

Dedalus Group Anti-Corruption Policy

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LEADERSHIP MESSAGE

Dedalus Group chooses to act with integrity, fairness and transparency every day.

We believe that corruption, in addition to being an illegal phenomenon, is a real obstacle to business and economic development: in fact, it raises serious social, moral, economic and political concerns, undermines good governance, hinders development and distorts competition. It erodes justice, undermines human rights and is an obstacle to the relief of poverty. It also increases the cost of doing business, introduces uncertainties into commercial transactions, increases the cost of goods and services, diminishes the quality of products and services, which can lead to loss of life and property, destroys trust in institutions and interferes with the fair and efficient operation of markets.

Governments have made progress in addressing corruption through international agreements and their national laws. However, the law alone is not sufficient to solve this problem. Organizations have a responsibility to proactively contribute to combating this phenomenon.

In this regard, Dedalus is committed to prevent any corrupt practice not just a legal obligation but through a concrete principle that shall guide the daily business activities. We have adopted the Dedalus Group Code of Ethics stating that we oppose all forms of corruption without exception. Furthermore, this Group Anti-Corruption Policy would operationally translate the "zero tolerance" principle in good practices aimed at avoiding or mitigating the costs, risks and damage of involvement in corruption and bribery, promoting trust and confidence in business dealings and enhancing our reputation.

Andrea Fiumicelli - Group CEO

1 INTRODUCTION

1.1 Objective and purpose of the document

One of the key factors of Dedalus Group's reputation is its ability to conduct business with integrity, transparency, fairness, loyalty and honesty and in compliance with laws, regulations, international standards and guidelines that apply to our day-by-day activities.

In this regard, Dedalus Group (hereinafter "**Dedalus**" or "**Group**") adopts this Group Anti-Corruption Policy (hereinafter "**Policy**") in order to:

- promote an appropriate "zero tolerance" anti-corruption culture within the Group;
- explain the general commitment and principles that Dedalus has defined as reference framework for setting, reviewing and achieving its objectives for the prevention of corruption and bribery;
- define, in line with the provisions of the Group Code of Ethics, rules of conduct to prevent corruption and bribery;
- define an Anti-Corruption Governance in order to facilitate the Company to abide by anti-corruption laws and regulations and effectively implement this Policy.

1.2 Scope of application

This Policy has been reviewed and approved by the Board of Directors of Dedalus S.p.A. and its implementation and enforcement is mandatory for Dedalus S.p.A. and all its Subsidiaries around the world.

This Policy applies to all individuals worldwide working on behalf of Dedalus at all levels and grades, including directors, senior executives, officers, employees (whether permanent, fixed-term or temporary) and trainees (hereinafter "**Dedalus' Persons**"), as well as public or private Third Parties associated to the Group or otherwise acting on its behalf or to further its business interests (such as consultants, suppliers, agents, intermediaries, etc.).

This Policy is in addition to the provisions of the Group Code of Ethics. Regardless of whether local laws or customs might allow something different, this Policy establishes a single standard that everyone must adhere to.

In jurisdictions where local laws or regulations set stricter rules than those set out in this Policy, the stricter rules must always prevail.

This Policy is immediately applicable to whole Dedalus Group, without possibility of derogation. In this regard, Subsidiaries shall ensure the adoption of this Policy, in a timely manner and in any case no later than six (6) months [by 30th June 2023], by resolution of their Board of Directors or equivalent body. The date of adoption of this Policy must be communicated to the Group Chief Risk & Compliance Officer.

