

# Simonelli Group Anti-Corruption Policy

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## **1. Purpose and Scope**

Simonelli Group S.p.A. and its parent companies are committed to complying with all anti-corruption laws and regulations applicable in the countries in which they operate.

As a socially responsible company, Simonelli Group integrates economic, social and environmental sustainability into its operations, adopting the fundamental principles of international conventions and the guidelines of the United Nations Global Compact, including the fight against corruption.

This Anti-Corruption Policy is intended to provide rules of conduct and illustrate the responsibilities and obligations of employees, collaborators and third-party stakeholders with whom Simonelli Group has business dealings, to ensure compliance with anti-corruption regulations.

Simonelli Group adopts a "**zero tolerance**" approach to any act of, including but not limited to, bribery, inappropriate gifts and other forms of corruption.

This **Policy** applies to all members of Corporate Bodies, employees, proxies and collaborators of Simonelli Group, as well as to suppliers, consultants and other third parties acting in the name and on behalf of the Company, regardless of the type of contractual relationship.

All persons and entities subject to this Policy must comply with the anti-corruption laws applicable in the countries in which Simonelli Group operates.

All Simonelli Group activities must be conducted with loyalty, fairness, transparency, honesty and integrity, in accordance with the corporate values and principles set out in the Company's Code of Ethics. The Management of Simonelli Group is responsible for promoting a corporate culture that combats corruption and supervising the application of this Policy.

Simonelli Group is committed to adopting specific compliance programmes, including training and communication programmes, to ensure awareness and adoption of the Policy by all employees and stakeholders.

Each subsidiary may adopt specific adaptations and implementation procedures to address emerging local risks, while ensuring compliance with the minimum requirements of this Policy.

This Policy is published on the Simonelli Group corporate website and on the corporate Intranet. Specific training and communication programmes will be implemented to ensure that all recipients are aware of their anti-corruption responsibilities and obligations.

The Board of Directors of Simonelli Group will verify at least annually the achievement of the objectives of the Policy and establish any revisions.

Simonelli Group is committed to maintaining high ethical standards and fighting corruption in all its forms, ensuring that its activities are conducted in compliance with laws and international best practices.

## **2. *Legal framework.***

The purpose of this Policy is to provide a systematic framework of reference on the prohibition of corrupt practices, with the aim of providing rules of conduct, responsibilities and obligations for employees, collaborators and third-party stakeholders with whom Simonelli Group has relations.

Simonelli Group operates in several countries and is therefore subject, together with its staff, to compliance with the laws of Italy and of the countries in which it operates or may operate in the future.

Where the law of a country provides for additional mandatory requirements, such requirements will supplement the provisions of this Policy.

## **3. *Definitions and addressees.***

### **3.1 *Definition of corruption and misconduct***

This Policy has been approved by the Board of Directors of Simonelli Group S.p.A. and concerns all Group personnel, including those who work for or on behalf of the Company, within the limits of their responsibilities. This also includes members of the Supervisory Board and of the Corporate Bodies (hereinafter referred to as "Addressees").

Simonelli Group S.p.A. and all its subsidiaries will implement this Policy through a resolution of the respective Board of Directors (or equivalent body if no such body exists in the governance of the subsidiary).

The Simonelli Group also encourages companies and entities related to the Group (such as consortia, joint ventures, etc.) to adopt and comply with the standards outlined in this Policy, or to implement their own guidelines ensuring compliance with the highest ethical principles.

The commitment to follow the anti-corruption regulations and principles set out in this Policy by third parties working for or on behalf of Group companies shall be formalised through specific contractual clauses accepted by the third party.

According to international conventions, bribery includes any act of offering, promising, giving, paying, requesting, soliciting, inducing, accepting or receiving a financial or other benefit, whether directly or indirectly, in the public or private sector, for the purpose of obtaining or retaining an undue advantage or unjustly influencing the achievement of an objective. Corruption can be both active - meaning the act of bribing - and passive - meaning the act of being bribed.

Benefits arising from acts of bribery may include not only money, but also other forms such as gifts, donations, payments of entertainment expenses, meals, travel, acts of hospitality, contributions and sponsorships, provision of services, professional appointments, business or investment opportunities, the awarding of contracts, or recognition that may influence a business or institutional counterparty, and other advantages or benefits.

