

Politica Anticorruzione CIRFOOD s.c.

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1. CIRFOOD'S CONTEXT: CORRUPTION RISK ANALYSIS

CIRFOOD conducted a careful analysis of the internal and external context in which it operates in order to assess corruption risks. As a national organisation engaged in public and private contracts in the collective catering sector, CIRFOOD adopted the ANAC risk indicators to classify corruption risk at the territorial and sector levels.

The analysis also considers the operating sectors, services, type of customers and suppliers, as well as the geographical distribution of company operations. The outcome of the risk analysis defines the preventive actions to be taken.

2. CIRFOOD'S ANTI-CORRUPTION CODE

One of the key factors in CIRFOOD's reputation is its ability to conduct its business with loyalty, propriety, transparency, honesty and integrity, and in compliance with the laws and regulations that apply to the company's operations.

The Anti-Corruption Code, an integral part of the ISO 37001 Anti-Bribery management system, was adopted to provide a systematic framework for the organisational and regulatory tools on anti-corruption that CIRFOOD has implemented and applied over time.

The Anti-Corruption Code has three main objectives:

- Reducing opportunities for corruption to occur.
- Increasing the ability to detect corruption.
- Creating a context that is unfavourable to corruption.

The Anti-Corruption Code is available in the relevant section of the company website.

3. THE PRINCIPLE OF “PREVENTION AS A STRATEGY”

CIRFOOD conducts its operations in accordance with the principles of loyalty, propriety, honesty, integrity and transparency, in compliance with laws, regulations, standards and international best practices. The company does not allow any conduct that conflicts with the principles, requirements and prohibitions set out in the Anti-Corruption Code and anti-corruption laws.

CIRFOOD personnel, relevant Business Partners and anyone who carries out work in favour or on behalf of CIRFOOD must not be involved even indirectly in acts of corruption.

In accordance with section IV of the Code of Ethics, the Preventive Protocols of the 231/01 Model, the Anti-Corruption Code published on the company website and its corruption risk management system certified under ISO 37001, CIRFOOD prohibits direct and indirect bribery and corruption without any exceptions.

Specifically:

- It is prohibited to directly or indirectly offer, promise, give, pay, authorise someone to give or pay, or instigate someone to give, pay or receive material benefits, economic and/or non-economic advantages, or other benefits to a Public Official/Public Service Officer or to a Private Individual (bribery).
- It is prohibited to directly or indirectly accept, authorise someone to accept, or instigate someone to accept economic and/or non-economic advantages or other benefits from a Public Official/Public Service Officer or from a Private Individual (corruption).
- No questionable or illegal practice (including facilitation payments) may be justified or tolerated because it is “customary” in the sector or territories in which CIRFOOD operates.
- Any service must be refused if it can be obtained only by compromising CIRFOOD’s ethical standards.

The prohibition includes the offer or receipt by CIRFOOD personnel or by anyone acting on behalf of the company of an economic/non-economic advantage or other benefit in connection with business operations.

The prohibition is not limited to cash payments, as corrupt conduct may also take the form of:

- Gifts
- Contributions in kind, sponsorships and donations

- Jobs, commercial operations, investment opportunities
- Consultancy appointments
- Award of projects to “recommended” suppliers
- Personal discounts or credit
- Business courtesies towards third parties, meals and transport, hospitality
- Facilitation payments
- Other advantages or other benefits

Prohibited conduct remains prohibited regardless of whether it is carried out:

- To the detriment of or against CIRFOOD’s interest, for a personal interest or advantage, or even for the benefit or advantage of the Company, or in the belief that this is the case.
- Using CIRFOOD resources or resources made available personally (in whole or in part) by a Recipient or by a third party.

The recipients of the Anti-Corruption Code and this Anti-Corruption Policy will be required to provide justification if they act by ignoring warning signs or grounds for suspicion (“Red flags”), or if they act with gross negligence or imprudence, for example by failing to conduct an adequate level of due diligence according to the circumstances.

