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Anti-corruption policy

Rev. 00  
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# ANTI-CORRUPTION MANAGEMENT SYSTEM UNI EN ISO 37001:2016

## Annex 01 Policy Statement

REV	DATE	OBJECT	CHANGES	DRAFTED	CONTROL	APPROVE
0	03.03.25	First Issue		Kuhn srl	RAC	AU
						AU

### **Premise and commitment of the organization**

Stamperia Carcano Giuseppe S.p.A., based in Albese con Cassano (CO), is a leading national and international company in the design and production of metal components made by hot forging in ferrous and non-ferrous metal, intended for strategic sectors such as hardware, naval, railway, telephone and electricity.

CARCANO is a company active in the hot forging sector since 1960, which has gained a well-established position of pre-eminence on the market, mainly thanks to the respect of the company philosophy focused on customer satisfaction, which has remained unchanged since its foundation.

Over half a century of experience and innovation have made hot forging one of CARCANO's flagships.

The process parameters are constantly monitored and modern analysis software allows continuous optimization for always optimal quality standards. In the CARCANO laboratory, tensile tests, spectrometric and X-ray analyses, impact and fatigue tests, magnetoscopic examinations and other controls are performed. A state-of-the-art test and testing room, equipped with all the best and innovative technologies, testimony to the desire to pursue, improve and redefine a new concept of total quality. CARCANO is also equipped with a warehouse for the storage of products that has a customized picking and storage system.

The department stands out for efficiency, space utilization, performance, optimizing and making delivery times certain.

In line with the company's founding values — quality, integrity, innovation and social responsibility — the Management has adopted a systemic approach to **the prevention of corruption**, based on the requirements of the **UNI ISO 37001:2016 standard**.

This Policy represents the organization's formal commitment to prevent and combat all forms of corrupt offences, strengthening the culture of integrity at all levels of the company and throughout the value chain.

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## **1 Objectives of the Anti-Corruption Policy**

Through the Management System for the Prevention of Corruption, Stamperia Carcano Giuseppe S.p.A. undertakes to:

- **Prohibit all forms of corruption**, active or passive, direct or indirect, against public and private entities, both in Italy and abroad, applying zero tolerance;
- **Promote ethical and responsible behavior** by all staff, external collaborators, suppliers and business partners;
- **Prevent situations of conflict of interest**, opacity or conduct that does not comply with current legislation or corporate values;
- **Fully comply with the legal, regulatory and contractual requirements** applicable in each operational context;
- **Ensuring the transparency of decision-making and operational processes** through adequate organisational structuring and internal control systems;
- Make corruption prevention an integral part of business management, in line with other certified management systems.

## 2 Scope

This Policy is binding for:

- All employees and collaborators of **Stamperia Carcano Giuseppe S.p.A.**, regardless of the hierarchical level or function held;
- Members of the administrative body and company management;
- Third parties (suppliers, consultants, agents, intermediaries, business partners) who operate on behalf of or in the interest of the organization.

## 3 Principles of conduct

All the above-mentioned subjects are forbidden:

- Offering, promising, authorizing or receiving, directly or indirectly, **gifts** (above the established value), **money, benefits, utilities or undue advantages**;
- Exert undue pressure or improper influence on a third party to obtain or maintain a business, contract, or competitive advantage;
- Use company funds for illegal or non-transparent purposes;
- Encourage situations of **conflict of interest** or act in a way that compromises the impartiality of decisions;
- Engage in conduct that, even if not criminally relevant, **may be perceived** by an impartial observer as inappropriate, incorrect or aimed at obtaining undue advantages.

## 4 Management System for the Prevention of Corruption

The company has adopted a Management System compliant with UNI ISO 37001:2016 which includes:

- Analysis and assessment of the risk of **corruption** for each business process;
- Adoption of **operational protocols and control procedures** in the sectors with the greatest exposure (e.g. purchases, sales, tenders, donations, institutional relations);
- Approval and authorisation mechanisms based on the principle of transparent **separation of duties and responsibilities**;
- **Traceability of transactions and financial flows**, with accurate and accessible records;
- **Periodic audits**, management reviews and continuous improvement activities;
- Integration with other company systems (e.g. Code of Ethics and Model 231).

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## 5 Training, awareness and communication

Stamperia Carcano Giuseppe S.p.A. guarantees that:

- All staff are trained and sensitized on **ethics, integrity and corruption prevention**, with programs differentiated by role and function;
- This Policy is **disseminated internally and externally**, available on the institutional website ([www.carcano.it](http://www.carcano.it)) and accessible to all interested parties;
- Third parties operating on behalf of the company are contractually bound to comply with the principles of the company's Anti-Corruption Policy and management system.

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## 6 Anti-Corruption Compliance Officer (RAC)

A Corruption Prevention Compliance Officer (RAC) **has been appointed**, with the following tasks:

- Supervise the implementation and effectiveness of the System;
- Offer support and advice to staff on ethical and compliance issues;
- Monitor the evolution of anti-corruption regulations;
- Periodically report to Top Management and, where applicable, to the Control Bodies.

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## 7 Reporting and whistleblowing

Anyone who becomes aware of suspicious behavior, violations of the Policy or concrete (or attempted) cases of corruption can make a report in good faith, by:

1. **Dedicated procedure mode** available on the company website
2. **Email reserved for** the Anti-Corruption Officer: [37001.carcano@gmail.com](mailto:37001.carcano@gmail.com) ;
3. **Paper letter** addressed with the wording "confidential personal" to the registered office of the Company.
4. Paper letter addressed with the wording "confidential personal" to the headquarters of the Supervisory Body
5. External office telephone ODV
6. All the above points are indicated in detail in the whistleblowing procedure of the company website [www.carcano.it](http://www.carcano.it)
7. Reports can also be sent through the following link: <https://carcano.whistlelink.com/>

Reports are handled **confidentially, securely and anonymously (if required)**. Any form of **retaliation or discrimination** against the whistleblower is prohibited. On the contrary, failure by persons with knowledge of wrongdoing may result in disciplinary consequences.

## 8 Monitoring, Reviewing, and Improving

The Policy is reviewed **at least once a year** by the Management, also as a result of:

- Legislative or regulator changes;
- Significant organisational or strategic changes;
- Results of internal audits or reports received;
- Opportunities for improvement identified by the Manager or by the Company Departments.

The organization promotes a **continuous improvement approach**, integrating the learnings deriving from internal and external experiences.

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## 9 Dissemination and approval

This Policy:

- It is **an integral part of the Management System for the Prevention of Corruption** of Stamperia Carcano Giuseppe S.p.A.;
- It is communicated, shared and made accessible to all company levels and stakeholders;
- It is approved by the Top Management, which ensures its effective implementation.

**Updated on:** 03.03.2025

**Approved by:** Top Management – Stamperia Carcano Giuseppe S.p.A.