

Corruption Prevention Policy and Anti-Bribery Guidelines of SisalPay Group

Courtesy translation

Contents

Foreword	3
Corruption Prevention Policy	6
Prevention and Fight Against Corruption	7
What is corruption for SisalPay Group?	7
SisalPay Group joins the battle against corruption	7
Commitment of SisalPay Group	9
Objectives of the Corruption Prevention Policy	10
Commitments to the Anti-Corruption Policy and Assumption of Responsibility	11
Compliance Function for the Prevention of Corruption	12
Reporting	13
Penalty System	14
Training, Dissemination and Communication	14
Anti-Bribery Guidelines	15
Field of Application	16
Consequences of Non-compliance with the Guidelines and Sanctions	16
Reporting on Violations	16
General Concepts	18

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Foreword

In recent years the fight against corruption has become increasingly important and almost all nations, both through enactment of local anti-corruption legislation and through adoption of relevant international agreements, have promoted legal and regulatory frameworks aimed at discouraging corrupt practices.

Through enactment of Law No.190 dated 6 November 2012, Italy intended to bring its national legislation in line with statutory requirements of the Strasbourg Convention dated 27 January 1999, by introducing new crimes in Legislative Decree No.231/2001.

In the category of the so-called "predicate offences" envisaged by the current text of Legislative Decree No.231/2001 as subsequently amended and supplemented, companies are now called upon to respond for two other types of offences: corruption between private entities and incitement to bribery between private entities (Articles 2635 and 2653-bis of the Italian Civil Code) and undue inducement to give or to promise benefits (Article 319-quater of the Italian Criminal Code).

SisalPay Group (hereinafter referred to as the "Group"), in line with Sisal Group, in full compliance with the laws, regulations, as well as with all provisions of relevant international standards and guidelines, undertakes to prevent and contrast the occurrence of offences in the performance of its activities, assuming, among its primary values, those of business ethics, through which it transmits messages of loyalty, fairness, transparency, honesty and integrity.

Starting from an already deeply rooted inherent cultural and value system, in coordination with the Code of Ethics adopted by its Companies and inspired by national and international regulations and best practices in the fight against corruption, by the international standard ISO 37001:2016, as well as by the Corruption Prevention Policy of Sisal Group to which it belongs, the Group has set forth this "Corruption Prevention Policy" (hereinafter referred to as "the Policy") with the aim of minimizing the risk of engaging in conduct of active and passive bribery.

The adoption of this Policy, as a further demonstration of the Group's commitment to combating illegal behaviour, aims to identify a systematic reference framework of ethical and behavioural principles and

rules for preventing and combating corruption (active and passive, public and private) and to further raise awareness of the behaviour to be observed by members of the Group.

The international anti-corruption legislation is very extensive:

- United Nations Convention against Corruption (UNCAC);
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions;
- OECD Recommendation for Further Combating Bribery of Foreign Public Officials in International Business Transactions and enclosed Good Practice Guidance on Internal Controls, Ethics, and Compliance;
- OECD Guidelines for Multinational Enterprises;
- Business Principles for Countering Bribery of Transparency International;
- Foreign Corrupt Practices Act USA (FCPA);
- Bribery Act UK of 2010 (entered into force in 2011) and related Guidance about procedures which relevant commercial organizations can put into place to prevent persons associated with them from bribing";
- the so-called "seven pillars", i.e. the 7 concepts set forth in the "Federal Sentencing Guidelines Manual - Chapter 8 - Part B Effective compliance and ethics program" dated 1 November 2010, of the U.S. Sentencing Commission for compliance with the Foreign Corruption Practice Act;
- United Nations Global Compact. In particular, the Company has been inspired by X Concept according to which: "Enterprises are committed to combating corruption in all its forms, including extortion and bribery. The adoption of X Concept requires the participants in the UN Global Compact not only to avoid corruption in all its forms, but also to develop strong policies and concrete anti-corruption programs. Enterprises, together with governments, UN agencies and civil society, are called upon to contribute to a more transparent global economy". The Global Compact invites its participants to consider the following three aspects of the fight against corruption in order to put the X Concept into practice: first of all, on the corporate level, to implement internally anti-corruption policies and programmes within their own structures and financial transactions; secondly, on the external level, to report in their annual communication to the Global Compact on measures taken to combat corruption; and to share their experiences and

best business practices by sending examples and case studies to the Global Compact; thirdly, on the collective level, to join forces with similar companies and other stakeholders;

