



Bribery Prevention Policy

(UNI EN ISO 37001:2016 and Legislative Decree no 231/01)



The Healthcare Partner



Bribery

The following constitutes bribery: offering, promising, giving or accepting a financial or other benefit to induce the recipient or another individual to improperly perform his or her duties, or to reward him or her in any way for acting inappropriately, or when the recipient behaves improperly in accepting the benefit.

The benefit includes money, gifts, loans, fees, hospitality, services, discounts, the awarding of a contract or any valuable asset.



| General Concepts



Senior Management at the **GPI Group** considers preventing bribery a fundamental element of its organisation, and encourages the combating of bribery and the dissemination of its core ethical principles and values across the Group.

Thus, **Senior Management** is committed to the following:

COMPLIANCE

with all requirements of UNI EN ISO 37001

IMPLEMENTATIONS AND UPDATES

to the **Anti-Bribery Management System** in order to ensure its ongoing improvement in terms of performance in the field

ADJUSTMENTS

to **this Policy** to keep pace with regulatory changes for the industry

RESTRICTIONS

against **bribery in any form** taking a zerotolerance stance

PUBLICATION AND AVAILABILITY FOR INSPECTION

for **this Policy** at all levels of the Group via the Intranet

UPDATES

to its **Risk Analysis** to keep pace with business changes and evolutions, with a view toward constant improvement

ADHERENCE

to all national and other laws, as well as with **applicable requirements** relating to the combating of bribery

PROACTIVE

encouragement of whistleblowing, when done in good faith and based on a reasonable belief, without fear of retaliation

BUY-IN

for all **commitments** made in this Policy from all stakeholders (employees, associates, trade partners, partners, suppliers, etc.)



Principles and Values



In keeping with the principles appearing in the GPI Group's Code of Ethics (<https://www.gpi.it/investors/governance/> in the Compliance Section) the commitments made by Senior Management, along with the organisation's values and general strategy to prevent bribery, whether in-house or externally, are predicated on the following **principles**:

AWARENESS

we must be cognizant of our responsibilities, and of those of who works for GPI, with a mindset towards bribery that is above reproach

TRANSPARENCY

we must ensure that all actions, operations, transactions, and more generally all behavioural standards and conduct demonstrated by GPI employees and associates meet the highest standards of ethics, transparency, and impartiality, in order to prevent instances of bribery from occurring

INFORMATION

we must provide information and support to those who work on behalf of GPI, such as knowing how to recognise and handle behaviour that might be ascribed to bribery





Behavioural Guidelines



The **principles and values** established by Senior Management take shape through the following **behavioural guidelines**, which must be applied by all employees and associates, and must be known by all stakeholders:

THE FOLLOWING SHALL NOT BE TOLERATED

any type of bribery in any form or manner

THE FOLLOWING SHALL BE STRICTLY PROHIBITED

accepting the hospitality of any external party in locations or situations which are inordinately expensive

SPECIFIC STEPS

must be taken following any request for extortion payments

THE FOLLOWING SHALL BE STRICTLY PROHIBITED

offering, promising, or authorising any type of benefit, including gratuities, gifts, or hospitality which might bring about a business advantage, or behaviour of that ilk, which might be perceived as intending to influence a business deal

THE FOLLOWING SHALL BE STRICTLY PROHIBITED

making campaign contributions or accepting any kind of benefit from a public official

ONE MUST ALWAYS

avoid situations where the persons involved have, or appear to have, a **conflict of interest** with GPI

THE FOLLOWING SHALL BE STRICTLY PROHIBITED

accepting or requesting any type of benefit, including gifts, gratuities, or hospitality other than those of de minimus value

THE FOLLOWING SHALL BE STRICTLY PROHIBITED

paying speed money in any form

THE FOLLOWING SHALL BE STRICTLY PROHIBITED

taking any action which might be construed as a **violation of this Policy**





Whistleblowing



Senior Management has established an internal **Bribery Prevention Compliance Board** and warrants the authority and independence of the same.

Anyone may report concerns or suspicions regarding incidents of bribery in the following manner:

EMAIL

by sending an e-mail to **anticorruzione@gpi.it**

POSTAL SERVICE

by post in an anonymous letter to be sent to “**GPI S.p.A. – Via Ragazzi del '99 n. 13, 38123 Trento**” Attn: Bribery Prevention Compliance Board.

ONLINE WHISTLEBLOWING CHANNEL

through the use of a dedicated **online WB channel** available through the company’s website at <https://www.gpi.it/investors/governance/>. This application ensures the confidentiality of all data appearing in the whistleblower’s report using security protocols and encryption that allow personal data and information to be protected, including those appearing in any attachments.

Pursuant to Law no. 179/2017, the Company – regardless of the reporting channel used – shall ensure the confidentiality of the whistleblower and the reported person, as a determination of the liability of the latter is made.

Any act of retaliation or discrimination, whether direct or indirect, against the whistleblower for reasons relating, whether directly or indirectly, to the report, shall be prohibited.






Training, information, and communication





Senior Management ensures ongoing training on issues relating to preventing bribery.

The **Bribery Prevention Policy** shall be supplied to all stakeholders through:

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- posting to the company's Intranet (for employees and associates);
 - posting to the company's official website, and inclusion in contract boilerplates (contracts with partners, suppliers, and trade partners).

In case of proved violation of the above-mentioned lines of conduct, GPI reserves the right to take any measure deemed appropriate and necessary.

