

Anti-Bribery Policy

Anti-Bribery management system

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Author

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NSR S.r.l.

Registered Office

Via Ortigara, 3
00195 Roma (RM)
Italia

**Operational and administrative head-
quarters**

via Portuense, 2482
00054 Fiumicino (RM)
Italia

tel +39 06 65047521
fax +39 06 65047519
info@nsr.it
www.nsr.it

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1 Introduction

The adoption of the Anti-bribery Management System (also “ABMS” or “Anti-Bribery System”) by NSR S.r.l. is part of a virtuous path that has as its primary objectives the prevention and fight against corruption, fundamental principles on which the Company bases its work activity.

To this end, NSR S.r.l. (hereinafter only “NSR”), in full compliance with all laws, regulations and other regulatory acts established at international and local level:

- undertakes to prevent and counteract illicit behavior by all persons who, in various capacities, act in its name, on its behalf and for its benefit;
- rejects bribery in all its forms and prohibits any behavior that may facilitate or promote corruption phenomena;
- is committed to constantly implementing a “sustainable” business that integrates results and performance with compliance with shared rules and values, in order to make the Company ethically virtuous on the assumption that any “illicit” profit does not constitute acceptable profit.

The NSR Anti-bribery Policy (hereinafter also the “Policy”) was created to integrate and coordinate the internal regulations regarding the fight against corruption in a single organic framework, recalling the principles of correctness, transparency, integrity, honesty and fight against corruption outlined in the Organization and Control Model pursuant to Legislative Decree 231/01, including the Code of Ethics and Corporate Conduct and the Supplier Code of Conduct adopted by NSR.

The Policy is an integral part of the company strategy and is a constant reference in all social decisions.



2 Purpose and scope of the Policy

The main objective of the NSR Policy is to raise awareness among all Recipients of the rules and behaviors to be followed, providing a useful guide for the identification, review and achievement of anti-bribery objectives.

Compliance with anti-bribery legislation is mandatory for all NSR personnel and all Partners, meaning all individuals acting in the name and/or on behalf of NSR who are likely to have relevant contact with Public Officials in the performance of their duties (e.g. intermediaries, suppliers, consultants, distributors, dealers, etc.).

The Company's Governing Body, through the designated structures, ensures the dissemination of the Policy to all interested resources, making it available internally in the internal company repository and externally on the website "<https://www.nsr.it>".

All Recipients are required to comply with the laws and regulations on the prevention of bribery applicable to the Organization. Recipients are also required to read, understand and maintain behaviors consistent with the principles and provisions set out in this document for the prevention and fight against bribery and corruption.



3 Glossary

The following table lists the terms and definitions used in the document for ease of reading.

Term	Definition
Code of ethics	<p>Corporate document that represents the Charter of moral rights and duties that in a business organization defines the ethical-social responsibilities and principles that all participants in the work activity must adhere to.</p> <p>In this document, "Code of Ethics" means the Code of Ethics and Conduct of NSR S.r.l.</p>
Controlled (or Controlled and/or Associated Companies)	The companies, directly or indirectly, controlled and/or participated by NSR.
ABMS	Anti-Bribery Management System
ABCF	Anti-Bribery Compliance Function
Corruption	Corruption is considered to be the offer, promise, receipt or giving of undue benefits and/or compensation to third parties, whether directly or indirectly, to obtain a personal advantage or for Group Companies or third parties. In this Policy, no distinction is made between "corruption of public officials" and "corruption of private individuals". The definitions of corruption provided by Transparency International ("the abuse of entrusted power for private gain") and by the World Bank ("offering, giving, receiving or soliciting, directly or indirectly, something of value to improperly influence the actions of another party") are adopted as generally recognized references for the purposes of this Policy.
Recipients	Management, or members of any other body of NSR, as well as all the Personnel of the Company and its subsidiaries and/or affiliates, as well as all those who operate in the name and/or on behalf and/or in the interest of the Company or who have professional or business relationships with it (third parties).
NSR Group or Group (or also Group Companies)	NSR and its controlled and/or participating companies.
Anti-corruption legislation	<p>The national regulations applicable in the countries where the Group operates, the best practices and guidelines developed by international private organizations (United Nations Global Compact, UNI ISO 37001), as well as the following international law conventions, listed by way of example and not exhaustively:</p> <ul style="list-style-type: none">- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997);



