



ENTAKSI SOLUTIONS

CERTIFIED MANAGEMENT SYSTEM

ISO 9001 | ISO 20000-1 | ISO 22301 | ISO 37001

ISO 27001 | ISO 27017 | ISO 27018 | ISO 27035

QUALIFIED TRUST SERVICES

ETSI 319 401 | ETSI 319 411-1 and 2 | ETSI 319 421 | ETSI 119 511

ELECTRONIC SIGNATURES AND SEALS - TIME STAMPS

LONG-TERM PRESERVATION

Manuale

MAN IMS 20220729 Anti-Bribery Policy

Entaksi Solutions SpA

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Date	Employee	Role	Signature
15/05/2023	Alessandro Geri	Sole Manager	<i>Digitally signed</i>

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1. Introduction

Entaksi Solutions SpA designs, develops, markets and supports software products and services used in various application contexts. The Company is committed to a continuous process of technical, organizational and infrastructural improvement to guarantee to its Customers and Partners the possession of the requirements at the highest level in terms of quality, security, reliability, transparency and correctness in the delivery of services and products.

One of the fundamental factors to protect Company's reputation is the ability to conduct its business with loyalty, fairness, transparency, honesty and integrity, in compliance with laws, regulations, similar mandatory requirements, international standards and guidelines that apply to the Company's business. This Anti-Bribery Compliance Standard is adopted for the purpose of providing a framework of the Anti-Bribery Regulations that the Company and its employees and/or collaborators are obliged to comply with.

In the national and international market in which the Company operates, bribery is a widespread phenomenon. It poses serious social, ethical, economic and political problems, puts good administration at risk, hinders development and others from competition. It undermines justice, undermines human rights and weakens the fight against poverty. It also increases the cost of economic activities, introduces elements of uncertainty in commercial transactions, increases the cost of goods and services, lowers the quality of products and services, which can lead to the loss of life and property, destroys trust in institutions and interferes with the fair and efficient functioning of markets.

For all these reasons, Entaksi has decided to concretely demonstrate its commitment to preventing and respond to bribery through the design, adoption and certification of an Anti-Bribery Management System in compliance with the international standard specification UNI ISO 37001:2016.

1.1. Scope of the document

This document describes the policy adopted by Entaksi Solutions SpA to prevent and respond to bribery.

This policy aims to clarify the commitment of Entaksi in the application of UNI ISO 37001:2016 "Anti-bribery Management Systems" standard to its organization, and how its implementation within the Integrated Management System has the goal of preventing, detecting and addressing bribery in relation to the organization activities by implementing appropriate measures to the detected risk of bribery.

With the adoption and publication of this policy, Entaksi Solutions SpA is committed to preventing and fighting any phenomenon of bribery, defined as "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".

The company also intends to expand the case studies within which the phenomenon of bribery can be found, as described in the Italian Criminal and Civil Codes, extending it to include, from the point of view of internal procedures, all those actions that, by engaging in unlawful conduct, are intended to obtain an advantage which would not otherwise be due or obtainable in the course of the normal business activity of the company.

Organization has therefore adopted an Anti-Bribery Management System in compliance with the UNI ISO 37001:2016 standard, which through the controls derived from it is able to maintain the adaptation of the Integrated Management System to the mandatory anti-bribery legislation.

This policy sets out the principles, objectives, practices and controls implemented by Entaksi for the maintenance of the Anti-Bribery Management System.

1.2. Application area

This policy applies to all interested parties mentioned in the [Context and stakeholders](#) chapter.

The document is public, and the principles contained in it concern aspects that Entaksi intends to communicate transparently with regard to anti-bribery management.

1.3. Definitions and reference documentation

This policy refers to the principles and definitions expressed in the UNI ISO 37001:2016 standard.

It also complies with Italian legislation on the Anti-bribery policy, and in particular:

Codice Penale, artt. 318, 319, 319-bis, 319-ter, 319-quater, 322.

Libro Secondo Dei delitti. In particolare, Titolo II Dei delitti contro la pubblica amministrazione, Capo I Dei delitti dei pubblici ufficiali contro la pubblica amministrazione.

Codice Civile, artt. 2635, 2635-bis, 2635-ter.

Libro Quinto del lavoro, Titolo XI Disposizioni penali in materia di società e di consorzi, Capo IV Degli altri illeciti, delle circostanze attenuanti e delle misure di sicurezza patrimoniali.

