

Group Anti-Corruption Policy

Anti-Corruption Policy

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1 Introduction

1.1. Document Objectives

This policy describes the general principles that the Banca Ifis Group (the Group) has adopted to fight corruption when performing all of its activities. It identifies the operational areas that are at greater 'corruption risk' and sets out the safeguards and organisational measures that make corruption more difficult.

This policy applies to all Group employees, members of management bodies, contract workers, consultants, suppliers and business and commercial partners, including any intermediaries.

The Group will not tolerate corrupt behaviour, whether it occurs in relationships with government bodies or with private individuals and entities.

Fighting corruption in all its forms reflects the Group's decision to act in strict accordance with the law and, with specific regard to corruption, not to participate in behaviour which may cause damage to the country and to the community, and which may prevent government from performing correctly and distort the market and competition.

Fighting corruption also has a practical use; it helps the Group to manage its businesses effectively and to protect its reputation with stakeholders, regardless of whether they are institutions, customers, investors, savers, suppliers or competitors.

1.2. Version history

Version	Date	Brief description of changes	Companies affected by the changes
1	19/12/2024	First Issue	-

1.3. Application

This Policy applies and is circulated via the Ifis4You intranet to the Group's Organisational Units affected by the process set out in it. This regulation requires staff affected by it to confirm that they have 'read and accept' its contents.

Scope of application	
<input checked="" type="checkbox"/> Banca Ifis S.p.A.	<input checked="" type="checkbox"/> Cap.Ital.Fin. S.p.A.
<input checked="" type="checkbox"/> Banca Credifarma S.p.A.	<input checked="" type="checkbox"/> Ifis NPL Investing S.p.A.
<input checked="" type="checkbox"/> Ifis Finance Sp. Z o.o	<input checked="" type="checkbox"/> Ifis NPL Servicing S.p.A.
<input checked="" type="checkbox"/> Ifis Finance IFN SA	<input checked="" type="checkbox"/> Ifis Rental Services S.r.l.
<input checked="" type="checkbox"/> Ifis NPL 2021-1 SPV S.r.l.	
<p>Section 1.6.2 applies only to the Group's Italian companies. Without prejudice to compliance with the Group Code of Ethics and Group Whistleblowing Policy, the safeguards and organisational and behavioural standards apply to the Group's foreign companies where they do not conflict with legislation from time to time in force in the countries in which they are based and are consistent with the relevant internal regulations.</p>	

1.4. Document Management

This policy has been drafted and approved in accordance with the following process:

Parent Company					Group Company
Drafting	Agreement	Validation	Approval	Circulation and Archiving	Implementation
- <i>Process Owner:</i> General Counsel	- <i>Regulatory Coordinator:</i> Corporate Affairs With support from General Counsel staff Communications, Marketing, Public Affairs and Sustainability Organisation	- Chief Executive Officer	- Board of Directors	- Organisation	- Subsidiary Company Board of Directors

This policy has also been agreed with the Compliance department, which assessed whether it is in line with the applicable regulatory framework.

1.5. General principles

Corruption in its general sense is defined as a pathological and criminal relationship between a private individual or entity and a public official, whereby the public official ‘sells’ acts of his or her office to the private individual or entity.

In more detailed terms, corruption is the supply or promise of money or other valuable made by a private individual or entity to a public official or person in charge of a public service, so that the official will carry out an act that falls within the powers of his or her office.

To qualify as corruption, the valuable given or promised need not be of a financial nature, it is sufficient that the valuable has value for the public official; similarly, the act carried out by the public official need not be in conflict with the duties of his or her office (based on whether or not the act carried out by the corrupt official conflicts with the duties of the office, corruption can be ‘direct’ or ‘indirect’).

Corrupt behaviour is, in essence, an illegal agreement, i.e., a conspiracy, between a private individual or entity and a public official to exchange money or other valuable for an act carried out by the official which may or may not conflict with his or her duties.