The definition of corruption in this Policy supplements, but does not replace, the specific definitions provided by the laws of the legal systems in which the Simonelli Group operates.

### **3.2** *Recipients*

The above Policy applies

- to employees and collaborators of the Simonelli Group
- to its subsidiaries;
- to stakeholders who have working relations with the Company, in particular with: the directors and members of any corporate body of the Companies of Simonelli Group and all employees and collaborators of the same (the "Company Recipients" or simply "Recipients")
- to the customers and suppliers of Simonelli Group and, in general, to anyone acting as a contractual counterparty or on its behalf.

All those to whom this policy is addressed are responsible, each within their own sphere of competence, for ensuring compliance with it.

Those who occupy corporate roles with supervisory and coordinating duties also have a duty to ensure that their collaborators comply with the policy, taking appropriate measures to prevent, detect and report any violations.

Simonelli Group undertakes to operate in compliance with the local regulations of the countries in which it operates, even if these are more restrictive than this policy.

#### *4. General rules.*

In establishing business relations with private parties and interfacing with public officials, Simonelli Group and its representatives undertake to act with transparency and integrity, complying with all applicable laws and regulations to prevent any form of active and passive corruption.

In general, it is prohibited:

**-Offering, promising, giving or paying** directly or indirectly sums of money or other benefits to Public Officials or private persons.

**-Prompting, soliciting, accepting or receiving** (directly or indirectly) sums of money or other benefits from Public Officials or private persons.

This prohibition includes the intention to induce a Public Official or private party to perform improper acts, to reward them for acts performed improperly, or to unduly influence the performance or omission of acts proper to their functions.

It is essential that all commercial, economic and financial transactions are duly traced and recorded in the Simonelli Group's accounting records in a truthful, correct and complete manner, highlighting not only the amount but also the nature of the transactions and the parties involved.

Simonelli Group manages tax matters according to a prudent and responsible approach, favouring transparency, cooperation and trust in order to improve relations with institutions, in compliance with the relevant company policies.

The addressees of this policy are required to:

- Comply with the specific rules set out in company directives.

- Declare any conflict of interest with a third party or with the Simonelli Group as soon as they become aware of it or suspect its existence. This includes situations in which personal interests could influence independence of action and judgement in business dealings.
- Act with caution in the case of investments that could be instrumentalised for acts of corruption.
- Carry out a check and assessment of the reputation and reliability of third parties before granting them powers of representation on behalf of Simonelli Group
- Act with caution when making donations or sponsorships on behalf of Simonelli Group
- Promptly report any act of corruption, real or suspected
- Strictly comply with the principle of segregation of roles between those who execute, those who control and those who authorise, as set out in Simonelli Group's internal policies and procedures
- Observe the rules for the exercise of signature and internal authorisation powers.
- Always operate with professionalism, impartiality and transparency, immediately reporting any situation that could generate a conflict of interest or a risk, even if only hypothetical, of corruption.

This set of rules aims to ensure that the Simonelli Group conducts its business according to high standards of integrity and regulatory compliance, promoting trust and respect among all stakeholders involved in its business operations.

#### 5. *Specific rules.*

Simonelli Group adopts a strict policy concerning the offer and acceptance of gifts, hospitality, entertainment expenses, donations and sponsorships, in order to maintain transparency, operational integrity and regulatory compliance.

The company does not allow the giving and receiving of such benefits if they can be interpreted as attempts at bribery or if they compromise independent judgement in the conduct of business.

Simonelli Group only authorises the acceptance of gifts and benefits bearing its logo and/or of modest value - by which is meant a value of less than € 100.00 - in accordance with normal business practices and local regulations.

Travel and accommodation expenses are only allowed if strictly necessary for legitimate business purposes, duly authorised and properly recorded according to internal protocols. It is essential that all such transactions are tracked, approved and documented in a transparent manner and in compliance with the accounting procedures established by Simonelli Group.

