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ANTICORRUPTION POLICY

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The ISS Palumbo Anti-Corruption Policy is founded on compliance with applicable regulations and the complete satisfaction of all stakeholders, with a focus on continuous improvement and the full involvement of all individuals engaged in our processes.

The objectives, set to capture opportunities identified by the System, are as follows:

- Ensure continuous compliance with international and national regulatory requirements;
- Optimize processes to achieve, through continuous improvement, the highest level of efficiency and effectiveness, with a Risk-Based Thinking approach;
- Develop the company's capability to respond to and anticipate the needs and expectations of all stakeholders by monitoring their satisfaction levels and initiating measures for their information and involvement;
- Act with the utmost transparency;
- Fulfill customer requirements and applicable mandatory standards, communicating them across the entire organization;

Customer focus, in line with contractual requirements and specific needs and expectations, includes:

- ❖ Professionalism of the resources involved;
- ❖ Adequate technical and legislative knowledge;
- ❖ Ease and speed of communication;
- ❖ Willingness to engage in problem-solving discussions

Aware of operating in a highly complex environment, the Company has implemented its Management System in accordance with UNI EN ISO 37001:2016 and is committed to strict adherence to ethical conduct.

The Company considers the unconditional sharing and full, genuine commitment to these values by all its employees and business partners to be indispensable.

Management supports the Anti-Corruption Policy, as formulated, to achieve and improve the stated objectives.

Through ongoing dialogue with employees and all stakeholders, Management commits to periodically reviewing the relevance and adequacy of this document to keep it aligned with the company's spirit and goals.

Date 11.11.2024



ISS Palumbo
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Vice President