

The SKIDATA management has defined the following company policy and anti-corruption policy, which is applied in the DESIGN, CONSTRUCTION, SERVICE AND INSTALLATION OF EQUIPMENT ADMITTED TO THE MANAGEMENT OF ACCESS AND CONTROL OF VISITORS FOR TOURIST DESTINATIONS, PARKING STADIUMS, PARKS OF FUN, SHOPPING CENTERS AND EXHIBITION ZONES

The company policy is pursued through the company management system, risk analysis management, the definition of specific objectives and indicators for its monitoring and compliance with the principles of the CODE OF ETHICS.

The principles are:

1. Consolidate market presence through customer loyalty;
2. Optimize company resources;
3. Constantly implement continuous improvement of the company system and its processes;
4. Maintain a constant commitment to meeting compliance obligations and other applicable requirements including corporate ethics principles;
5. Take into consideration the main expectations of the interested parties that orbit the company;
6. The commitment towards Corruption Prevention positively influences contractual relations, thus guaranteeing a progressive diffusion of company principles and ethical values to a sphere of stakeholders;

Stakeholders	Iso 9001	Iso 37001	Main special needs
			<i>(requirements that are compliance requirements in bold)</i>
Customers	X	X	Compliance with contractual and tender requirements in full compliance with transparency and legality requirements
Group Leader	X	X	Proper administrative and accounting management , budget management, fair capital remuneration, risk containment. Continuous technological innovation.
Employees /collaborators	X	X	Stability of the workplace, clear and unambiguous organization and operational management, support for change, increased skills; business climate, work in safety.
Business brokers	X	X	Organization stability. product / service innovation compared to the market.
Suppliers	X	X	Clarity of order requirements and delivery methods , continuity of the relationship, compliance with payment terms.
P.A.	X	X	Correctness in administrative relations, taxes and duties, compliance with organizational and technical requirements, compliance with legal and anti-corruption laws.
Control bodies	X	X	Compliance with mandatory requirements , collaboration in the verification phase, prompt application of any applicable prescriptions, transparency and legality in the relationship.
Neighboring and neighboring companies	X		Control of external emissions (air, liquid, dust, noise, etc.); collaboration to solve common problems.

In order to pursue the principles of this policy, specific indicators are associated for their monitoring and during the annual review the relative objectives are defined.

SKIDATA formally undertakes the commitment to:

- Comply with all the requirements of the reference Standard (ISO 9001 and ISO 37001)
- Prohibit any form of corruption by adopting a zero-tolerance approach to it
- Observe the national laws, other laws and requirements in force regarding anti-corruption;
- Implement and keep updated the Management System in order to guarantee a continuous improvement of its performance;
- Supervise the application of the internal Code of Ethics regarding the regulation of the conduct of business
- Make this Policy public and accessible at all levels of the company by posting it on the notice board, publishing it on the site and providing appropriate training
- Encourage the reporting of suspects in good faith, or on the basis of a reasonable and confidential belief, without fear of retaliation;
- Adapt this Policy to the regulatory changes in the sector and to the requirements deriving from the requirements defined in the Anti-corruption management system with a view to continuous improvement.

All violations of this policy, as well as those of the CODE OF ETHICS, can be transmitted, either in confidential or anonymous form, to the Supervisory Body (which also covers the function of RPC "Corruption Prevention Manager" at the email address : odv.skidata.it.

SKIDATA is committed to protecting the reporter from any form of retaliation, as well as guaranteeing its anonymity.

Corruption refers to: *offering, promising, giving or accepting a financial or other benefit, to induce those who receive it, or another individual, to perform their duties improperly, or they are recognized as a reward of any other nature for having acted inappropriately, or when the recipient of the benefit behaves incorrectly by accepting the advantage.*