T.E.A.TEK S.p.A., in the person of its President and Legal Representative, considers the prevention of corruption to be a cornerstone of its organisation and promotes a commitment to the fight against corruption, as well as compliance with the principles laid down in the Code of Ethics in accordance with the mandatory requirements set out in Italian Legislative Decree 231/01 'Administrative responsibility of companies and bodies".
For this reason, it undertakes to:

- comply with all the requirements of the UNI ISO 37001 standard;
- prohibit all forms of bribery by adopting a zero-tolerance approach to them; and
- comply with national laws, other laws and requirements in force on anti-bribery;
- implement and keep up-to-date the Anti-Bribery Management System, in a manner appropriate to the organisation's purposes, in order to ensure continuous performance improvement;
- provide a framework for establishing, reviewing and achieving anti-bribery objectives;
- explain the consequences of non-compliance with the Anti-Bribery Policy;
- make this Policy public and accessible to all levels of the company through publication on the website and/or direct dissemination by e-mail;
- encourage the reporting of suspicions, in good faith or on the basis of a reasonable and confidential belief, without fear of retaliation;
- adapt this Policy to regulatory developments in the sector;
- share the commitments expressed in this Policy with all stakeholders (employees, collaborators, business associates, partners, suppliers, etc..).

1. LINES OF CONDUCT AND SANCTIONS

The principles and values defined in T.E.A. Tek S.p.A.'s Code of Ethics and Corporate Policy are embodied in the following lines of conduct, which must be applied by all employees and collaborators and must be known by all stakeholders:

- bribery in any form or manner is prohibited;
- it is forbidden to offer, promise, authorise any form of benefit, including free gifts, presents, hospitality, which may induce the receipt of a commercial advantage or where conduct of this kind may be perceived as a desire to influence a negotiation;
- it is forbidden to accept or request any form of benefit, including gifts, presents, hospitality as long as they are not of a modest entity;
- it is prohibited to pay political contributions or accept any form of benefit from public officials;
- in the case of extortion payments, reporting to the Anti-Bribery function is required;
- it is prohibited to accept hospitality from a third party in excessively expensive places or situations;
- it is always necessary to avoid situations where the persons involved are, or may even only appear to be, in conflict of interest with T.E.A. Tek S.p.A;
- it is forbidden to take any action that could be considered as a violation of this policy.

Any conduct in breach of this policy, as well as of the requirements set out in the Anti-Bribery Management System, will be sanctioned.
The application of these sanctions is irrespective of the outcome of any criminal proceedings, since the rules of conduct imposed by the Management System are assumed by T.E.A. Tek S.p.A. in full autonomy and independence.

Sanctions for employees
The infringement committed by T.E.A. Tek S.p.A. employees is defined as a 'disciplinary offence' and, as such, is liable to sanctions.
The sanctions that may be imposed on these employees fall within those provided for by the Italian Collective Bargaining Agreement (CCNL), any special applicable regulations and the Disciplinary System, annexed to the 231 Organisation, Management and Control Model adopted by the company.
In particular, T.E.A. Tek S.p.A. will apply disciplinary sanctions in compliance with the Criteria of correlation between workers' misconduct and disciplinary measures contained in the applicable Italian Collective Bargaining Agreements.
The type and extent of each sanction shall be applied in relation to:

a) the intentionality of the conduct or degree of negligence, imprudence, or inexperience with regard also to the predictability of the event;
b) the overall conduct of the employee, with particular regard to the existence or non-existence of disciplinary precedents of the same, within the limits allowed by law
c) the employee's tasks;
d) the relevance of the obligations violated
e) the functional position of the persons involved in the facts constituting the misconduct;
f) the other particular circumstances accompanying the breach.

Disciplinary measures are ordered by the employer who, after careful consideration of the above factors, sends the addressee a copy of the disciplinary measure or notice by registered letter with return receipt or Certified E-Mail address or by direct delivery with collection of a signature for acknowledgement of receipt..
In the event of a breach by Managers of the requirements prescribed by the Anti-Bribery Management System, the most appropriate measures will be applied against those responsible, in accordance with the provisions of the Italian Collective Bargaining Agreement for Industrial Managers.

Sanctions for CEOs
In the event of any violation of the requirements of the Anti-Bribery Management System by the CEOs, the Anti-Bribery function shall promptly inform the Board of Directors, who shall proceed to convene the Assembly to deliberate on the adoption of the appropriate initiatives provided for by the legislation and the Disciplinary System and, if necessary, the revocation of the mandate.
If this is not possible as determined above, an arbitration board will be appointed consisting of three members: one appointed by the party concerned, one appointed by the Board of Directors and the chairman appointed by the court of jurisdiction.

Measures against business associate
Any conduct by business associates that is contrary to the lines of conduct indicated by the Anti-Bribery Management System may result, through the activation of appropriate clauses, in the termination of the contractual relationship. The Anti-Bribery function ensures that such specific contractual clauses are drafted, updated and included in the letters of appointment or partnership agreements.

2. REPORTS

T.E.A. Tek S.p.A. has assigned an Anti-Bribery function within its organisation and guarantees his authority and independence. Anyone may report any doubts or suspicions in relation to corrupt acts in one of the following ways:
by e-mail: anticorruzione.teatek@gmail.com;
by post to the address:
T.E.A. Tek S.p.A.
Via Maddaloni snc Consorzio Area 80011 Acerra (NA)
specifying
To the attention of Anti-Bribery function / RESERVED.

With regard to reports received in the above-mentioned manner, the identity of the reporter will only be known by the Anti-Bribery function, which will guarantee its confidentiality; the protection and confidentiality of the reporter's data is also guaranteed, and no form of retaliation or discriminatory measures, whether direct or indirect, are allowed or tolerated against the reporter.

Anonymous reports will also be considered if they are well-substantiated, detailed, and capable of highlighting facts related to specific contexts, given that it is not possible to request further information. However, in such cases, the report may only be submitted using the methods described in the PR21 Reporting Procedure available on the website: https://www.teatekgroup.it/whistleblowing/

3. TRAINING, INFORMATION AND COMMUNICATION

T.E.A. Tek S.p.A. guarantees an ongoing training process on bribery prevention issues. The Anti-Bribery Policy is posted on the notice board and published on the website https://www.teatekgroup.it/, and specific clauses are included in contracts with business associates.

Acerra, NA, Italy
30 June 2025

The Chairman of the Board of Directors of T.E.A.TEK

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