D. Lgs. 30 marzo 2001, n. 165

Norme generali sull'ordinamento del lavoro alle dipendenze delle amministrazioni pubbliche.

Decreto Legislativo 8 giugno 2001, n. 231

Disciplina della responsabilità amministrativa delle persone giuridiche, delle società e delle associazioni anche prive di personalità giuridica, a norma dell'articolo 11 della legge 29 settembre 2000, n. 300.

Convenzione delle Nazioni Unite contro la corruzione

adottata dall'Assemblea generale il 31 ottobre 2003 e aperta alla firma a Merida dal 9 all'11 dicembre dello stesso anno, entrata in vigore il 14 dicembre 2005.

Legge 6 novembre 2012, n. 190

Disposizioni per la prevenzione e la repressione della corruzione e dell'illegalità nella Pubblica Amministrazione.

Direttiva (UE) 2019/1937 del Parlamento Europeo e del Consiglio

del 23 ottobre 2019, riguardante la protezione delle persone che segnalano violazioni del diritto dell'Unione.

Decreto Legislativo n. 24 del 10 marzo 2023

Attuazione della Direttiva UE 2019/1937.

Convenzione dell'Organizzazione per la cooperazione e lo sviluppo economico

Lotta alla corruzione di pubblici ufficiali stranieri nelle operazioni economiche internazionali.

Circolare Accredia DC2017SSV335 del 20 novembre 2017

Circolare Tecnica N° 28/2017 - Dipartimento Certificazione e Ispezione Informativa in merito all'accreditamento per lo schema di certificazione UNI ISO 37001:2016 Prevenzione della corruzione.

2. Context and stakeholders

The Management has determined the external and internal elements relevant for its purposes and that influence its ability to achieve the goals of its Anti-Bribery Management System. This analysis considered:

- the nature of the company, its scope and links with other interested parties;
- the places, sectors and areas in which Entaksi operates;
- the processes, activities and operations carried out and their planning;
- the business model;
- business partners and their relationship with Entaksi;
- legal, regulatory, contractual and professional obligations applied.

The Sistema di Gestione della Prevenzione della Corruzione applies to the processes managed by Entaksi for the performance of its activities and includes all interested parties with whom the Company comes into contact for the performance of the above-mentioned activities: public officials, inspectors, auditors and others belonging to inspection bodies, partners, employees, collaborators, customers, suppliers, prospects, consultants, in existence or potential.

Each employee, regardless of the sector to which he belongs and the organization, is responsible for achieving adequate levels of prevention and management of bribery phenomena.

The Company is strongly committed to integrating the Anti-Bribery Management System into daily business management and to disseminating this Policy document to all staff, to anyone interacting with the Company in any way and to anyone who requests it in order to make employees and collaborators aware and to inform all interested parties of the commitment towards the prevention and management of the risk of bribery.

3. Anti-Bribery Policy

For its Anti-Bribery Management System Entaksi has developed and adopted the following policy, deemed appropriate to the purposes of the Company:

- a. bribery is prohibited;
- b. it is prohibited to request and accept gifts, hospitality, offer of money, donations, gifts of use or similar benefits;
- c. is required compliance with laws, regulations and internal provisions adopted for preventing and combating bribery and for prohibition of pantouflage applicable to the Company;
- d. the objectives for the Anti-Bribery Management System are established and reviewed annually;
- e. the Company undertakes to meet the requirements of the Anti-Bribery Management System;
- f. the Company encourages to reporting, even anonymously, of alleged and actual acts of bribery, and of any violation or deficiency inherent in the management system of bribery's prevention, to the Compliance Function or to the staff in charge, without fear of retaliation;
- g. the Company is committed to the continuous improvement of the Sistema di Gestione della Prevenzione della Corruzione;
- h. the Company undertakes to establish a Anti-Bribery Compliance Function (ABCF) for the bribery's prevention, ensuring its authority, independence and sufficient powers;
- i. the Company has established and formalized in its internal rules the sanctions resulting from non-compliance with the Anti-bribery Policy, in compliance with the CCNL applied.

To ensure transparency and effectiveness towards all stakeholders, this Anti-Bribery Policy:

- a. is managed and distributed as documented information;
- b. it shall be communicated in due form within and outside the organization, in accordance with the arrangements and time limits laid down in the relevant operational procedure;
- c. is made available to interested parties on the Company's institutional website.

