aspects

In the context of the relationship with Consultants, Suppliers and Contractors that the Company may use in order to manage environmental compliance,reference must be made to the rules of conduct laid down in the sensitive activity “Purchase of goods and services, consultancy and professional services”.

As regards the management of inspections, reference is made to the rules of behaviour laid down in the sensitive activity “Management of inspections”.

6.12. Waste Management

The following minimum standards of conduct must be observed in the performance of this activity:

- the selection and contracting of qualified intermediaries, transporters and disposal plants must be carried out in compliance with the rules defined in the sensitive activity "Management of purchases of goods and services, consultancy and professional services" to which reference should be made, and in the Procedures adopted by HSE;
- for the purposes of the verification/qualification and selection of Suppliers/Contractors, it must be ascertained that they meet the requirements to lawfully carry out waste management operations (possession, transport, recovery, disposal, brokering) and a prior documentary analysis must be carried out on the Supplier's possession of all the authorisations and requirements provided for by law to carry out the assignment;
- the acquisition of the documentation necessary to verify that the Suppliers/Contractors meet the organisational and legal requirements is necessary for their inclusion in the list of qualified Suppliers/Contractors;
- formalised evaluations of the effectiveness and efficiency of the service rendered must be conducted.

The following aspects must be regulated in contracts with Suppliers/Contractors:

- identification, by the waste producer, of the correct waste coding (EWC code - European Waste Catalogue or equivalent code), also by means of appropriate physical-chemical analyses (if it is not immediately possible to determine the appropriate EWC code or equivalent code);
- characterisation of the waste in the cases provided for by the rule;
- definition of the collection methods;
- identification of temporary storage areas for each type of waste, where they exist;

- definition of the method of transport, recovery and/or disposal to which the waste is to be sent according to current environmental legislation.

Within the framework of waste management and procurement contracts, the responsibilities of the Company and the Supplier/Contractor for the proper handling of the waste produced must be defined.

Roles, responsibilities, controls, and the possibility of auditing internal waste management methods must also be defined in internal rules, as well as the way of reporting any anomalies found as a result of such audits.

The activities carried out and the controls implemented must be such as to ensure:

- the adequacy of analytical reports assigning EWC Codes or equivalent codes to waste produced during the works;
- compliance with the applicable laws and regulations on the transport of waste by road by the transporter;
- the existence of authorisation certificates of transporters and destination plants used by the Contractor
- the existence and adequacy of the necessary documentation to verify the suitability of the waste transport means (insurance, authorisation, etc.);
- the correct management of storage and delivery times to the waste disposal plant, by means of specific controls on the areas where waste produced within offices and internal areas is stored or deposited, even temporarily.

In the event of inspections, please consult the provisions laid down in the sensitive activity “Management of inspections”, to which reference should be made.

6.13. Management of litigation, arbitration and disputes

The following minimum standards of conduct must be observed in the performance of this activity:

- assessments concerning the initiation of litigation (civil, criminal, administrative, tax and labour) as well as the management thereof must be carried out by the persons identified through or proxies or powers of attorney forming part of the System of Powers;
- the appointment of consultants (external lawyers/technical consultants/arbitrators) must comply with the rules set out in the sensitive activity “Purchase of goods, consulting and professional services” to which reference should be made;
- A qualification and due diligence process must be carried out to detect possible conflicts of interest before the mandate/assignment is granted. In the event of a risk greater than the low, the Anti-Corruption Function must be involved in order to identify possible risk mitigation measures;
- the relationship with the Judicial Authority and its auxiliaries must be managed through Consultants (external lawyers, technical consultants, arbitrators), appointed by the legal representative of the Company or his/her proxies;
- the heads of corporate departments must promptly transmit to Legal any warning and/or communication addressed to them or to the Company, from which the existence or probable existence of a dispute may be inferred;
- the Consultant (external lawyer, technical consultant, arbitrator) must be selected on the basis of criteria of professionalism and reliability;

- remunerations, fees or commissions to the Consultants shall be determined in an appropriate amount in relation to the services rendered and the assignment conferred, according to the conditions or practices existing on the market, taking into account the professional tariffs in force for the category concerned;
- Any proposals for settlement agreements must be formulated (and accepted) by the Authorised Persons;

In the context of the above, it is prohibited, in particular, to:

- make or promise gifts of money, gratuities or other benefits of any kind, including through an intermediary;
- be represented by People working for Lumson, or Suppliers or Consultants who are in a position of conflict of interest;
- influence or attempt to influence by any means the decisions of the representatives of the Public Administration dealing with or making decisions on its behalf;
- induce a person to make false statements in the context of criminal proceedings in the interest and/or to the advantage of the Company, and/or in any case in order to hinder the exercise of the Authority's functions;
- induce a person to exercise the right to remain silent, or to lie, before the Authority;
- help a person to elude the Authority's investigations or to evade its searches.

