

"Bribery is a widespread phenomenon. It raises serious social, moral, economic and political concerns, undermines good governance, hinders development and distorts competition. It erodes justice, undermines human rights and is an obstacle to the relief of poverty. It also increases the cost of doing business, introduces uncertainties into commercial transactions, increases the cost of goods and services, diminishes the quality of products and services, which can lead to loss of life and property, destroys trust in institutions and interferes with the fair and efficient operation of markets."

This is the introduction to ISO 37001:2016, and it is from this awareness that the SINTAGMA company begins its fight against bribery and corruption, guaranteeing actions and conduct based exclusively on criteria of transparency, correctness and moral integrity, which prevent all forms of bribery and corruption.

The Board of Directors, as the governing body, has confirmed this commitment in its anti-bribery policy with the aim of:

1. absolutely **prohibiting** any conduct that could **take the form of bribery** or attempted bribery or inducement to bribery;
2. personally **complying with** and requiring compliance with **current laws on the prevention and fight against bribery and corruption**, throughout the territory in which it operates, for all employees, collaborators, partners and subjects working under the control of Sintagma;
3. **identifying** the areas of potential **risk** and identifying and **implementing** suitable **actions** to mitigate the risks;
4. **being a guideline** for defining, reviewing and achieving anti-bribery goals;
5. **pledging** to satisfy the requisites of the **anti-bribery management system**, guaranteeing continuous implementation and the pursuit of its continual improvement;
6. **encouraging** the **reporting** of suspicions in good faith or on the basis of a reasonable and confidential belief, without fear of retaliation (whistleblowing);

7. **promoting awareness** among **business associates** involved in sensitive activities, requesting acceptance of the policy and acceptance of the controls required by the management system for the prevention of bribery and corruption;
8. **promoting** constant **training and informing of personnel** and of the closest **collaborators** on the policy, on the anti-bribery system, and on important regulatory updates;
9. **encouraging awareness** among **personnel and the closest collaborators** so that they are able to recognize a bribery event or even just an attempt at bribery, and can also report it anonymously;
10. **asking** all personnel/closest collaborators to **contact the person responsible for the prevention of corporate bribery/corruption** for any matter related to bribery, corruption and the management system. The person responsible for the prevention of bribery and/or corruption has a mandate and the task of supervising the anti-bribery management system;
11. **informing** that the **failure to comply with the policy** may result in the application of the company **penalty** system.

In order to ensure the maximum divulgation of the commitment made to the appropriate stakeholders, the Board of Directors has it published on the website and communicated via the appropriate means internally to Sintagma and to business associates who pose a higher-than-low-risk of bribery or corruption.