

This document is provided for information purposes only and constitutes a courtesy English translation of the original Italian-language version.

In the event of any discrepancy, inconsistency or conflict, the Italian-language version shall prevail and shall be the only legally binding version.

CYBER 4.0

ANTI CORRUPTION POLICY

Approved by the Coordination and Management Committee of Cyber 4.0

Date of first approval: 24 September 2024

SUMMARY

Definitions	3
1. Introduction.....	4
2. Reference Regulations.....	4
3. Objectives of the policy	5
4. Scope of application and Recipients.....	5
4.1 Roles and Responsibilities.....	6
5. Principles, Standards and Rules of Conduct	6
5.1 General Control Standards	7
5.2 Rules of conduct for compliance with the policy.....	8
6. Management of the conflict of interest	9
6.1 Conflict of interest toward personnel and the Association	10
6.2 conflict of interest toward the Association and customers.....	10
6.3 Conflict of interest arising from relationships between suppliers/sub-suppliers and customer.....	11
6.4 Methods for reporting conflicts of interest	12
7. Reporting System.....	12
7.1 Internal Reporting Channel.....	13
7.2 External Reporting Channel	13
8. Sanctions	14
8.1 Disciplinary Sistem.....	14
8.2 Violation by Third Parties.....	14
9. Training, Dissemination and communication	14

Definitions.

Cyber 4.0 or the Association: The Cyber 4.0 Association.

Code of Ethics: The Code of Ethics adopted by Cyber 4.0 and available on the Association's website: www.cyber40.it.

Model 231: The Organization, Management and Control Model pursuant to Legislative Decree 231/2001 of Cyber 4.0.

Conflict of Interest: in general, a situation in which an individual, acting on their own behalf or on behalf of third parties, including through an intermediary, holds a personal, professional, or economic interest that conflicts with the interests represented by the Association in the performance of its activities.

Corruption: The conduct of anyone who, directly or indirectly, performing functions or activities in the name, on behalf, or in the interest of the Association, offers, promises, solicits, requests, authorizes, accepts, receives, or gives money or other benefits (economic or otherwise) to a person, directly or indirectly (and thus also through an intermediary) and regardless of the location, to act or omit actions in relation to that person's duties, or to obtain a personal advantage, or in favor of the Association or third parties. For the purposes of the Policy, both public and private corruption are relevant, as are both active and passive corruption.

Recipients: Personnel and all those who operate in the name and/or on behalf and/or in the interest of Cyber 4.0 or who maintain professional/commercial relations with it. This includes components of the General Assembly of members, the Coordination and Management Committee (CMC), the President and Vice-President, the Scientific and Steering Committee, the Supervisory Body, employees, collaborators and consultants, commercial partners, customers, suppliers, and anyone else operating in the interest, name, or on behalf of the Association.

PNRR: National Recovery and Resilience Plan.

Policy: The Policy for the Prevention of Corruption adopted by Cyber 4.0

1. Introduction.

Cyber 4.0 carries out its activities according to a vision based on the values of responsibility, ethics, integrity, fairness, transparency, and legality, committing—pursuant to the principle of “zero tolerance”—to preventing, discouraging, and combating any conduct attributable to corrupt practices.

The prevention of and fight against corrupt practices represent for the Association, in addition to being a legal obligation, one of the core principles guiding its day-to-day actions, also in light of the importance of the legal and social fields in which it operates.

Through the adoption of this Policy, in line with what is set out in the 231 Model and the Code of Ethics, Cyber 4.0 intends to establish a comprehensive framework of ethical and behavioral principles and rules for the prevention of and fight against corruption, further increasing awareness among internal and external stakeholders of the rules and behaviors that must be observed.

For these reasons, Cyber 4.0 does not allow any conduct that conflicts with the principles, provisions, and prohibitions set out in the aforementioned Policy.

Should any applicable provisions of Anti-Corruption legislation prove more stringent than those contained in this Policy, such statutory provisions must in any case be complied with, and any violation thereof shall also constitute a violation of this Policy.

2. Reference Regulations

The main reference regulations deemed significant are:

- Legislative Decree no. 231/2001, concerning the “Regulation of the administrative liability of legal persons, companies, and associations, including those without legal personality, pursuant to Article 11 of Law no. 300 of 29 September 2000”;
- Law no. 190/2012, concerning “Provisions for the prevention and repression of corruption and illegality in the Public Administration”;
- Legislative Decree no. 24/2023, concerning the “Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, on the

protection of persons who report breaches of Union law and laying down provisions on the protection of persons who report breaches of national legislation”;

- UNI ISO 37001:2016, *Anti-bribery management systems – Requirements with guidance for use*.