Furthermore, the Company is committed to establishing relations exclusively with counterparties that comply with high ethical and legal standards, ensuring that all donations are made without conflicts of interest and with the aim of supporting lawful and ethical activities.

More detailed rules on these practices are set out in the internal guidelines adopted by Simonelli Group, in order to provide clarity and support to employees in complying with these principles.

In case of doubt, employees are required to consult their company contact person for the necessary assessments.

### *5.1. Initiatives in favour of local communities*

Simonelli Group operates in several countries, working with various local communities.

The Company's objective is to be a trusted partner for the organisations and institutions with which it interacts, establishing relationships based on transparency, ethics and impartiality, guided by values of social responsibility.

Furthermore, Simonelli Group is actively committed to supporting the development of the local communities in which it is present.

To this end, Group companies may make contributions to public and private entities - including non-profit organisations - and organise or sponsor events and initiatives.

They may also finance specific social development projects, often in collaboration with third parties.

In order to prevent the risk of corruption associated with such initiatives, Simonelli Group requires that all activities are carried out in full compliance with applicable regulations, the Company's internal procedures and the delegation system in force.

It is mandatory that all financial transactions are properly documented and recorded in accounting records.

Simonelli Group is committed to guaranteeing proper management of the funds allocated to these initiatives, ensuring that they are received by authorised parties and used exclusively for the agreed projects and purposes.

### *5.2 Relations with Representatives of the Public Administration*

**Simonelli Group does not tolerate and condemns any attempt to influence the behaviour of Public Officials.**

Simonelli Group prohibits any form of direct or indirect payment to Public Officials (e.g. employees of public bodies or entities subject to public control, international organisations, politicians, party officials, candidates for public office) in order to obtain improper advantages for themselves, their families or the company.

By way of example but not limited to, offers or promises of:

- **obtain licences, authorisations or accelerate** administrative procedures;
- **influence outcomes** of Public Administration activities such as audits and inspections, or report irregularities in order to avoid them or induce them to not obtain public contributions that are not due or of a higher amount.

All contacts with Public Officials must be managed by authorised Simonelli Group personnel, who operate in compliance with the procedures defined to ensure traceability and correct filing of relevant documentation.

Whenever possible and appropriate, interactions with public officials of any nature (such as inspections) should take place in the presence of at least two persons.

In particular:

- obligations towards the Public Administration and the preparation of related documentation must be carried out with the utmost care and competence, in order to provide clear, precise, complete, accurate and truthful information, avoiding and reporting any situations of conflict of interest in an appropriate and timely manner;



- relations with persons in the Public Administration must be based on fairness, transparency, cooperation and total respect for their institutional role, guaranteeing the prompt and accurate fulfilment of the prescriptions and obligations required;
- it is prohibited to promise or offer goods and/or advantages to individuals in the Public Administration with the intention of influencing their decision-making autonomy or inducing them to unjustifiably favour Simonelli Group products;
- all documentation intended for the Public Administration must be prepared accurately, using clear, objective and complete language, and must be verified and signed by the Simonelli Group managers involved or other authorised persons with adequate delegated powers.

### *5.3 Relations with suppliers, professionals and consultants*

**Simonelli Group could be held indirectly liable for acts of bribery committed by third parties with whom it does business. Therefore, we expect all those who do business with the Company to act in accordance with applicable laws and regulations and in compliance with this Policy.**

Simonelli Group may use the support of consultants and professional service providers in carrying out its business activities.

It is important to carry out an assessment of them and be able to determine whether each of them has undertaken or may undertake activities prohibited by the Code of Ethics, the Group Supplier Code of Conduct and the policies set out in this Anti-Bribery Policy.

Suppliers must be individuals, legal entities or de facto entities, trustworthy and of excellent reputation for honesty and integrity.

The selection and conclusion of the contract must be approved in compliance with corporate procedures. Where necessary, Simonelli Group cooperates with legal persons in order to win, develop or manage orders (within the framework of the formation of ATIs, consortia, joint ventures).

The Company develops partnership relations with counterparties of established reputation and experience, setting up such relations in compliance with current legislation and the principles of the Company's Code of Ethics.

It is essential to know one's partners and to be able to assess existing or potential risks arising from activities that are not in line with one's internal regulations and ethical principles.

