

# ANTI-CORRUPTION POLICY



**REV 0**  
**05.07.2024**

## PREMISE

This document, together with our *Environmental Policy*, our *Ethics Code* and our *Supplier Code of Conduct* has to be considered the basis on which TOMET MECHANICS SRL, located in Via dell'Artigianato 7 in Castelgomberto (VI), manages every internal and external business partnership. As a company, we believe that business ethics is comparable and complementary to the the quality of our products, and this point should never put into question.

For this reason, after having verified our compliance with the legislative obligations about anti-corruption practices, TOMET would like to inform all its employees and clients on what is acceptable as a reward and what is not.

It is necessary to underline that the reputation of a company is based on the behaviour of everybody, including directors, workers and collaborators, so reporting any misconduct through the whistleblowing platform should be everyone's responsibility.

## OBJECTIVE AND FIELD OF APPLICATION

This document is published in order to:

- Inform the personnel on the crimes and the related punishments related to corruption and concussion.
- Prevent any potential internal or external misconduct carried out or suffered by employees, collaborators or clients that could damage the reputation of the company.

It is applicable to all the activities, internal or external, related to the company TOMET MECHANICS SRL, and it is necessary that it is respected by all employees, including interns, advisors etc...

Please note that: all charity donations are excluded from this document, nevertheless, they need to be verified and authorized by the Directors or the Human Resources Office.

## USEFUL DEFINITIONS

The standard UNI ISO 37001:2016 defines **corruption** as a crime, specifically: *"Offer, promise, supply with, accept or request and illicit benefit of any value (economic o not), directly or indirectly, regardless of the place, violating the law in force, as a reward or incentive for a person in order to act or omit actions related to the role or the service of the same person"*.

→According to the Italian law, the punishment is imprisonment from 3 to 8 years. This is applicable to both the corrupt and the corruptor.

However, there are different types of corruption:

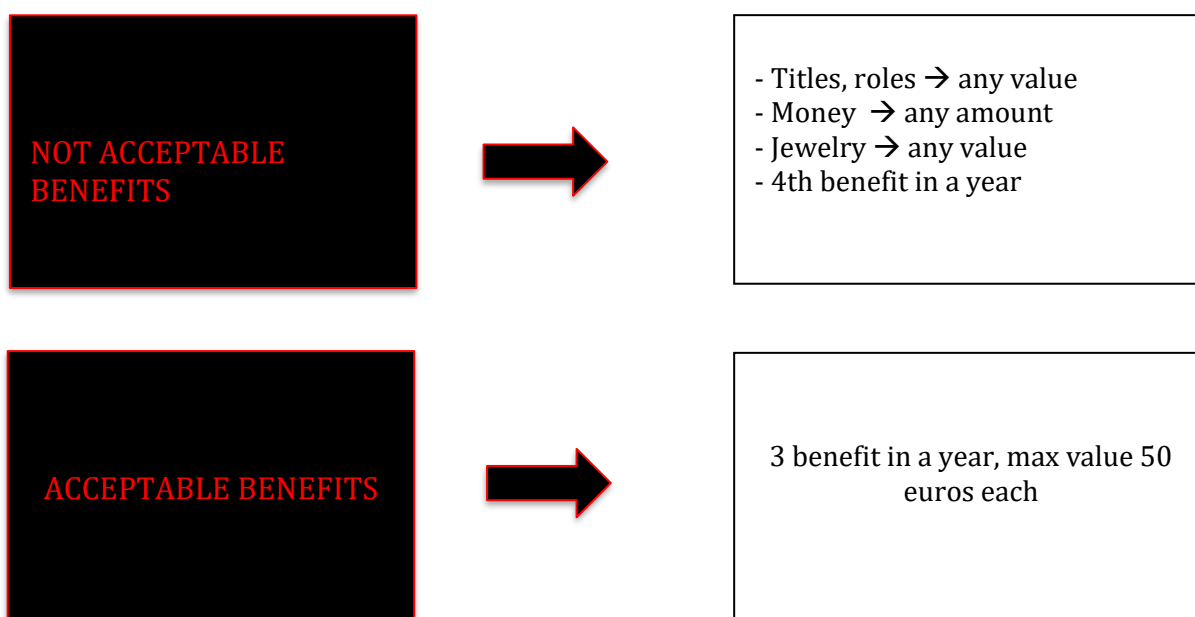
- Proper corruption: paying a public figure so that he or she does not perform in his or her job correctly, omitting or ignoring irregularities.
- Improper corruption: paying a public figure so that he performs in his or her job "too well" on a particular subject or situation indicated by the corruptor.



According to the Italian law, **concussion** is a crime: "A public figure that, abusing his position, forces someone to promise or give illicitly, to him or to a third person, money or other benefits."

→ The punishment is imprisonment from 6 to 12 years.

## INTERNAL AND EXTERNAL BUSINESS PARTNERSHIPS



For any doubt or clarification please contact the Human Resources Office.

Sincerely,

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