

ANTI-CORRUPTION POLICY






REGISTRATION OF CHANGES





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16/06/2021	0	AI, Risk & Corporate Affairs	BoD 16/06/2021	Emission	7	Public

The Jakala Group (hereinafter also referred to as "Jakala") is fully aware that the phenomenon of corruption represents an obstacle to the economic, political and social development of a country, as well as a heavy distortion of the rules, fairness and competitiveness of the markets.

Jakala recognizes the importance of the Anti-Corruption Laws and repudiates all forms of Corruption, avoiding and stigmatizing the use of corrupt behavior and, in general, illicit or otherwise unethical behavior to achieve its economic objectives.

In application of this commitment, and in compliance with its policies, which the Organization, Management and Control Model, Ethic Code, the Anti-corruption Management System Manual, the Whistleblowing Policy e and the policy related to the management of conflicts of interest, the Group has determined that the Organization's Corruption Prevention Policy is based on:

-  Strict and full compliance with current legislation on the prevention and fight against corruption, in Italy and in any country where the Group operates, with the involvement of employees, collaborators in any capacity, and all subjects who work in favor of and / or under the control of the Group organization;
-  The absolute prohibition of carrying out behaviors that may constitute corruption or attempted corruption;
-  The carrying out of an accurate context analysis that led to the identification, as part of the activities carried out by the Group's organizational structures, of the areas of potential danger and to the identification and implementation of the appropriate actions to reduce/minimize the risks;
-  The full commitment to comply with all the requirements of the management System for the prevention of corruption by all corporate stakeholders;
-  The awareness-raising activity among all partners so that they adopt, in the activities of specific competence, policies and actions for the prevention of corruption phenomena, respectful of the legal requirements and consistent with the objectives of the Jakala Group;

-  The awareness and training of its employees on the issues of prevention of the corruption phenomenon;
-  The provision of ways of reporting suspicions in good faith, or on the basis of a reasonable belief, ensuring the anonymity of the reporters;
-  The prosecution of any behavior that does not comply with the policy for the prevention of corruption, including possibly with the adoption of sanctions measures in accordance with local provisions;
-  The designation of a compliance function for the prevention of corruption, which is guaranteed full authority and independence in the office;

All subjects active within the organization of the Jakala Group are encouraged to report any violation of the Anti-Corruption System of which they have had knowledge, even indirect, in the course of their activity.

Reporting is guaranteed protection from any form of retaliation, discrimination or penalization, without prejudice to legal obligations.

The Group undertakes to give this Policy the necessary dissemination and visibility so that all potential citizens are fully aware of it.

This document will be updated on the basis of the Group's organizational developments and regulatory changes.

The Group believes that the most suitable corporate strategy for achieving this Anti-Corruption Policy consists in the full implementation of the Management System for the prevention of corruption in accordance with ISO 37001: 2016 standard.

Any employee or collaborator who does not act in accordance with this Policy and in compliance with local provisions from time to time in force will be subject to disciplinary sanction, commensurate with the seriousness of the violation carried out.

Any partner or supplier who does not act in accordance with this Policy will be subject to the contractual disciplinary sanctions.

ROLES AND RESPONSIBILITIES

In order to ensure full compliance with the Anti-Corruption Policy of the Jakala Group and the national and/or international laws applicable to the conduct of Jakala's business activities, the following roles and responsibilities are defined:



All Jakala Group Staff:

1. Maintains the highest ethical and professional level in the performance of its tasks, in accordance with the Code of Ethics, values, this Anti-Corruption Policy and any other relevant policy or procedure adopted by the Group;
2. Reports all requested information in line with the provisions set forth in this Policy, including but not limited to, the receipt and offer of gifts and acts of hospitality, the receipt of requests to make gifts and give hospitality, payments, suspected violations of anti-corruption laws and this Policy by other employees or business partners, situations that give rise to an actual or possible conflict of interest, etc.;
3. It's necessary to contact the AI, Risk & Corporate Affairs Department if you have any doubts regarding the application of this Policy.



IA, Risk & Corporate Affairs:

1. It is the contact of last resort for questions of interpretation of this Policy and it is responsible for the maintenance, management and administration of this Policy;
2. Ensures the information to Jakala staff of the rules set out in this Policy;
3. Periodically updates of this Policy to ensure its continued efficiency;
4. In collaboration with the various Group companies, it highlights the *due diligence* activities carried out, reports on suspicious activities and compliance observations;
5. Independently monitors and examines the internal control system to ascertain whether the requirements of this Anti-Corruption Policy are met;
6. Maintains documentation of verification activities and controls carried out, reports on suspicious activity and compliance observations.



Human Resources Department

It's responsible for implementing and updating the database for the declarations required of candidates.



