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## POLICY TO PREVENT CORRUPTION

Next Turbo Technologies S.p.A. is fully aware that corruption is a serious obstacle for economic, political and social development of a Country and a strong distortion of the rules, correctness and transparency of the markets, with particular reference to public works. In this direction, Next Turbo Technologies forbids corruption and is extremely vigil to ensure actions and conduct based exclusively on criteria of transparency, correctness and moral integrity, that prevent any attempt of corruption.

In the application of this commitment, the Top Management has decided that the Organisation Prevention Policy is based on the following:

- Absolute and full observance of the laws in force to prevent and impede corruption, in Italy and in any Country where the Organisation operates, with involvement of the employees, any type of assistants and all the persons who operate for and/or under the control of the organisation;
- Strict prohibition to implement a conduct that could be configured as corruption or attempt of corruption ;
- Identification, in the environment of the activities performed by the organisation, of the areas of potential risk and identification and actuation of the appropriate actions to reduce/minimise these risks;
- Availability of a clear reference framework to identify, review and attain the targets to prevent corruption ;
- Commitment to program and actuate these personal policies and actions in a manner to avoid involvement in any way in matters in hand or corruptive attempts and not risk involvement in situations of an illegal nature with public or private subjects;
- Full commitment to observe all the requirements of the management system to prevent corruption ;
- Awareness campaign with business associates so that in their specific activities, they apply policies and actions to prevent any forms of corruption , observing the provisions of the law and in consistency with the targets of the organisation ;
- Awareness and training of the employees regarding the matter of protection against corruption;
- Provision of modes to signal suspects in good faith or based on a rational conviction, with no fear of retaliatory measures;
- Follow-up of any behaviour not in conformity with the prevention of corruption policy with application of the organisation disciplinary system and renounces any business or activity that presents risks of corruption;;
- Presence of a conformity officer for the prevention of corruption, ensured full authority and independence;
- Pledge to continually improve the corruption prevention activities .

The Top Management deems that the most suitable company strategy for the attainment of this Anticorruption Policy consists in the implementation of the Management system for the prevention of corruption in conformity with standard UNI ISO 37001: 2016.

04/03/2024

The Company Management