Corrupt behaviour may also have a purely private dimension where the corrupt person, i.e., the intended recipient of the promised or given money or valuable, is not a public official but holds a position of responsibility within a company or private entity. Corrupt behaviour is relevant even where it is carried out in conjunction with others or is only attempted or results in mere instigation.

1.6. Regulatory Framework

1.6.1 Internal regulatory framework

- The **Group Code of Ethics** which provides a set of rules of conduct based on principles of honesty, fairness, and consistency, aimed at constantly reinforcing its recipients' ethical and behavioural standards.
- Each Group company's **Organisational, Management and Control Models pursuant to Italian Legislative Decree 231/2001**, which describe the operational areas exposed to the risk of 'predicate offences' and give details of the related system of controls and safeguards.
- **Group Whistleblowing Policy** which describes the whistleblowing system for reporting breaches. This system is made available to employees, contractors, partners and other individuals/entities who work with the Group.

1.6.2 External regulatory framework

- **Italian Penal Code - ROYAL DECREE no. 1398 of 19th October 1930, in Articles:** 318, Corruption due to performance of a function; 319, Corruption due to an act that is contrary to the duties of an office; 319-*bis*, Aggravating circumstances; 319-*ter*, Corruption in judicial acts; 319-*quater*, Undue inducement; 320, Corruption of a person performing a public service; 321, Sentencing for corruptors; 322, Instigating corruption; 322-*bis*, which regulates the application of some of the preceding rules to officials of community institutions and member states; Article 353, Italian Penal Code – Disturbing the free conduct of a public auction or tender; Article 353-*bis*, Italian Penal Code – Disturbing the free conduct of a procedure to select a contractor.
- **Italian Civil Code – Royal Decree no. 262 of 16th March 1942, in Articles:** 2635, Corruption between private individuals/entities; 2635-*bis*, Instigating corruption between private individuals/entities; 2635-*ter*, Accessory sentencing.
- **Italian Law 190/2012** (the 'Severino Law') **Provisions on the prevention and repression of corruption and illegal conduct in public office** which introduced special measures to prevent and combat corruption in public office.
- **Italian Legislative Decree 231/01 on entities' administrative liability for criminal offences**

2 Process description

1.1. Sensitive areas

In collaboration with the other companies in the Group, Banca Ifis has identified a number of activities as being at greater risk of corruption. It has also determined that there are business processes that may be instrumental to criminal behaviour. Together they are known as sensitive areas. They are:

- Relationships with public bodies
- Relationships with suppliers/purchasing cycle
- Appointment of staff and contractors
- Sponsorship and donations
- Relationships with private counterparties
- Accounting

This policy and other relevant internal regulations contain appropriate organisational measures and specific behavioural rules to contain and prevent the risk of corruption in these sensitive areas.

The activities in question are managed in accordance with the following general principles: i) roles are segregated to ensure that a business process is carried out by a number of people/bodies with different business management duties. This is so that no-one can be given unlimited powers and be free from the obligation to be audited by other people/bodies; ii) signatory and spending powers are allocated transparently and a structured system of powers and responsibilities has been defined; iii) all transactions and documentation are recorded and stored.

1.1.1. Relationships with public bodies

The Group's activities provide a number of opportunities for contacting and interacting with representatives of public bodies. For example, these include relationships with supervisory authorities arising from requests, communications, inspections or complaints, managing legal cases, relationships with local government to request authorisations or other official paperwork. These situations are open to corruption by means of attempts to influence or affect a public official's decisions or actions.

