Anti-Bribery Policy

MER MEC STE Top Management wishes to support a bribery prevention policy that prohibits any corruptive practice and to implement Management Systems for the Prevention of Bribery in compliance with UNI ISO 37001:2016 and relevant applicable laws.

For this reason, the Top Management commits on:

General principles

- Prohibit the procurement, promise, acceptance and offer of gifts or valuables to improperly obtain new contracts or maintain contracts in place, to secure an undue advantage in conducting business, to speed up the processing of official documentation or to improperly influence any person, including Public Administration officers;
- Maintain accurate accounting records to provide reasonable detail to all transactions.

Raising concerns

Provide a communication channel that allows anyone to report a suspected bribery, in good faith or based on a reasonable and confidential belief, without fear of retaliation.

Disciplinary and sanctioning consequences

- Adopt adequate and proportionate disciplinary measures, also considering any criminal relevance, against any violation of the policy or applicable laws on bribery by employees and business partners.
- Ensure full cooperation with authorities.
- Evaluate not to establish or terminate existing contractual relationships with third parties who violate what is described in this Policy.

Context of the organization

Periodically analyze and review the context in which it operates, identifying the internal and external factors, the interested parties and the related needs and expectations relevant to the prevention of bribery.

Leadership, Roles and Responsibilities

- Promote the culture of bribery prevention;
- Ensure the integration of Anti-Bribery Management System (ABMS) requirements into business processes;
- Define an organizational structure that, through the assignment of roles and responsibilities, ensures the effective application, maintenance, and improvement of the ABMS over time, together with the authority and independence of the Anti-Bribery function;
- Ensure the availability of sufficient resources to plan, implement, organize, control, review, manage, and continuously improve the ABMS;
- Guarantee the involvement of staff based on information, education, training, and experience and through a process aimed to analyze and fulfill training needs;
- Define, regulate, and implement appropriate internal and external communication processes, to ensure the effectiveness of the ABMS processes and the proper involvement of staff and other interested parties;
- Ensure that the ABMS achieves the expected results.

Risk and opportunity analysis

- Identify the risk factors that generate threats and opportunities;
- Analyze and weigh the risks associated with bribery;
- Define risk criteria to guide decisions aimed to minimize negative effects and achieve opportunities;
- Implement risk management plans and evaluate their effectiveness.

Definition and achievement of objectives

Define objectives aimed to guarantee the prevention of bribery, periodically verifying the state of achievement.

Personnel who work for MER MEC STE, at any level, are responsible for the application of the prescriptions contained in the Anti-Bribery Management System implemented.

Milan, 22/09/2022

MER MEC STE Top Management

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True and faithful copy of the Italian Version.

1-1