In this sense, all employees, managers and directors must pay particular care and attention in the selection and evaluation of partners, carrying out an adequate prior check in order to have a true and complete representation of their status and to ascertain their commercial and professional reliability.

Furthermore, in their relations with their suppliers, professionals and consultants, the addressees of this Policy are required to avoid

**-offering, promising, delivering or paying** (or authorising someone to do so), either directly or indirectly, money or any other benefit in favour of suppliers, professionals and consultants with whom Simonelli Group collaborates, in order to obtain favourable conditions for the Company or personal advantages and/or to obtain, provide or disclose confidential information, and to unduly favour the Company.

**-requesting, soliciting, encouraging, accepting or receiving** (or authorising someone to do so), whether directly or indirectly, money or any other benefit from suppliers, professionals and consultants of Simonelli Group in order to establish or maintain a contractual and business relationship with Simonelli, unduly favouring the company

**-using money, gifts or other benefits received as a means of creating illicit funds for the purpose of corruption;**

**-carry out corrupt activities through third parties**, in particular suppliers, professionals and external consultants acting on behalf of the Company.

Contracts, if any, established with suppliers, professionals and consultants, including economic details and conditions, must be drawn up in writing and signed by authorised representatives in accordance with the Simonelli Group proxy system.

The traceability of the receipt and acceptance of purchased goods and services is guaranteed by the functions involved in the purchasing processes.

It is essential to monitor the performance and behaviour of suppliers, reporting and investigating any irregularities.

All payments must be made in accordance with the agreed contractual provisions and only after receipt of invoices, duly approved in accordance with the Simonelli Group authorisation system and properly recorded.

#### *5.4 Relations with Customers and Business Partners*

**Simonelli Group could be held indirectly liable for acts of corruption committed by third parties with whom it has business dealings. Therefore, we expect all those who have business dealings with the Company to act in accordance with applicable laws and regulations and in compliance with this Policy.**

Simonelli Group requires from its customers and business partners a commitment to behave in line with the values and principles outlined in the Code of Ethics and in this Policy, urging them to provide transparent and timely information regarding any non-compliance and the relevant corrective measures adopted or to be adopted.

To this end, Simonelli Group only establishes business relations with customers and business partners (such as agents and sales representatives, distributors, sales dealers) who have a respectable reputation and conduct exclusively lawful activities inspired by ethical principles in line with those of the Company.

Customers and business partners who maintain relations with Simonelli Group are required to respect and accept the Code of Ethics and this Policy, providing, in the event of non-compliance and failure to plan and implement the necessary corrective actions, the right of Simonelli Group to terminate and/or interrupt the contractual relationship immediately and without notice.

Furthermore, in the context of business relations with its customers and business partners, the addressees of this Policy must refrain from:

- Offering, promising, giving or paying (or authorising someone to do so), directly or indirectly, sums of money or other benefits (e.g. gifts, gratuities, donations, sponsorships, acts of hospitality and entertainment expenses) to actual or potential customers in order to establish or maintain a contractual relationship, thereby unduly favouring Simonelli Group (ref. Definition of "Corruption")

- Requesting, soliciting, inciting, accepting or receiving (or authorising someone to do so), directly or indirectly, sums of money or other benefits from customers of the Company in order to establish or maintain a contractual relationship, unduly favouring Simonelli Group
- Use money, gifts or other benefits received as a means of creating unlawful funds for the purpose of corruption;
- Conduct unlawful activities of a corrupt nature through third parties, in particular through intermediaries acting on behalf of Simonelli Group.

Any contribution, discount or bonus based on the achievement of targets may only be granted to customers if provided for in the relevant contract and, in any case, only if those targets have actually been achieved.

In the event of non-achievement of contractually agreed targets, contributions, discounts or bonuses may only be granted in exceptional and justified cases, and must be approved in writing in compliance with the adopted system of delegation.

In contractual relations with customers and business partners, the rules and principles defined in this Policy, section 'Specific Rules', paragraphs 1-3-4, shall also apply, insofar as they are compatible.