1.3 References

The referring laws and regulations are related to:

- Italian law and, in particular, the provisions of the Italian Criminal and Civil Code, Legislative Decree no. 231/2001 governing the administrative liability of entities for offences (including, for example, corruption) committed by their directors, employees or collaborators, in Italy and abroad, in the interest or to the advantage of the entity;
- the laws in force in the countries in which we operate, including laws ratifying international conventions which prohibit corruption of Public Officials and corruption between private individuals, such as (i) the Organization for Economic Co-operation and

Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions; (ii) the United Nations Convention against Corruption; (iii) the Foreign Corrupt Practices Act issued by the United States; (iv) the UK Bribery Act issued by the United Kingdom; (v) the European Anti-Corruption Conventions; (vi) the Brazilian Clean Company Act and the Brazilian Anti-Corruption Law; (vii) the Sapin II Law issued by France; (viii) the Ley Orgànica issued by Spain; (xi) the Chinese Anti-Corruption Laws; (x) Canadian Corruption Of Foreign Public Officials Act; as subsequently amended and supplemented.

In general, the anti-corruption laws prohibit and sanction payments or other benefit (also offers or promises of a payment or other benefit) made to Public Officials or private individuals - directly or indirectly - for corrupt reasons (to influence any act or decision to assist in obtaining or retaining a business advantage).

In case of violation of anti-corruption laws, we must be aware that significant criminal and administrative sanctions, may be applied to legal entities (pecuniary and disqualification sanctions) and individuals (fines and/or imprisonment). The consequences of which include the risk that the company's reputation may be seriously damaged.

1.4 Definitions, abbreviations and acronyms

BRIBE: money, any item of value or other benefits offered, promised or given to an individual in order to influence his / her judgement or conduct.

BRIBERY: 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.

BUSINESS ASSOCIATE: public or private external party with whom the organization has, or plans to establish, some form of business relationship (e.g. clients, customers, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries, investors, etc.).

All Business Associates are Third Parties, but not all Third Parties are Business Associates.

CHARITABLE DONATIONS: giving or providing of cash, venues, equipment, personnel time or other benefit to a charity or to an individual or organization nominated by or connected with a charity. A donation could be considered to be a bribe if it is given or received with the intention of influencing someone to act improperly, or as a reward for having acted improperly.

CONFLICT OF INTEREST: situation where business, financial, family, political or personal interests could interfere with the judgment of persons in carrying out their duties for the organization.

CORRUPTION: dishonest or fraudulent conduct by those in power, typically involving bribery. So, corruption is any form of abuse of entrusted power for private gain and it may include, but is not limited to, bribery.

DEDALUS: Dedalus Group.

DEDALUS' PERSONS: all individuals worldwide working on behalf of Dedalus at all levels and grades, including directors, senior executives, officers, employees (whether permanent, fixed-term or temporary) and trainees.

DUE DILIGENCE: process to further assess the nature and extent of the corruption risk and help organizations make decisions in relation to specific transactions, projects, activities, Business Associates and personnel.

EXTORTION PAYMENT: is when money is forcibly extracted from personnel by real or perceived threats to health, safety or liberty. The safety and liberty of a person is paramount and many legal

systems do not criminalize the making of a payment by someone who reasonably fears for their or someone else's health, safety or liberty.

FACILITATION PAYMENT: term sometimes given to an illegal or unofficial payment made in return for services that the payer is legally entitled to receive without making such payment. It is normally a relatively minor payment made to a Public Official or person with a certifying function in order to secure or expedite the performance of a routine or necessary action, such as the issuing of a visa, work permit, customs clearance or installation of a telephone. Although facilitation payments are often regarded as different in nature to, for example, a bribe paid to win business, they are illegal in most locations and are treated as bribes for the purpose of this document, and they should be prohibited by the organization's anti-bribery management system.

GIFT: something given voluntarily, without the expectation of anything in return. A gift can be cash, or an asset (e.g. a watch, pen, bottle of alcohol). A gift could be considered to be a bribe if it is given or received with the intention of influencing someone to act improperly, or as a reward for having acted improperly.

GROUP: Dedalus Group.

GROUP CODE OF ETHICS: Dedalus Group Code of Ethics.

HOSPITALITY: hospitality is primarily the provision of meals and refreshments. Hospitality may also include expenses ancillary to business meetings. For example, an organization may wish to pay for a taxi or provide a company car for client personnel to travel to the airport, or to provide accommodation for client personnel that are visiting the organization. Hospitality could be considered to be a bribe if it is given or received with the intention of influencing someone to act improperly, or as a reward for having acted improperly.

