

# Anti-Bribery Policy

2026 Edition

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# 1.0 Scope

The purpose of this document is to outline the general anti-bribery principles as defined by HRIT Srl in order to develop an efficient and adequate Anti-Bribery Management System.

The Anti-Bribery Policy represents expectations of the behavioural objectives established by HRIT for all its employees and business partners.

For this reason, all company staff and business associates are invited to read this document carefully, given that it is the responsibility of everyone to prevent, detect and report any form of bribery.

For this reason, appropriate confidential channels have been set up for the reporting of any suspicion of bribery.

# 2.0 Description

HRIT considers the primary objective of anti-bribery to be the prevention, tracing and tackling of bribery. HRIT does not acknowledge exceptions to the prescriptions and prohibitions set out within this Policy. The belief of having acted in the interests of the organization does not, in any way, justify the adoption of behaviour contrary to these aforementioned principles.

The principles and rules referred to in the present Policy view as unlawful for staff, the Company, Business Partners and any individual exercising an activity in favour of or on behalf of the Company, the offer, payment or acceptance, directly or indirectly, of money or other benefits for the purposes of obtaining or maintaining business or securing an unjust advantage in relation to business activities.

Useful definitions include:

1. **Bribery:** The offer, promise, provision, acceptance or request of an undue advantage of any value (which may be economic or non), directly or indirectly, and regardless of location, violating the current law, as an incentive or reward for a person to act or omit actions in connection with the performance of that person's duties.
2. **Organization:** Person or group of people establishing their own functions over areas of responsibility, authority and relationships in order to achieve their goals.
3. **Requirement:** A requirement that is explicit and mandatory.
4. **Management System:** Set of related or interacting elements of an organization aimed at establishing policies, objectives and processes in order to achieve these objectives. Elements of the system include structure, roles and responsibilities, planning and functioning of the organization.
5. **Management:** Group of people who, at the highest level, manage and control an organization and hold ultimate responsibility and authority for the organization's activities, administration and policies.
6. **Anti-Bribery compliance function:** The person or people with responsibility and authority for the functioning of the Anti-Bribery Management System.

7. Effectiveness: Degree of realization of the planned activities and achievement of the planned results.
8. Policy: Direction and guidelines of an organization, as formally expressed by its top management or its governing body.
9. Objective: Results to be achieved. Objectives are defined by the organization, in line with the Anti-Bribery Policy put in place to achieve specific results.
10. Risk: The effect of uncertainty on objectives, where uncertainty is the state, or partial state, of a lack of information relating to the understanding or knowledge of an event, its consequences or its probability. Risk is often expressed in terms of combining the consequences of an event and the “probability” associated with its occurrence.
11. Availability: Information must be available promptly, when required by company processes, both efficiently and effectively;
12. Process: Set of related or interacting activities that transform inputs into outputs.
13. Monitoring: Establishing the state of a system, process or activity. In order to determine its status, it may be necessary to check, monitor or critically observe.
14. Compliance: Satisfaction of a requirement.
15. Non-compliance: Failure to satisfy a requirement.
16. Corrective action: Action aimed at eliminating the cause of non-conformity and preventing its recurrence.
17. Continuous improvement: Reoccurring performance improvement activities.
18. Staff: Managers, officers, employees, staff or temporary and voluntary workers of the organization. Different types of staff pose different types and degrees of bribery risk and can be treated distinctly in terms of the procedures for assessing the risk of bribery and managing the organizational risk of bribery.
19. Business partner: External party with which the organization has established, or plans to establish, any form of commercial relationship. Business partners include, but are not limited to, customers, buyers, “joint ventures”, joint venture partners, consortium partners, external suppliers, contractors, consultants, subcontractors, vendors, experts, agents, distributors, representatives, intermediaries and investors.
20. Public official: Person who holds legislative, administrative or judicial positions, regardless of whether they derive from appointment, election or succession, or any person who exercises a public function, including those acting on behalf of a public agency or public enterprise, any official or agent of a public organization, national or international, or any candidate for a public office.
21. Third party: Person or entity independent of the organization.

## 3.0 Field of Application

The HRIT Anti-Bribery Policy applies to all internal staff and third parties who collaborate towards the realization of the services offered.

For this reason, the company undertakes to disseminate the information contained within the policy and invite stakeholders to sign a declaration of understanding.

# 4.0 Declaration of Anti-Bribery Policy

The Anti-Bribery Policy of HRIT represents the organization's commitment to customers and third parties in order to guarantee the prevention of bribery, understood as:

- a. Bribery by the organization;
- b. Bribery by the staff of the organization, who acts on its behalf or for its benefit;
- c. Bribery by business members of the organization, who act on its behalf or for its benefit;
- d. Bribery of the organization;
- e. Bribery of the organization's staff in relation to its activities;
- f. Bribery of business members of the organization in relation to its activities;
- g. Bribery and indirect bribery (e.g. a bribe offered or accepted by or through third parties).

With this document, HRIT undertakes to:

1. Prohibit any corrupt practice: illegitimate favours, collusive behaviour, solicitations, direct and/or through third parties, of personal and professional advantages for either an individual or others;
2. Ensure that the Anti-Bribery Management System, including policies and objectives, is established, implemented, maintained and reviewed in order to adequately address bribery risks within the organization;
3. Ensure that bribery risks and irregularities are promptly recognized and correctly managed through efficient systems of prevention, communication and reaction in order to minimize the impact on the business;
4. Appoint an internal figure who holds authority and independence in order to operate towards the continuous functioning of the Management System;
5. Request, where possible, that business partners who pose a risk of bribery beyond minimal levels are committed to preventing bribery;
6. Be able to terminate relationships with a business partner in the case of bribery committed by the partner, either for their own gain or advantage in relation to transactions, projects, activities or relationships;
7. Not make contributions or donations to political parties or related foundations and associations;
8. Respect the applicable law in force;
9. Guarantee the traceability, availability and correct conservation of documents, IT data and corresponding IT support structures;
10. Promote an appropriate anti-bribery culture within the organization;
11. Communicate the company Anti-Bribery Policy to all staff and business associates, underlining the importance of compliance with the requirements of the Management System;
12. Ensure the application of law 179/2017 (on the act of "whistleblowing");
13. Ensure continuous improvement to practices;

14. Establish a framework of objectives aimed at measuring and monitoring the absence of bribery;
15. Implement sanctioning systems through internal regulations.

## 5.0 Sanctions in Case of Non-Compliance

To ensure the application of the Anti-Bribery Policy, HRIT aims to implement disciplinary measures in line with the CCNNL contract applied to its employees. For all suppliers and customers who demonstrate behaviour that does not comply with this policy, HRIT reserves the right to terminate contractual obligations.

## 6.0 Responsibility for Anti-Bribery Policy

Company Management is responsible for the Anti-Bribery Management System, in line with the evolution of the business and market contexts, evaluating any actions to be taken in the face of events such as:

- a. Significant business developments;
- b. New threats beyond those already considered through risk analysis processes;
- c. Significant cases of bribery;
- d. The evolution of the regulatory or legislative framework regarding anti-bribery.