Term	Definition
	<ul style="list-style-type: none">- Council of Europe Criminal Law Convention on Corruption (1999);- United Nations Convention against Corruption (2004);- Italian Penal Code: provides for crimes such as corruption and extortion;- Legislative Decree 8 June 2001, n. 231: regulation of the administrative liability of legal persons, companies and associations even without legal personality;- Law 6 November 2012, n. 190: provisions for the prevention and repression of corruption and illegality in the Public Administration;- Legislative Decree 30 December 2016, n. 254: provisions on whistleblowing and on the protection of the whistleblower;- Legislative Decree 24/2023 implementing EU Directive no. 1937/2019;- Legislative Decree 36/2023: Public Contracts Code implementing Article 1 of Law 21 June 2022, n. 78;- NSR Code of Ethics and Corporate Conduct;- NSR Supplier Code of Conduct;- NSR Anti-Bribery Policy.
Group Personnel	Employees of NSR and Group Companies.
Public Official	Anyone who exercises a public legislative, administrative or judicial function. "Public" means "the administrative function governed by public law and authoritative acts, characterized by the formation and manifestation of the will of the Public Administration or by its performance by means of authoritative or certifying powers".
Public service officer	Anyone who, in any capacity, provides a public service, understood as an "activity regulated in the same ways as a public function, but characterised by the lack of the powers typical of the latter, with the exclusion of the performance of simple administrative tasks and the provision of merely material work".
Protection System	The set of documentation system and organizational methods of the Group, aimed at preventing or in any case minimizing the risk of commission of crimes. With reference to NSR Srl, the Model 231 and the complementary documentation are included, at Group level it includes the Policy and the Compliance systems with the specific regulations in force.



4 Commitment

NSR has implemented its own Anti-bribery Management System based on the international standard ISO 37001:2016, defining its own model to minimize the risk of engaging in behaviors attributable to bribery.

NSR's Anti-Bribery Policy therefore formalizes the Company's commitment to preventing and combating bribery in every area of activity, integrating and enclosing in an organic framework the rules, guidelines and minimum standards of behavior already present in the Company.

All internal Recipients of the Organization are invited to become aware of and implement the Anti-Bribery Policy, behaving in accordance with its provisions.

To ensure the commitment to establish, maintain and review its Anti-Bribery System, the following responsibilities are foreseen:

- the **Governing Body** of NSR has approved this Policy and guarantees that company activities are carried out in compliance with it, representing a behavioral model to be followed in compliance with principles of correctness, transparency, integrity, truth and compliance with national and international regulations;
- the **Governing Body** of NSR has also established the Anti-Bribery Compliance Function, appointing a designated Officer, with the primary task of monitoring the compliance of the Anti-bribery System;
- the **heads of the Directions, Offices and Business Areas** involved at every level have the responsibility of ensuring that the principles of the Anti-Bribery System are applied and respected within the areas of their competence, playing an active role in the communication and promotion of the anti-bribery culture, committing themselves to transferring the principles and values of behaviour.



5 Anti-Bribery Compliance Function

For the purposes of coordinating, developing, monitoring and maintaining the anti-bribery management system according to the UNI ISO 37001:2016 standard “Anti-bribery management systems” (ABMS), NSR has appointed its own Anti-Bribery Compliance Function (ABCF), in line with the requirements, tasks and responsibilities required by the ISO 37001 standard.

Specifically, before the appointment it was verified that the identified individual:

- has the appropriate skills, status, authority and independence in line with the provisions of ISO 37001 (in terms of: adequate level of education, training and experience; absence, to the extent possible, of personal involvement in activities exposed to the risk of corruption; possession of necessary powers, capacity and possibility to interface directly with Function Managers, Control Bodies, Top Management and Single Director);
- was not involved in criminal proceedings and had not received definitive convictions for corruption or similar crimes.