Supervisory Body (pursuant to Legislative Decree 231/2001)

1. Checks and examines any possible violation of Gruppo's Code of Ethics;
2. If necessary, at least every six months, it communicates to the Board of Directors any relevant anti-corruption activities detected.
3. Continuously monitors the development of activities concerning the management and deepening of reports of sensitive activities.

GENERAL PRINCIPLES

In addition to the ethical principles stated in the Jakala Group's Ethics Code, which must always guide the activities of all staff, the following general principles must inspire the organization and performance of activities in the areas subject to greater risk:



Segregation of responsibilities

Tasks, operational activities and control functions must be appropriately separated, ensuring that the person responsible for operational activities is always different from the person who controls and authorises those activities;



System of proxies and powers of attorney

The powers of attorney, which are formally defined, must be consistent with the organization and management responsibilities conferred and exercised within the defined limits;



Clarity and simplicity

The roles and responsibilities of all actors involved in the processes, including activities and controls, must be clearly defined and must provide mechanisms easy to apply;



Impartiality and absence of conflict of interest

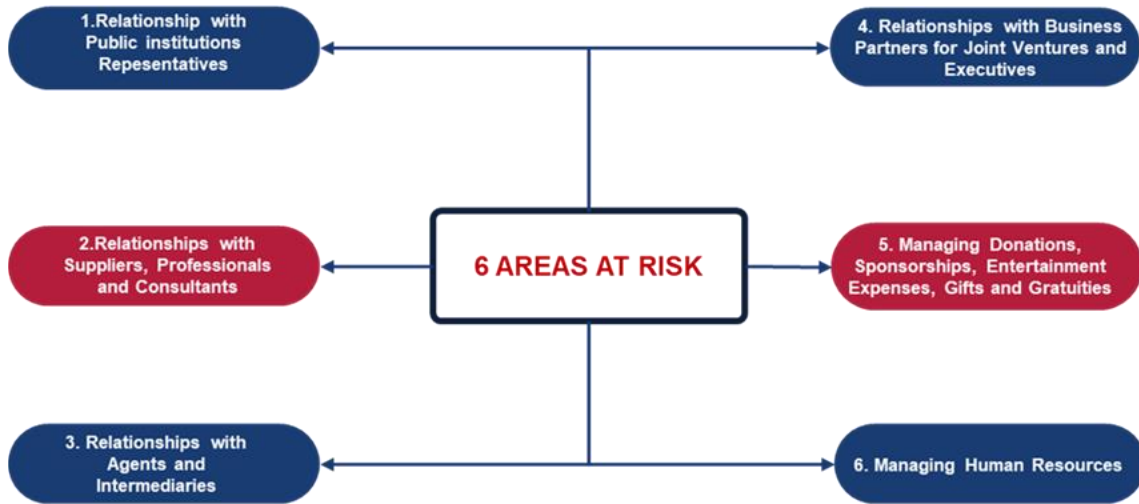
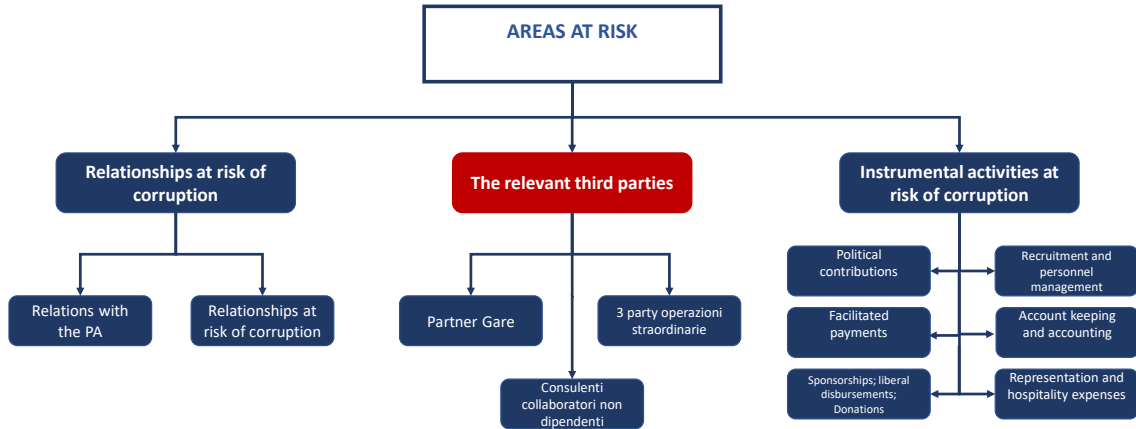
All those who work directly for or represent the Jakala Group must act with professionalism, impartiality and in accordance with anti-corruption regulations. They must also avoid all situations which may give rise to a conflict of interest and which may, even potentially, impair their ability to act in the interests of the group and in accordance with those laws;



Traceability and archiving

Sensitive activities under this Policy must be traceable and verifiable subsequently; all documentation required by it and by other related procedures must be appropriately completed and archived.

Areas of application of corruption risk



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