



POLICY FOR THE PREVENTION OF CORRUPTION

MGI-15

INTEGRATED MANAGEMENT SYSTEM

POLICY FOR THE PREVENTION OF CORRUPTION

Revision	Date	Description
0	2022/2023	Fourth Edition – Issue of new system updated in accordance with the rules ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 27001:2013 ISO 20000-1:2011

Produced by	<i>ESG & Sustainability</i> <i>Emma Daniela Cemi</i>	Date	16.02.2023
Classification		CEO for approval	SIGNATURE <small>INNOVERY SPA Centro Direzionale Milanofiori Strada Quattro Palazzina A6 - I piano 20057 Ascago (MI) Partita IVA 02566430987</small> 
		PUBLIC	

POLICY FOR THE PREVENTION OF CORRUPTION

MGI-15

SUMMARY

1 POLICY FOR THE PREVENTION OF CORRUPTION.....3

1 POLICY FOR THE PREVENTION OF CORRUPTION

Innovery Group is fully aware that the phenomenon of corruption is a major obstacle to the economic, political, and social development of a country and a heavy distortion of the rules, fairness and transparency of markets.

Senior management at Innovery prohibits corruption and is fully committed to ensuring actions and behavior based exclusively on criteria of transparency, fairness and moral integrity, which prevent any attempt at corruption on the part of all resources involved.

In application of this commitment, the Innovery Group has determined that the organization's Prevention Policy is based on:

- Strict and full compliance with current legislation on preventing and combating corruption, in Italy and in any country where the organization operates, with the involvement of employees, collaborators in any capacity, and all persons working for and/or under the control of the organization;
- The absolute prohibition of conduct that may amount to bribery or attempted bribery
- The identification, within the organization's activities, of potential risk areas and the identification and implementation of appropriate actions to reduce/minimize these risks
- The provision of a clear framework for identifying, reviewing, and achieving corruption prevention objectives

POLICY FOR THE PREVENTION OF CORRUPTION

MGI-15

- A commitment to plan and implement its policies and actions in such a way that it is in no way involved in corrupt acts or attempts and does not risk involvement in situations of an illicit nature with public or private entities.
- Full commitment to comply with all requirements of the management system for the prevention of corruption.
- Raising awareness among business partners so that they adopt policies and actions for the prevention of corruptive phenomena in their specific activities, in compliance with legal requirements and consistent with the organization’s objectives
- Awareness-raising and training of their employees on corruption prevention issues
- Providing ways of reporting suspicions in good faith, or based on reasonable belief, without fear of retaliation
- The prosecution of any conduct that does not comply with the policy for the prevention of corruption with the application of the organization’s penalty system
- The presence of a compliance function for the prevention of corruption, which is guaranteed full authority and independence.
- Commitment to continuous improvement of corruption prevention activities.

POLICY FOR THE PREVENTION OF CORRUPTION

MGI-15

Top Management believes that the most appropriate corporate strategy for the achievement of this Anti-Corruption Policy consists in the full implementation of the Company's Management System, in full compliance with the principles of the Code of Ethics and its Organizational and Management Model pursuant to Legislative Decree No. 231, which constitute the pillars of its own anti-corruption management system.

<< END OF THE DOCUMENT >>