The ABCF has adequate powers and resources to effectively carry out compliance responsibilities, constantly monitoring and directing the planned priorities and activities.

The main responsibilities of the ABCF are:

- a) supervise the design and implementation by the Company of the Anti-Bribery Management System;
- b) provide advice and guidance to personnel on Anti-Bribery and the related Anti-Bribery Management System;
- c) ensure that the Anti-bribery Management System complies with the requirements of the UNI ISO 37001:2016 standard;
- d) report on the performance of the Anti-Bribery System to the Governing Body and other relevant functions as appropriate.



6 Objectives of the Anti-Bribery Management System

The Anti-Bribery Management System implemented by NSR responds to an approach aimed at continuous improvement and demonstrates the constant commitment of the Company's top management to the prevention of corruption phenomena.

To this end, NSR formulates specific objectives in terms of management and mitigation of the related risk.

In particular, the Company's top management defines:

- the human, technical and economic resources involved;
- the time needed to achieve each individual objective;
- the methods, times and responsibilities for monitoring the level of achievement of each objective.

The objectives may undergo changes during the work following internal and/or external input or as a function of management changes or new market needs and constitute a firm and binding commitment of all components of the organization, starting from the Top Management. For these reasons, the objectives are defined and evaluated during the management review and shared by all the function managers.

By way of example and not exhaustively, the main objectives of corruption prevention include:

- promotion of an adequate culture against bribery within the organization training of all personnel on anti-bribery issues;
- management of reports on anti-bribery matters and activation of protection mechanisms both towards the good faith whistleblower and towards the reported person;
- continuous assessment of the context, risks and opportunities for improvement of the Management System through scheduled audits on the Management System;
- compliance with best practices, Guidelines, Conventions, reference regulations and continuous monitoring of the related developments.

The complete list of Management System objectives and the indicators defined for their measurement can be consulted through the **MOD-PC-6.2-PC** Objectives Module.



7 General rules and principles

The Company, in line with the values of the NSR Group, is committed to preventing and counteract the occurrence of illegal situations in the performance of its business activities, believing that ethical integrity, correctness and acting in accordance with the principles and rules of conduct adopted are a constant duty of all those with whom the Company has business relations.

In this perspective, the following general principles are observed:

- **segregation of responsibilities:** the person responsible for operational activities is different from the person who controls or authorises them, to ensure adequate separation between operational activities and control functions;
- **signature powers:** formalization and clear definition of signature powers, attributing them appropriately to the organizational and management responsibilities of the attorney. It is important to respect the established limits of value and subject matter, as well as the directives, company procedures and applicable regulations. Finally, the importance of adequately tracing the investigation process and the relevant documentation is underlined;
- **impartiality and absence of conflicts of interest:** all Recipients of this Policy must behave in a professional, transparent, impartial manner and in compliance with the anti-corruption law. If they encounter situations that may cause conflicts of interest, they must report them immediately. They must avoid doing anything that may damage the interests or reputation of the company and/or the Group;
- **traceability and archiving:** all the activities performed and the related checks carried out must be traceable and verifiable afterwards; the documentation produced must be archived in an orderly fashion and remain easily retrievable;
- **know your partner:** each corporate department responsible for a process must verify the reputation of the business partners (including suppliers) with whom NSR is considering doing business. Specific clauses must also be included in the contracts that commit partners to compliance with ethical and anti-corruption standards. Finally, they must monitor the performance of partners to ensure that they are being compensated fairly.



8 Principles of conduct relating to sensitive activities

With regard to the types of activities carried out by NSR, the following can be classified as theoretically most exposed to the risk of corruption:

- relations with the Public Administration;
- gifts, hospitality and entertainment expenses;
- assignment of consultancy, specialist and professional tasks;
- selection and hiring of personnel;
- sponsorships;
- accounting records.

In relation to NSR's current or potential business, Recipients must comply with the provisions of the Code of Ethics, the Supplier Code of Conduct and company procedures, as well as the following principles of conduct.