To manage this specific risk of corruption, the Group has put in place a number of internal regulations on the matter, and included special provisions in its Code of Ethics and its Organisational, Management and Control Models pursuant to Italian Legislative Decree 231/2001. All affected staff are also bound by an obligation to abide by the following behavioural and organisational standards:

- when conducting relationships with public bodies, all of the Bank's staff (executives, middle managers, administrative staff), contractors and consultants must behave in a way that is lawful, honest, transparent and in strict accordance with the contents of the policies, procedures and operational notes adopted at company and Group level;
- all relationships with public officials must be conducted with professionalism and diligence. Any inappropriate behaviour on the part of these counterparties or colleagues must be reported to your line manager or to the Supervisory Board and/or Internal Audit in accordance with the '*Group Whistleblowing Policy*';
- Group employees and representatives who conduct relationships with public bodies on behalf of the Group, must be formally given the power to do so (with an appropriate official granting of powers for employees and senior management bodies or a written mandate, consultancy contract or partnership contract for other people/bodies indicated). Where necessary, a specific written power of attorney must be issued to the person concerned;
- all staff must refrain from conducting relationships with public bodies on behalf of the Group, for reasons that are not connected with the functions assigned to them and/or fall outside the situations set out in internal regulations;

- when conducting relationships with public officials which require participation in meetings, at least two Group representatives must attend those meetings;
- interactions with public officials must be initiated and conducted using official channels that are available to the public. Typically, these are postal or email addresses or telephone numbers indicated on institutional websites. Contact should be made with a competent department or office rather than with a single official. Where possible, communication must be made in writing to ensure that the process can be documented and recorded. Where communications are to be sent via email, staff must use an official company email address;
- when conducting relationships with public officials or representatives of public bodies, staff are prohibited from offering, promising or paying money or other valuable (e.g., business opportunities, favourable treatment in relation to lending/credit recovery processes or deposit contracts, professional/consultancy positions, or hospitality) in exchange for any activity, service or advantage in favour of the Group, the prohibition is also extended to so-called facilitation payments;
- when managing legal cases, staff are prohibited from interacting with representatives of law enforcement authorities (adjudicating or investigating magistrates, court officials, public prosecutor officials, police, public prosecutor consultants, court assessors, etc.) unless it is in official hearings/meetings and offices and in the presence of legal counsel engaged by the Bank. Where possible, this ban extends to other parties in legal proceedings, witnesses and suspects in criminal proceedings. Staff are prohibited from offering or promising money or other valuable to any party in legal proceedings, even where they are not a public official;
- when interacting with public officials or representatives of public bodies, staff are prohibited from proposing investment or financing opportunities in any way arising from a request in that sense made by those public officials or representatives, either for themselves or on behalf of third parties indicated by them. In the same circumstances, staff are also prohibited from proposing consultancy services or promising or providing consultancy services;
- when conducting relationships with public officials, staff are prohibited from providing or promising, soliciting or obtaining confidential information and/or documents;
- when making acquisitions, staff are prohibited from favouring suppliers and/or sub-suppliers indicated by representatives of public bodies, even where this indication has not been made as a condition of the performance of any type of activity. Even where there is no such indication staff are prohibited from engaging or entering into contracts with a supplier or a consultant as a result of a particular familial or close personal relationship between that supplier or consultant (or their company officers) and a public official or representative of a public body;
- staff are prohibited from agreeing to any kind of solicitation or inducement from a counterparty which is aimed at obtaining undue sums of money or other valuables, in exchange for commercial and/or contractual benefits or any other type of advantage in favour of the Group.

1.1.2. Relationships with suppliers and the purchasing cycle

When performing their activities, Group companies will conduct relationships with a number of suppliers who supply goods and/or services in exchange for payment. Unsurprisingly, this situation is open to corruption.

Engaging and paying a supplier selected on the basis of a relationship with a public official or private individual/entity may be a way of obtaining an illegal advantage in favour of the Bank or another Group company.

Engaging a complicit supplier - e.g., a consultant - may also be a way of creating unaccounted funding destined for corruption where the supplier is remunerated for invoices that have no objective basis in fact, i.e., remuneration is paid for activities which are entirely or partially fictitious.

