



# Anti-Corruption Policy



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## Document revision

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## Goal and field of application

The goal is to prevent any form of corruption, promoting a zero-tolerance approach and ensuring that all business activities are conducted in compliance with laws and ethical principles. The policy applies to all activities and all recipients involved in business processes.

**Validity:** Corporate

## Legend and Glossary

- ISO 37001:2016: International Standard for Anti-Corruption Management Systems.
- RPC (Corruption Prevention Officer): Appointed to supervise and monitor the anti-corruption system.
- Due Diligence: Process of assessing the integrity and level of risk of third parties and internal stakeholders.
- Whistleblowing: Confidential and confidential mechanism for reporting suspected acts of corruption.
- Top Management: Company management responsible for the implementation and control of the anti-corruption system.



## Anti-Corruption Policy

Referring to the UNI ISO 37001:2016 standard, corruption is defined as the act of offering, promising, providing, accepting or requesting an undue advantage of any value (which may be economic or non-economic), directly or indirectly, and regardless of location, in violation of the law in force, as an incentive or reward for a person to act or omit actions in relation to the performance of that person's duties.

Gruber Logistics recognizes that the fight against corruption is a prerequisite for every business initiative to operate in a fair and transparent market. The company, following these principles, has adopted the following policy:

- Firm approach and absolute prohibition towards any form of corruption;
- Full compliance with regulatory obligations, constantly verifying the correct and adequate application of laws, regulations and other requirements on the fight against corruption;
- Commitment to conduct its activities and business in such a way as not to be involved in any corruption case;
- Commitment to avoid involvement in illegal situations, through the following programs;
- Commitment to create an unfavourable environment for corruption and reduce the opportunities in which cases of corruption may arise;
- Commitment to increase the capacity to detect cases of corruption;
- Commitment to enhance the transparency of the activity and the organization;
- Commitment to pursue objectives and continuous improvement through;
- The training of all personnel and in particular those employed in the areas with the greatest risk of corruption;
- The performance of independent controls and documented internal audits, to periodically assess compliance with the criteria adopted;
- The dissemination of the Code of Ethics which contains specific measures in the field of corruption prevention;
- The guarantee of anonymity and the protection of the employee who makes any reports;
- The application of the Company Sanction Code to Recipients who do not comply with the guidelines of this Corruption Prevention Policy;
- The conferral of an active role in the controls to an independent figure specifically designated and identified in the Corruption Prevention Officer (RPC).