3. Objectives of the policy

The objectives of this document are:

- To establish a system for preventing all forms of corrupt practices, concerning both relations with private parties and with the public administration;
- To provide all those who operate on behalf of, in the name of, or for the benefit of Cyber 4.0 with the principles and rules to follow in order to ensure compliance with regulatory provisions;
- To prohibit any conduct even potentially attributable to corrupt practices and to ensure the achievement of higher compliance with national and international regulatory standards in this area;
- To encourage the reporting of any suspected corrupt act, whether certain, presumed, or attempted, through dedicated channels;
- To disseminate, support, and make the Policy understandable to all personnel, not only through its communication but also through specific training sessions;
- To promote the Policy externally as well, by publishing it on the company website, in order to publicize behavioral rules and anti-corruption prevention measures.

4. Scope of application and Recipients

This Policy is mandatory and applies to all Recipients who are called upon to collaborate in implementing the principles and rules set out in this document, in order to carry out the anti-corruption prevention measures., of reports that prove to be unfounded. The rights of the Association and of persons wrongly or maliciously accused are also guaranteed protection.

4.1 Roles and Responsibilities

The Coordination and Management Committee (also “CMC”) has approved an Anti-Corruption Prevention Policy in compliance with the requirements established by anti-corruption legislation and in line with industry best practices.

The CMC, also through the Chairman and the Chief Operating Officer, is tasked with:

- a) Monitoring compliance with the behavioral principles set out in the Policy, promoting the proper fulfillment of the provisions described therein and continuous improvement;
- b) Conducting, whenever deemed necessary and in any case periodically, a reassessment of the efficiency and effectiveness of the measures identified by the Policy, in order to determine, where necessary, their update and improvement;
- c) To promote the dissemination of the Policy and the Code of Ethics to all Recipients in order to ensure their awareness;
- d) To foster an appropriate anti-corruption culture within Cyber 4.0;
- e) To support function managers so that they demonstrate leadership in preventing and detecting corrupt practices, within their area of responsibility;
- f) To encourage the use of procedures for reporting corrupt practices, whether suspected or confirmed.

5. Principles, Standards and Rules of Conduct

Cyber 4.0 considers any behavior even potentially related to corrupt practices, illicit favors, or collusive conduct to be unacceptable and, therefore, prohibited and subject to sanctions.

Accordingly, all Recipients are strictly forbidden, under this Policy, to:

- Offer, promise, give, pay, or authorize a third party to give, promise, offer, or pay, directly or indirectly, undue benefits, money, economic advantages of any value, or other non-monetary benefits to a third party (whether a public official, a person in charge of a public service, or a private individual) as an incentive or reward to act or refrain from acting in relation to their duties, regardless of where the conduct takes place and regardless of where the third parties or the Recipient operate;
- Receive, solicit, request, or accept, or authorize a third party to receive, solicit, request, or accept, directly or indirectly, undue benefits, money, economic advantages of any value, or

other non-monetary benefits from a third party (a private individual, or, in some cases, a public official or a person in charge of a public service) as an incentive or reward to act or refrain from acting in relation to their duties, regardless of where the conduct takes place and regardless of where the third parties or the Recipient operate.

By way of example and not exhaustively, it is not permitted—whether directly, indirectly, or through an intermediary—to offer or request, accept, or solicit money, gifts, or any form of compensation, nor to exert illicit pressure, nor to promise any good, service, performance, or favor to executives, officers, or employees of private companies or public administration, or to their relatives or cohabitants, for the exercise of their functions or powers, or to unlawfully induce them to perform or omit any act related to or contrary to their official duties, carried out for the benefit of or in the interest of the Association.

Violations of the rules set out in this Policy, in addition to constituting a breach of the Code of Ethics and the 231 Model, may expose the Association to the risk of sanctions as well as serious reputational damage. In accordance with the principle of “zero tolerance,” Cyber 4.0 allows no exceptions to the provisions and prohibitions established in this Policy.

The intention to act for the benefit of the Association can in no way justify behaviors that conflict with the aforementioned principles.

Any violations, even if only suspected, of this Policy or the applicable legislation must be reported immediately as provided in paragraph 8 below.

