

Anti-Corruption and Anti-Bribery Policy

Purpose

Bribes, kickbacks, and other unlawful incentives are not permitted to be offered or paid to anybody.

RIMOND's business relies on the trust we develop with our clients, partners, and suppliers, as outlined in our Group Code of Conduct. Bribes or kickbacks, whether offered or paid, destroy confidence. Bribery has a negative impact on our clients' decisions and is incompatible with RIMOND's aim to provide outstanding projects.

RIMOND is an international corporation, and our operations are governed by the laws of the countries in which we do business. Bribes or kickbacks, whether offered or paid, are illegal in the countries where we conduct business.

Wherever we do business, RIMOND is committed to following the laws and regulations that govern our operations. Everyone, regardless of job function, is responsible for adhering to this policy.

Summary

The duties that all RIMOND people have to each other, our clients, and the public are outlined in our Group Code of Conduct. It demonstrates how our Values govern all of our behaviours and activities and inspire our highest desires. It explains what it means to work at RIMOND and what our individual and collective duties are.

Our values are at the centre of all we do. To do the correct thing in the proper manner. They form our character, drive our daily activities, and influence our decisions. They serve as the cornerstone of a resilient culture that is ready to face challenges with integrity, ensuring that we never lose sight of our primary obligation of safeguarding the public interest. And they drive us ahead by inspiring confidence and empowering change throughout the world via our work and example.

Our collective obligations to anti-bribery and corruption, as expressed in the Group Code of Conduct, include:

- i. Act lawfully, ethically, and in the public interest; not tolerating unlawful, unethical, or human rights-infringing activity inside RIMOND, by clients or suppliers, or by public authorities with whom we work;
- ii. Accept or offer bribes, or engage in corrupt activities, and have zero tolerance for bribery and corruption in any form; and
- iii. Maintain strong ethical standards across the world, particularly adhering to the UN Global Compact's ten principles (including anti-bribery).

These pledges reflect RIMOND commitment to the United Nations Global Compact, as well as the World Economic Forum's Partnering Against Corruption - Principles for Bribery Prevention.

RIMOND businesses must either embrace the Group Code of Conduct or, if they have their own local code, ensure that it is compatible with the Group Code of Conduct and disseminate it to their employees.

Bribes and unlawful payments are prohibited.

Group personnel and business partners are forbidden from:

- a) providing or receiving any financial or other advantage to or from another party with the aim to influence or reward the improper conduct of an activity; and
- b) making or receiving bribes in connection with Group operations.

Bribes come in a variety of shapes and sizes, but they almost always have a corrupt motive. There will almost always be a quid pro quo – both parties will profit.

- a) Bribery is defined as the offer, promise, giving, demanding, or accepting of an advantage as an inducement for an illegal or unethical action.
- b) A bribe can be a direct or indirect promise, offering, or authorization of something of value, or the offer or receipt of any kickback fee, reward, or other advantage.
- c) Bribery or corruption are intended to affect an individual's execution of their task and convince them to act dishonestly.
- d) If any Group Personnel violates this policy, disciplinary action, including termination, may be taken against them.
- e) The payment of bribes or other inappropriate payments through intermediaries (including agents) is forbidden.
- f) There are no exceptions to the ban on bribes or inappropriate payment activities set out in this Policy.

The fact that Group Personnel may be conducting business in a country where corruption is widespread, is part of the culture or way of doing business, or where legal standards governing bribery are unclear, or in a transaction where a Group employee has been solicited for a bribe, will not be used as an excuse for engaging in improper payment activity. There will also be no proof that the Group's rivals are engaging in unethical behavior. There will be no repercussions for any Group employee or Business Partner who refuses to engage in inappropriate payment activity, even if it results in a loss of business.

Extortion and Solicitations to Engage in Unethical Payment Practices

Extortion and other requests for incorrect payments made under duress will be strongly opposed by the Group.

If payments must be paid in unusual circumstances to ensure personal health or safety, such payments must be accounted for by local senior management and audited. For further examination, all such payments must be reported to the internal audit VP.

When directed to do so by a boss or co-worker, Group Personnel should never engage in inappropriate payment behaviour. If this circumstance happens, the individual must notify internal audit VP in line with the appropriate procedures.

