



Alkemy S.p.A.
Anti-Corruption Policy

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1. PURPOSE

Alkemy S.p.A. (hereinafter also the "Company" or "Alkemy") is an international public company and the parent company of the Alkemy Group (hereinafter also the "Group" or "Alkemy Group"), that operates in Italy, Spain, Mexico, USA and the Balkans through its 11 offices located in Milan, Turin, Rome, Naples, Potenza, Cagliari, Rende, Madrid, Belgrade, Mexico City and New York. Across all of its geographies, the Group applies high ethical standards that takes a zero-tolerance approach to any form of bribery and corruption.

Alkemy Group defines corruption as any form of direct or indirect abuse of one's power or privileged position to obtain improper advantages for oneself or others. This includes offering, promising, requesting or receiving payments or benefits with the objective of obtaining or maintaining an unfair business advantage. Instruments of corruption can include money, other financial benefits, trading practices or any other benefit that can result in improper influence.

Enacting the values stated in its Code of Ethics, Alkemy has developed this Anti-Corruption Policy (hereinafter also the "Policy") aimed at defining guidelines to reject and avoid any form of potential and actual corruption practices within the Group.

Alkemy Group is aware of its social responsibility to prevent the risk of misconduct in areas vulnerable to corruption and bribery. Because of this, the Group commits to conducting its business practices with integrity, honesty, and transparency.

Alkemy believes that ethical business practices are critical to its long-term success. With the guidance of the Supervisory Board the Company keeps up on its mission to stand against corruption and adopt responsible business practices.

2. RECIPIENTS AND SCOPE OF APPLICATION

This Policy applies to Alkemy Group and to employees, corporate boards, collaborators, job applicants, contractors and suppliers, and all persons who maintain relations with the Group and the provisions and commitments are fully supported by the Group's top management.

All the players along the Group's supply chain are encouraged to adopt and comply with the principles stated in the present Policy. The monitoring of suppliers and contractors' adherence to these principles (and other sustainability principles) is defined within the Supplier Code of Conduct.

3. RELEVANT REGULATION

The Alkemy Group is subject to all applicable anti-corruption and anti-bribery regulations in force in the jurisdictions in which it operates. In particular, Alkemy adopts and refers to the Legislative Decree 231/2001, the Italian Criminal Code, and the Italian Civil Code.

All principles deployed in the present document are in compliance with the principles set out by the Council of Europe's Criminal Law on Corruption No. 173 (1999) and the Council of Europe's Civil Convention No. 174 (1999).

4. AREAS OF APPLICATION

Contributions to political parties or public authorities:

Offering financial or other support to political parties, politicians, political campaigns, public administration, and public officials can be perceived as an unethical attempt to gain unfair business advantage. Alkemy Group therefore prohibits establishing direct or indirect relationships of favor with these authorities, offering them cash or goods, or granting them economic advantages or benefits.

Relationships with political parties and public authorities must be carried out by parties specifically appointed by the Group to fulfil this role. All exchanges must be documented with detailed and exhaustive reports, that must be then properly filed and stored.

Travel and lodging expenses:

Alkemy and all of its subsidiaries prohibit the improper use of travel and lodging expenses funds or reimbursements. All funds received for these purposes should be used for their intended purposes only.

Alkemy and its subsidiaries will grant the payment of business travel and lodging expenses if the following criteria are met:

- They are for legitimate business purposes and activities.
- They are reasonable.
- They are mandatory or necessary.
- They are not intended for third parties.
- They do not include side trips or activities.

Gifts and hospitality:

Alkemy at group level prohibits gifts, payments, favors, hospitality offered or received directly or indirectly, as they can be given with the intention of obtaining unfair business advantage.

Within the group there are exceptionally allowed gifts offered or received, if they meet the following criteria:

- They are modest in value.
- They are symbolic in character.
- They are given or received in good faith.
- They conform to commercial and professional courtesy standards.

Alkemy and its subsidiaries always prohibit gifts given or offered if they meet the following criteria:

- They are in cash.
- They are illegal.
- They are given with the intention to obtain undue and unfair business advantage.
- They have the purpose to influence independent judgement.

For any doubt regarding the acceptance of specific gifts, Alkemy's Supervisory Board can be contacted.

Charitable Donations:

Alkemy Group generally permits donations and contributions to foundations, charitable institutions, and not for profit organizations made on its behalf.