### *5.5. Extraordinary Transactions*

In the event of extraordinary transactions (such as acquisitions, mergers, demergers, sale of shareholdings, transactions on the share capital of the company or its investees, corporate reorganisations, etc.), Simonelli Group managers, supported by external consultants where appropriate, are required to

1. Identify the main risk factors related to compliance with anti-corruption laws that may emerge in the context of the extraordinary transaction;
2. Request from the counterparty, or prepare at the counterparty's request, information on compliance with anti-corruption laws
3. Define the anti-corruption clauses to be included in the agreement relating to the extraordinary transaction.

In contractual relations with consultants assisting Simonelli Group during extraordinary transactions, the rules and principles defined in this Policy, section "Specific Rules", paras. 1-3-4 shall apply.

Simonelli Group requires that, in the case of extraordinary transactions such as mergers, acquisitions or divestments, due diligence be performed on the target company.

This process aims to obtain a true and complete representation of the state of the company, ascertaining its commercial and professional reliability and identifying the main risk factors, including those of corruption.

The entire process must be conducted by ensuring compliance with the principles of transparency, traceability of the relevant stages, fairness and timeliness, in line with corporate policies, environmental, health and safety guidelines and the rules of conduct referred to in the Group's Code of Ethics.

#### *5.6. Human Resources Management*

From the earliest stages of the **selection process**, Simonelli Group is committed to establishing fair and transparent working relationships based on mutual understanding and the sharing of potential professional and career paths.

Recipients are prohibited:

- Offering, promising or accepting requests for money or other benefits in the form of recruitment, career advancement, recognition of bonuses, incentives and MBO awards as forms of bribery (including to public officials) in order to obtain undue advantages for Simonelli Group;
- Use expense reimbursements and entertainment expenses as a means of creating illicit funds for the purpose of corruption.

The staff recruitment process must only be initiated in the presence of a real need, with extra-budget recruitment formally authorised in compliance with internal procedures.

Decisions regarding selection, recruitment, career advancement and awarding of bonuses must be based on objective and impartial factors, such as the evaluation of performance and technical-professional skills.

The recruitment process must be traceable and documented in a comprehensive and timely manner.

The selection, assessment and recruitment processes must not be managed by a single corporate contact and must be guided by the HR management.

They must include verification of the candidates' professional experience and suitability for the position in question.

Any potential conflicts of interest or relations with representatives of public institutions, suppliers and other relevant persons must be identified and examined.

All employment relationships must be formalised in writing and signed by persons with appropriate power of attorney.

Awards, performance targets, benefits and other incentives must be authorised in accordance with the delegation system and applicable policies.

Reimbursable expenses and their maximum amounts are defined in policies and procedures to be observed by all employees.

Expense claims must be formally authorised in accordance with the authorisation system adopted by the company.

Advance payments to employees and cash payments for business trips must be authorised within the limits and according to the procedures defined by Simonelli Group.

Simonelli Group recognises the central role of human resources in the achievement of corporate objectives and adopts selection procedures that respect human values, autonomy and responsibility of personnel.

The recruitment and human resources management process must ensure that operations are carried out in compliance with the principles of professionalism, transparency and fairness, in accordance with applicable laws and regulations.

In particular, the selection process for staff recruitment must be formalised, ensuring the absence of conflicts of interest between the person making the selection and the candidate, and compliance with the principle of segregation between the functions requesting the resource and the person making the selection.

The personnel evaluation process must be based on objective and transparent criteria and any bonuses must be paid following the achievement of pre-established objectives.

Staff travel expenses are reimbursed within the limits and in compliance with company procedures that define the types of expenses allowed and reimbursement ceilings.

It is forbidden to use travel funds and reimbursements for purposes other than those for which they are intended.

## **6. "Red Flag" and the disciplinary system.**

Recipients of this Policy are required to report, even anonymously, any alleged or actual violation of applicable laws or this Anti-Bribery Policy by employees, collaborators or third parties working for Simonelli Group.

There are several situations that represent red flags and for which further investigation should be envisaged in order to establish whether a given transaction or a specific relationship could potentially constitute a corruption risk, potential or actual.