- Law No.190/2012 (Italian legislation) on "Provisions for the Prevention and Suppression of Corruption and Unlawful Acts in Public Administration" aimed at improving the efficiency and effectiveness of anti-corruption measures, taking into account both the features provided by certain supranational tools to fight bribery and international standards to combat corruption phenomena.
- In October 2016, the international standard ISO 37001 "Anti-Bribery Management Systems" developed by the Technical Committee ISO/PC278 was published, specifying the requirements and providing guidance for establishing and implementing, maintaining, updating and improving a management system for the prevention of corruption.

In general, in compliance with anti-corruption laws, the Policy prohibits payments made either directly or indirectly - including payments made to a third party with the knowledge that the amount of money will be further shared with a public official, a public service appointee or a representative of a "private" legal entity (hereinafter, for the sake of simplicity, referred to as the "Private Entity") - as well as offers or promises of payment or other benefit for corruption purposes to public officials, public service appointees or Private Entities, regardless of whether or not the offer or promise is accepted,

The same prohibitions apply in cases where the request is made by a public official or a public service appointee or by Private Entities.

Corruption Prevention Policy

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Prevention and Fight Against Corruption

Corruption is known to be a widespread phenomenon, an "evil" whose price is very high: lack of GDP growth, uncertainty in the markets, lack of investments, increased cost of economic activities, goods and services, quality decline, limited competition, lack of confidence. For this reason it is necessary that not only governments but also companies reject corruption in the conduct of business and undertake all measures to prevent and combat this phenomenon.

What is corruption for SisalPay Group?

SisalPay Group rejects and opposes all forms of bribery in the broadest sense of the word, i.e. any form of abuse supplemented by a promise, inducement, instigation, request, proposal and acceptance of incentives or other benefits as a reward for a person to act or omit actions in the performance of his or her duties regardless of whether or not they are to be committed.

SisalPay Group joins the battle against corruption

The laws, the call for compliance with them and the law enforcement measures taken by the State are not sufficient to ensure consistent results over time unless accompanied by a strong restoration of ethical values, which can only be taught by example and by the education of civil society (family, school, working environment).

Therefore SisalPay Group as well is held obliged to actively contribute to the fight against corruption and conflict of interests. With this aim in view it has adopted a set of rules, tools and people. In particular, special emphasis has been placed on:



Commitment of SisalPay Group

SisalPay Group rejects and opposes, as far as possible, any form of bribery in the broadest sense of the term, such as "abuse of power for private purposes"¹ and such as malfeasance practices supplemented by a promise, inducement, instigation, request, proposal, acceptance of incentives or other benefits as a reward for a person by virtue of his office to act or omit actions regardless of whether or not they are to be committed.

The culture of legality underlies the Group's *working methods*. For this reason, the need to comply with current legislation and the need to ensure conditions of correctness and transparency in the conduct of business and corporate activities are continuously affirmed to protect the company's position and image, the work of the company's employees, payment services and banking products offered to the customers. This Policy is aimed at promoting general compliance with international laws and best practices, and in order to concretely implement a culture of legality and to prevent and combat corruption, the SisalPay Group companies have strengthened their internal corporate control system both by adopting the organisation, management and control model pursuant to ex-Legislative Decree No.231/2001 as well as by adopting a management system to prevent corruption in accordance with the UNI ISO 37001:2016 Standard.

Each person who operates on behalf of the Group Companies is held obliged to read and understand the contents of this Policy for the prevention of corruption and to behave in compliance with the provisions of this Policy and with applicable laws and regulations.

All members of the corporate, supervisory and control bodies, managers, employees of all levels, qualifications and grades, partners, suppliers and, more generally, all business partners² operating in the interest or on behalf of the Group Companies (hereinafter referred to as the "Recipients") are held obliged to observe the concepts of this Policy.

¹ Definition of corruption by Transparency International .

² The term "soci in affari", which represents the Italian translation of the English term "business associates" of the international edition of ISO 37001: 2016, refers to the third parties, with which the SisalPay Group companies maintain commercial relations.