5.1 General Control Standards

The Association adopts and complies with the following general control standards:

- a) **Traceability:** The verifiability and documentation of every operation, transaction, and action must be ensured; therefore, the identification and reconstruction of sources, informational elements, and controls carried out on sensitive activities must be guaranteed.
- b) **Segregation of functions and powers:** There must be a clear separation of activities between those who perform, those who check, and those who authorize.

- c) **Rules/Procedures:** Internal provisions must exist that are suitable to provide at least general reference principles for regulating sensitive activities, and such regulatory framework must be up-to-date and effectively applied.
- d) **Signing and authorization powers (delegation system):** Formalized rules must exist for the exercise of internal signing and authorization powers, also ensuring that the assignment of such powers is consistent with the organizational responsibilities assigned.

5.2 Rules of conduct for compliance with the policy

The Association adopts and complies with the following behavioral rules:

- a) **Relations with the public administration:** The relationships that Cyber 4.0 maintains with representatives of the public administration, in all its possible forms, must be guided by strict compliance with the applicable regulations and must in no way compromise the integrity and reputation of the Association. These relationships must be based on the principles of loyalty, transparency, and fairness
- b) **Relations with clients, suppliers, and partners:** These must be guided by the principles of transparency, fairness, and fair competition, leaving no room for illegitimate favoritism.
- c) **Third-party verifications:** Periodic due diligence must be carried out on all suppliers regarding the possession of the requirements necessary for registration in the supplier list. In addition, it is necessary to:
 - i. Verify the reliability, integrity, and reputational profile of third parties with whom the Association intends to establish a professional, collaborative, or partnership relationship;
 - ii. Include specific contractual clauses that commit third parties to comply with the principles contained in the 231 Model, the Code of Ethics, and the Policy; and
 - iii. Monitor the actual performance of the services provided by third parties under the contracts concluded with the Association.
- d) **Impartiality and absence of conflicts of interest:** Recipients of the Policy must act with professionalism, transparency, and impartiality in compliance with applicable regulations, and must promptly report to the Association any situation that could potentially give rise to a conflict of interest.

- e) **Gifts and other gratuities:** Employees and collaborators of the Association are prohibited from giving/offering and/or accepting/receiving gifts, gratuities, benefits, or any other advantages with the aim of obtaining favorable treatment, engaging in corruption, or carrying out collusive behavior in connection with any activities related to the Association. Exceptions are modest gifts related to normal courtesy or business practices that are not likely to create suspicion that they are intended to exert undue influence on the recipient
- f) **Events, non-profit initiatives, and sponsorships:** These may be conducted in compliance with existing procedures and authorization processes, within pre-approved spending limits, and in a manner that allows documentation of the activities.
- g) **Personnel selection, hiring, and management:** The selection, hiring, and management of Cyber 4.0 personnel are guided by principles of fairness and impartiality.
- h) **Procurement of goods and services:** The process must be carried out in compliance with the internal control system, procedures, and organizational processes, observing the criteria of transparency, traceability, publicity, free competition, non-discrimination, equal treatment, and rotation.
- i) **Accounting:** Every action, operation, and transaction, as well as every accounting entry, must be managed with the utmost correctness, completeness, transparency, and accuracy. Each operation or transaction must be authorized, verifiable, legitimate, consistent, and appropriate.

For the purposes of applying the Policy, the following are also considered prohibited:

- i. Any other conduct, even if not expressly prohibited by this Policy, that has the same purpose as one or more of the behaviors prohibited by the Policy;
- ii. Any method of circumventing or evading the prohibitions set forth in the Policy.

6. Management of the conflict of interest

The Association operates in accordance with the principles of loyalty, honesty, fairness, transparency, integrity, and good faith, respecting the legitimate interests of its personnel, members, partners, suppliers, clients, and all other stakeholders.

All decisions and operational choices made in the name of or on behalf of the Association must always pursue its best interests.

For this reason, all Recipients of this Policy must prevent situations in which a conflict of interest could potentially arise, which may interfere with their ability to make decisions impartially and in full compliance with the provisions of this Policy and the obligations incumbent upon the Association, including as a PNRR Implementing Entity.

In any case, for anyone in a conflict-of-interest situation, in addition to the general duty to promptly report the conflict, it is explicitly forbidden to make decisions, execute, or participate in the deliberation of acts or transactions related to the areas or matters in which they are conflicted, and they must abstain from doing so. If abstention is not possible, they must be accompanied by another responsible person.