To manage this specific risk of corruption, the Group has put in place a regulation to manage the Purchasing Cycle and further regulations for relevant processes, and included provisions in its Code of Ethics and its Organisational,

Management and Control Models pursuant to Italian Legislative Decree 231/2001. All affected staff are also bound by an obligation to abide by the following behavioural and organisational standards:

- the purchasing cycle is managed by a number of separate departments and requires pre-determined and verifiable processes that identify the roles of each person involved and their operational skills. Each transaction is recorded and must be audited using appropriate documentation. Documents prepared in support of the process to select and acquire/provide services/tasks must be sufficiently detailed to reconstruct the assessment and decision-making process that led to the decision;
- suppliers are selected in accordance with the phases described in the relevant internal regulations on the matter for selecting a person/entity that is able to offer the best good or service. Suppliers are assessed in terms of value for money, competitiveness, technical and professional skill, reputation and references, efficiency, financial stability, official authorisation, safety, timescales for implementing business continuity solutions based on the detailed indications set out in the relevant internal regulations;
- the process is described in detail in internal regulations on managing the purchasing cycle, the '*Organisational Procedure on Managing the Acquisition of the Company's Goods and Services (Purchasing Cycle)*' and in the Operational Note – Managing the Process for Recording and Paying Invoices (purchasing cycle). This last document is divided into the following macro-phases: i) Managing Purchase Requisitions and Identifying Suppliers; ii) Approving Purchase Requisitions and Completing Contracts; iii) Accounting and Monitoring. Each macro-phase is in turn broken down into sub-phases. Each phase in the process requires action by different and rigidly pre-determined organisational units, departments and divisions;
- requests are approved, jobs are assigned and contracts are drafted by Bank representatives who are given the powers to do so. Those powers are based on pre-established spending limits set out in the '*Group Delegated Powers on the Acquisition and Disposal of Goods and Services*';
- when making acquisitions, staff are prohibited from favouring suppliers and/or sub-suppliers indicated by representatives of public bodies, even where this indication has not been made as a condition of the performance of any type of activity. Even where there is no such indication staff are prohibited from engaging or entering into contracts with a supplier or a consultant as a result of a particular familial or close personal relationship between that supplier or consultant (or their company officers) and a public official or representative of a public body;
- contracts with suppliers and framework agreements/procurement contracts are re-assessed annually - close to the termination date - to confirm whether there is a need to maintain the service;
- no payment can be made to any person or entity other than those named in the contract;
- before a procurement relationship can be started, potential suppliers must be assessed to see if they meet the minimum requirements described in the '*Group Policy on Managing the Purchasing Cycle*'. The minimum requirements include checks on obligatory certifications, whether social security contributions have been remitted correctly, conditions set out in Italian Presidential Decree 445/2000, etc.;
- all supplier and consultant contracts must be concluded in writing and must contain, in accordance with the indications in the relevant internal regulation, a specific 'anti-corruption' clause, whereby the counterparty agrees to comply with the contents of Italian Legislative Decree 231/2001 and the Group's Organisational Models and Code of Ethics. Contracts must also contain an express termination clause which gives the Group company the right to terminate the contract in the event that the supplier or consultant breaches that commitment;
- the '*Group Policy on Managing the Purchasing Cycle*' describes the thresholds to be followed for requests for tender or launching bid competitions; for each phase of the tender process, internal regulations include specific obligations and behavioural safeguards relating to: selecting suppliers, invitations to participate in tenders, launching competitions, assessing bids, engaging suppliers;
- when tender competitions are under way, Bank representatives must not accept gifts/favours from suppliers in the competition, all communications must be made using standard and certifiable methods of

communication (e.g., mail vs. conversations), any meetings with potential suppliers must be attended by at least two Bank representatives, where the competition has a value greater than EUR 200,000;

- goods with a value appreciably lower than market average can only be purchased after conducting in-depth investigations into the variations and excluding the possibility that the difference in value is unreasonable and attributable to the good or supplier;
- all relationships with counterparties must be conducted with professionalism and diligence. Any inappropriate behaviour on the part of these counterparties or colleagues must be reported to your line manager or to the Supervisory Board and/or Internal Audit in accordance with the '*Group Whistleblowing Policy*';
- if a supplier has a conflict of interests, this must be checked by the staff conducting that particular operation and, if confirmed, must be reported to the competent control department. Any contract that the Bank offers to suppliers must contain a clause that requires them to report the existence of potential conflicts of interest.

