

Anti-Corruption Policy

M.M. S.r.l. a socio unico recognises that legality, integrity, transparency, correctness and accountability are fundamental principles in the conduct of its activities.

This Anti-Corruption Policy is adopted as an integral part of the Company's internal control and compliance system, in accordance with the Code of Ethics and Conduct (hereinafter "Code of Ethics"), the Organisation, Management and Control Model pursuant to Legislative Decree No.231/2001 (hereinafter "Model 231"), the whistleblowing procedure, the disciplinary system and any other applicable internal procedures and controls.

The Policy sets out the general principles and commitments of the Company with regard to the prevention, detection and combating of corruption.

Purpose

This Policy is aimed at: preventing and combating any form of corruption, whether active or passive, direct or indirect; promoting a corporate culture founded on ethics, legality and transparency; defining general rules of conduct and the responsibilities of its recipients; strengthening coordination with the Code of Ethics, Model 231, the whistleblowing procedure and the disciplinary system; supporting the implementation of controls that are adequate and proportionate to the risks involved.

Scope of Application

This Policy applies to members of the corporate bodies, senior managers, employees, external collaborators, consultants and, insofar as compatible and applicable, to business partners, suppliers, contractors, subcontractors, intermediaries and any other party acting on behalf of or in the interests of the Company.

Zero-Tolerance Principle

The Company adopts a zero-tolerance principle with regard to corruption.

It is prohibited to offer, promise, authorise, give, request, solicit, receive or accept, directly or indirectly, money, benefits or other undue advantages for the purpose of obtaining or retaining business, improperly influencing a decision, securing an undue advantage or inducing a party to breach their duties.

This prohibition applies in dealings with both public and private parties, including where the conduct is carried out through third parties.

Coordination with the Code of Ethics, Model 231, Whistleblowing and the Disciplinary System

This Policy implements and specifies, within its remit, the principles contained in the Code of Ethics and Conduct.

The Policy is coordinated with Model 231, of which it constitutes, where applicable, an internal control measure for the prevention of relevant offences.

The whistleblowing procedure constitutes the formal instrument for the receipt and management of reports.

The Company's disciplinary system applies in the event of a breach of the principles and rules set out herein.

Commitments of Corporate Bodies, Management and Personnel

Corporate bodies, management and all personnel are required to operate in compliance with the law and internal rules; to maintain conduct founded on correctness, good faith, integrity and transparency; to avoid conflicts of interest and to report them promptly; to refrain from behaviour liable to constitute or facilitate corrupt practices; to cooperate in control, audit and review activities; to participate in information and training programmes; and to make any required reports in a timely manner.

Gifts, Hospitality, Entertainment Expenses and Other Benefits

Gifts, hospitality, entertainment expenses, sponsorships, charitable donations and other benefits are permitted only within the limits set out in the Code of Ethics and Conduct, and provided they are lawful, justified by legitimate purposes, not capable of improperly influencing the recipient, duly authorised where required, and correctly documented and traceable.

Cash or cash-equivalent benefits are prohibited in all cases, as is any benefit that, by reason of its value, frequency, context or purpose, may constitute or even merely give the appearance of a corrupt intent.

Facilitation Payments

The Company prohibits facilitation payments, meaning unofficial payments or benefits intended to expedite or facilitate activities that are already due.

Any exceptional cases connected with the need to protect health, safety or personal liberty must be reported immediately and adequately documented.

Relations with Third Parties

The Company applies selection, qualification, evaluation and monitoring criteria for third parties that are proportionate to the risk involved.

Relations with consultants, suppliers, business partners, intermediaries and other third parties must be conducted in accordance with the principles of legality, correctness, transparency and traceability, as well as in compliance with the principles contained in this Policy, the Code of Ethics and any applicable contractual clauses.

Financial and Non-Financial Controls

The Company adopts controls adequate to prevent the risk of corruption, including through segregation of duties, defined authorisation levels, traceability of transactions, adequate supporting documentation and complete, accurate and timely accounting records.

Any false, incomplete, misleading or artificially fragmented recording is prohibited.

Reporting

Anyone who becomes aware of facts or circumstances that may constitute a breach of this Policy, the Code of Ethics, Model 231 or applicable legislation is required to make a timely report through the channels provided for in the whistleblowing procedure adopted by the Company.

The Company guarantees confidentiality, impartial handling of reports and the protection of good-faith whistleblowers against any form of retaliation, within the limits and according to the procedures set out in applicable legislation and the internal procedure.

Violations and Consequent Measures

Breach of this Policy constitutes failure to comply with company obligations and entails the application of the measures provided for under the disciplinary system, the Code of Ethics, Model 231, applicable legislation and any applicable contractual clauses.

The Company retains the right to adopt any further protective measures, including reporting to the competent authorities and terminating relationships with third parties, where the relevant conditions are met.

Training, Dissemination and Review

The Company promotes adequate information, training and awareness-raising activities on the contents of this Policy.

The Policy is subject to periodic review and updating, where necessary, in light of developments in legislation, the organisational structure and the internal control system.

This Policy takes effect from the date of its approval by the Board of Directors and is disseminated through the Company's main communication channels (website, social media) and made visible in key locations at its operating premises, as a testament to the Company's commitment to promoting a shared culture of integrity.