Objectives of the Corruption Prevention Policy

The Corruption Prevention Policy of SisalPay Group pursues the achievement of the following goals:

- ◆ to prohibit and to combat corruption, and to ensure the attainment of the highest level of compliance with national and international anti-corruption regulatory *standards*;
- ◆ to ensure sustainability, honesty and transparency of its own *business* by counteracting any phenomenon of malfeasance;
- ◆ to promote the dissemination of the culture of doing business by supporting loyalty, integrity, honesty, fair competition and transparency as a fundamental element of work;
- ◆ to promote and develop ethics in economic relations by combating all forms of unlawfulness;
- ◆ to adopt the management system for the prevention of corruption as a tool to effectively combat corruptive phenomena, demanding the continuous commitment and *leadership* from Senior Management and consolidating the system of controls at every level of the Organisation;
- ◆ to develop and to maintain awareness of the commitment to prevention and fight against corruption on the part of all *stakeholders*;
- ◆ to establish an integrated system of controls that should be easy to understand, implement and monitor in order to ensure the effectiveness and efficiency of the preventive function of the control itself;
- ◆ to encourage the reporting of any suspicion of attempted, certain, admittedly presumed acts of corruption through dedicated channels and methods which, while always in line with the protection of the reputation and image of the Company, should allow, on the one hand, to carry out investigations and in-depth analyses in order to assess the validity of such reporting and to prepare effective countermeasures and, on the other hand, to ensure protection to the reporter from all forms of retaliation as well as the protection of persons who have been wrongfully reported.

Commitments to the Anti-Corruption Policy and Assumption of Responsibility

SisalPay Group stigmatizes, condemns and in any case rejects bribery in any form, where bribery is defined as the offer or acceptance, directly or indirectly, of money or other benefits capable of influencing the recipient, in order to induce or reward the performance of a function/activity of his office or the omission thereof. It therefore includes both the "active corruption" (offering and/or giving of a bribe) and the "passive corruption" (acceptance of a bribe), both in the event of a public subject's involvement in the corruption ("public corruption") and in relations between subjects belonging to private entities ("private bribery"), both the corruption aimed at inducement to perform an act contrary to one's official duties ("proper corruption") as well as the corruption committed for the purpose of performing an act of one's office ("improper corruption"), both the "prior" and the "subsequent" corruption with respect to the performance of one's official duties.

In compliance with the national legislation, international conventions and guidelines and *best practices*, the Group adopts both the organizational tools capable of making the prevention and control of corruption phenomena effective and feasible as well as an integrated control system, which is easy to know and to understand, to implement and to monitor in order to ensure the effectiveness and efficiency of the preventive function of the control itself, to monitor and to check the suitability and the state of implementation of the above measures.

SisalPay Group engages its Senior Management in the prevention of corruption, making it a promoter of a culture in which corruption is unacceptable and binding it to make a strong and visible commitment to supervise compliance with anti-corruption measures, ethics, internal controls and to oversee implementation of all measures deemed appropriate for prevention, identification and reporting of potential breaches.

The Group recognizes as necessary a *due diligence* on its *business partners* in order to reduce the risk of corruption, with higher levels of detail in relation to the degree of potential crime risk.

Compliance Function for the Prevention of Corruption

Each company of SisalPay Group appoints its own Compliance Function for the Prevention of Corruption, with independent powers and resources, with the task of supervising the management system design for the prevention of corruption while ensuring its implementation and operation.

This Function is assigned with specific powers, faculties and capacities for the effective performance of its role. More specifically this Function:

- ◆ checks the updating status of the management system documentation;
- ◆ is responsible for monitoring, measuring, analysing and evaluating the performance of the system;
- ◆ monitors the state of implementation of the anti-corruption measures resulting from the review of the Senior Management and the Governing Body, Risk Assessment, Internal and External Audits or other checks and investigations;
- ◆ assesses the suitability, adequacy and implementation of preventive measures;
- ◆ provides the Senior Management and the Governing Body with relevant reports containing information on the management system performance (state of implementation and efficiency of the undertaken measures, opportunities for improvement);
- ◆ may receive reports on attempted, alleged or actual acts of corruption;
- ◆ sends specific information to the Supervisory Authority whenever it becomes directly aware of facts, actions or situations involving the risk of committing corruption offences or any crimes relevant under Legislative Decree No.231/2001;
- ◆ promotes and participates in periodic meetings with the Supervisory Authority;
- ◆ assesses the reports received on acts of corruption/breach of the corruption prevention system and, if necessary, promotes investigations;
- ◆ may assign powers and capacity for action to investigators;
- ◆ receives and assesses the investigation report and undertakes measures to implement appropriate actions;

- ◆ provides advice to the Organization's resources on the performance of the management system and on the reporting methods.