1.1.3. Other relationships with private counterparties

All commercial and business relationships with private counterparties who are not suppliers and consultants, for example, in relation to the purchase of equity interests, property, credit portfolios or other assets, are potentially exposed to the behaviour described in Article 2635 et seq. of the Italian Civil Code.

To manage this specific risk of corruption, the Group has put in place a number of internal regulations on the matter, and included special provisions in its Code of Ethics and its Organisational, Management and Control Models pursuant to Italian Legislative Decree 231/2001. All affected staff are also bound by an obligation to abide by the following behavioural and organisational standards:

- Group employees and representatives who conduct relationships with private counterparties on behalf of the Group, must be formally given the power to do so (with an appropriate official granting of powers for employees and senior management bodies or a written mandate, consultancy contract or partnership contract for other people/bodies indicated). Where necessary, a specific written power of attorney must be issued to the person concerned;
- when conducting relationships with public and private counterparties, Group company activities are separated into distinct departments; commercial counterparties are not identified by the same departments that carry out due diligence and assessment activities, a different department is responsible for negotiating contracts, and another will authorise or sign the deed or contract or, in any case, will take the final decision on behalf of the company;
- all contact with counterparties will be limited to the phases or sub-processes that require such communication;
- when conducting relationships with private counterparties, Group staff are prohibited from offering, promising or paying money or giving another personal valuable to the counterparty's agents with a view to acting against the interests of the entity he or she represents;
- all activities must be recorded and all documentation must be stored, including electronically; this is to ensure that motives and responsibilities can be reconstructed at a later time;
- all relationships with private counterparties must be conducted with professionalism and diligence. Any inappropriate behaviour on the part of these counterparties or colleagues must be reported to your line manager or to the Supervisory Board and/or Internal Audit in accordance with the '*Group Whistleblowing Policy*';

1.1.4. Selecting and managing staff

Staff selection, appointment and management is an area that is potentially at risk of corrupt behaviour. Appointing people with a close personal relationship with public officials or officers of private entities, can be used as a bribe in the interests or to the advantage of a Group company. Granting a bonus or advancing a career may also be seen as a bribe.

To manage this specific risk of corruption, the Group has put in place a regulation on human resources management and further regulations for relevant processes, and included provisions in its Code of Ethics and its Organisational, Management and Control Models pursuant to Italian Legislative Decree 231/2001. All affected staff are also bound by an obligation to abide by the following behavioural and organisational standards:

- staff are appointed in line with the organisational and quantitative structure established for each organisational unit, office or division in the Group Strategic Plans in force from time to time and in detailed plans prepared by Human Resources and involving the Heads of all departments;
- the staff selection and appointment process is regulated by appropriate internal regulations. The process is made up of a number of pre-established recruitment and assessment sub-processes which define in detail the roles and activities required of the Human Resources division and the other organisational units and departments involved;
- the staff selection and appointment process is segregated between a number of separate departments and individuals;
- staff are selected using objective criteria of professionalism, preparation and skill and technical knowledge. These criteria are aimed at selecting the best applicant from a shortlist of candidates, without favouritism or discrimination of any kind. Candidates are always assessed by applying standardised parameters and methodologies that are set out in internal regulations;
- Group staff are prohibited from appointing or supporting or responding in any way to requests to appoint public officials or individuals linked to them in exchange for unlawfully obtaining, even potentially, an advantage for a Group company;
- the staff selection and appointment process requires candidates to provide information relating to previous convictions or pending criminal charges which are used to assess their application and to identify any risks associated with them;
- when appointing new members of staff, staff are prohibited from favouring candidates indicated by any representative of a public body, even where this indication has not been made as a condition of the performance of any type of activity under the remit of that person's public office. Even where no such indication has been made, staff are prohibited from appointing a candidate because of that candidate's familial or close personal relationship with a public official or a representative of a public service;
- Group staff are prohibited from promising or supporting or responding in any way to requests to appoint made by or coming from company officers of private entities in exchange for unlawfully obtaining from them an advantage for the Group;
- if a candidate in an appointment process is a disabled person, the recruitment process will take account of any registration in lists of people belonging to protected categories provided by the competent employment office for the area;
- contracts with individuals/entities outside the Group engaged to perform staff selection or management activities must contain a declaration that they are aware of and accept the principles of lawfulness, integrity, transparency and honesty that are set out in the Group Code of Ethics;
- all activities relating to the staff selection and appointment process must be recorded; likewise, all staff performance and progress assessments must also be recorded. All documentation relating to the main phases of these activities must be stored.