8.1 Relationships with third parties

As part of its business activities, NSR maintains commercial relationships with Third Parties (for example suppliers of goods and services, customers, collaborators and partnerships), which could expose the Company to corrupt activities or in which it could be held liable for corrupt actions committed by persons carrying out activities in its name and on its behalf.

NSR encourages Third Parties with which it has business relationships to adopt principles, procedures and behaviors in line with this Anti-Corruption Policy and its Supplier Code of Conduct as well as to observe the relevant laws and regulations.

The inclusion of appropriate anti-bribery clauses is envisaged within the agreements with parties operating in the name or on behalf of the Company.

When engaging Third Parties, it is necessary to take into account the business needs, the reputation of the counterparty, its ethical conduct and the appropriateness of the compensation due.

The checks are aimed at acquiring information in terms of (i) reputation and ethics, (ii) compliance with transparency standards, (iii) respect for the principles of independence, (iv) presence of any risk indicators and (v) adoption of controls or measures to prevent the risk of corruption, where appropriate.

The Company expects relevant Third Parties/Business Associates with whom it has business relationships to provide complete, accurate and up-to-date information to facilitate the verification activities undertaken, where required..



In the event of any risk factors emerging, the Company shall provide for appropriate corrective measures in a timely manner, including for example the non-activation of the relationship or, during the contractual relationship, the non-continuation of the relationship with the Third Party.

8.1.1 Suppliers

NSR is committed to maintaining relationships based on respect for the law, as well as aimed at finding the right efficiency in supply, loyalty in the relationship, recognition of the professionalism and competence of the counterpart.

The choice of the Supplier must be based not only on the actual purchasing needs, but also on objective parameters, such as the quality and price of the goods or services to be purchased, as well as guarantees of reliability, assistance, timeliness, efficiency, solidity and availability of means.

Before signing agreements with Suppliers, information on the Third Party regarding its ethical and reputational characteristics is acquired and assessed and any situations that could constitute problems of independence and conflict of interest are verified.

Suppliers must:

- read and agree to this Policy;
- read and adhere to the Code of Ethics and Conduct and the Supplier Code of Conduct adopted by NSR;
- attach the required declarations and mandatory documents.

NSR is committed to requiring its Suppliers to comply with behavioral principles aligned with its own, considering this aspect of fundamental importance to establish and maintain the business relationship. Therefore, in drafting the contract, the inclusion of appropriate clauses on anti-bribery, reference to the Code of Ethics and Model 231 and the Supplier Code of Conduct and clauses that guarantee the Company to also evaluate the adoption of appropriate protection measures up to the termination of the contract in the event of violations or non-compliant behavior are requested and promoted.

The payment of invoices is processed and recorded in a transparent, truthful, correct, complete, accurate manner, on the basis of the applicable accounting principles and on the basis of appropriate supporting documentation.

8.1.2 Public Administration

Relations and cooperation with the Public Administration, with Institutions, with Public Supervisory Authorities and with other relevant subjects must be based on general principles of legality, correctness and transparency.

Since relations with these subjects are particularly sensitive to the risk of corruption, only authorised corporate figures and functions can assume commitments and manage relations with Public Officials and/or public bodies.



The following activities are included among the areas at risk of corruption attributable to this context:

- a) participation in public tenders, awarding and signing of the contract and management of the related obligations;
- b) management of obligations and transmission of declarations and/or other required documentation;
- c) obtaining permits, authorisations, licences for which the Public Administration is an active part;
- d) management of legal disputes/arbitrations;
- e) checks and inspections conducted by Public Authorities;
- f) management of public contributions and funding.

Relations with the Public Administration, with the Public Supervisory Authorities and similar Institutions/Subjects must be conducted according to the following general principles:

- relationships must be based on principles of transparency, truthfulness, correctness and traceability and compliance with applicable laws and regulations;
- the relationships must be managed exclusively by the organizational structures/corporate entities designated for this purpose;
- the traceability of relationships/interactions with such Subjects must be guaranteed, where necessary also through the drafting of any minutes/notes correctly archived and stored;
- internal anti-corruption provisions must be respected, including specific indications relating to gifts, hospitality and entertainment expenses, promotional and marketing expenses and the prohibition of payments for facilitations.

