

ANTI - CORRUPTION POLICY (STANDARD ISO 37001)

For Favero Health Projects, the prevention of corrupt practices represents, not only a legal obligation but also one of the core principles guiding the company's actions. This is particularly true considering the strategic importance of the sectors in which it operates and the legal and social contexts in which its business is rooted.

As a concrete expression of its commitment in these areas, Favero has adopted a Code of Ethics, which defines the values that inspire the company in achieving its goals and the key principles that guide its operations. This Code of Ethics is closely integrated with the Organizational, Management, and Control Models requested by the Italian Legislative Decree 231/01.

In compliance with national and international regulations and in application of what expected by the Code of Ethics, Favero Health Projects does not tolerate any form of corruption. Especially in relation to the company's current or potential business and in any area of activity of interest to the company, the Recipients of this Policy must not:

- Offer, promise, give, pay, or authorize a third party to give or pay, directly or indirectly, any undue benefits, economic advantages of any value, or other non-economic advantages 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 for acting or omitting actions related to their duties, regardless of where the offer or payment is made or where the parties involved operate;
- Request or accept, or authorize a third party to request or accept, directly or indirectly, any undue benefits, economic advantages of any value, or other non-economic advantages from a third party (whether a private individual or, in some cases, a Public Official or a Person in Charge of a Public Service) as an incentive or reward for acting or omitting actions related to their duties, regardless of where the offer or payment is made or where the parties involved operate.

The Company, having adopted a management system in compliance with the requirements of the ISO 37001 standard, has also appointed a collegial Anti-Corruption Function.

Each member possesses the appropriate skills, status, authority, and independence to carry out this specific role, as they do not hold any other decision-making positions within the Organization in processes exposed to corruption risk. The choice of a collegial body also enables oversight of individual members.

The Anti-Corruption Function has the responsibility and authority to:

- Supervise the planning and implementation of the anti-corruption management system;
- Provide advice and guidance to personnel regarding the anti-corruption management system and corruption-related issues;
- Ensure that the anti-corruption management system complies with ISO 37001 requirements;
- Report on the performance of the anti-corruption management system to Senior Management, the Governing Body, and other relevant functions, in an appropriate manner.

Favero Health Projects is aware that the mere achievement of results is not what matters most, but places value on how those results are achieved.

The Board of Directors and Management of Favero Health Projects are committed to conducting activities in a transparent, honest, and ethical manner, in compliance with applicable Italian and international laws and regulations.

Any employee who becomes aware of violations or attempted violations of this Policy within the company is required to report them (even anonymously), according to the General Whistleblowing Notice, available at link <https://www.favero.it/en/company> and on the company notice board.

The violation of the principles and provisions contained in this Anti-Corruption Policy constitutes a particularly serious misconduct, capable of undermining the relationship of trust with the organization.

In the event of a violation by employees, the disciplinary measures provided for by the applicable National Collective Labour Agreement (CCNL) and the internal disciplinary system will be applied, in accordance with the procedures established by current legislation.

With regard to business partners, consultants, agents, suppliers, and other third parties acting on behalf of or in the name of the organization, any violation of this Policy may lead to the application of specific contractual measures, including – in the most serious cases – termination of the contract, suspension of the collaboration, and claims for compensation for any damages incurred.

Montebelluna (TV), 27/11/2025

The General Management