POLICY: Group Anti-Corruption Policy.

POLITICAL DONATIONS: giving or providing of cash, venues, equipment, personnel time or other benefit to a political party or to an individual or organization nominated by or connected with a member of a political party. A donation could be considered to be a bribe if it is given or received with the intention of influencing someone to act improperly, or as a reward for having acted improperly.

PUBLIC OFFICIAL: person holding a legislative, administrative or judicial office, whether by appointment, election or succession, or any person exercising a public function, including for a public agency or public enterprise, or any official or agent of a public domestic or international organization, or any candidate for public office.

SOLICITATION: the act of a person asking, ordering or enticing someone else to commit corruption or another crime.

SPONSORSHIP: where the organization gives cash or another benefit to an individual or organization in return for or to assist that individual or organization perform an act (e.g. an individual running a race, or an organization holding a sporting or cultural event or a conference). Sponsorship could be considered to be a bribe if they are given or received with the intention of influencing someone to act improperly, or as a reward for having acted improperly.

THIRD PARTY: public or private person or body that is independent of the organization.

Not all Third Parties are Business Associates, but all Business Associates are Third Parties.

2 POLICY DECLARATION

Dedalus, according to the "zero tolerance" principle, prohibits without exception all forms of corruption, active, passive, direct and indirect, in favor of and by anyone, in favor of the Group or

to the detriment of the same. It is therefore forbidden for Dedalus' Persons, Third Parties and anyone acting in Dedalus' interest, without any exception, to:

- offer, promise, give or pay, authorize someone to give or pay, directly or indirectly, money or other benefits (financial or otherwise) to Public Officials or private persons (**active corruption**);
- accept, or authorize someone to accept, directly or indirectly, money or other benefits (financial or otherwise) or their requests or solicitations by a Public Official or private person (**passive corruption**);

when the intention is to:

- induce a Public Official or private person to perform improperly any function of a public nature or any activity connected with a business or reward them for such improper performance;
- influence any official act (or omission) by a Public Official or any decision in violation of any official duty;
- obtain or secure an improper advantage in the conduct of business;
- in any case, violate applicable laws.

3 RULES OF CONDUCT

We have identified specific sensitive areas within our business processes through which potential corrupt acts could be carried out:

- Relations with Public Officials;
- Relations with Business Associates;
- Gifts, hospitality and other similar benefits;
- Charitable donations, sponsorships and political contributions;
- Human Resource management;
- Facilitation and extortion payments;
- Books and Records;
- Financial transactions.

The minimum rules of conduct and controls applicable to above listed sensitive areas are set out in the following sections.

As a cross general rule, please remember that any situation that may constitute / determine a conflict of interest must be avoided. In any case, these situations must be reported in the manner provided for by the Group Code of Ethics and the appropriate internal regulatory instruments. Third Parties must promptly report any situation of conflict of interest, even potential, with Dedalus.

3.1 Relations with Public Officials

In order to prevent illegal activities related to interactions with Public Officials, Dedalus encourages and supports active cooperation and dialogue with them, with the aim of creating relationships based on the principles of transparency and fairness.

For this reason, we should never:

- agree to Public Officials' requests for bribes;
- submit to any Public Officials' requests for favors imposed as a condition for obtaining business;
- offer, promise, give or pay to Public Officials money or other benefits in order to obtain improper advantages for Dedalus, for Dedalus' Persons or for Third Parties or to induce them to perform (or reward them for performing) their role improperly or to influence their decisions.

Furthermore:

- interactions with Public Officials must be reserved exclusively to the responsible functions and positions;
- traceability of interactions with Public Officials must be ensured;
- if possible, at least two Dedalus' representatives must participate to the meetings with Public Officials.

The general principles and controls set out above apply to all interactions with Public Officials (regardless of the specific case / type).