Reporting

In compliance with the *Whistleblowing* procedure, SisalPay Group guarantees the possibility of reporting on any suspected, attempted, certain, alleged corrupt practices, as well as any possible violation of the concepts set out in the Code of Ethics or in this Policy.

The report should be addressed to the Whistleblowing Committee by filling in and sending the "Whistleblowing Form" using the following communication channels, published on the Group's website:

- e-mail: segnalazioni_sisalpaygroup@sisalpay.it, segnalazioni_sisalpay@sisalpay.it, segnalazioni_sisalpayservizi@sisalpay.it (the boxes are protected by Multi Factor Authentication systems);
- Traditional mail, to the address: "Reporting Service", Via A. Di Tocqueville, 13 - 20154 Milan

Reports may be made anonymously and, whenever the reporter identifies himself, the reports are treated confidentially in order to protect the identity of the reporter and those involved in the report.

No form of retaliation or discrimination is permitted against the informant in good faith or against the reporter who acts on the basis of reasonable belief for reasons related to the complaint, meaning by discriminatory measures any unjustified disciplinary action, harassment in the workplace, dismissal, change of job, or any other form of retaliation that results in intolerable or even simply more onerous working conditions.

However, it should also be emphasised that any form of abuse of the report is strictly prohibited, such as, by way of example, the intention to falsely accuse a person, improper use, wilful misuse or intentional exploitation of the institution covered by this Policy. The Company reserves the right to pursue an obviously distorted use of this tool, believing that the abuse of the reporting system can give rise to a risk of significant impact on the entire management system.

Penalty System

The commission of acts in breach of the Anti-Corruption Policy, as well as, more generally, the breach of the rules on the management system for the prevention of corruption and the abuse in reporting activities constitutes a breach of contractual obligations and a non-compliance with corporate rules that initiates disciplinary proceedings for the imposition of sanctions as provided for in the corporate system, as well as possible consequences of a criminal and civil nature.

Training, Dissemination and Communication

The companies of SisalPay Group establish and implement specific training plans for their personnel regarding the commitment to the prevention of corruption, the Policy, procedures, protocols and other anti-corruption tools, applicable international and national anti-corruption legislation and the legislation relating to wider crime risk prevention (Legislative Decree No.231/2001), aimed at ensuring its dissemination and correct understanding.

The Group undertakes to do everything possible to ensure dissemination of this Anti-Corruption Policy to all *stakeholders*³ and to promote compliance, application and adoption of it by the Recipients, providing for a system of sanctions for the related breaches and ensuring that it is constantly updated.

The Group is also committed to the fight against corruption, including publicly, to promote and disseminate the culture of legality and fight against corruption, including through dedicated publication on its website.

This Policy is approved by the Board of Directors.

Milan, May 26th 2020

Chief Executive Officer

³ If by "interested party" or by " *stakeholder*" is intended any person or entity that can influence, be influenced or perceive itself as influenced by a decision or activity (see Standard UNI ISO 37001: 2016), SisalPay Group considers the following below listed subjects as "interested parties" and *stakeholders*, with respect to its corruption prevention system, and namely: shareholders, employees and all those who collaborate with the Group companies, the local community, the Public Authorities (Customs and Monopoly Agency), suppliers, *partners* and customers as subjects interested in being able to use the provided services with awareness and perception of being in a reality effectively dedicated to the prevention and suppression of corruption.

Anti-Bribery Guidelines

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Field of Application

These Guidelines apply to all companies of SisalPay Group (hereinafter referred to as the "Group"). They are defined in compliance with the corruption prevention policy and their knowledge and observance are obligatory for all members of the corporate, supervisory and control bodies, managers, employees of all grades, qualifications and levels, partners, suppliers and more generally all business partners who operate in the interest or on behalf of SisalPay Group companies (hereinafter referred to as the "Recipients").

The Group will promote the compliance of its member companies with the standards set out in these Guidelines, adopting and maintaining an adequate internal control system consistent with the requirements set out in the Anti-Corruption Laws.

