Anti-Corruption Policy

23 September 2026

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1. Introduction

1.1 Purpose of this Policy

Axxam S.p.A. and its Affiliates (hereinafter collectively also referred to as the "Axxam " or "Group") has adopted this Anti-Corruption Policy (hereinafter also referred to as the "Policy") to detail its commitment to responsible governance and business ethics. The Group is committed to conducting its activities while maintaining the highest standards of ethics, integrity, and transparency. It therefore firmly prohibits any form of corruption and bribery.

This Policy should be considered as an integral part of the Organization, Management and Control Model (hereinafter also referred to as the “Model”) established in relation to the Legislative Decree 231/01, with which the Group decided to comply. This Policy should therefore be read in conjunction with OCSE Principles and other Group’s existing policies, including Axxam’s Code of Ethics.

1.2 Scope of this Policy

The Policy applies, and without exception, to employees, collaborators, contractors, suppliers, scientific and commercial partners, and all those who have relationships with the Group.

The provisions set out in this Policy apply to all activities and transactions carried out by or on behalf of the Group, and extend to every location where the Group operates, whether directly or indirectly.

Recipients are expected to familiarise themselves with the provisions of the Policy and to comply with its requirements.

2. Principles

2.1 Anti-Corruption

The Group is committed to conducting its activities, whether commercial, scientific, or administrative, with the utmost integrity and in full compliance with the anti-corruption laws applicable in the countries in which it operates.

The Group does not tolerate any form of corruption, whether involving public officials or scientific or commercial partners, and firmly prohibits any phenomenon of corruption or favouritism. As such, employees, collaborators, contractors, suppliers or any other third party operating on its behalf are strictly prohibited from offering, promising, giving, soliciting, or accepting any undue advantage, directly or indirectly, with the aim of obtaining or retaining business or any other illegal advantage.

2.2 Anti-Bribery

The Group condemns bribery in all forms. Accordingly, no director, officer, employee, or third party acting on behalf of the Group shall, directly or indirectly, offer, promise, give, solicit, or accept any payment, gift, service, or other benefit of any kind to or from any person, where such benefit is intended, or may reasonably be perceived, to induce or reward the improper performance of a function or activity, or to obtain or retain any business advantage. This provision covers not only relationships with private entities but also with public entities and officials. Attempts to influence the decisions of public institutions and officials, whether based in Italy or not, are equally prohibited. Facilitation payments, kickbacks, and any indirect payment made through intermediaries on behalf of the Group are equally prohibited.

Axxam recognizes that delegating specific tasks to third parties may carry inherent risks. For this reason, the Group requires that all agents, consultants, or intermediaries acting on its behalf be contractually bound to comply with applicable anti-corruption regulations (ref. the Model) and with the provisions set out in this Policy. This obligation may be incorporated into specific contractual clauses, the acceptance of which is an essential condition for continuing any relationship with the Group.

2.3 Gifts & Entertainment

The Group restrains its employees and management from requesting or accepting gifts, invitations, or any other type of advantage from partners or any other entities with whom the Group collaborates or to which it may otherwise be related. The above notwithstanding, small tokens of courtesy or gifts of nominal value may nonetheless be accepted if management's approval has been sought and obtained beforehand. In any case, these gifts and tokens of courtesy must remain reasonable and proportionate and must comply with any internal Group procedures specifying the applicable limits, thresholds, and maximum values for this practice (the SOP ADM_005 - Management of Gifts, Sponsorships, Donations/Contributions).

Recognising that courtesy gifts are customary in some countries, the Group permits the offering of gifts and hospitality in those countries as long as their nature and value remain appropriate, comply with the above-mentioned SOP and cannot reasonably be interpreted as a means to obtain any preferential treatment. Compliance with applicable legislation must always prevail. Any such expenditure must be authorized in advance and properly documented to ensure full traceability.

2.4 Political contributions

The Group refrains from exerting any direct or indirect pressure on politicians and affiliated organisations to obtain an improper advantage. The Group maintains a strict

policy of not providing any contributions, whether in cash or in kind, to political parties or organisations or trade unions, or to their representatives or candidates.

However, the Group recognises that collaboration with certain political organisations and trade unions may serve the public interest. The Group permits cooperation with such organisations provided that the collaboration is lawful, its purpose aligns with the Group's mission, the financial resources involved are clearly documented, and the relationship has been expressly authorised by Management.

2.5 Money Laundering

In line with applicable anti-money laundering laws, the Group is committed to not entering or continuing relationships with suppliers, customers, or partners of uncertain legitimacy or unclear ownership structure, and prohibits any transaction designed to disguise the origin, ownership, or destination of funds.

The Group is committed to ensuring that every transaction is legitimate, properly authorized, accurately recorded, consistent, and verifiable. Employees involved in accounting, finance, or contractual relationships with suppliers and partners must ensure that all documentary support is complete and traceable, and must promptly report any operation, payment, or counterparty relationship that appears inconsistent with the legitimate purpose of the associated business activity.

3. Compliance

3.1 Compliance

Compliance with the provisions set out in this Policy must be considered an essential part of the contractual obligations of the Group's employees. It must also be considered an essential obligation for suppliers, contractors and other partners having relationships with the Group.

3.2 Violations

Any cases of non-compliance or violations of the Anti-Corruption Policy must be duly reported to the Group.

Violations or suspected violations of the Policy can be reported through the Group’s Whistleblowing Procedure. The Group’s Supervisory Body will promptly review the request and, if deemed valid, submit it to the VP in the Human Resources department and the CEO for resolution. The Procedure ensures anonymity and protection against any form of retaliation or intimidation. Internal and external stakeholders can report any cases of violation using the following email address: axxam@organismodivigilanza.com.

In line with Legislative Decree 24/2023, the reporting channel is managed by a person or office dedicated to handling reports and guarantees the confidentiality of the reporting person's identity, of the persons involved, and of the content of the report. Protection under the Procedure extends not only to employees but also to former employees, job candidates, consultants, shareholders, and members of the Board of Directors. Alternatively, employees can report violations or suspected violations to their line-manager or reach out directly to the VP, in the Human Resources department.

3.3 Sanctions

If cases of non-compliance or violation are confirmed, the Group will promptly implement appropriate corrective or disciplinary actions, consistent with applicable laws and internal procedures.

The Group will not maintain relations of any kind with stakeholders who do not intend to operate in strict compliance with legislation, and/or who refuse to abide by the provisions set out in the Policy.

4. Governance & Review

4.1 Governance

The Policy will be made available to relevant stakeholders through the Group's website and its intranet.

A training plan may be formalized to ensure the provisions of this Policy are adequately disseminated and understood across the Group.

4.2 Review

The Board of Directors is responsible for reviewing, at least annually, or more frequently, if needed, the Anti-Corruption Policy to ensure it remains aligned with applicable legal and regulatory requirements. Any updates to the Policy will be made after consultation of the Group's Supervisory Body and in line with its recommendations.

5. About this document

Policy Owner	Board of Directors
Review by	Supervisory Body; Legal Department; HR Department; Quality Assurance Department.
Approved by	Board of Directors
Approved on	23 September 2026
Next review	23 September 2027

Related policies	• Axxam's Code of Ethics • Axxam's Disciplinary System • SOP ADM_005 - Management of Gifts, Sponsorships, Donations/Contributions
Confidentiality	Public