
M383 Anti-Corruption Policy

1. INTRODUCTION

Silcart S.p.A. recognizes the prevention and fight against corruption as fundamental elements to ensure integrity, transparency, and fairness in its activities and business relationships.

In line with the requirements of ISO 37001 – *Anti-Bribery Management Systems*, applicable national and international anti-corruption regulations, and principles of ethics and corporate responsibility, Silcart firmly opposes any form of corruption, whether direct or indirect, active or passive, in both the public and private sectors.

This Policy is inspired by principles of integrity and corporate responsibility and establishes minimum behavioral and control requirements to prevent, detect, and combat corrupt practices and improper conduct.

2. SCOPE OF APPLICATION

This Policy applies to all employees, collaborators, members of corporate bodies, business partners, suppliers, consultants, and any party acting “on behalf of” or “in the interest of” Silcart.

The Anti-Corruption Policy is approved by Top Management and is subject to periodic review, at least annually or in the event of significant regulatory or organizational changes.

It is published on the corporate website and communicated internally to ensure accessibility to all relevant stakeholders.

3. DEFINITIONS

Corruption: any offer, promise, giving, request, or acceptance of an undue advantage—financial or non-financial, direct or indirect—intended to improperly influence a decision or obtain an unlawful benefit for oneself or others.

This includes both active corruption (offering or giving undue advantages) and passive corruption (requesting or accepting undue advantages).

Conflict of Interest: any situation in which personal interests or the interests of third parties may compromise the impartiality of decisions taken in the interest of Silcart.

4. COMMITMENTS AND RULES OF CONDUCT

Within its system of values and the principles of integrity, fairness, and transparency that guide all corporate activities, Silcart defines specific commitments aimed at preventing unlawful or unethical behavior.

These commitments are intended to protect the company’s reputation, ensure fairness in relations with all stakeholders, and guarantee that decisions are made impartially and responsibly.

Absolute Prohibition of Corruption

Silcart strictly prohibits any form of corruption, in any context, country, or phase of its operations.

Conduct that could even be perceived as an attempt to improperly influence public or private counterparts is not permitted.

The use of third parties to circumvent anti-corruption prohibitions is strictly forbidden.

Conflicts of Interest

Anyone acting on behalf of Silcart must avoid, prevent, and promptly disclose any actual or potential conflict of interest that could compromise decision-making impartiality.

Any conflict of interest, including potential conflicts, must be reported without delay.

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Gifts, Hospitality and Expenses

Gifts, hospitality, travel expenses, or other benefits may be offered or accepted only if they are:

- Of modest and proportionate value;
- Lawful, transparent, and properly documented;
- Such as not to influence—or appear to influence—decision-making.

Gifts or benefits of significant value, undocumented benefits, or benefits intended to obtain undue advantages are prohibited.

Relations with Public Authorities

Interactions with public authorities and their representatives must be conducted in a transparent, fair, and fully documented manner.

It is prohibited to offer payments, benefits, or other advantages intended to influence public decisions or improperly expedite administrative procedures.

Donations, Sponsorships and Contributions

Donations and sponsorships are permitted only if lawful, traceable, duly authorized, and consistent with corporate values. They must never be used as an indirect means of corruption.

Record Keeping and Accounting Controls

Silcart requires that all transactions be recorded accurately, completely, and truthfully.

Fictitious records, parallel accounting systems, or concealment of the true nature of expenses are strictly prohibited.

5. DUE DILIGENCE ON THIRD PARTIES AND SUPPLY CHAIN

Silcart applies a risk-based due diligence approach to suppliers, consultants, agents, intermediaries, and business partners, with a level of scrutiny proportionate to the identified risk.

In particular, Silcart requires acceptance of anti-corruption clauses and compliance with this Policy (or equivalent standards); may carry out reputational and documentary checks and periodic assessments; may define and monitor corrective measures where necessary.

6. TRAINING, AWARENESS AND ETHICAL CULTURE

Silcart promotes an organizational culture based on integrity by providing periodic training programs for internal personnel and, where appropriate, for external partners exposed to higher corruption risks, in relation to their role and the level of associated risk.

7. REPORTING AND PROTECTION OF REPORTING PARTIES

Silcart encourages the reporting - also on a confidential basis - of suspicious or non-compliant behavior with respect to this Policy, ensuring confidentiality, protection of the reporting party, and prohibition of retaliation. Reports may be submitted through dedicated corporate channels. Operational guidelines on whistleblowing, including reporting methods, investigation procedures, and safeguards, are published and available in the “Compliance Documents” section of the corporate website: <https://www.silcartcorp.com/compliance-documents/>.

Reports are handled with impartiality and confidentiality, in compliance with applicable regulations, and may lead—where necessary—to corrective actions and disciplinary or contractual measures.

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8. MONITORING AND CONTINUOUS IMPROVEMENT

The effectiveness of this Policy is periodically monitored through internal controls, management reviews, and—where applicable—targeted checks or audits. The outcomes support corrective actions and continuous improvement.

9. VIOLATIONS AND SANCTIONS

Failure to comply with this Policy may result in disciplinary and contractual measures, in accordance with applicable laws and regulations.

10. APPROVAL, COMMUNICATION AND REVIEW

This Policy is approved by Top Management, communicated internally, and made accessible to stakeholders (e.g. corporate website/intranet).

It is reviewed at least annually or in the event of significant regulatory or organizational changes.

Place and date

Carbonera, 23/09/2025

SILCART SPA


