

**Anti-Bribery Management System in accordance with UNI ISO 37001:2025**

Demont S.r.l., aware that its reputation is founded on its ability to operate with loyalty, fairness, transparency, honesty, and integrity, carries out its activities in compliance with national and international laws and standards on the prevention of bribery. To this end, it has adopted a Management System for the Prevention of Bribery compliant with UNI ISO 37001:2025.

The Anti-Bribery System is integrated with the Organization, Management and Control Model adopted pursuant to Legislative Decree 231/2001, with the Code of Ethics, and with the Integrated Quality, Health and Safety, and Environment Management System, ensuring a unified approach to corporate governance.

This Policy constitutes the reference framework for the definition, monitoring, and review of the Company's anti-bribery objectives and is appropriate to the purposes, organizational context, nature of the activities carried out, and the bribery risks to which DEMONT S.r.l. is exposed, including activities carried out abroad.

**General Anti-Bribery Principles**

Demont S.r.l. adopts a zero-tolerance policy toward bribery, in whatever form it may take, whether in relations with public or private parties. It is therefore prohibited to:

- offer, promise, give, pay, or authorize someone to give or pay, directly or indirectly, material benefits, economic advantages, or other advantages to a Public Official or a private party (active bribery)
- accept, or authorize someone to accept, directly or indirectly, material benefits, economic advantages, or other advantages (passive bribery)

Every corporate activity must be based on the principles of legality, impartiality, transparency, traceability, and accountability.

**Objectives of the Anti-Bribery Policy**

To give concrete effect to the principles outlined above, Demont S.r.l. is committed to:

- Combating bribery in all its forms, active and passive, direct or through third parties, in relations with the Public Administration, private parties, customers, suppliers, contractors, subcontractors, agents, consultants, and any other business partner;
- Regulating and monitoring the granting and acceptance of gifts, hospitality, donations, sponsorships, and other similar benefits, permitting them only within the limits set out by company procedures and applicable law;
- Carrying out adequate due diligence on business associates and business partners, in a manner proportionate to the identified bribery risks;
- Complying with applicable anti-bribery legislation, including the provisions of the Criminal Code referenced by Model 231 (Articles 317-322bis, 2635 of the Civil Code) and, where relevant to the Company's operations, the anti-bribery legislation of the countries in which it operates or in which its business partners operate;
- Requiring compliance with the principles of this Policy, in a manner proportionate to the bribery risk involved, from personnel at all levels and, where practicable and appropriate, from business associates, suppliers, contractors, subcontractors, agents, and consultants, as a condition for establishing and maintaining the relationship;
- Establishing, implementing, maintaining, and continuously improving the Management System for the Prevention of Bribery, integrated within the Integrated Quality, Health and Safety, and Environment Management System, periodically monitoring its effectiveness and reviewing anti-bribery objectives and related performance as part of Management Review;
- Actively and measurably promoting and fostering a corporate culture that rejects bribery at all levels of the organization, starting with the example set by the Board of Directors and Top Management;
- Periodically assessing the bribery risks to which the Company is exposed, integrating this assessment into the already-adopted risk and opportunity management process (procedure QHSE06.01) and into the Risk Assessment required by Model 231;
- Assigning the Anti-Bribery Function identified by Management adequate powers and resources, ensuring its independence, authority, and direct access to Top Management and the Board of Directors for oversight of the Management System for the Prevention of Bribery;
- Encouraging anyone, whether employee or third party, to report in good faith, or on the basis of a reasonable suspicion, cases of suspected or established bribery, including anonymously, through the whistleblowing channel already in place (Whistlelink platform), guaranteeing protection from any form of retaliation against the whistleblower, in accordance with Legislative Decree 24/2023;
- Applying the disciplinary measures set out in the Disciplinary Code and the Code of Ethics in the event of violation of the principles of this Policy or of the Management System for the Prevention of Bribery, regardless of the role or position held by the responsible party;
- Ensuring that no worker suffers retaliation, discrimination, or negative consequences for having refused in good faith to take part in activities that could constitute a bribery risk, even where such refusal results in the loss of business opportunities;
- Promoting the prevention and management of real, potential, or perceived conflicts of interest;
- Providing periodic training and awareness activities for personnel and, where relevant, for business associates, on bribery risks and the prevention measures adopted by the Company.

**Scope of Application**

This Policy applies to all personnel of DEMONT S.r.l. and, to the extent relevant to all parties acting on behalf of or in the interest of the Company, including business partners, suppliers, consultants, contractors, subcontractors, and any other interested party involved in corporate activities. The principles contained herein apply to all offices, plants, and temporary worksites of DEMONT S.r.l.

**Role of Top Management**

Top Management confirms its commitment to ensuring the effective implementation of the Anti-Bribery System, by making adequate resources available, promoting a culture of legality, and ensuring the continuous improvement of the system. Top Management acts as a role model, promoting behavior consistent with the principles of this Policy.

**Management of Non-Conformities**

Failure to comply with the Anti-Bribery Policy and/or any failure to fulfill Anti-Bribery laws and/or Model 231 will trigger the disciplinary system against employees responsible for the violations, in accordance with the applicable employment contract, and, with respect to third parties, may result in the suspension or termination of the contractual relationship, as well as possible exclusion from the List of Qualified Suppliers, in accordance with company procedures.

**Communication of the Policy and Review**

This Anti-Bribery Policy is maintained as documented information of the Management System for the Prevention of Bribery, is periodically reviewed, and is made available to all personnel and interested parties through company channels and the Company's website.

All recipients of this Policy are required to be familiar with its content, comply with its principles, and actively collaborate in the effective implementation of the Management System for the Prevention of Bribery.

Millesimo, 06<sup>th</sup> august 2026

Chief Executive Officer

Melloni Leonardo



Employer

Massimiliano Lazzarino

  
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**Demont S.r.l.**