



CORRUPTION PREVENTION POLICY

"Corruption is a widespread phenomenon. It poses serious social, ethical, economic and political problems, puts good administration at risk, obstructs development, and alters competition. It damages justice, undermines human rights, and weakens the fight against poverty. It also increases the cost of economic activities, introduces elements of uncertainty into commercial transactions, increases the cost of goods and services, lowers the quality of products and services, which in turn can lead to the loss of life and property, destroying of trust in institutions, and interfering with the fair, efficient functioning of the markets." ISO 37001:2016

Our Company, **TM.E. S.P.A. - Termomeccanica Ecologia** sets out from this awareness in our *fight against corruption*, ensuring actions and behaviour based exclusively on criteria of transparency, correctness, and moral integrity, which impede any form of corruption.

Management has sanctioned this commitment in this corruption prevention policy, in order to:

- Completely forbid behaviour that may be construed as corruption, attempted corruption, or inducement to corruption.
- Respect on their part, and require respect of current legislation on preventing and combating corruption, throughout Italy in which it operates, from all its employees, collaborators, partners and entities that operate under the control of TM.E. S.P.A.
- Identify areas of potential risk and identify and implement suitable actions to mitigate the risks themselves.
- Provide guidelines for drawing up, reviewing, and attaining the corruption prevention goals.
- Encourage reports of suspicions based on good faith or a reasonable, confidential conviction, without fear of reprisals.
- Facilitate sensitisation of business partners involved in sensitive activities, asking them to accept the policy and the checks called for by the corruption prevention management system.
- Promote constant training and informing of personnel and closest collaborations on the policy, for corruption prevention system, and significant updates of the norm.
- Facilitate sensitisation of personnel and closest collaborators so that they will be able to recognise a corruption event or even a mere attempt at the same, and to allow them to report it anonymously.
- Ask all personnel /closest collaborators to refer to the Supervisory Body for any question related to corruption and the management system.
- Inform them that failure to respect the policy can lead to application of the sanctionary system provided for in the Company's Organisational Model.

In order to ensure the widest dissemination of the commitment made, Management orders its publication on the website and communication to all business partners and personnel via the most opportune channels.

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Managing Director
Giovanni Bonanini