4. ANTI-CORRUPTION POLICY

Compliance with anti-corruption laws, this Anti-Corruption Policy and the requirements defined in the Anti-Corruption Code is mandatory for all CIRFOOD personnel, all those who operate in favour or on behalf of CIRFOOD and relevant Business Partners.

CIRFOOD Management has an active role in fighting corruption in the Company, in order to support the effective implementation of the Anti-Corruption Code in its area of responsibility.

Moreover, the Compliance Function, which also acts as the Anti-Corruption Unit under ISO 37001 Anti-Bribery Certification, ensures the effectiveness of this Anti-Corruption Policy and the Anti-Corruption Code and provides CIRFOOD functions with specialised anti-corruption support.

The Company prepared its Anti-Corruption Policy in keeping with its vision and with CIRFOOD's primary ethical values, which are set out specifically in the Code of Ethics. For this purpose, account was also taken of the context in which the Company operates and the outcomes of the anti-corruption risk assessment.

Against this background:

- All CIRFOOD relations with, relating to or involving a Public Official/Public Service Officer must be conducted in compliance with the requirements defined in the Anti-Corruption Code and by anti-corruption laws.
- All CIRFOOD relations with, relating to or involving private individuals deemed to be at risk of corruption must be conducted in compliance with the Anti-Corruption Code and anti-corruption laws.
- CIRFOOD personnel, each within their own functional area of responsibility, are responsible for compliance with the Anti-Corruption Code and anti-corruption laws.
- No questionable or illegal practice may under any circumstances be justified or tolerated because it is customary in the sector or territory in which CIRFOOD operates.
- No service may be imposed or accepted if it can be obtained only by compromising CIRFOOD's ethical standards.
- Personnel who violate the Anti-Corruption Code or anti-corruption laws will be subject to disciplinary measures and any other legal action necessary to protect CIRFOOD's interests.
- The above-mentioned sanctions and/or actions may also apply to those who, while aware of violations of the Anti-Corruption Code or anti-corruption laws, did not prevent their perpetration or in any event did not facilitate their discovery.
- Business Partners that violate the Anti-Corruption Code or anti-corruption laws will be subject to contractual remedies and claims for damages.
- CIRFOOD personnel will not be dismissed, demoted, suspended, threatened, harassed or discriminated against in any way in their employment treatment for refusing to make a prohibited payment, even if that refusal resulted in the loss of business or another adverse consequence for the business.
- Awareness-raising initiatives and periodic training on anti-corruption must be carried out.
- CIRFOOD personnel are required to exercise their role knowingly and to identify and report any suspicious operation or any critical issue that represents a potential corruption risk to the Anti-Corruption Unit. For this purpose particular

attention must be paid to the structure and circumstances of transactions and to the potential factors that could lead to the belief that the transaction is structured in an unusual way or with the intention of circumventing or violating legal requirements.

- Reports are encouraged concerning any operation that may constitute a potential violation of the Anti-Corruption Code and/or anti-corruption laws. These reports, as also envisaged by the whistleblowing reporting procedure, must be made in good faith, without fear of retaliation, ensuring that no whistleblower is discriminated against with effects on working conditions linked to the report.
- CIRFOOD personnel are required to avoid and report any situation that may constitute or give rise to a conflict of interest between personal or family economic operations and the duties they perform in the company. Specifically, any situation that may constitute or give rise to a conflict of interest must be promptly reported to the manager and to the Anti-Corruption Unit. The person involved shall promptly refrain from taking part in the operational/decision-making process. The Anti-Corruption Unit, together with the Supervisory Body under the 231/01 Model, ensures that reports are managed in accordance with the principles protecting whistleblower confidentiality.

5. REVIEW AND CONTINUOUS IMPROVEMENT

This Policy is subject to periodic review and continuous improvement, including on the basis of audit findings and regulatory changes.

Reggio
Emilia,

26/06/2025

The Chair,
Chiara Nasi