Furthermore, it is absolutely forbidden to:

- offer, promise, give, pay, solicit, authorize someone to give or pay, directly or indirectly, even through a third party, an economic advantage or other benefit (including, by way of example but not limited to, gifts, sponsorships and donations, entertainment and hospitality expenses towards third parties, supplies, professional assignments, employment or investment opportunities, more favorable commercial conditions), to a Public Official/Public Service Officer or to a private individual (Active Corruption);
- accepting a request from, or solicitation from, or authorising/soliciting someone to accept, directly or indirectly, even through a third party, an economic advantage or other benefit (including, by way of example but not limited to, gifts, sponsorships and donations, entertainment and hospitality expenses, supplies, professional assignments, employment or investment opportunities, more favourable commercial conditions) from any counterparty (Passive Corruption);

in order to:

- induce a Public Official/Public Service Officer to improperly perform any public function, or reward him for having performed it;



- influence an official act (or omission of an official act) by a Public Official/Public Service Officer or any decision in violation of an official duty;
- induce any private counterparty to omit or perform an act in violation of the obligations inherent to his office or of the obligations of loyalty, or reward him for carrying out the same;
- obtaining or securing an improper advantage in relation to business activities;
- violate the Anti-Bribery Laws and, in any case, the applicable laws.

8.2 Gifts and presents

Relations with Customers, Suppliers, collaborators or Third Parties in general with whom the Company establishes business relations must be based on the service provided in exchange for fees, amounts paid for goods and services purchased and received as well as on the mutual advantages achieved in the commercial relationship.

NSR, in general, does not allow, outside of the normal courtesy practices generally recognized in the context of commercial relationships, the offering or receipt of gifts and gratuities, since, in some conditions or circumstances, such gestures may be interpreted as behaviors aimed at fueling or generating corruption phenomena and/or issues related to conflicts of interest, with a consequent impact on the company's reputation and image.

Gifts and freebies may be offered and/or accepted only if of modest value and, therefore, if:

- are not and cannot be considered capable of compromising the integrity and objectivity of the Company's personnel;
- they do not give the impression of inducing a person to act improperly in the course of their work or of rewarding inappropriate behavior.

Incoming and outgoing gifts must be recorded accurately and transparently, in order to ensure traceability and documentation, as required by internal provisions.

In all cases, gifts are always prohibited if they consist of cash or cash equivalents, if they are inappropriate in nature or if they violate any applicable law or regulation.

It is not permitted to offer money or other benefits (such as gifts) or to perform acts of commercial courtesy to public officials or public service employees, including their family members, even through a third party, unless it is of modest value and, in any case, if it cannot be interpreted as a tool to receive illegitimate favors or improperly influence the recipient.



8.3 Liberality

Acts of liberality, donations, social projects are part of the commitment that the Company has towards local communities in support of cultural, social, environmental and charitable initiatives not strictly linked to business.

In this context, corporate sustainability donations can typically be traced back to the following categories:

- volunteer initiatives;
- liberal donations, i.e. donations of money to third sector entities;
- in-kind donations, i.e. donations of materials (e.g. personal computers, technological equipment, furniture, etc.) to third sector organizations or public schools.

In view of the risks underlying the use of the relevant funds, such initiatives must be conducted in good faith and not with the aim of obtaining undue advantages, they must be driven exclusively by a pure liberal spirit; therefore, it is important that the Company makes use of specific control measures, including:

- appropriate checks must be carried out with respect to the beneficiary counterparts;
- the initiative must be authorised by the relevant bodies;
- initiatives must be consistent with the plan and budget for such types of initiatives, where defined;
- where applicable, a formalized contract must be drawn up with the conditions of the Initiative;
- the initiatives must be registered according to criteria of transparency, truthfulness and correctness in the accounting books.

Donations for political purposes are not permitted, where they are aimed at improperly influencing government decisions or decision-making processes.