1.1.5. Donations and sponsorships

Charitable donations and sponsorship contracts provide a potential opportunity for corruption. The donation of money to entities indicated by public officials or representatives of public services or by private individuals/entities as set out in Article 2635, Italian Civil Code, may constitute a bribe or, in any case, be made in exchange for unlawful activities.

To manage this specific risk of corruption, the Group has put in place a number of internal regulations on the matter, and included special provisions in its Code of Ethics and its Organisational, Management and Control Models pursuant to Italian Legislative Decree 231/2001. All affected staff are also bound by an obligation to abide by the following behavioural and organisational standards:

- processes to enter into sponsorship contracts and to provide charitable donations are structured into separate roles and responsibilities. Any person or office wishing to propose or promote a sponsorship or donation must send the request to a specially constituted decision-making body which will assess and, if agreed, approve the proposal. The department responsible for making payments of this kind is separate from the proposer and the assessing and approving body;
- when a proposal is being assessed, the assessment will look at the beneficiary/contractual counterparty and ask what type of entity it is, what the entity's purpose is, what is its history and reputation, is it reliable, does it or any of its officers have a previous criminal conviction or are they involved in criminal proceedings;
- when selecting a beneficiary, and for the purposes of exclusion, the Group will take account of any familial or close personal relationship with public officials who are involved in the management of current and material administrative or legal cases involving Group companies or competitors or suppliers of goods and services. The Group's assessment will also look into any situation whereby a charity donation or sponsorship may be used in exchange for a favour or advantage or an interference tool. In all cases above, the Group will not make the charity donation or provide sponsorship;
- the Group's charity donations are to be destined for people and entities whose constituting documents or company articles state that their purpose is to provide assistance, to provide access to education and culture, to restore artistic heritage, to conduct scientific and medical research or study, or to carry out socially useful projects;
- sponsorships must ensure a suitable return in terms of image and publicity for the Bank, other Group companies and their trademarks, products and services; they must not be activities that are free of charge and must provide a positive cost/benefit ratio for the Group. The Group will not provide sponsorship in order to obtain any advantage of another nature;
- even charitable donations of a small amount must be recorded in written agreements;
- sponsorship agreements of any amount must be subject to contract. Contractual terms must specify the mutual benefits and, in particular, must set out in detail the activities that the sponsored person/entity is obliged to perform. Examples include using the Bank's branding in event publications or at event locations, use of media material, etc.;
- sponsorship contracts must include a specific 'anti-corruption' clause, whereby the counterparty agrees to comply with the contents of Italian Legislative Decree 231/2001 and the Group's Organisational Models and Code of Ethics. Contracts must also contain an express termination clause which gives the Group company the right to terminate the contract in the event that the supplier or consultant breaches that commitment;
- amounts due for the performance of sponsorship contracts or as charity donations must be paid directly to a current account in the name of the beneficiary; payments may not be made in cash or to another person or entity who is not the direct beneficiary;
- the sponsorship and charitable donations process includes pre-established and traceable phases. Each transaction is recorded and must be audited using appropriate documentation. Documents prepared in support of the sponsorship and charitable donations process must identify the proposer and be sufficient to reconstruct the assessment and decision-making process.

