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Capitale Sociale € 604.800 i.v.
REA n. CO-155979
Meccanografico Co 001842
Reg. Imprese Como N. 00668140130
Partita IVA IT 00668140130
Codice Fiscale 00668140130

ANTI-BRIBERY POLICY

Company Commitment and Introduction

Stamperia Carcano Giuseppe S.p.A. recognizes that the prevention of bribery is an essential element of its corporate governance and of the proper management of its business relationships.

Through this Policy, Top Management reaffirms its prohibition of all forms of bribery and its commitment to promoting a culture based on legality, integrity, and transparency. Furthermore, the Company is committed to supporting the Anti-Bribery Compliance Function, providing adequate resources, and continually improving its Anti-Bribery Management System in accordance with UNI ISO 37001:2025, integrated with the Company's other governance, control, and compliance systems.

Objectives of the Anti-Bribery Policy

The Company pursues the following objectives:

- to prohibit and prevent all forms of bribery in dealings with both public and private entities;
- to promote a culture focused on the prevention of bribery and the proper management of conflicts of interest;
- to comply with all applicable requirements and implement controls proportionate to bribery risks, including due diligence activities and the monitoring of sensitive activities;
- to ensure appropriate training, communication, and the reporting of suspected bribery or violations, while protecting reporting persons in accordance with the applicable procedures

Scope of Application

This Policy applies to all of the Company's activities and is binding, within the scope of their respective responsibilities, on:

- employees and collaborators;
- the Board of Directors and Top Management;
- suppliers, consultants, intermediaries, contractors, subcontractors, and other business associates, to the extent applicable under contractual arrangements and the relevant procedures.

Principles of Conduct

All recipients of this Policy are required to act with integrity, fairness, transparency, and accountability. In particular, the following are strictly prohibited:

- offering, promising, authorizing, requesting, or accepting any undue advantage, whether directly or indirectly;
- exerting undue influence, using improper intermediaries, or abusing one's position to obtain undue advantages;
- using Company funds, resources, or records for unlawful, misleading, or non-transparent purposes;
failing to disclose conflicts of interest or engaging in conduct that is inconsistent with this Policy.

Anti-Bribery Management System

The Company implements, maintains, and continually improves an Anti-Bribery Management System based on a risk-based approach, which includes, among other elements:

- analysis of the organizational context, relevant interested parties, and bribery risks;
- due diligence, qualification, and ongoing monitoring of business associates and sensitive activities;
- financial and non-financial controls, traceability, segregation of duties, and the management of conflicts of interest;
- rules, procedures, training, monitoring, internal audits, and periodic management reviews;
- integration with the Code of Ethics, the Organizational, Management and Control Model pursuant to Legislative Decree 231/2001 (Model 231), the Whistleblowing Procedure, and other applicable control measures.

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Training, Awareness and Communication

The Company ensures appropriate information, training, awareness, and communication processes to ensure that the principles of anti-bribery are understood and applied in accordance with individual roles, responsibilities, and associated risks.

To this end, the Company ensures that:
- personnel receive regular training on matters relevant to the prevention of bribery;
- this Policy is communicated internally and made available to relevant interested parties;
- relevant external parties are informed of, and required to comply with, the applicable anti-bribery principles and controls.

Anti-Bribery Compliance Function

The Company has established an Anti-Bribery Compliance Function (ABCF) with appropriate authority, independence, competence, resources, and direct access to Top Management and the Governing Body.
In carrying out its responsibilities, the Anti-Bribery Compliance Function is authorized to access all documents, data, information, records, and other evidence relevant to the Anti-Bribery Management System. It may also request from all Company functions any information, clarification, and support necessary to perform its oversight, monitoring, verification, and review activities.
All Company functions are required to provide full, timely, and transparent cooperation.
Among its responsibilities, the Anti-Bribery Compliance Function shall:
- oversee the implementation, maintenance, adequacy, and effectiveness of the Anti-Bribery Management System;
- monitor bribery risks, the implementation of controls, and compliance with the Company's anti-bribery rules and procedures, promoting appropriate corrective actions and continual improvement;
- report periodically to Top Management and the Governing Body on the implementation and effectiveness of the Anti-Bribery Management System, any identified issues, the results of monitoring and verification activities, and any necessary corrective or improvement actions.

Disciplinary System

Any breach of this Policy, the anti-bribery procedures, and the applicable controls, as well as any failure to comply with the duty to cooperate with the Anti-Bribery Compliance Function, is treated by the Company with the utmost seriousness and may result in the application of the disciplinary measures provided for, in accordance with applicable laws, the Company’s disciplinary system, and the contractual relationships in place.

The Company ensures that such measures are proportionate to the seriousness of the breach and are applied in accordance with the principles of impartiality, traceability, and regulatory compliance.

Reporting and Whistleblowing

The Company encourages the reporting, in good faith or on the basis of a reasonable belief, of any conduct or circumstances that may constitute or give rise to a suspicion of bribery or a breach of this Policy. To this end, the Company provides dedicated reporting channels governed by its Whistleblowing Procedure.

Reports are handled in accordance with the principles of confidentiality, impartiality, protection of the reporting person, and safeguarding of all persons involved, in compliance with applicable laws and the Company's internal procedures.

Any form of retaliation, discrimination, or adverse treatment against anyone who makes a report in good faith or on the basis of a reasonable belief is strictly prohibited. This does not affect any liability arising under applicable law in cases where reports are made with malicious intent or gross negligence.

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Monitoring, Review and Continual Improvement

This Policy is reviewed periodically by Top Management and updated, where necessary, to reflect changes in applicable legislation, the Company's organizational structure, or the results of monitoring activities, audits, reports, and management reviews.

The Company is committed to the continual improvement of its Anti-Bribery Management System through the assessment of the effectiveness of the controls in place, the analysis of nonconformities and reports received, and the implementation of appropriate corrective actions.

Distribution and Approval

This Policy forms an integral part of the Company's Anti-Bribery Management System and its governance and control framework. It is communicated to internal and external recipients through appropriate means and is approved by Top Management, which is responsible for ensuring its implementation and ongoing support.

Support for Interested Parties

The Anti-Bribery Compliance Manager (ABCM) is available to provide advice and guidance to personnel and external interested parties regarding the Anti-Bribery Management System, bribery-related matters, and the appropriate actions to be taken in the event of a suspected or actual bribery incident.

The Anti-Bribery Compliance Manager may be contacted by email at: 37001.carcano@gmail.com.

Last updated: 18 May 2026

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