Finally, any corporate lobbying initiatives (including via Third Parties) must:

- comply with the Group's strategic guidelines and be clearly linked to the pursuit of its business objectives;
- be conducted without giving rise to any suspicion of corruption, conflict of interest or other irregularity, in compliance with applicable laws and the principles set out in the Group Code of Ethics and this Policy. In dealings with Public Officials, transparent and lawful channels of accreditation must be used;
- be adequately traced and traceable ex post. In this respect, the corporate interest represented in an ongoing decision-making process must also be supported via the presentation of proposals, suggestions, studies, research and analyses that highlight the importance and impact of the decision.

3.2 Relations with Business Associates

Dedalus, in the context of its business activity, may have relationships of various kinds with different types of public or private Business Associates.

Such relationships may present corruption risks for Dedalus, as Dedalus could also become involved in potential corruption activities carried out by the same Business Associates. For this reason, we should never:

- do business with Business Associates refusing, without any justifiable reason, anti-corruption clauses or reference to the Group Code of Ethics or to the Anti-Corruption Policy in the contract;
- select Business Associates close to or suggested by Public Officials or any private Third party, or pay them fees not aligned with market conditions or not consistent with services provided, in order to secure improper advantages for Dedalus;
- promise or give to Business Associates or their representatives money or other benefits aimed at obtaining an undue advantage for Dedalus, for Dedalus' Persons or for Third Parties;
- accept / solicit a bribe from a Business Associate;

- carry out transactions designed to create "slush funds" for corrupt purposes.

Dedalus enters into business relationships exclusively with Business Associates that fulfill the Group's principles of correctness, fairness, integrity, loyalty and good faith. For this reason, Business Associates, according to a risk-based approach, are subject to due diligence activities under which the likelihood of their participating in corruption and their compliance with ethical principles are assessed.

Due Diligence allows the verification of the ethical and reputational background of Business Associates and the existence of possible indicators of corruption risks linked to the Third Party and to the transaction (Red Flags)¹. In the case of Red Flags which are relevant in light of the factual circumstances, measures must be taken to mitigate the risks associated with the Business Associates and/or the transaction.

In long-term contracts, the Due Diligence must be periodically updated, following a risk-based approach.

Furthermore, the following control principles have to be applied:

GENERAL

- all transactions with Business Associates must be covered by specific and written contracts / agreements approved in line with Powers of Attorney / Delegations of Authority;
- traceability of interactions with Business Associates must be ensured;
- multiple levels of contracts authorization or internal sign-off must be defined;
- verify if the products / services are properly delivered also in line with contract provisions;
- Business Associates' conduct must be monitored throughout the relationship to ensure full compliance with contractual provisions and this Anti-Corruption Policy;

PROCUREMENT PROCESS

- contracts, where possible and reasonable, must be awarded only after a fair transparent competitive tender process;
- in case of single or sole source supplier, the selection process must be properly documented in order to guarantee its traceability;
- the personnel who approve the placement of a contract must be different from those requesting the placement of the contract and from a different department or function from those who manage the contract or approve work done under the contract;

SALES PROCESS

- a process for setting sales prices and applying discounts must be defined in order to limit the level of discretion of the negotiation;

BUSINESS TRANSACTIONS WITH AGENTS AND INTERMEDIARIES

- assess the need and legitimacy of the services to be provided by the agent / intermediary;
- commission rates must be aligned with both best practices and market conditions; in order to do that specific analysis (e.g. benchmark) must be performed.

¹ Among others, the due diligence process shall identify if Business Associate has any direct or indirect links to Public Officials or any private Third Party with which Dedalus has relations which could lead to corruption.

3.3 Gifts, hospitality and other benefits

Gifts, hospitality and complementary benefits are part of our day-to-day business activities: they can be customary business courtesies. However, gifts, hospitality and similar benefits must never be offered, given or received in circumstances in which an impartial Third Party observer would reasonably conclude that they are intended to create a duty of gratitude or to improperly influence a decision or activity by the recipient in order to obtain an undue advantage (*i.e. not constitute a "quid pro quo"*).