- all sponsorships or charitable donations must be recorded precisely and completely and entered into accounts by the competent organisational units.

1.1.6. Invoices payable and Accounting

Improper management of the invoice payment process may also be a way of creating unaccounted funding destined for corruption where money is paid for invoices that have no objective basis in fact, i.e., remuneration is paid for activities which are entirely or partially fictitious.

To manage this specific risk of corruption, the Group has put in place a number of internal regulations on the matter, and included special provisions in its Code of Ethics and its Organisational, Management and Control Models pursuant to Italian Legislative Decree 231/2001. All affected staff are also bound by an obligation to abide by the following behavioural and organisational standards:

- invoices must only be paid and accounted for where there is a written contract in place. There must always be a check to see if the good or service has been provided correctly and in line with the supporting written contract;
- invoices must only be paid where there is a written contract in place, which must have followed the regular supplier assessment process. Invoices must be for standardised values and amounts, and must be in line with the agreed terms and conditions, and after having provided the good or service;
- once an invoice is recorded, the Head of the Responsibility Centre or the organisational unit Contact Point that requested the good or service will be asked to confirm that the invoice is payable, in terms of the quantity and quality of good or service actually received;
- any member of Group staff involved in Group activities must record all management events, i.e., any event that may generate an accounting item, on a daily basis;
- only authorised staff may record events in the computer software used by various organisational units. These management events will be transferred into general accounts;
- management events recorded will be subject to controls whose frequency and method will vary in accordance with the business sector they refer to. The management event records must show the responsible or owning person/organisational unit, in line with the provisions of internal regulations;
- each accounting item must faithfully reflect the information contained in the supporting documentation, which, in turn, must be carefully stored to enable future audit;
- accounting obligations must be managed by people who have the necessary powers to do so in accordance with the system of responsibilities that govern the operations of offices or organisational units involved;
- if anyone becomes aware of any omission, error or falsification in management records and, consequently, in accounts, they must immediately inform their line manager, in line with the provisions of the 'Group Whistleblowing Policy'.

1.2. Training

The Group conducts specific training activities on the contents of this Policy and the prevention of the types of offenses referred to herein as well as other predicate offenses pursuant to Legislative Decree No. 231/2001, the attendance and completion of which represent a punctual contractual and professional obligation that binds the members of corporate bodies and employees.

1.3. Whistleblowing

Banca Ifis Group staff are required to immediately report to their line manager or, in accordance with the 'Group Whistleblowing Policy', to Internal Audit or the Supervisory Board, where instituted, any breaches of anti-corruption provisions, whether originating internally or externally, that affect Group activities in any way.

All Group companies have implemented an internal whistleblowing system to report breaches of national or EU law. These systems are available to all Group staff who become aware of any breach whilst performing their duties.

Whistleblowers can make whistleblowing reports through any of the following channels:

1. a dedicated app, which can be accessed via the link on the company intranet (Ifis4You) or on the institutional website;
2. voicemail system;
3. postal service (or internal post service), sending a written report for the attention of the Head of Internal Audit in a sealed envelope marked 'STRICTLY CONFIDENTIAL';
4. meeting with the Head of Internal Audit.

The whistleblowing system ensures that a whistleblower's identity will remain confidential and will be protected from retaliation.

Under certain conditions, such as any situations where the ordinary process is not sufficient, the internal reporting system also includes the following communication channels, which ensure that the reporting individual's identity is kept confidential, his/her data is processed correctly, and have the same level of protection from retaliation;

- external reports to the Italian National Anti-Corruption Authority (ANAC);
- public disclosure via the press or electronic means or by publication methods that can reach a large number of people.

1.4. Sanctions

If any of the principles set out in this policy are breached by any member of staff, director or auditor working for any Group company or by another recipient (contractual counterparty, supplier or partner of any kind), the Group will apply the disciplinary sanctions set out in relevant contractual terms and conditions.