Consequences of Non-compliance with the Guidelines and Sanctions

SisalPay Group pursues any corrupt practice with the utmost rigour and without exception and the Recipients are obliged to fully observe these Guidelines. In the event of breach, disciplinary proceedings are initiated to impose sanctions against those responsible, in compliance with the procedures foreseen by law, collective agreements and other applicable contracts.

Reporting on Violations

Anyone who becomes aware of any violations of these Guidelines shall inform the Reporting Committee by filling in and sending the "Notification Form", or by using the following other communication channels:

- e-mail: segnalazioni_sisalpaygroup@sisalpay.it, segnalazioni_sisalpay@sisalpay.it, segnalazioni_sisalpayservizi@sisalpay.it (the boxes are protected by Multi Factor Authentication systems);
- Traditional mail, to the address: "Reporting Service", Via A. Di Tocqueville, 13 - 20154 Milan

No Recipient will be discriminated against or in any way sanctioned for having refused to commit a corrupt or potentially corrupt act, even if such refusal has resulted in the loss of a business or other detrimental consequence for the business of SisalPay Group, or for having reported in good faith a violation of this Guideline or any anti-corruption legislation norm.

Below is a brief summary of the general principles and basic control measures to mitigate bribery risk.

The prohibited conduct includes the offer, giving, acceptance or receipt by the Company personnel (direct bribery), or by anyone acting on behalf of the Company (indirect bribery), of an economic advantage or other benefit in relation to business activities.

easy translation



General Concepts

Below is a list of measures and actions that further enhance the ethical standards and general concepts to be followed in the conduct of business and to be observed in order to ensure an adequate system of internal control and management of corruption risks.



Compliance with the Code of Ethics

SisalPay Group adheres to the principles of loyalty, correctness and transparency defined in its Code of Ethics in managing its business activities and business relations, as well as in relations with any Public Official and public service appointee. Any offer or promise of money or other benefits to Public Officials and public service appointees, as well as to any person belonging to private negotiating partners, is therefore prohibited.

Participation and Awareness



SisalPay Group Companies involve the Senior Management in the will to combat and prevent corruption, demanding from it to play an active part in communicating with its employees, making it the promoter of a culture in which corruption is not acceptable and demanding from it to make a strong and visible commitment to monitor the compliance with anti-corruption measures, ethics, the implementation of internal controls as well as the implementation of all measures deemed appropriate for the prevention, identification and reporting of potential breaches.

In this regard, Department Managers are required to issue, on an annual basis, a statement certifying compliance with the Anti-Corruption Policy, as well as with these Guidelines, in the management of the relevant company processes, reserving the right to demand such statement from other members of staff if necessary in proportion commensurate with the degree of corruption risk.



Conflict of Interests

All employees of the Companies belonging to SisalPay Group must avoid any situation in which a conflict with the interests of the Company may arise that could interfere with their ability to make impartial decisions in full compliance with the rules defined by the Code of Ethics, these Guidelines and the principles of legality, loyalty, fairness, transparency.

Positions of the conflict of interests (actual, presumed or potential) must be disclosed and reported at any time whenever they arise. By way of example, situations of potential conflict of interest include:

- economic or financial interests of the employee and/or his family in the activities of suppliers, customers and competitors;
- performance of work activities, including those in the past (own or that of family members) with customers, suppliers, competitors or public administrations;
- acquisition of information due to one's job or position that could create a conflict with one's own interests or the interests of one's family members;
- acceptance of money, favours or benefits from third parties who intend to enter into business with SisalPay Group.

Gifts and Representation Expenses



Gifts, payments or other benefits may be made or received if they are provided as a commercial courtesy and do not compromise the impartiality, integrity and/or reputation of either party and cannot be construed by an impartial observer as being intended to create an obligation of gratitude or to gain improper benefits.

Gifts in the form of money are prohibited.

A gift or economic advantage or other benefit offered to/received by the Staff of the Companies of SisalPay Group is considered inappropriate even if its actual or estimated value exceeds the threshold of € 150.00.

Gifts in excess of this amount may be given for certain occasions provided that they fall within the context of acts of courtesy and are subject to particular verification and authorisation.

Representation expenses for business lunches/dinners with guests, as well as other forms of hospitality, may be borne exclusively by those invested with authority or by collaborators formally authorised/delegated by them, according to established circumstances and limits of admissibility.

Traceability and transparency of expenses for gifts and representation are guaranteed.



