

FRAUD CONTROL POLICY

1. OBJECTIVE

ILTOM GROUP has a zero-tolerance attitude toward fraudulent behaviors and a strong commitment to the high ethical standards stated in the Company Code of Ethics. All persons concerned by this policy (“Policy”) are expected to share this attitude and commitment.

ILTOM GROUP promotes consistent organizational behavior by providing guidelines and assigning roles and responsibilities in the prevention, detection and investigation of potential and actual frauds against ILTOM GROUP .

This Policy is established to strengthen the fraud risk awareness and knowledge, and improve the internal control system for the prevention and detection of frauds.

2. SCOPE

The Policy applies to all ILTOM GROUP ‘s employees and to consultants, vendors, contractors, customers, and any other company stakeholders.

3. DEFINITION OF FRAUD

Fraud is defined as any illicit and intentional act characterized by deceit, concealment, or violation of trust perpetrated with the purpose of obtaining an unauthorized and unjust benefit and/or damaging ILTOM GROUP, mainly through:

- Asset misappropriation;
- Commercial frauds;
- Corruption;
- Fraudulent statements and misrepresentations.

4. REPORTING SYSTEM AND CONFIDENTIALITY

All company’s stakeholders are expected to report their suspicions of potential frauds or irregularities to the dedicated department >>>> sicurezza@iltom.it

All information received, as well as the identity of the reporting individual will be treated in the most confidential way; anyone who reports suspected or known fraudulent activity will be protected by the Company from any possible retaliatory actions.