6.1 Conflict of interest toward personnel and the Association

A conflict of interest may arise in any situation in which the personnel of the Association, regardless of their position or role within the Association, or their spouse, cohabitant, relative, or in-law, even through an intermediary, have interests that conflict with those of Cyber 4.0 due to particular personal or professional circumstances.

In order to identify potential conflict-of-interest situations, when assigning administrative and management roles within the Association or upon hiring employees, they must provide, under their own responsibility, a declaration of the absence of conflicts of interest with respect to the Association (attached to this document)

6.2 conflict of interest toward the Association and customers

A significant conflict of interest with the Association may arise if the personnel of the Association, or their spouse, cohabitant, relative, or in-law—even through an intermediary—have interests that are similar or related to those held by a Client or other parties otherwise associated with the Client. By way of example and not exhaustively, the following circumstances may give rise to a conflict of interest:

- Having held fixed-term or permanent positions, including consultancy roles, with public or private entities associated with the Client;
- Having engaged in scientific collaboration agreements, participation in initiatives, or involvement in companies and professional firms connected to the Client;
- Having held shares, with or without administrative roles, in partnerships or corporations, public or private, associated with the Client;
- Having pending or concluded legal disputes with the Client.

To prevent the occurrence of such conflicts of interest, personnel involved in the operation must inform their hierarchical superior, as provided in the Declaration of Absence of Conflict of Interest attached to this document.

Similarly, Clients using the services provided by Cyber 4.0, including as a PNRR Implementing Entity, are required to declare the existence of any interests—whether direct or through an intermediary—that conflict (even potentially) with those of the Association, by signing specific contractual clauses or dedicated declarations.

6.3 Conflict of interest arising from relationships between suppliers/sub-suppliers and customer

A significant conflict of interest with the Association may arise if the Association’s suppliers or subcontractors—even through an intermediary—have interests that are similar or related to those held by clients using the services offered by Cyber 4.0, through the supplier/subcontractor.

By way of example and not exhaustively, the following circumstances may give rise to a conflict of interest:

- The supplier or subcontractor currently holds or has held, within the past three years, directly or indirectly, shares in the Client receiving the services provided by the Association through the same supplier or subcontractor, with or without management or administrative roles;
- Both the supplier/subcontractor and the client receiving services from Cyber 4.0 are currently, or have been within the past three years, associated with the same owner,

controlling entity, or person with management and coordination powers, even through an intermediary;

- The supplier or subcontractor currently holds or has held, within the past three years, a corporate office in the Client's organization.

To prevent the occurrence of such conflicts of interest, suppliers and/or subcontractors providing services to Cyber 4.0, as well as clients using the services offered by Cyber 4.0, including as a PNRR Implementing Entity, are required to declare, through a specific contractual clause, the existence of any interests—whether direct or through an intermediary—that conflict (even potentially) with those of the Association.

6.4 Methods for reporting conflicts of interest

In order to promote and encourage maximum transparency in relation to this type of relationship and to facilitate the communication of any conflicts of interest, the Association has developed specific internal control procedures and dedicated contractual clauses for their management.

Recipients are also required to promptly communicate any changes to the content of previously submitted Declarations of Absence of Conflict of Interest.

Recipients of this Policy who become aware of conflict-of-interest situations not properly disclosed by the directly involved Recipients, if the reported facts fall within the scope of whistleblowing reports (see Whistleblowing Policy), may submit a report in the manner and according to the procedures set out in paragraph 8 of this Policy.

7. Reporting System

In line with the Whistleblowing Policy, available on the Company's website (www.cyber40.it), to which reference is made for completeness, the Association encourages the prompt reporting of any suspected or imminent commission of corrupt acts, even if only attempted or presumed, as well as any other violation, confirmed or suspected, of this Policy, the Code of Ethics, the 231 Model, the applicable legislation, and the internal control system.

7.1 Internal Reporting Channel

Reports are received and managed by the Supervisory Body, which is independent and specifically trained (hereinafter also the “Manager”).

To contact the Manager, the Whistleblower may use the following communication channel:

- Dedicated online platform, accessible at the link <https://cyber40.segnalazioni.net>, where reports can be submitted either in writing or orally.

