

	SISTEMA DI GESTIONE PER LA PREVENZIONE DELLA CORRUZIONE UNI ISO 37001:2025	
	ANTI-BRIBERY POLICY	POLITICA_VER_01 25.09.2026

ANTI-BRIBERY POLICY ABITARE IN S.P.A. GROUP

The companies of the **ABITARE IN GROUP** conduct their business in accordance with the values and principles set out in the Code of Ethics, in the belief that business cannot be conducted without regard to ethics. ABITARE IN recognizes the importance of Anti-Bribery Laws and rejects any form of Bribery, avoiding and condemning recourse to corrupt conduct and, in general, to unlawful or otherwise unethical conduct in order to achieve its economic objectives.

In this regard, ABITARE IN, aware of the negative effects of corrupt practices on economic and social development in the context in which it operates, adopts a firm approach of absolute prohibition of any form of bribery.

The Governing Body and Top Management of ABITARE IN actively, visibly, consistently and continuously promote, at all levels of the organization and within the companies of the GROUP, an anti-bribery culture based on integrity, transparency, honesty and accountability, and do not tolerate any conduct that may compromise it. The culture of bribery prevention is regarded as a decisive factor for the effectiveness of the Anti-Bribery Management System and for the overall soundness of the organization.

To this end, ABITARE IN has adopted an Anti-Bribery Management System, structured in accordance with the requirements of the UNI ISO 37001:2025 standard, of which this Anti-Bribery Policy forms an integral part, aimed at preventing, detecting and addressing bribery and at complying with Anti-Bribery Laws.

1. SCOPE

The purpose of this Policy is to provide a systematic reference framework for the management of bribery prevention, setting out the standards and rules of conduct that all recipients must adopt in order to ensure compliance with Anti-Bribery Laws.

This Policy pursues the following general objectives:

- Strict and full compliance with the legislation in force on the prevention and combating of bribery, in Italy and in any country in which the ABITARE IN GROUP operates, involving employees, collaborators in any capacity and all persons acting on behalf of and/or under the control of ABITARE IN and/or of a GROUP company;
- Absolute prohibition of any conduct that may constitute bribery or attempted bribery;
- Identification, within the activities carried out by the ABITARE IN GROUP, of potential risk areas, and identification and implementation of the actions, protocols and procedures suitable to reduce/minimize such risks;
- Provision of a clear framework for setting, reviewing and achieving anti-bribery objectives;
- Commitment to plan and implement its policies and actions in such a way as not to be involved in any bribery or attempted bribery and not to risk involvement in unlawful situations with public or private parties;
- Full commitment to comply with all the requirements of the Anti-Bribery Management System;
- Awareness-raising among business associates so that, within their respective areas of competence, they adopt bribery prevention policies and actions that comply with the law and are consistent with those of the ABITARE IN GROUP;
- Awareness-raising and training of employees on bribery prevention;
- Provision of means for raising concerns in good faith, or on the basis of a reasonable belief, without fear of retaliation;
- Sanctioning of any conduct that does not comply with the Anti-Bribery Policy through the application of the corporate disciplinary system;
- Presence of an anti-bribery compliance function, which is guaranteed full authority, independence, adequate resources and direct access to the Board of Directors and Top Management;
- Identification, disclosure and documented management of actual or potential conflicts of interest, in accordance with the company procedure for the management of conflicts of interest;
- Consideration of climate change among the relevant context factors, where it has an impact on the Anti-Bribery Management System or on the expectations of interested parties;
- Commitment to the continual improvement of bribery prevention activities.

In pursuit of the above objectives, ABITARE IN has defined and implements a structured bribery risk assessment process aimed at identifying, analysing and evaluating the bribery risks associated with the activities of the ABITARE IN GROUP and at guiding the definition and updating of the controls of the Anti-Bribery Management

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System. The results of this process are documented in the Bribery Risk Mapping and in the risk assessment sheets for each function, which are subject to periodic review. Specific controls are adopted for each activity at risk, monitored and updated with a view to continual improvement, and compliance with them is mandatory for all recipients of this Policy.

2. RECIPIENTS

This Policy applies to ABITARE IN S.p.A., to the members of its corporate bodies and of its control/supervisory bodies, and to the employees and collaborators of the Company in any capacity, as well as to the Subsidiaries of the ABITARE IN Group.

With regard to joint ventures and Investee Companies, ABITARE IN will use its influence, to the extent reasonable in the circumstances, to ensure that such companies and entities comply with the standards and rules of conduct set out in the Anti-Bribery Policy.