For example:

- transactions or business dealings with countries with a high prevalence of corruption;
- requests for cash or non-contractual payments;
- payments to parties other than the contractual counterparty or through countries unrelated to the contractual relationship;
- payments to third parties not precisely determined;
- absence of written agreements;
- unusual dealings with public officials;
- refusal to commit to this Policy and payments without a purchase order number, where applicable.

### **6.1. Signalling System**

Simonelli Group offers employees, collaborators and third parties who have business relations with Group companies the opportunity to report, confidentially and confidentially, any unlawful conduct or irregularities that may violate this Policy, anti-corruption laws, the Code of Ethics and other Group policies and procedures.

Such reports may also concern potential violations of laws or regulations.

Any person inside or outside the Company who becomes aware or has a reasonable suspicion that conduct may violate this Policy or anti-corruption laws is required to promptly report the fact, either anonymously or identified, through the reporting channels made available by the Group.

Simonelli Group undertakes to protect the reporter in good faith against any form of retaliation, discrimination or penalisation connected with the report.

The confidentiality of the identity of the whistleblower is guaranteed, without prejudice to legal obligations and the protection of the rights of the Company or of the persons accused in the event of wilful misconduct or gross negligence.

Failure to report a known or suspected wrongdoing may lead to disciplinary action against the employee.

Those who report possible misconduct in good faith or provide assistance in investigations are protected from any form of retaliation, discrimination or penalisation for reasons related to the report.

In order to facilitate the receipt of reports, Simonelli Group has set up specific communication channels as follows

- written report to be delivered by registered mail with return receipt to the attention of the Whistleblowing Office, to be sent to the Company's registered office in (62020) Belforte del Chienti (MC), Via Emilio Betti no. 1;
- confidential telephone line no. +39-3440626883, managed directly by the Whistleblowing Office of the Company, possibly also by leaving a voicemail, sms or WhatsApp message. Via the same telephone number, the whistleblower may also request a direct meeting with the members of the Whistleblowing Office. The meeting will take place in a location that guarantees the confidentiality of the whistleblower. Oral reports will be recorded, transcribed or documented in minutes by the Whistleblowing Office.



## *6.2 Disciplinary systems*

Simonelli Group undertakes to make every reasonable effort to prevent conduct that violates anti-corruption regulations and/or this Policy, and to interrupt and sanction any conduct contrary to these regulations on the part of employees, partners or third parties working for the Group.

Disciplinary measures commensurate with the seriousness of the breach will be taken against anyone who violates these regulations, or who unreasonably fails to detect or report such violations, as well as against anyone who threatens or retaliates against anyone who reports such violations.

Such measures may include sanctions provided for in the collective labour agreement or applicable national laws, up to and including possible termination of employment.

For partners or third parties, this could result in termination of contract, claims for damages or other actions deemed appropriate.

It is therefore extremely important that you read this Policy carefully and comply with it strictly.

## **7. Glossary**

### **Simonelli Group S.p.A.**

A joint stock company based in Via Emilio Betti 1, 62020 Belforte del Chienti, Italy (C.F. 01951160439).

**-Code of Ethics:** The document establishing the moral principles and behavioural guidelines for Simonelli Group, available on the company website.

**-Supplier Code of Conduct:** The rules of ethical conduct and integrity that Simonelli Group suppliers must follow, available on the corporate site.

**-Corruption, Active Corruption and Passive Corruption:** These terms are defined in Section III of this Policy of Simonelli S.p.a.

**-Recipients:** The persons or entities to which this Policy applies, as defined in Section III of the Policy.

**-Corporate Recipients:** The Recipients which include Directors, members of any corporate body, employees or collaborators of Simonelli, as defined in Section III of the Policy.

**-Anti-Corruption Legislation:** International laws and treaties relevant to the prevention of corruption, such as the Italian Legislative Decree No. 231/2001 (the "231 Decree"), the Foreign Corrupt Practices Act of the United States (the "FCPA"), the UK Bribery Act 2010 (the "Bribery Act"), as well as international conventions such as the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and the United Nations Convention Against Corruption.

These definitions are crucial for the correct interpretation and application of the Simonelli Group Anti-Corruption Policy.