The mentioned platform is accessible exclusively by the Manager. Reports will be handled promptly, confidentially, and professionally. The names of the Whistleblower, the Reported Person, any other individuals mentioned, and the contents of the report, including any follow-ups and requests, will be treated confidentially and shared with others only if required by applicable laws and/or regulations.

The possibility of submitting a report anonymously is, however, guaranteed. In such cases, the report must be sufficiently detailed and specific to allow the Association to assess the validity of the reported facts and carry out the investigation without the need for direct contact with the Whistleblower.

The Whistleblower may choose to disclose their identity even after submitting the report.

The Association reserves the right to request the Whistleblower’s authorization to reveal their identity if this is essential for initiating disciplinary and/or judicial proceedings against the person responsible for the reported conduct.

7.2 External Reporting Channel

In addition to the internal reporting channel, incidents or acts of corruption—whether committed, attempted, or even reasonably suspected—as well as any other violation of this Policy, may be reported to ANAC (National Anti-Corruption Authority) through the platform accessible at the following link: <https://whistleblowing.anticorruzione.it/#/>, only under the following conditions:

- An internal report has already been submitted that did not receive adequate follow-up from the Manager.

- Having reasonable grounds to believe that, if the report were made through the internal channel, it would not receive effective follow-up or that it could result in the risk of retaliation against the Whistleblower;
- The reported facts may constitute an imminent or evident danger to the public interest.

8. Sanctions

8.1 Disciplinary System

Any violation of the Anti-Corruption Policy by employees constitutes responsibility on the part of the individual committing the violation, who will be subject to disciplinary and/or legal sanctions that are appropriate and proportionate, in accordance with applicable law and the National Collective Labor Agreement, also taking into account the potential criminal relevance of the conduct.

Violations of the rules set forth in this Policy may also result in the **revocation of access** to network resources and documents.

8.2 Violation by Third Parties

Any violation by third parties of the principles or provisions of this Policy constitutes a breach of contract and may result in the non-establishment of the contractual relationship or, pursuant to specific contractual clauses, for example, the payment of penalties or the termination of the contract, without prejudice to the right to seek compensation for any damages.

9. Training, Dissemination and communication

Cyber 4.0 promotes awareness of this Policy, the Code of Ethics, and the relevant regulations among all personnel through the provision of specific training sessions.

The Association plans training activities so that employees can understand, in a practical manner and in relation to their role:

- the risks to which they and the Association may be potentially exposed;

- the preventive actions to be taken and the reports to be made regarding risks, suspicions, or knowledge of unlawful practices;
- the Anti-Corruption Policy and the consequences of violating it.

The Policy is communicated and disseminated to all personnel.

External communication of the rules adopted by Cyber 4.0 is ensured through the publication of this Policy on the Association's website.

===== END OF THE DOCUMENT =====

Attached: **Substitute Certification Declaration Employee Conflicts of Interest**

SUBSTITUTE CERTIFICATION DECLARATION (art. 46 DPR 28/12/2000 n. 445) Employee Conflicts of Interest

The undersigned _____, born in _____
(_) on _____, residing at _____ (), street
_____ No. _____, Tax Code (C.F.)
_____, employee of the Association Cyber 4.0, fully aware
of the criminal liabilities provided for cases of false statements and fraudulent declarations as
established by Articles 75 and 76 of DPR 28/12/2000 n. 445,

DECLARES

1. to have reviewed the list of the Association's Members and to remain informed of any changes thereto (terminations or new members);
2. to have access, in the Quality System repository, to the Association's list of external suppliers;
3. to the best of their knowledge, not to have familial relationships up to the fourth **degree** with members of supplying organizations or with individual suppliers;
[or: to have familial relationships up to the fourth degree with (specify name and surname), employee of the following organization: (specify), in the role of (specify);]
4. to the best of their knowledge, not to have familial relationships up to the fourth degree with employees of the Public Administration (Central, Local, or European);
[or: to have familial relationships up to the fourth degree with (specify name and surname), employee of the following Public Administration: (specify), in the role of (specify);]
5. not to have any direct professional interest with the Members or external suppliers;
[or: to have the following professional interest (specify) with the Member/External Supplier (specify) regarding (specify type of professional relationship);]
6. not to have any direct professional interest with any Public Administration (Central, Local, or _____ European);
[or: to have the following professional interest (specify) with the following Public Administration (specify) regarding (specify type of professional relationship);]
7. to commit to immediately notify the Association of any changes regarding the statements made herein.

Rome, _____

Signed, _____