Guidelines on specified acts

The "Guidelines" that follow clarify how the Policy relates to different sorts of activities:

Facilitating Payments

Except in very restricted circumstances when a Facilitating Payment is legitimate and necessary, it is the Group's policy not to make or permit Facilitating Payments of any sort. The CEO must authorize all Facilitating

Payments. Furthermore, all Facilitating Payments must be reported and accounted for honestly and correctly.

Gifts

You may not give or propose a gift to anybody with whom the Group does business, or receive a gift from anyone with whom the Group does business, in excess of customary courtesies connected with recognised ethical general commercial practice.

Business entertainment and hospitality

Meals, invites to events, parties, or other social gatherings in conjunction with the Group's business are examples of hospitality. These activities are permissible as long as they are kept within appropriate limits.

Reasonable and proportionate hospitality is recognized as an established and significant component of doing business, with the goal of improving the Group's image, better presenting its services and goods, or establishing amicable connections. To be considered a bribe, hospitality must be meant to persuade someone to execute a task incorrectly.

If you are unsure about what is appropriate in a given scenario, speak with your supervisor and/or the head of your business unit.

When it comes to arranging entertainment for government officials, more prudence is required.

Expenses for business entertainment or hospitality must be appropriately reported in the books and records of Group members.

Sponsored travel

In appropriate circumstances, the Group may sponsor Clients', potential Clients', and others' reasonable and bona fide travel expenses that are directly related to promoting or demonstrating the Group's services, to performing a contract between the Group and the Client, or to a fact-finding mission to gain a better understanding of relevant foreign markets and regulatory environments.

These costs must be related to a valid business objective and be limited to those that are essential to achieve that goal. Sponsored travel costs are subject to prior written permission.

Political contributions

Without the CEO's prior written consent, you may not make contributions to any political party or public international organization.

Business Partners

No Business Partners may be kept unless they are evaluated, selected, and retained in accordance with the procedures and conditions outlined below.

As a minimum, basic contract clauses relating to compliance with Anti-Corruption Laws and this Policy shall be included in all written agreements with Business Partners.

Only cheques or wire transfers, never cash, are accepted as payment methods for business partners. All payments shall be made in accordance with invoices, receipts, or other paperwork that reflect the services provided. These standards will be spelled out in standard contract language in all agreements with Business Partners.

Only once an acceptable amount of due diligence has been completed may Business Partners be employed. Ownership, background checks, reviews of letters of recommendation, reviews of credentials, reviews of financial statements, contact with local Chambers of Commerce, independent confirmation of the candidate's history of government employment, and evaluation of the candidate's other connections to government officials, including family relations, are all examples of such due diligence.

Only the provisions of the Group's processes may be used to engage Business Partners. The concerned director will be in charge of making sure that all "red flags" have been explored and ruled out.

Business with Governments

When working with government authorities, Group Personnel must be extremely cautious. When dealing with a government official, activities that are acceptable when working with private sector partners may be inappropriate or criminal.

Internal Audit VP should be contacted promptly if group personnel have any issues about whether or not interactions with government authorities are appropriate.

Compliance and Implementation

Any violation of Group's anti-bribery and anti-corruption policy or related procedures by a Group employee could result in serious consequences for both the employee and Group, including possible prosecution, fines, and other penalties, as well as imprisonment and/or disciplinary action up to and including termination for employees, depending on local laws.

Business Associates' violations may result in the termination of their business agreement with Group, among other things.

Record Keeping

It is Group policy to keep books and records that fairly and accurately represent the Group's transactions in reasonable detail, as well as to maintain internal controls to prevent and identify possible breaches of the Group's policies or relevant laws.

For any cause, no fraudulent or fake entries may be made in the books and records, and all payments and transactions, regardless of their amount, must be precisely documented. RIMOND anticipates that any records submitted to RIMOND by Business Associates will be accurate and detailed.

Reporting Breaches

Employees and Business Associates who are aware of, or reasonably believe there is, or will be, a violation of the Group's anti-corruption policies and procedures must immediately notify the Compliance Division as specified in the Group Code of Conduct, RIMOND's International Anti-Bribery and Anti-Corruption Business Principles, or otherwise.

Employees at RIMOND have a variety of options for reporting issues, including reporting to supervisors and Human Resources.

Violations can also be reported by employees and anyone outside of RIMOND by emailing the Compliance Division at corporate.compliance@rimond.com.

Giuseppe Antonio Chiarandà

CEO and Founder

