

ANTI-CORRUPTION POLICY



The ILTOM Group mainly specializes in sheet metal working, in particular in light metal frames for different applications. Its registered office, administrative and operational headquarters are located in Romanengo (CR), Italy; the Group consists of several production sites based in different European Countries, namely in Italy, France, Romania and Bulgaria.

With this anti-corruption policy, the Iltom Group confirms its commitment to preventing and combating illegal practices. This policy is applied to all the staff of the different companies of the Group, to collaborators, suppliers, manager and to all those entities that makes stable or temporary contact with the Iltom Group during its activity. All the subjects listed above must commit themselves to guarantee actions and behaviours based exclusively on criteria of transparency, fairness and moral integrity, which prevent any attempt at corruption.

The main objectives set forth in this corruption prevention policy are the following:

- To comply with anti-corruption legislation in all Countries the Group operates in
- To prohibit both active and passive corrupt practices, to the advantage of the company and of a natural person respectively, possibly in conflict with the Company's interests.
- To undertake to carry out their business activity in such a way to prevent becoming involved in any form of corruption and favouring or risking the involvement in illegal situations.
- To commit to create unfavourable conditions for corruption and to reduce circumstances likely to result in corruption.
- To encourage all employees to report any actual or suspected violation of the corruption prevention policy through the email address **sicurezza@iltom.it**. Reporting persons should act in good faith and be aware of the potential consequences of their complaint. All information received, as well as the identity of the individual, will be treated in the most confidential way possible and will be protected from retaliation by the company.

This policy is periodically reviewed to ensure it is adequate for the Iltom Group reality and it is communicated within the organization and made available to all stakeholders on the corporate website.

Romanengo, 20/04/2022

The ILTOM Group MANAGEMENT