

Giordano Controls Anti-Corruption Policy

Document Control

Field	Information
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1. Purpose

The purpose of **Giordano Controls Anti-Corruption Policy** is to establish a framework for action to address the risks of generating significant negative impacts related to **fraudulent** acts and the use of the company's functions and resources for **the economic or other** benefit of its employees, managers or members of its governing bodies, and to determine the measures necessary to prevent, detect and sanction them.

2. Field of application

The scope of this Policy covers the parent company in Italy; its subsidiaries; and those investee companies over which it exercises control. It also extends to our business partners, suppliers and third parties acting on behalf of Giordano Controls.

It applies to all areas of the company: its own operations; value chain; products and services; and stakeholders, as well as all employees, managers and collaborators of the Company, regardless of their geographical location or role within the organisation.

3. Commitments

The Giordano Controls' commitments in its **fight against corruption** are:

- Any person within Giordano Controls, as well as any person or entity working on its behalf or representing it, is prohibited from **offering, promising or making**, directly or indirectly, **payments** in money or through any valuable goods to third parties, whether they are **individuals or employees of private entities, national or foreign**, in order to obtain or retain any type of business, favour or interest. Any decision to favour Giordano Controls with preferential conditions, or to provide confidential, private or competitor information that may give it an unfair advantage, is included in this prohibition.
- Giordano Controls employees, as well as any person or entity working on its behalf or in its name, may not **offer, make, promise or authorise the payment** of any sum of money or goods of value, directly or indirectly, to any individual, government official, political party, representative, member or candidate of a political party or political office, for the purpose of

providing, obtaining or retaining any business, favour, interest or dishonest advantage, or for the purpose of:

- influence any act or decision of the recipient in the exercise of his or her duties;
 - induce the recipient to act or refrain from acting in any way that would constitute a breach of the recipient's legal duties; or
 - inducing the recipient to use his or her influence with the state, regional or local administration, the Government, or a public company, to alter or influence any act or decision of these.
- All **expenses** incurred on behalf of or for Giordano Controls must be properly **documented** by **invoices** or **proof of payment**. These expenses must always be reviewed and approved by the **manager or superior of the person incurring the expense** and subsequently reviewed by the accounting department to verify that they are properly documented and reasonable.
 - Payments will be made **against an invoice sent to the company**. **This rule will be especially applicable to travel expenses, accommodation, meals, performances, etc.** Exceptionally, and in unforeseen situations that require the use of personalized payment methods (company cards), payments will be strictly justified by invoice and proof of payment.
 - All **expenses** will be **recorded in the company's accounting records**, with the level of detail required by the applicable regulations and supporting documentation must be kept for the period established by the company.
 - No payments will be made to expedite administrative procedures, or to obtain permits, licenses, authorizations or similar.
 - Any type of **invitation** extended to suppliers, customers, and other third parties related to Giordano Controls must guarantee transparency and compliance with the law and therefore must be **expressly authorised by Management**.
 - Any **donation** made for charitable purposes must be **authorized by the Management and the Governing Board of Giordano Controls**.
 - Any **sponsorship** carried out by the company must be properly documented and have the **specific approval of the Giordano Controls Governing Board**.
 - **Impact, risk and opportunity management**: identifying, assessing, managing and remedying impacts, risks and opportunities, both in our own operations and in the value chain, considering the recommendations of leading organisations.
 - **Awareness, training and involvement**: establishing training and information programmes, as well as channels for participation, so that everyone at Giordano Controls takes responsibility for carrying out the actions planned to comply with the policy, objectives and management system.
 - **Transparency and disclosure of results**: disclose results and progress achieved in a transparent and regular manner.

4. Approval and follow-up

- **Approval**: this Policy has been developed by Giordano Controls' Sustainability Committee, which is responsible for its implementation, thus reflecting senior management's commitment to the **fight against corruption** and ensuring its integration into the company's overall strategy. It is approved by the Board of Directors of Giordano Controls S.p.A.

- **Follow-up:** the Sustainability Committee will oversee the implementation of this Policy. It is composed of representatives from different areas of the company and reports directly to the Giordano Controls Board of Directors.
- **Review:** this Policy is reviewed periodically, and at least every two years, by the competent Policy Owner. Where necessary, it is updated to reflect Giordano Controls' commitments and objectives in this area, changes in applicable legislation, organisational developments and relevant comments or suggestions received from stakeholders. Substantial revisions are submitted to the Board of Directors for approval. Editorial or non-substantial updates may be managed by the competent corporate functions, if they do not alter the scope, commitments or responsibilities defined by this Policy.
- **Availability:** Giordano Controls makes this Policy available on its website to interested parties who may be affected and to interested parties who should contribute to its implementation.

5. Revision History

Version	Date	Approved by	Description of changes
v1.0	16/09/2026	Board of Directors	First issue