In the context of relations with Public Administrations and Authorities with which the Company may interface in the management of legal disputes, arbitrations and litigations, the rules defined in the sensitive activity “Relations with Public Administrations and Authorities” must be complied with.

6.14. Management of corporate assets

The following rules must be observed in the context of this sensitive activity.

The following must be provided for with regard to the acquisition and disposal of real estate:

- the involvement of several parties (including consultants in connection with expert opinions) in the definition of the purchase/sale price;
- selection and verification activities on counterparties.

The following must be provided for with reference to the allocation or personal property or real estate to Employees and/or Suppliers:

- the signing of a “take-over declaration” for each company asset received by the assignee;
- the obligation for the assignee to use the company assets and resources to which they have access that are available to them in accordance with the Code of Ethics and the internal policies in force;
- the obligation to keep track of each asset held (inventory) and given for use to Employees or external personnel, indicating the name of the assignee, the date of assignment of the asset, the expiry date of the assignment (lease, rental contract);
- periodical monitoring (assignment/withdrawal/ disposal) of the allocated assets
- when returning the corporate asset received for use, a return declaration must be completed and signed in accordance with current internal policies;

- the use of company assets in conflict with the interests of the company and the regulations in force is prohibited;
- in the event of loss or theft of a corporate asset, a report must be filed promptly with the competent Authority and a copy of the report must be submitted to the Corporate Department managing the asset so that it may proceed, where appropriate, to block access to corporate data.

Suppliers for the supply or purchase of corporate goods must be selected in compliance with the rules of conduct laid down in the sensitive activity "Purchase of goods and services, consultancy and professional services" to which reference is made.

6.15. Obtaining and managing loans/contributions from public administrations and private entities comparable to them

The obtaining and management of loans/contributions from public administrations and private entities comparable to them must comply with the principles of transparency, verifiability and relevance to the company's activities.

In particular, the following rules must be observed:

- the persons authorised to apply for, manage and report on financing/contributions must be formally identified by means of powers of attorney or proxies forming part of the System of Powers;
- the actual fulfilment of the requirements for access to funding/contributions must be verified;
- It must be ensured that the documents, data and information provided are correct, accurate and up-to-date, and no information that could be an obstacle to obtaining funding/contributions must be omitted;
- the documents prepared, prior to transmission, must be verified and signed by the Authorised Persons;
- the financing/contributions obtained must be used exclusively for the purposes for which they were obtained;
- reporting on the use of the financing/contributions must be submitted by the deadline and in the manner stipulated by the granting body;
- follow-up checks must be carried out on the consistency between the measure granting the disbursement and the subsequent allocation of the funding/contributions obtained.

With reference to the management of relations with public administrations and authorities and the management of inspections, please see the provisions of the Sensitive Activities “Relations with Public Administrations and Authorities” and “Management of Inspections” to which reference is made.

In the event that the services of Consultants are used in the context of this sensitive activity for preparing the necessary documentation in order to submit the application for funding/contributions, reference should be made to the provisions of the sensitive activity “Purchase of goods and services, consultancy and professional services”.

6.16. Selection and recruitment of Employees and management of relations with People working at Lumson

Activities relating to the selection and recruitment of Employees and the management of relations with People working for Lumson may create potential risk situations, since the Company could be held liable for acts of corruption committed or attempted in this context. By way of example, the selection and subsequent employment of a family member of a public person may expose the Company to the risk of bribery towards

the public person concerned (in order to obtain in return, for example, an administrative measure that is not due); the same activity may also expose the Company to the risk of bribery between private individuals, if a person working for Lumson were to accept a bribe in order to hire a certain candidate.

The Company regulates in specific internal procedures the processes of selection, recruitment and management of Employees, in order to ensure that the activities are carried out in compliance with the principles of professionalism, transparency and fairness, in accordance with the applicable laws and regulations, including Anti-Corruption Laws, in particular:

The following rules must be complied with in the Personnel selection and recruitment process:

