

ANTI-CORRUPTION POLICY

BLUENEXT S.r.l. (hereinafter also referred to as **the "Company"**) is committed to constantly monitoring tools and measures aimed at combating all forms of corruption, whether active or passive, direct or indirect, involving the Company's staff and any person carrying out activities on its behalf.

It also guarantees compliance with current regulations, both in relations between private individuals and with the Public Administration .

To reinforce this commitment, the Company has adopted its own anti-corruption management system in accordance with UNI ISO 37001 - **Anti-bribery management systems**, published in 2016, of which this Policy is an integral part. This is the only internationally recognised standard that allows for the implementation of a management system aimed at preventing and combating corruption in the corporate environment and specifies the measures and controls that an organisation can adopt to monitor its business activities and increase the effectiveness of preventing corruption.

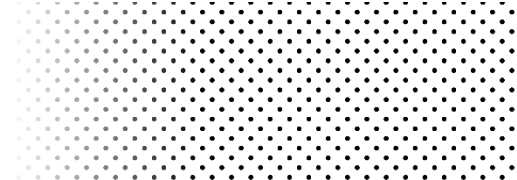
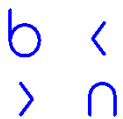
This Corruption Prevention Policy (hereinafter the "Policy") is an integral part of a broader system of corporate ethics and internal control, aimed at ensuring compliance with national and international rules and standards and protecting the company's reputation. It contributes to increasing the overall level of compliance with applicable laws, regulations and international best practices and, in order to implement a corporate culture inspired by the values of honesty, ethical behaviour, and the prevention and combating of corruption.

Anyone carrying out activities on behalf of BLUENEXT S.r.l. is required to read and understand the contents of this Anti-Corruption Policy and to behave in accordance with its provisions.

BLUENEXT S.r.l. staff must carry out their activities in accordance with the ethical principles of transparency, clarity, fairness, integrity and equity. In particular, in business relationships and dealings, collusive behaviour and practices, payments that may appear illegal, attempts at corruption and favouritism, direct or indirect solicitation of personal and career advantages for oneself or others, and more generally acts contrary to applicable laws and regulations are prohibited.

The governing body of BLUENEXT S.r.l. is committed to ensuring an adequate internal control system and to guiding the entire organisation in achieving the expected performance in the prevention of corruption in accordance with the following guidelines:

- **ensuring a continuous commitment** to conducting its activities in full compliance with regulatory obligations, constantly verifying the correct and adequate application of anti-corruption regulations and the requirements of the Anti-Corruption Management System;



- **prohibiting all forms of corruption** and encouraging employees to report suspicions in good faith without fear of retaliation, considering transparency and legality to be an added value, integrating the controls and improvement actions necessary to manage the prevention of corruption into its processes;
- **take appropriate disciplinary or legal action** against individuals who have engaged in unlawful conduct contrary to the principles of this policy.

These guidelines are translated into operational objectives defined in a specific document, constantly monitored during Senior Management Reviews and communicated to the entire organisation through the appropriate means and channels.

The Company is committed to continuously improving its Corruption Prevention Management System and guarantees the authority (defined through the responsibilities assigned to the function and made known to all company personnel) and independence of **the Compliance Function for the prevention of corruption**, appointed by Senior Management.

Those who work in the name and on behalf of BLUENEXT S.r.l. are aware that, in the event of corrupt behaviour and violation of the laws on corruption, they will incur offences punishable not only under criminal and administrative law, but also under company disciplinary rules.

BLUENEXT S.r.l. requires its **'business partners'** to comply with applicable laws and this Policy, on the basis of clauses whose non-compliance implies termination of the contract.

BLUENEXT S.r.l., considering reporting to be an effective tool for combating corruption, encourages the reporting of alleged corruption, including anonymously.

Such reports may be submitted in writing or orally through the Whistleblowing portal on the Company's institutional website, which can be accessed via the following link: <https://wb-portal.bluenext.it/?companyCode=3bba4b96-36f6-4772-bd6a-d89132b5d351>.

The senior management of BLUENEXT S.r.l. shall ensure that this Policy is widely disseminated and understood and implemented by all employees; to this end, it is made available on the company website.

Approved by the Board of Directors of Bluenext Srl on 19/04/2024

Stetano Righi - Direzione Generale