8.4 Sponsorships

Sponsorship activities are among the initiatives aimed at having an image return and maintaining profitable relationships for business development.

In supporting these activities, it is necessary to ensure that they are aligned with the company plans and carried out by adopting the necessary measures to guarantee transparency, correctness and traceability.

To this end:

- the counterparty must be a reliable organization and preliminary checks must be carried out on the beneficiary, in ethical and reputational terms;



- a preliminary verification must be carried out regarding independence and the absence of privileged relationships or conflicts of interest, current or even potential;
- sponsorship activities must be carried out in accordance with approved budgets, where defined, and appropriately approved considering the nature, purpose and legitimacy of the sponsorship initiative.

The sponsorship initiative must be recorded in accordance with the criteria of transparency, truthfulness and correctness, on the basis of applicable accounting principles and on the basis of appropriate support documentation, and payments made on the basis of contractually agreed upon.

8.5 Personnel selection and recruitment

NSR ensures that the recruitment and selection process includes specific screening of candidates, with the goal of ensuring their suitability for the role they will be filling.

The process of resource selection and placement must be managed in accordance with the following provisions and principles:

- responsibility for the process is entrusted to qualified and experienced persons appropriate to the task and under the supervision of the relevant organizational structure;
- appropriate information must be acquired to identify and manage any potentially prejudicial situations of independence and/or conflict of interest in the subsequent performance of professional activities, as well as collected information regarding integrity, in compliance with current regulations;
- reporting, hiring, collaborating or activating internships for the purpose of obtaining undue advantage is not permitted;
- in the case of recruitment of personnel who have worked in Public Administrations¹, who have held senior positions in client companies or persons with relatives and relatives-in-law who hold positions of responsibility in Public Administrations or client companies, all measures necessary to avoid conflicts of interest, problematic independence and/or to comply with legal constraints or impediments must be carried out.

¹ In order to address the requirements of Article 53 paragraph 16 of Legislative Decree No. 165/2001, public employees who in the last three years of service have exercised authoritative or negotiating powers on behalf of the Public Administration may not be hired in the three years following the termination of public employment, if the Company is the recipient of the activity of the same Public Administration, carried out through the same powers (so-called "pantouflage" or "revolving doors" clause).



The selection should be made taking into account the role and activities that the resource is expected to perform.

All new additions are promptly brought to the attention of the Code of Ethics and Conduct, Model 231, the Policy for the Prevention of Corruption, as well as the Company Procedures, which they are required to comply with.

Recruitment shall be conducted in compliance with applicable current regulations and appropriately formalized through an employment contract signed by a person with appropriate authority, and all supporting documentation shall be duly retained.

Upon hiring, personnel are required to sign a statement of commitment in which they are asked to certify—among other aspects—that they are aware of the internal anti-corruption regulations adopted by the Company, that they have understood their contents and that their behaviors are in line with what is stated in them.

The personnel compensation system is designed with the aim of rewarding work performed, taking into account assigned responsibilities and demonstrated performance. Bonuses disbursed and other incentive elements of remuneration are periodically reviewed to assess their reasonableness, including with a view to not incentivizing misconduct.

8.6 Accounting records and confidentiality

Any economic and financial operation is carried out in compliance with the principles of legality, integrity and transparency; therefore, every operation and transaction must be properly authorized, verifiable and accompanied by adequate documentary support in order to be able to carry out checks on its nature and purpose.

The Company records all business transactions in its books of accounts in a detailed, transparent, true, fair and timely manner, and in accordance with applicable accounting standards. In particular, costs, payments, revenues, receipts, and expenditure commitments shall be timely included among financial operations and shall reflect the information contained in supporting documents, issued in accordance with applicable laws.

Company transactions and operations are appropriately tracked and documented, and such traceability is ensured by company personnel and information systems. Documentation produced in this regard is appropriately filed.

It is the responsibility of the relevant organizational structures to perform adequate controls to verify that business transactions are executed against appropriate authorizations and recorded truthfully and fairly, and that these records ensure that the financial statements are prepared in accordance with applicable accounting standards.