- the persons authorised to select and recruit Personnel must be formally identified through powers of attorney or proxies forming part of the System of Powers;
- the need for Personnel must be proven by specific planning or contingent needs authorised according to the System of Powers;
- before starting the selection process, the requirements must be formalised with reference to the professional figure sought, with an indication of the duties and role;
- the search for candidates must be carried out according to the methods in use for the sector in question, using the possible recruitment channels (e.g., search on internal databases, selection companies, external databases);
- Personnel selection must be based on an objective assessment of the candidate's expertise and characteristics;
- prior to recruitment, checks must be carried out to detect possible conflicts of interest. In the event of risk greater than the low, the Risk and Control Committee must be involved in order to identify possible risk mitigation measures;
- the grade level and remuneration must be defined according to previously established objective criteria that take into account the skills, experience and role to be filled by the new employee;
- the Code of Ethics, the Anti-Bribery and Anti-Corruption Policy, Model 231, Whistleblowing Policy, Company Policy and any other procedure deemed useful must be made available to each new employee, also by indicating the section of the company intranet where they are available, and the employee will be called upon to countersign a special receipt with the commitment to comply with the internal rules contained therein.
- upon hiring, the new employee must be informed of the obligation to attend training courses on the Code of Ethics, the Anti-Bribery and Anti-Corruption Policy and Model 231 available on the company intranet; the actual completion of the courses must be tracked and verified.

The following rules must be complied with in the Personnel management process:

- prior to the granting of a power of attorney, whether notarised or not, a check must be made as to the possible existence of conflicts of interest of the designated person.

The following rules of conduct must be complied with in the Personnel management process:

- there must be checks on the correct calculation of salaries and on the correspondence between the number of salaries processed and the number of Employees in force on the date the pay slips are processed. Any deviations must be timely verified and justified;

- changes in salaries must be supported by adequate justification and verified during the processing of salaries;
- checks must be conducted to ensure that the pay slips processed correspond to the bank transfers to be used as payment. Any deviations must be verified and justified;

The following rules must be observed with regard to the definition of remuneration and incentive policies and the management of career paths:

- the remuneration policy must be approved according to the System of Powers;
- the definition of the remuneration policy must take into account the relevant labour market and the strategic needs of the company and be based on criteria of equity, merit and expertise;
- where applicable, the remuneration policy must define, for organisational positions, a type of fixed and variable remuneration as well as related benefits;
- the Employee assessment system must be based on objective criteria and be adequately traced, with the involvement of several persons belonging to different corporate departments;
- the incentive system, where applied, provides that the achievement of the qualitative and quantitative targets assigned must take place in compliance with the rules of conduct set by the Company, which have their highest expression in the Code of Ethics;
- the objectives assigned must be structured in such a way as to counter and not encourage unlawful conduct in the achievement thereof.

6.17. Warehouse management

The following minimum control standards must be observed in this sensitive activity:

- warehouse procurement programmes must be authorised as part of the budget process, ensuring consistency with actual production needs;
- the definition of the minimum stock level must be based on objective factors that ensure the tracking of the activity;
- each procurement order must be authorised in accordance with the System of Powers after verification of the stock level and must in any case be justified by operational needs;
- checks must be conducted on incoming materials, where possible, to verify their origin, quantity, quality (conformity to the requirements); checks linked to the nature of the material must also be provided;
- each material in the warehouse, relevant to the valuation of the same, must be appropriately coded;
- it is forbidden to accept materials of dubious or illegal origin into storage;
- stock movements must be recorded within the management and accounting systems so that movements/allocations can be reconstructed;
- any withdrawals from the warehouse made outside working hours must be traced and regularised in the system as soon as possible;
- periodic checks must be carried out, by material code, on the consistency of the data resulting in the management systems with those resulting in the accounting system with regard to stock movements and unsold stock. Warehouse audits must involve a department other than those that ordinarily manage the operation of the warehouse, guaranteeing the documentation of the checks carried out;

- The physical inventory of warehouse stock must be carried out periodically;
- all inventory differences found must be authorised according to the System of Powers and promptly accounted for;
- access to the warehouse must be allowed only to the Personnel in charge; access by third parties must be authorised in accordance with the System of Powers.

6.18. Facilitation Payments

So-called 'Facilitation Payments' are unofficial payments of modest value made to a Public Official/Provider of a Public Service (usually at lower hierarchical levels) for the purpose of expediting, facilitating or securing the performance of a routine non-discretionary activity or an activity falling within the scope of the Public Official's duties (e.g. payments to expedite customs operations, obtaining documents, issuing visas, etc.).

Facilitation Payments do not include payments that may be provided for by applicable local regulations (e.g. relating to fees for preferential lanes).

Facilitation Payments are expressly prohibited.

In any case of a request for a Facilitation Payment, the Audit and Risk Committee must be alerted without delay.

6.19. Accounting and financial controls

Applicable legislation, financial reporting regulations and tax laws require the Company to maintain detailed, complete and correct accounting records of every transaction. The Company's accounting records must therefore comply with the applicable accounting standards and reflect a detailed, complete, correct and transparent accounting.

No unregistered financial transactions are permitted.

All costs and charges, revenues and income, receipts and disbursements of the Company must be truthfully and fairly represented in the accounts and appropriately documented in accordance with applicable legislation, accounting principles and regulatory instruments. All entries in the accounting records and the related information documentation must be made available to the auditing company (or equivalent entity) for control activities.

