



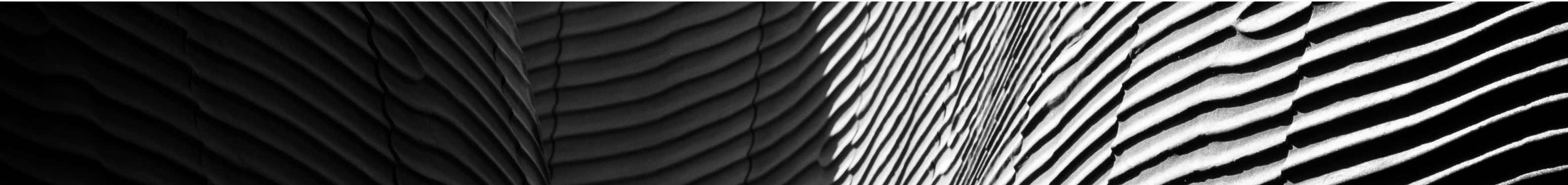
Fighting corruption

Fight against corruption

GRI 205-3 Confirmed incidents of corruption and actions taken

GRI 206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices

Total number and percentage of employees having received anti-corruption training



Integrity is a fundamental part of the identity of GVS, and one of the founding principles of the Group's Code of Ethics. In carrying out its activities, the Company places integrity at the basis of its economic and social relations, and recognises the phenomenon of corruption as a serious threat to its development.

GVS promotes the performance of its activities in compliance with the regulations and the fight against corruption at national and international level, both in relations with public officials and with private individuals.

The risk of corruption is present in various areas of business activity, involving all relationships on various levels. The occurrence of wrongdoing could result in penalties and possible repercussions on the conduct of business, as well as serious damage to the Group's reputation.

Directors and all employees in positions of autonomy or responsibility must report in writing the cases in which there are relationships of an organisational nature (e.g. customer - supplier) with persons, entities or organisations capable of influencing their judgement in the performance of their activities, for reasons of family or other relationships of a personal nature.

GVS is committed to constant compliance with national and international antitrust regulations and the guidelines of the Competition and Market Authority. The Group avoids any kind of agreement or communication aimed at influencing free competition.

In the course of their business activities, all employees and managers of the Group must adhere to professional and commercial integrity. Acts of violence or threats, capable of damaging free competition or misleading third parties into believing that the competitor is not financially capable of meeting the obligations contracted, shall not be tolerated.

As a company operating at international level, GVS Group is exposed to a number of risks in carrying out its ordinary activities, including the commission of crimes of active and passive corruption.

For this reason, the Group strictly prohibits any form of

favouritism, corruption or collusion with third parties or representatives of public power (public officials, politically exposed persons or persons closely linked to them) is strictly prohibited.

The pursuit of the Group's interest or advantage shall never be justification for unethical and dishonest conduct. No employee may receive gifts, presents or personal gratuities of any form or value, in relation to the performance of their activities, from persons, entities or organisations with which they have any kind of relationship.

The aforementioned risks associated with corruption, in some cases also entail the administrative liability of the entity in the event of violations of the rules.

GVS S.p.A., in order to ensure the correctness and transparency of company operations, consider it appropriate to adopt an Organisation, Management and Control Model in accordance with Legislative Decree 231/2001 (MOG). The purpose of the model is to constitute a set of procedures and control activities aimed at preventing the commission of the various types of offences provided for in the Decree.

GVS has set up the Supervisory Board in order to supervise the operation of and compliance with the Model, and to propose its updating. A further tool for reporting violations of 231 regulations is the so-called "Whistleblowing", defined as one or more channels that allow all recipients of the Model 231 to report unlawful conduct to the detriment of the entity. The Code of Ethics also incorporates Whistleblowing, thus overcoming the national limitations of the Model 231, since the Code of Ethics has been adopted by all Group companies.

The Code of Ethics aims to ensure transparent and appropriate conduct by all recipients. The occurrence of risky events may lead to the application of sanctions,

loss of profit, compromise of business relations and damage to the image, which may be to the detriment of the entire Group. In order to mitigate this risk, in addition to the adoption and distribution of the Code of Ethics, specific training plans are promoted for all employees on anti-corruption principles and general principles of conduct.

All subjects who come into contact with GVS reality, such as managers, employees, suppliers, clients and public administration are required to avoid any situation of corruption or collusion. The relationship with public authorities requires transparency and correctness, as does the management of public funds (contributions, subsidies, loans, etc.), which must presuppose maximum transparency both in the truthfulness of every related document and in the correct destination of the money. Finally, in the event of inspections or investigations by public authorities, GVS personnel are required to cooperate fully in order to protect the integrity and reputation of the Group.

On 17 December 2021, the Board of Directors adopted the Global Compliance Programme, a Group-wide programme to prevent perpetration of offences. As part of this programme, the Anti-Corruption Policy has also been adopted, as an integral part of the system of control of business ethics, aimed at guaranteeing the compliance of GVS with the Anti-Corruption Laws, both national and international, and with the best international standards in the fight against corruption.

a prohibition on offering or receiving money or other benefits to obtain undue advantage or otherwise influence the decisions of others. The prohibition includes those actions that may even generate the doubt of having corrupt purposes.

The Policy applies to employees, collaborators and all other persons who in various ways have dealings with GVS.




Find out more about our "Anti-corruption Policy"

The Policy provides for specific rules and controls in relation to activities identified as potentially "at risk" (e.g. relations with public officials, donations, sponsorships, relations with suppliers) and activities concerning the effective implementation of anti-corruption compliance (e.g. adoption of written procedures, segregation of roles, formalisation of powers, traceability and documentation of decisions, assessment of business partners).

Finally, in order to guarantee the effectiveness of the provisions, the Policy provides for control systems (audits), training and communication activities, disciplinary measures, as well as channels for reporting, including confidential ones ("whistleblowing").

In conclusion, it can be said that the Group is committed to spreading a culture of compliance in the various countries in which it operates, to ensure maximum dissemination and adherence to its ethical principles for the fight against corruption.



Find out more about our "Global Compliance Program"

The Anti-Corruption Policy enshrines the GVS Group's commitment to a zero tolerance principle in relation to corruption and requires compliance with all national anti-corruption legislation where the Group operates. The commitment to zero tolerance includes

GRI 205-3 Confirmed incidents of corruption and actions taken

During the reporting period there were no confirmed incidents of corruption.

GRI 206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices

In its relations with its competitors, GVS does not propose or accept market-distorting agreements with competitors, such as selective pricing or discounts. Reflecting this, there were no legal actions for anti-competitive behaviour, antitrust or monopolistic practices during the reporting period.

Total number and percentage of employees having received anti-corruption training

As a whole, 1539 employees were trained in 2022, representing 30% of the total.