



NKE Automation Srl

*Anti-corruption and
anti-bribery policy*

NKE Automations Srl adopts a zero tolerance approach to corruption and is committed to acting with professionalism, fairness and integrity in all business relationships, wherever it operates, and to implementing and applying effective systems to combat corruption. Both in Italy and abroad, all NKE staff are required to conduct themselves in accordance with EU and UK anti-corruption and anti-bribery laws, with particular regard to the Bribery Act 2010.

The main purpose of this anti-corruption policy is to preserve the integrity of the company, ensure an ethical working environment, and ensure that all activities are conducted in compliance with applicable laws and regulations.

WHO IT APPLIES TO

The policy applies to all persons working in NKE Automation Srl, at all levels and grades, including managers, officers, employees (permanent, fixed term or temporary), consultants, contractors, trainees, seconded staff, home workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with NKE Automation Srl, or any of our affiliates or their employees, wherever they are located (collectively referred to as workers in this policy).

In this policy, are meant "third parties" all individuals or organizations with whom you could come into contact in the course of your work at NKE; this includes actual and potential customers, suppliers, distributors, business contacts, agents, consultants, and government and public bodies, including their consultants, representatives and officials, politicians and political parties.

RESPONSIBILITY

The Board of Directors is responsible for ensuring that this policy complies with legal and ethical obligations and that all those acting on behalf of the Company comply with it. The support of executives and HR must demonstrate an ongoing commitment to preventing corruption and fostering a corporate culture based on integrity.

Each worker must ensure that they have read, understood, and complied with this policy.

The prevention, - detection and reporting of acts of corruption and other forms of corruption are the responsibility of all those who work for NKE or on its behalf. All workers are required to avoid any activity that may lead to or suggest a violation of this policy. You should inform your manager as soon as possible if you suspect that there has been, or may be in the future, a conflict with this policy. Any violation of this policy will give rise to a report to the Company Supervisory Board and a disciplinary dispute.

TRAINING AND AWARENESS

The Company ensures regular training programs for all employees and is part of the onboarding process for all new employees and other workers in order to raise awareness of the risks related to corruption and to provide guidelines on how to recognize and avoid it. The zero-tolerance approach to corruption and bribery must be communicated to all suppliers, contractors, and business partners at the beginning of the business relationship with them and, if necessary, thereafter.

HOW TO REPORT A PROBLEM

NKE Automation Srl fully adheres to the anti-corruption laws in force in accordance with Legislative Decree 231/2001. All employees are required to comply with the provisions of these laws and to promptly report any violations. The Company fosters an environment where employees should feel free to report suspicious activity or unethical behavior without fear of retaliation. The whistleblowing procedure ensures the protection of whistleblowers and the timely management of reports.

MONITORING AND REVIEW

The internal control systems and procedures will be subject to periodic audits by the Chief Executive Officer, to ensure their effectiveness in combating corruption.

All workers are responsible for the success of this policy and must ensure that they use it to disclose any suspicion of danger or wrongdoing. Workers are encouraged to comment on this policy and suggest ways to improve it: comments, suggestions, and questions should be directed to the compliance officer. This policy is not part of the employees' employment contract and may be changed at any time.

NKE Automation Srl recognizes that corruption undermines trust, damages reputation and compromises the sustainability of the Company. This anti-corruption policy reflects a commitment to act ethically, in compliance with laws and regulations, fostering a culture of integrity and accountability among all members of the organization. The policy will be periodically reviewed and updated to ensure its continued effectiveness in preventing and combating corruption in all company activities.

Fulvio FERRERO

CEO

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