It is strictly forbidden for People working at Lumson to falsify and/or alter the books and records in any way.

These principles apply to all transactions, whether or not they are significant from an accounting point of view.

6.20. Conflicts of interest

In order to identify and assess the risk of conflicts of interest, and, in particular, to enable Lumson to identify situations in which individuals working for Lumson might favour or fail to prevent or report acts of corruption, the people working for Lumson are required to report any actual or potential conflict of interest (e.g. family, business or other ties with Public Sector Persons or Relevant Third Parties), which are directly or indirectly related to their job duties/offices held.

To ensure effective management of such situations, Lumson implements specific control tools, including a system of periodic disclosure (through self-declaration), a register dedicated to declared conflicts of interest, and verification procedures conducted by the Human Resource. Each declared conflict situation is examined confidentially and independently, involving the responsible of anticorruption, taking corrective or mitigating action when necessary. In addition, regular training sessions are organised to make staff aware of the risks of conflicts of interest and how to report them, in order to strengthen a corporate culture based on integrity and transparency.

7. COMMUNICATION AND TRAINING

The Company considers communication, both internally and externally, and training as fundamental in order to ensure the implementation and effectiveness of its corruption prevention rules. To this end, it undertakes to disseminate the Anti-Bribery and Anti-Corruption Policy and to promote adherence to the principles contained therein by the Recipients.

External communication is achieved through:

- publication of the Anti-Bribery and Anti-Corruption Policy on the company website;
- inclusion of contractual clauses or specific provisions in contracts with Third Parties providing for the acceptance of the anti-corruption principles adopted by the Company.

Internal communication takes place through:

- publication of the Anti-Bribery and Anti-Corruption Policy in a dedicated section of the company intranet;
- sending of regular communications on the principles of ethics and integrity to be observed;
- organisation of specific anti-corruption training initiatives;
- communication addressed to newly recruited staff.

Anti-bribery compliance **training** is designed to provide in-depth knowledge of the risks, responsibilities and sanctions associated with anti-bribery violations, as well as to promote the principles and conduct to be adopted to prevent them. It is compulsory for all staff, with duration and content adapted to their professional level and role, and is subject to monitoring to ensure participation and completion. The company is therefore committed to defining specific and measurable training metrics and objectives to foster continuous improvement in the prevention of corruption and the dissemination of a corporate culture based on ethics and transparency.

8. REPORTING VIOLATIONS

Recipients of this Policy who, in the performance of their duties or activities, become aware of acts of corruption- alleged or actual- or of any violations of applicable anti-corruption regulations or non-compliance with the principles and rules of conduct set out in this Anti-Bribery and Anti-Corruption Policy, are required to report them through the appropriate channels.

Such reports may be made both by internal employees of the Company and by third parties who have relations with it, also anonymously.

Details on reporting channels are available in the 'Whistleblowing' section of the corporate website. The same section contains the Whistleblowing policy, which also regulates the process of investigating reported conduct.

Please note that in order to be the subject of in-depth analysis and investigation, the report must contain a description of precise and adequately substantiated facts.

In this sense, anonymous reports, although not prohibited, may only be taken into account if they offer a sufficient degree of detail to enable the Reporting Manager to carry out investigations, assessing their prior appearance of merit.

The Company guarantees that anyone making a report of a violation, even a suspected one, will not be subject to any form of retaliation. It also undertakes to protect the confidentiality of the information provided and to protect the identity of the whistle-blower.

The Reporting Manager shall account for all reports received, including archived reports, in its periodic reports to the board of directors.

9. PENALTY SYSTEM

The commission of violations of this Policy as well as, more generally, the violation of the rules for the prevention of corruption and the abuse of reporting activities, constitutes a breach of contractual obligations and obligations of compliance with corporate rules and triggers disciplinary proceedings for the application of the penalties referred to in the corporate system (CCNL, Code of Ethics, Organisation, Management and Control Model) as well as possible consequences of a criminal and civil nature.

In particular:

- Employees are subject to the penalties provided for in the applicable pro tempore National Collective Labour Agreement;
- members of the management and supervisory bodies are subject to the sanctions of suspension and, in the most serious cases, removal from office; these will be determined by the relevant shareholders' meeting/administrative body;
- Third Parties (other than the foregoing) are subject to the penalties provided for in the contracts concluded with them, which may include suspension and, in the most serious cases and depending on the case, revocation of the appointment or termination of the contractual relationship with possible claim for damages.

In all cases, the penalty shall be commensurate with the level of responsibility of the person involved, the intentionality and seriousness of the conduct; it shall require to hear the interested person and may be applied irrespective of the initiation of court proceedings.