This principle must be strictly observed even when Dedalus' Persons pay gifts or hospitality through the use of personal financial resources.

For this purpose, all gifts, hospitality and similar benefits offered or received must:

- be, according to the circumstances, reasonable in cost, quantity and frequency and in good faith. For this reason, a maximum value for gifts, hospitality and similar benefits which can be offered / received must be defined and a limit on frequency of gifts, hospitality and similar benefits to the same recipient must be imposed;
- be respectable and conform to generally accepted standards of professional courtesy. If gifts need to be given, then as far as possible must be given Dedalus branded gifts of limited re-sale value;
- be carried out in relation to legitimate business purposes and not purely personal ones;
- never be in cash or equivalent (e.g. cheques, gift certificates, vouchers);
- comply with Dedalus' internal rules providing for specific authorization procedures and information flows;
- comply with local laws and regulations applicable to the recipient of the gift / hospitality / similar benefits, including codes of conduct or other legislation that the public or private entity, to which the person belongs, has adopted;
- be recorded accurately and transparently, also from an accounting point of view, and supported by appropriate documentation.

3.4 Charitable donations, sponsorships and political contributions

Dedalus is engaged in different charitable donations and sponsorships. These initiatives are aimed at supporting organizations or individuals in need and/or promoting Dedalus' brand.

Charitable donations, sponsorships and political contributions present corruption risks. For this reason, it is important that such initiatives are:

- consistent with the approved budget and adequately reasoned;
- approved in line with Powers of Attorney / Delegations of Authority;
- carried out after due diligence on the beneficiary / partner, performed according to a risk-based approach;
- governed by a specific written agreement / letter which (i) defines the subject matter and purposes for which the contribution may be used; (ii) provides, where applicable, for controls on the use of the contribution made by Dedalus; and (iii) contains anti-corruption compliance commitments;
- recorded accurately and transparently, also from an accounting point of view, and supported by appropriate documentation.

Contributions to political parties or to any other entity, organization or individual for political purposes are strictly forbidden.

3.5 Human Resource management

The human resource process is an area at risk of corruption, especially concerning selection and recruitment, as well as the management of the reward system.

We should never:

- select employees or recognize benefits / bonuses / career advancements / salary increases as a *quid pro quo* for activities that do not comply with laws and internal rules and regulations;
- pay employees a salary not aligned with market conditions or not consistent with assigned role and responsibilities, in order to ensure advantages of any kind to Dedalus;
- include fictitious employees in the personnel master data to create "slush funds" for corrupt purposes.

The selection and hiring process of Dedalus' People must be carried out to ensure that the resources have the technical / professional and / or leadership skills required by the Group and in such a way as to avoid situations of incompatibility, favoritism or facilitations of any kind.

The following control principles have to be applied:

- any requests for new personnel must be documented in order to guarantee their traceability;
- according to the position's complexity / relevance, the selection process must comprehend several steps (e.g. collection of applications, performing of two or more job interviews, etc.);
- traceability of the job interviews' results must be ensured;
- according to the local applicable laws and the position's complexity / relevance, the personnel selection process must include pre-employment checks on references and previous professional experiences, including verification of the possible presence of:
 - situations of incompatibility envisaged by law;
 - conflicts of interest / privileged relationships;
 - any criminal record and pending criminal proceedings and any civil or administrative sanctions or pending investigations, concerning activities related to the candidate's professional ethics;
- due diligence activities (i.e. background check) on specific categories of personnel in certain positions must be performed in order to ascertain as far as is reasonable that it is appropriate to employ them²;
- ensure that: (i) the definition of economic conditions is consistent with market levels, Group's remuneration policies, the position held by the candidate and the responsibilities / duties assigned; (ii) salary increases, bonuses or promotions are consistent with the Group's remuneration policies;
- the employment contracts must include reference to the Group Code of Ethics and this Policy in order to ensure employees' commitment to anti-corruption;

² The due diligence process must include reasonable steps in order to: (i) verify that the Group is not offering employment to prospective personnel in return for their having, in previous employment, improperly favored the organization; (ii) identify direct or indirect links to Group's relevant Stakeholders or to a relevant Public Official which could lead to corruption.