4. General objectives

The general objectives that the Company aims to achieve are:

- adopt, conduct and continuously improve the Anti-Bribery Management System keeping it compliant with UNI ISO 37001:2016, in order to operate in accordance with the applicable legislation and regulations; ensure proper and continuous training and information to all staff, involving them in the process of continuous improvement of the Anti-Bribery Management System;
- ensure the proper management of any nonconformities detected during the implementation of the Anti-Bribery Management System, including those related to non-compliance with the policy adopted.

The strategic and tactical objectives defined for each individual period are formalized respectively in the documents "PN SIG aaaammgg Pianificazione strategica aaaa-aaaa" and "PN SIG aaaammgg Obiettivi aaaa".

5. Specific commitment from the Management

The Management, i.e. the Top Management, is the function that guides the entire organization and which with this document assumes responsibility for the effectiveness of the Anti-Bribery Management System.

The Management of Entaksi Solutions SpA considers the prevention of bribery a cornerstone of its organization and promotes commitment to the fight against bribery and the dissemination of ethical principles and values at all levels of the organization.

According to the ethical principles of Entaksi, the commitments defined by the Management, the values the general strategy of the organization for the prevention of bribery, are aimed both inside and outside the company and are based on the following principles:

- **Awareness:** we must be aware of our responsibilities and those of those who work for the Company, and maintain an irreproachable attitude towards bribery.
- **Information:** we must provide information and assistance to those who work for the Company on how to recognize and manage aspects and behaviors attributable to bribery.
- **Transparency:** we must ensure that all actions, operations, transactions and, in general, behaviors held and followed by employees and collaborators of the Company are characterized by maximum correctness, transparency and objectivity, in order to prevent any risk related to bribery.

The Management has committed to integrating the requirements of Anti-Bribery Management System into its business processes in order to manage the pursuit of business objectives in a non-separate manner from the pursuit of anti-bribery objectives.

The commitments of the Management also concern the financial, technical and human resources to implement a business management system that functions in line with the requirements of compliance with applicable laws and anti-bribery regulations.

The Management undertakes to encourage and actively involve people in the functioning of the system and to communicate in all locations its commitment to compliance with the anti-bribery system adopted by the Company.

6. Anti-Bribery Compliance Function (ABCF)

To achieve the objectives set, the Company has appointed a Anti-Bribery Compliance Function (ABCF), providing it with an organizational framework and adequate financial instruments to ensure its authority, independence and operational autonomy. The Compliance Function is assigned the tasks, responsibilities and powers detailed in the document "MAN SIG 20200421 Funzionigramma" and briefly and not exhaustively summarized below:

- supervising the design and the implementation by the organization of the management system for the prevention of bribery;
- providing training, advice and guidance to staff on the Anti-Bribery Management System and bribery issues;
- ensuring that the Anti-Bribery Management System complies with the requirements of the UNI ISO 37001:2016 standard.
- reporting on the performance of the Anti-Bribery Management System to the Management and other functions, as specified by Company procedures;
- being the recipient of reports made by employees regarding any violations;
- leading control audits;
- continuously evaluating whether the Anti-Bribery Management System:
 - is adequate to effectively manage the corruption risks to which the organization is exposed;
 - is effectively implemented.

The Compliance Function is established through a formal appointment.

Concurrently with the appointment or at the beginning of each year, the Management identifies and allocates a specific annual budget, which is sized according to the state of the Anti-Bribery Management System and the objectives set by the Company.

The Compliance Function can be reached for reports of actual or suspected corruption at the email address anticorruzione@entaksi.eu.

7. Sistema di Gestione della Prevenzione della Corruzione Policy Update

Reviewing and updating of this Policy document are carried out by Management at least once a year, in conjunction with the external audits for the recertification of the subsystems that make up the Integrated Management System, of which the Anti-Bribery Management System is an integral part.

8. Noncompliance consequences

Any violation of the criminal code or other specific regulations will be persecuted in any case. Plus, all individuals who commit violations of this Policy will be subject to the application of a specific disciplinary procedure to be carried out in compliance with and according to the provisions of the applicable Italian law regulation ("Contratto Collettivo Nazionale di Lavoro (CCNL)", Legge 300/70) and the internal regulations.

The sanctions will be imposed by Direzione.