Donations

The acts of donations ("contributions for charitable purposes") have exclusively charitable purposes and must therefore be aimed at carrying out initiatives that are not strictly business-related, but capable of improving the image of the Company.

They may be made by officially delegated subjects, within the permitted expenditure limits, subject to due diligence on the beneficiary, and must be adequately documented.

Traceability and transparency of such contributions and their recipients are guaranteed.

Sponsorship

**SPONSORED
BY**

Sponsorship activities (or similar events) are aimed at promoting the Group's image.

The support of such expenses is admissible only if they are incurred within the budget authorised by formally delegated parties, within the permitted expenditure limits.

A declaration is obtained against the expenses incurred, in which the beneficiary certifies that the sum is allocated to the sole and exclusive purpose declared.

An ex-post assessment of the results of each initiative (or at least of those of a "significant" amount) may be carried out with respect to the initial goals and this assessment must be documented.

Traceability and transparency of expenses incurred for sponsorships are guaranteed.

Purchases of Goods and Services, Consultancy and Professional Services



In procurement relationships, regardless of the purchasing procedures applied, it is ensured that the purchase is based on actual needs with the aim of obtaining the best possible conditions in terms of quality and price; in no case the qualification activities can be used to cause damage to a potential supplier by distorting free competition.

Suppliers are chosen on the basis of specific qualification and selection criteria according to the principles of impartiality, fairness and transparency. For each purchase of goods or services, as well as for each awarding of professional assignments, it is ensured that what has been received corresponds to what has been agreed upon, the fairness of remuneration paid with respect to the service provided and to the market conditions.

The Companies of SisalPay Group guarantee due diligence activities on certain suppliers and transactions based on the corruption risk profile.



Financial Controls

The Group adopts processes and management systems for financial transactions in order to guarantee their accuracy and punctuality. Each financial transaction provides for the segregation of duties, implementation of differentiated authorization levels, verification of the beneficiary, restriction on the

use of cash, periodic financial checks and audits and due diligence on transactions that present particular corruption risks.

Accounting Procedures



The compliance of the bookkeeping with applicable accounting standards is ensured by a full and transparent reflection of the facts underlying each transaction. All costs and charges, receipts and collections, revenues, payments and expenditure commitments must therefore be entered into the financial information in a timely, complete and accurate manner and have adequate supporting documents issued in compliance with all applicable laws and relevant provisions of the internal control system.



Relations with Points of Sale

In its relations with the Points of Sale, SisalPay Group guarantees that the process of selection and choice of a Partner is preceded by adequate financial and non-financial controls (ethical-reputational verification) through the performance of due diligence that is commensurate and adequate with respect to the exposure to the risk of corruption, verifying that the contracting process is based on the principle of transparency, tracing the transactions and the process of elaboration of the application of special conditions and credit management in the course of the relationship.

Recruitment and Management of Personnel



The Group guarantees specific selection, recruitment and career development paths, ensuring transparency, impartiality and traceability of these activities.

Specific measures are adopted to verify conflicts of interest and to carry out due diligence both on newly hired personnel and on the occasion of transfers and job changes.

Payroll, bonuses and incentives are closely linked to the achievement of corporate or personal goals defined and assessed by a specific Committee.



Penalty System

A breach of these Guidelines and, more generally, a breach of the rules on the prevention management system constitutes a non-fulfilment of contractual obligations and a non-compliance with the corporate rules, entailing thus disciplinary proceedings aimed at the application of sanctions as provided for in the corporate system as well as possible consequences of criminal and civil nature.

Training, Dissemination and Communication



SisalPay Group sets forth and implements specific training plans for the staff of its member-companies, concerning the commitment to the prevention of corruption, Anti-Corruption Policy, Guidelines, procedures, protocols and other anti-corruption tools, international and national anti-corruption legislation and legislation on the broader crime risk prevention (Legislative Decree No.231/2001), aimed at ensuring its dissemination and correct understanding.

The Group undertakes to do its utmost to ensure the dissemination of these Guidelines among all stakeholders and to promote their observance, application and adoption by the Recipients. In particular the following measures are provided for:

- to publish these Guidelines on the company's website;
- to guarantee their availability for all personnel who requests them;
- to deliver them to newly hired personnel or to the personnel in change of duties;

- to disseminate their contents during periodic training sessions and, if necessary, to supply them in printed form;
- to inform suppliers and partners of their adoption and invitation to observe them, as well as subscription.

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