- employment contracts must be authorized by Dedalus' representatives with specific Powers of Attorney;
- specific assignment criteria must be defined with regard to benefits in relation to the duties and contractual status of employees;
- salary increases must be formally based on a structured and defined process;
- performance bonuses, performance targets and other incentivizing elements of remuneration must be based on Company's bonus scheme, formally defined to prevent them from encouraging corruption.

3.6 Facilitation and extortion payments

Facilitation payments are expressly prohibited even when such payments are permitted or tolerated under local law and jurisdiction. Furthermore, in general, it is not permitted to accept, offer or promise, under any circumstances, financial advantages or other benefits to expedite, favor or facilitate the performance of an activity in an improper manner.

During business activities, Dedalus' Persons may be forced to pay money to public or private Third Parties, by means of violence or serious and imminent threats to their physical safety and personal security (so-called extortion payments). Such payments, which are permitted only for the purpose of avoiding personal injury, are the only exception and they must be:

- promptly identified and properly documented;
- duly recorded in the accounts;
- where appropriate or where required by law, reported to the competent authorities.

3.7 Books and Records

Some of the main global corruption and bribery scenarios have been found related to inaccurate record-keeping. The anti-corruption laws, indeed, require companies to establish and maintain books, records and accounts which, in reasonable detail, accurately and correctly reflect expenses (even if not significant from an accounting point of view), acquisitions and disposals of assets. Even inaccuracies in the reporting of non-corrupt payments constitute violations.

Every Group transaction or operation must be properly entered in the Group's accounting system, in accordance with the applicable laws and accounting standards. In fact, inaccurate record-keeping or off-the-books transactions are not permissible in any circumstance.

For the accounts to be truthful, complete and transparent, the following control principles have to be applied:

- the entries must be properly documented with supporting evidence (especially manual entries), so as to make it possible to: (i) enter the amounts in the books accurately; (ii) determine at once the characteristics and the reason for the transaction; (iii) easily trace back the transaction; (iv) check the decision-making, authorization and implementation process, as well as the identification of the various levels of responsibility;
- a segregation of duties model must be in place; the access to the accounting system must be restricted to appropriate personnel according to their role / duties;
- accounting reconciliations must be periodically performed and properly documented;
- the most significant accounting estimates, made on the basis of assumptions and subjective opinions, must be subject to a formal approval process, according to existing Powers of Attorney / Delegations of Authority.

In line with the above, all employees are required to cooperate - in keeping with their individual responsibilities - so that every Group transaction is recorded in a proper and timely manner.

Each accounting entry must reflect exactly what appears on the supporting documentation. Therefore, it shall be the duty of each employee to ensure that the supporting documentation is easily retrievable and ordered.

3.8 Financial transactions

Financial transactions can be designed to create "slush funds" for corrupt purposes or to facilitate bribery scenarios.

For this reason, the following requirements have to be applied:

- a segregation of duties model must be in place (the same person cannot both initiate and approve a payment) and appropriate tiered levels of authority must be implemented for payment approval (so that larger transactions require more senior management approval);
- payments made and received must be in line with contractual requirements and appropriate supporting documentation;
- in any event, without prejudice to further control measures provided for by policies and procedures in place concerning the selection of counterparties and the making of payments, such payments may not normally be requested, made or received:
 - to / from a party other than the contractual counterparty or the party contractually intended as the recipients of the payment / party making the payment;
 - to / from numbered bank accounts or in cash or similar instruments, through anonymous or fictitiously registered current or savings accounts;
 - to a bank account not formally communicated by the Third Party;
- ensure that payments are made to a payee in the same location in which the payee resides and/or carries on business, unless there are good legitimate reasons for payment to another jurisdiction.