Donations made on behalf of the Group must comply with the following standards to be permissible:

- They are within the approved budget.
- They are granted to reliable organizations that act in compliance with the principles of this Policy and of the legal framework of reference.
- They are granted to projects or initiatives that bring benefit, in terms of image, to Alkemy and/or its subsidiaries.
- They could not be reasonably interpreted as having the objective of retaining improper business advantage.
- The related documentation is correctly filled in and ensures that the donation can be tracked over time.

Before proceeding, the involved company of the Group should conduct a sufficiently detailed due diligence procedure on the beneficiary entity in question, to ensure that it is reliable and honest in its business practices.

The request for a charitable donation on behalf of the Group should include an adequate description of the nature and purposes of the contribution and a verification of its legitimacy according to applicable laws.

All requests must be approved by a legal representative of the company of the Group involved before proceeding with the donation or contribution.

Sponsorships:

Alkemy and/or its subsidiaries, will occasionally engage in the sponsorship of cultural, charitable, sporting, or similar activities, with the purpose of strengthening its business.

Sponsorship activities are permitted, provided that they meet the following criteria:

- The activities must be carried out without exceeding the approved budget.
- Sponsorship partners must be reliable and with a reputation for honesty and fairness.
- The related documentation is correctly filled in and ensures that the sponsorship can be tracked over time.

The sponsorship partner should guarantee the correct execution of the activity by declaring in writing that:

- The amount paid by Alkemy or one of its subsidiaries will be used exclusively to carry out the sponsorship activity.
- The sponsorship partner is willing to abide by Alkemy's Anti-Corruption Policy and Code of Ethics.

Requests for the approval of a sponsorship activity must include:

- An adequate description of the nature of the activity.
- Due diligence on the lawfulness of the potential sponsorship partner.
- Verification of the legitimacy of the activity under the legal framework of reference.

Requests for the approval of a potential sponsorship activity can be submitted to Alkemy Supervisory Board.

Third Parties:

The selection of third parties as potential business partners, sales partners, suppliers, vendors, or any other relationship must be carried out in line with this Anti-Corruption Policy to avoid eventual risk of corruption.

Third parties should be selected based on objective criteria such as their service reputation, their technical abilities, their production or service capacities and their price. Furthermore, they should demonstrate the intention to adhere to Alkemy's standards of business conduct outlined in this Policy and in the Supplier Code of Conduct.

Alkemy and its subsidiaries are committed to selecting their clients based on principles of impartiality, integrity, and transparency.

5. REPORTING VIOLATIONS

Reporting systems:

All recipients are required and encouraged to report any conduct that does not comply with the principles and rules set forth in the Policy by using the whistleblowing channel available at www.alkemy.integrity.complylog.com. For reporting any alleged breach with reference to the Group Spanish subsidiaries, a dedicated channel has been set up and is available at <https://www.alkemy.es/canal-denuncias/>.

Alkemy Group undertakes to treat each report with confidentiality and to protect the anonymity of the informants, ensuring that they will not be subject to any form of retaliation, in accordance with the legislation in force.

Breaches of this Policy make applicable disciplinary sanctions or measures modulated in relation to their seriousness.

Disciplinary measures:

Involvement in any form of corruption may lead to serious consequences for Alkemy, its subsidiaries and its Employees involved, including criminal liability. For this reason, any violation of this Policy is grounds for internal disciplinary action, including but not limited to termination of employment or contract, penalties and claims for damages.

Exceptions:

Exceptions to this Policy are subject to the consent of the Supervisory Board; approval of eventual exceptions is always required before proceeding, irrespective of their nature.

6. APPROVAL AND DIFFUSION

Adoption and Communication:

The adoption and the diffusion of this Policy is promoted by Alkemy to all addressees and to all persons who maintain relations with the Company, also through specific training and induction sessions which may involve the Board of Directors.

Alkemy will promote the diffusion of this policy by adopting suitable methods for its dissemination. It will publish this Policy on its website and intranet and ensure that each member of staff receives a copy of this Policy. In particular, all new staff will be provided with a copy of this Policy.

Furthermore, Alkemy and its subsidiaries will ensure that its stakeholders and all third parties involved in its business practices are made aware of this Policy and pledge to comply with its principles.

Training:

The Alkemy Group promotes and supervises the correct spread of this Policy by offering mandatory anti-corruption training programs to all personnel.

Members of the staff that are most exposed to corruption risks will follow additional training programs tailored to the specific needs of their role.