

---

## ANTI-BRIBERY POLICY

---

REV.	DATE	PREPARED	CHECKED	APPROVED
00	26/05/2025	N.A.	L.Cogorno C-QHSE-DIR	E.Barbiero CEO

---

## ANTI-BRIBERY POLICY

---

RIZZANI DE ECCHER S.p.A. is aware of the negative effects of corrupt practices on economic and social development in the context in which it operates, so it adopts a absolutely prohibitive approach against any form of corruption. The prevention of bribery represents therefore, as well as a legal obligation, one of the principles underlying the actions of RIZZANI DE ECCHER S.p.A.

As a concrete demonstration of its commitment in this area RIZZANI DE ECCHER S.p.A. has adopted:

- An Ethical Code, A Code Of Conduct in relationship with PA and an Anti-Bribery Code of Conduct, which define values and principles to be followed in order to pursue organization's mission;
- An Anti-Bribery Management System according with UNI ISO 37001;
- A Business and Organization Model according with Legislative Decree 231/2001.
- 

According with ISO 37001, "Bribery" definition is: offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties.

Therefore, RIZZANI DE ECCHER S.p.A. prohibits any corruptive behavior, requires compliance with the law and commits to adopt and enforce the Management System for the Prevention of Corruption, also to increase the awareness of all Stakeholders on the rules and behaviors that must be observed.

RIZZANI DE ECCHER S.p.A. aims to base its behavior and its way of working both in internal relations and in relations with external subjects on correctness, fairness, integrity, integrity, loyalty and professional rigor, placing full compliance with the law as well as compliance with company procedures at the center of attention.

Employees must comply with the principles of transparency, clarity, correctness, integrity and fairness while carrying out their activities. Behaviors and practices that may even appear illegal or collusive, payments that may appear illicit, favoritism, solicitations, direct or indirect, of personal and career advantages for oneself or for others are prohibited.

RIZZANI DE ECCHER S.p.A. undertakes to continuously improve its Anti-Bribery Management System and guarantees the authority (defined through the responsibilities attributed to the function and communicate to all company personnel) and the independence (guaranteed by non-involvement in the activities identified at risk of corruption) of the Anti-Bribery Compliance Function.

In the event of corrupt behavior and violation of the Laws on corruption, those who work in the name and on behalf of RIZZANI DE ECCHER S.p.A. are aware of incurring in offenses punishable not only on the criminal and administrative level, but also on the corporate disciplinary level. RIZZANI DE ECCHER S.p.A. requires to its "Business Associates" compliance with the laws, the Company's Ethical Code and this Policy, on the basis of clauses whose non-compliance implies the termination of the contract.

RIZZANI DE ECCHER S.p.A., considering the reporting tool effective to combat the corruption phenomenon, encourages the reporting of corruption events through a "whistleblowing" procedure that regulates the management and verification of reports, to guarantee the confidentiality of the content of the reports, the identity of the reporter and the reported and to protect the whistleblower from any discrimination or retaliation.

Top Management gives maximum diffusion to this Policy, ensuring it is understood, by implementing a dedicated and periodic training and information plan, and applied by all employees as well as third parties operating in the name or on behalf of the Company; to this end, the Policy is also made available on the Company's website.

In case of confirm violation of this Anti-Bribery Policy, RIZZANI DE ECCHER S.p.A. will initiate, following dedicated investigations and with the support of a specialized consultancy service, the Sanctioning and Disciplinary System, providing the established sanctions.

In case of concerns regarding violation of Anti-Bribery Policy, RIZZANI DE ECCHER S.p.A., carries out an evaluation of the report to verify its validity and, if necessary, activates an investigation into actual or suspected violation of the Anti-Bribery Policy or into Management System's rules, according with Whistleblowing procedure. Regarding this, the organization has activated follow PEC address for concerns directed to Anti-Bribery Function: [rde@serviziosegnalazioni.it](mailto:rde@serviziosegnalazioni.it); this address is also made available on the company website. In addition to the digital reporting channel, the Whistleblower may submit reports concerning corruption-related risks to the Anti-Bribery Function in written form, via regular mail, by sending a confidential letter addressed to: Anti-Bribery Function of Rizzani De Eccher S.p.A. – Via Buttrio 36 – Pozzuolo del Friuli (UD) – 33050 – Italy.

Chief Executive Officer

Enrico Barbiero

.....