The recipients of this Policy are required, in particular, to comply with:

- Italian law and, in particular, the provisions of the Italian Criminal Code on bribery and related offences against the Public Administration (including Articles 318, 319, 319-ter, 319-quater, 320, 321, 322, 322-bis and 346-bis of the Criminal Code), the provisions of the Italian Civil Code on private-to-private bribery (Articles 2635 and 2635-bis of the Civil Code) and Legislative Decree No. 231 of 8 June 2001, which governs the administrative liability of entities for offences committed, including abroad, in their interest or to their advantage by persons in senior positions or by persons subject to the direction of others, including the bribery offences referred to in Articles 25 and 25-ter, paragraph 1, letter s-bis), of that Decree;
- the laws ratifying the international Conventions on combating corruption, which prohibit the bribery of public officials, including foreign public officials, as well as private-to-private bribery.

This Policy is intended to be made known to:

- employees;
- management and the members of the corporate bodies of ABITARE IN;
- Subsidiaries and/or Investee Companies;
- Third Parties;
- Certification Bodies.

3. UPDATING OF THE POLICY

ABITARE IN undertakes to maintain and periodically review this Policy so that it is always active, applied, appropriate to its purpose and compliant with the applicable anti-bribery laws.

4. ANTI-BRIBERY COMPLIANCE FUNCTION

For the purposes of coordinating, developing, monitoring and maintaining the Anti-Bribery Management System, ABITARE IN has appointed its Anti-Bribery Compliance Function (FCA), in line with the requirements, tasks and responsibilities set out in the UNI ISO 37001:2025 standard.

Pursuant to clause 5.3.2 of the UNI ISO 37001:2025 standard, the FCA is assigned the responsibility and authority to oversee the design and implementation of the Anti-Bribery Management System, provide advice and guidance to personnel on the System and on bribery-related issues, ensure that the System conforms to the requirements of the standard and report on the performance of the System to the Board of Directors and Top Management. The FCA is also responsible for informing stakeholders and raising their awareness on bribery prevention issues.

To this end, ABITARE IN ensures that the FCA has the competence, status, authority, independence and resources necessary to perform its function and, in particular, grants it the following powers:

- to access, without restriction and without the need for prior authorization, the Company's documents, records, data, information systems, premises and personnel, at any stage of its processes;
- to report directly and at any time to the Board of Directors and Top Management, without hierarchical constraints or filters, including on a confidential basis;
- to plan, carry out and coordinate internal audits of the System, including jointly with the Supervisory Body (*Organismo di Vigilanza*) established pursuant to Legislative Decree No. 231/2001;
- to identify nonconformities, propose corrective actions and verify their effectiveness;
- to initiate internal investigations into suspected bribery and breaches of this Policy, reporting the outcome to the bodies responsible for taking appropriate action;
- to use the annual budget granted by the appointment resolution, which may be spent without prior authorization and subject to reporting, including to engage external specialist advice and support.

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The independence of the FCA is ensured by the absence of any hierarchical relationship with the functions subject to review and by the fact that it is not assigned operational responsibilities in processes exposed to bribery risk.

For any queries or clarifications, the FCA may be contacted by e-mail (fca@abitareinspa.com)

5. REPORTING OF VIOLATIONS

ABITARE IN disseminates this Anti-Bribery Policy internally and externally, encouraging personnel and third parties to raise any concerns and to promptly report any violation, including suspected violations, of this Policy and/or any attempted, actual or presumed act of bribery. Reports may be made to the FCA at the e-mail address fca@abitareinspa.com or through the whistleblowing channel implemented by the Company, accessible via the website at <https://contents.abitareinspa.com/whistleblower-channel/>

6. SANCTIONS SYSTEM

Any act in breach of the Anti-Bribery Policy and, more generally, any breach of the rules of the Anti-Bribery System constitutes a serious breach of company rules and, in addition to criminal and civil consequences, gives rise to the sanctions provided for by the corporate disciplinary system adopted within the Organization, Management and Control Model (MOG) pursuant to Legislative Decree No. 231/2001.

ABITARE IN will take appropriate measures, such as termination of the contract and claims for damages, against suppliers, partners, consultants and employees in the event of actions committed in breach of anti-bribery legislation and/or this Policy.

Milan, 25.09.2026

Abitare In S.p.A.
The Chief Executive Officer
Marco Claudio Grillo