In more general terms, NSR has an organizational system marked by compliance with the principle of segregation of roles so that there is separation of responsibilities between those who perform, control and authorize a specific business activity.

NSR ensures the confidentiality of the information in its possession, establishing the prohibition of improper use of news and information acquired and/or processed during the performance of the tasks and activities carried out, through the adoption of appropriate policies, procedures, rules and tools aimed at achieving an adequate level of security in the management of the company's information assets, in compliance with applicable current regulations, in terms of confidentiality, integrity and availability of information.

8.7 Conflict of interest

All Recipients are required to avoid situations and activities in which a conflict with the interests of the Company may arise or which may interfere with their ability to make, in an objective, transparent and impartial manner, decisions in the interest of the Company.

In particular, Recipients are required to refrain from activities, behaviors and acts that are in any way incompatible with the obligations related to their relationship with the Company and to avoid conflicts of interest between personal and family economic activities and those of the Company.

Any situation that may constitute or result in a conflict of interest must be promptly communicated to the relevant organizational structures, including through the reporting tools identified.

Any information on potential conflicts of interest shall be noted when hiring personnel or in case of business relations with Third Parties.



9 Personnel training

NSR ensures that all Personnel are aware of the Protection System.

The purpose of the training is to make employees understand the corruption risks that the organization and they themselves may face, the corruption prevention policy, the management system for the prevention of corruption, and the preventive actions to be taken in case of suspicion or risk of malpractices.

In addition, NSR ensures that partners, business and financial, professionals, business promoters, collaborators and suppliers are also aware of the Policy and are required to abide by and enforce it.

The content of anti-corruption training is overseen by the Corruption Prevention Compliance Function.

Training is mandatory for all personnel – differentiated where appropriate by professional level and role – and is subject to monitoring regarding effective participation and completion.



10 Reporting of violations

NSR disseminates internally and externally the “Speak Up Culture,” encouraging staff and third parties to raise any concerns and promptly report any violation, even suspected, of this Policy and/or any corrupt act, whether attempted, certain or alleged.

NSR will ensure that no whistleblower who has made a report in good faith (or on the basis of a reasonable and confidential belief) will suffer retaliation or be discriminated against with an effect on working conditions, because of the report or for refusing to engage in unlawful conduct (even if harm to the Company's business resulted from such refusal).

At the same time, NSR may provide for the application of sanctions if reports are made with bad faith, malice or gross negligence.

The system for reporting potential violations, which ensures the highest degree of confidentiality and privacy in the processing of communications received (to protect the reporter and the reported), is the Whistleblowing IT platform accessible by everyone (Employees, Third Parties, etc.) on the Company's website (available at the following link: <https://whistleblowing.nsr.it>).

This is an easy-to-use channel structured in such a way as to encourage the indication of possible wrongdoing through a direct and confidential mode of communication, which allows for the submission of reports, including anonymously, from any internet access point and with any device.



11 Sanctioning measures

Respect for and compliance with the Anti-Corruption Policy and Anti-Corruption regulations is an integral part of the contractual obligations of employees and Third Parties with whom the Company has business relations. Their violation constitutes a breach of contractual obligations and compliance with Company rules.

The Company is committed to implementing reasonable controls aimed at preventing possible misconduct as well as applying appropriate sanctions where deemed appropriate. Any measures will be modulated according to the seriousness and in compliance with the regulatory and contractual framework of reference, providing for internal personnel measures consistent with the provisions of the Workers' Statute.

In the case of external parties working on behalf of or with the Company (e.g., Suppliers, Collaborators), non-compliance with the provisions of the Policy will be dealt with through contractual provisions that may also include suspension of performance or termination of the contract and, where there are grounds, a claim for damages.



12 Dissemination and updating of the Policy

This document is:

- signed by the legal representative, who intends to ensure its adequacy to the purposes of the organization and the needs of its users through periodic review, and is disseminated to all organizational levels through the tools and communication channels present in the organization;
- subjected to periodic and event-driven review in cases of changes in the external and internal regulatory, socio-cultural and organizational environment, change requests received or other events that make it necessary to modify the contents of the document.