



# Anti-corruption Policy

## What is corruption?

Bribery is the **act of unduly receiving** (or even accepting the promise of) **an advantage** (by way of example, money or other benefit), **for oneself or a third party, for doing, not doing, or delaying, something within one's duties and public functions**, whether it is an act contrary to one's official duties or the exercise of one's function, including in the context of private companies and entities.



Corruption affects both **developed and emerging countries**, public authorities and private entities.

Operating in several countries, **F.I.S. Fabbrica Italiana Sintetici S.p.A.** (together with its subsidiaries, collectively "FIS" or the "Company") **is committed to managing its business responsibly and sustainably**. Combating corruption and cronyism is at the heart of both international commitments and corporate conduct principles.

The Anti-Corruption Policy **applies to:**

- **all directors, managers, officers and employees of F.I.S.** (collectively, "Company Personnel") regardless of where they carry out their activities
- **in all countries where F.I.S. conducts business**, regardless of whether F.I.S. has a permanent physical presence in the country

The Company also expects compliance with applicable Anti-Corruption Laws and the principles set forth in these Guidelines from any individual or organization with which F.I.S. has a business relationship, including customers, suppliers, distributors, advertising representatives, business contacts, agents, and consultants (collectively, "Third Parties").

In addition, since F.I.S. could be held liable in some cases for the corrupt conduct of third parties such as agents, brokers, consultants and business partners, F.I.S. Subsidiaries work only with counterparties of proven reputation.

**F.I.S. has never tolerated NOR tolerates any act of bribery, as well as undue payments of any kind, whether committed directly or through third parties, in Italy or abroad.**

**The Anti-Corruption Laws qualify as unlawful, for F.I.S. Personnel, for Business Partners and for anyone engaged in business for or on behalf of F.I.S., the offer, payment or acceptance, directly or indirectly, of money or other benefits for the purpose of obtaining or retaining business or securing an unfair advantage in connection with business activities.**

Recipients are **prohibited from giving, offering or promising any object or other utility or benefit of value** (including but not limited to gifts, hospitality, event tickets, travels, goods in kind, employment opportunities, business opportunities, personal favors) **to Public Officials and/or anyone for the purpose of improperly obtaining or retaining a personal business advantage and/or for the benefit of third parties**. Similarly, Recipients are prohibited from requesting or accepting such improper rewards.

Failure to comply with the Anti-Corruption Policy may, if the conditions are met and subject to possible criminal and/or civil liability, expose employees to disciplinary measures ranging from a simple warning (or equivalent measure) to dismissal, depending on the facts. As a reminder, F.I.S. has a zero-tolerance policy regarding acts of corruption and influence peddling.



Each of us must make a personal commitment to comply with this Anti-Corruption Policy. F.I.S. applies a zero-tolerance principle with reference to these issues.

If an employee believes that a rule is being violated or that any of the provisions of this Policy have not been complied with or are about to be violated, he or she should immediately inform his or her Manager and, if appropriate, use the alert system established by F.I.S. to receive reports from employees (whistleblowing).