With reference to petty cash, it by its nature, can easily be a mechanism for making corrupt payments and as such all:

- use of cash must be restricted to specific hypothesis / cases;
- payments in cash must be subject to a formal approval process, according to existing Powers of Attorney / Delegations of Authority;
- traceability of payments in cash and their business purposes must be ensured;
- transactions must be supported by appropriate evidences (e.g. invoices, receipts, etc.);
- petty cash funds must be reconciled on periodic basis.

4 IMPLEMENTATION OF ANTI-CORRUPTION POLICY

4.1 Group Risk & Compliance

Dedalus S.p.A. has established the Group Risk & Compliance Function, providing it with suitable status, authority and independence. This Function is chaired by the Group Chief Risk & Compliance Officer.

The Group Chief Risk & Compliance Officer is responsible and has the authority for:

- supervising the design and implementation of the Anti-Corruption Compliance Program, also ensuring that the Anti-Corruption Policy is effectively designed and updated;
- providing specialist anti-corruption advice and guidance to personnel;
- reporting, on a regular basis, on the relevant activities within the scope of the Anti-Corruption Compliance Program in the manner indicated in the following section 4.5.

In order to carry out the activities envisaged in the Anti-Corruption Compliance Program, the Group Chief Risk & Compliance Officer can rely on the cooperation of local Functions in charge.

4.2 Monitoring of regulatory and compliance requirements

The Group Risk and Compliance Officer, supported by local Functions in charge and line Management, is in charge of monitoring applicable anti-corruption requirements.

This phase is essential to have a clear framework of applicable anti-corruption laws so that both Dedalus' activities and its Anti-Corruption Compliance Program:

- are compliant with applicable local laws, rules and regulations;
- meet or exceed local industry standards.

In case of changes in local legislation, market environment or industry trends, new requirements must be communicated to the Group Risk & Compliance Function and the infrastructure of the Anti-Corruption Compliance Program, which includes the Anti-Corruption Policy, will be reviewed to evaluate its compliance and effectiveness.

In case of misalignments arising from gap analyses performed periodically, corrective actions will be adopted.

It is important that the Anti-Corruption Policy is compliant with external requirements or best practices, and also consistent with the Group policies and procedures.

4.3 Risk Assessment

Dedalus shall undertake regular anti-corruption risk assessment(s), which shall:

- identify the corruption risks Dedalus might reasonably anticipate³;
- analyze, assess and prioritize the identified corruption risks;
- evaluate the suitability and effectiveness of the Dedalus' existing controls to mitigate the assessed corruption risks.

The anti-corruption risk assessment shall be reviewed:

- on a regular basis so that changes and new information can be properly assessed;
- in the event of a significant change to the structure or activities of the organization.

³ The corruption risks must be identified given the following factors:

- its size, structure and delegated decision-making authority;
- the locations and sectors in which it operates or anticipates operating;
- the nature, scale and complexity of its activities and operations;
- its business model;
- the entities over which it has control and entities which exercise control over it;
- its Business Associates;
- the nature and extent of interactions with Public Officials;
- applicable statutory, regulatory, contractual and professional obligations and duties.

Risk Assessment activities must be coordinated by the Group Chief Risk & Compliance Officer, who shall liaise with the local Functions in charge and make use of external specialist consultants, where necessary or appropriate.

4.4 Training, Education & Awareness

Dedalus encourages Dedalus' Persons to be informed about the applicable anti-corruption laws and the importance of compliance with such laws and with this Policy. In accordance with this purpose, Dedalus provides necessary dedicated trainings and periodic updates on anti-corruption topic.

These training activities are mandatory for all Dedalus' Persons. Participation in training and periodic updates constitute for Dedalus' Persons the correct fulfilment of their labor contractual obligation. Training program will be released periodically and in accordance with the role and risks to which people are exposed.

Training sessions might also be provided to Third Parties.

Critical areas of risk exposure might need a specific focus: in such case ad hoc material shall be developed.

In addition, on-going diffusion of anti-corruption materials for raising awareness shall be provided through all available communication channels.

The anti-corruption training program will be annually performed within the Compliance Training Program defined by the Group Risk & Compliance Function and the Human Resources Department. It should include duration, target audience and learning certification requirements.

4.5 Reporting violations

Reporting of actual or suspected breaches of the Anti-Corruption Policy or any other related misconduct, must be promptly reported throughout channels made available in accordance with Dedalus' Whistleblowing Policy.

Dedalus encourages and enables all the employees to reporting attempted, suspected and actual violations, ensuring that Dedalus' Persons who reported the violation shall not be dismissed, demoted, suspended, threatened, harassed or discriminated against in any way in their treatment at work, for the fact that they have lawfully made a report in good faith.

4.6 Compliance Audit and Investigation

Periodically compliance audits with specific reference to anti-corruption are conducted by the Group Internal Audit function, in order to verify whether measures to prevent corruption risks are adequately designed and work effectively.

Moreover, in the event of any act of corruption or breach of the Anti-Corruption Policy or the anti-corruption rules and regulations, as reported, detected or reasonably alleged, ad hoc internal inquiries or investigations shall be carried out.

When necessary or appropriate, specialized Third Parties may be entrusted, via specific mandates, to support the Group Internal Audit in such investigations.

4.7 Top management reporting

Each local Function in charge shall report, according to the deadlines periodically communicated, the results of relevant activities within the scope of the Anti-Corruption Compliance Program to the Group Chief Risk & Compliance Officer.

The Group Chief Risk & Compliance Officer shall report on annual basis to the governing body and the top management the overall results of relevant activities within the scope of the Anti-Corruption Compliance Program, including proposed action plans.

A complete overview of the Dedalus' anti-corruption initiatives and results is necessary to understand Dedalus' achievements and potential weaknesses which may need to be resolved.

4.8 Disciplinary measures

Dedalus' Persons are all required to comply with the provisions contained in this Policy, all the time and everywhere.

When a violation or a potential violation is detected, the Group Risk & Compliance Function, in cooperation with the Human Resources Department, the Group Legal Counsel and the Supervisory Body (if any), will carry out an initial examination and adopt all the initiatives deemed necessary to ensure the validity of the same, always in compliance with the provisions on the protection of personal data, company regulations and the rules set up to protect the employee from time to time in force.

If the violation is confirmed, the Human Resources Department, supported by the Group Legal Counsel and the Group Risk & Compliance Function, will take prompt measures to mitigate the violation and to sanction the misconduct, consistent with local labour laws and Group applicable policies and procedures.

Dedalus will make every reasonable effort to apply contractual remedies, including but not limited to contract termination and claim for damages, against Third Parties whose actions are found to be in violation of anti-corruption laws and/or the anti-corruption compliance commitments envisaged in the relevant contracts.

4.9 Monitoring and improvements

Dedalus implements compliance monitoring activities aimed at periodically detecting and analyzing the trend of anti-corruption compliance risks by performing specific checks and analyzing risk indicators aimed at ensuring adherence to regulatory requirements and the effectiveness of the models used to monitor them. The compliance monitoring activities in the areas of anti-corruption are planned and carried out according to a risk-based approach.

Dedalus is committed to working towards continuous improvement of its activities and the results thereof, about the sustainability, adequacy and effectiveness of the Anti-Corruption Compliance Program.

The Group Chief Risk & Compliance Officer must periodically review this Policy to ensure that it remains effective to the highest degree, as well as that it reflects the latest legislative changes and any feedback raised by the internal and external stakeholders.

4.10 Guidance For Employees

For any questions or concerns, please refer to the Group Risk & Compliance Function who will provide the necessary support.

5 DOCUMENT REVISION HISTORY

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5.4 Document Revision History

Version #	Date	Author	Main Change description (incl. section)
Draft v1	22/12/2022	V. Paduano	Draft submitted for approval by the Board of Directors of Dedalus S.p.A.