

Policy Document

Corruption Prevention Policy

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Scheda

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Società Destinatarie

Cassa di Risparmio di Bolzano S.p.A.
Banca di Cividale S.p.A. – Società benefit
Sparim S.p.A
Raetia SGR S.p.A. in liquidazione
SPK OBG S.r.l
Sparkasse Energy S.r.l

Foreword

In carrying out its activities, the Cassa di Risparmio di Bolzano Group is committed to preventing and combating bribery and corruption in all forms, in compliance with the law and in strict observance of the principles of legality, loyalty, honesty and transparency.

With the adoption of the Code of Ethics and the Organisational, Management and Control Model pursuant to Legislative Decree no. 231 of 8 June 2001, which provide for specific principles of conduct, rules of conduct and controls aimed at preventing corruption, Cassa di Risparmio di Bolzano and its subsidiaries have ensured that the relevant risks are adequately monitored.

Nevertheless, in view of the expansion of the bank's operations, its significant relations with public entities and the development of its business with foreign entities, it was deemed appropriate to define this Policy, also in order to comply with industry best practices.

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1. Subject and purpose

This *policy* defines, in a coordinated manner, the main controls adopted by the Cassa di Risparmio di Bolzano Group to identify, prevent and combat bribery conduct by representatives, employees and collaborators of the various Group companies.

Bribery is defined as the direct or indirect offer or acceptance of money or other benefits capable of influencing the recipient, in order to induce or reward the performance of a function or activity or its omission.

In this regard, they therefore point out:

- the offer of money or other benefits (= 'active bribery') and the acceptance of money or other benefits (= 'passive bribery');
- corrupt acts involving a public subject (= bribery of a civil servant or public official) and those occurring between private parties (bribery between private parties);
- bribery for the purpose of having an act performed contrary to one's official duties (= proper bribery) and bribery for the purpose of having an act performed contrary to one's official duties (= improper bribery);
- corruption before and after the performance of official acts.

The occurrence of bribery offences or, in any case, non-compliance with the rules for the prevention of bribery exposes the Banks and the companies of the Group to the risk of incurring administrative sanctions, including those arising from the commission of offences pursuant to Legislative Decree No. 231/2001, and to significant legal and reputational risks.

This *policy* is part of the general system of controls for the prevention and management of risks adopted by the Cassa di Risparmio Group. The provisions of this *policy* are, therefore, coordinated and supplemented by the principles, safeguards and controls defined in the Code of Ethics, in the 231 Model of the Cassa di Risparmio and its Subsidiaries, as well as by all the internal regulations and employment contracts governing the orderly and lawful performance of the various activities.

2. Reference regulations

The Group's commitment to preventing and combating corruption and its approach are based on internationally agreed declarations, conventions and *standards*.

These include:

- Organisation for Economic Cooperation and Development (OECD), '*Convention on Combating Bribery of Foreign Public Officials in International Business Transactions*', 1997;
- United Nations Organisation (hereinafter referred to as 'United Nations' or 'UN'), '*Convention Against Corruption*', adopted by resolution 58/4 of 31 October 2003;
- Council of Europe, '*Criminal Law Convention on Corruption*' and '*Civil Law Convention on Corruption*', 1999; and 'Council Framework Decision 2003/568/JHA of 22 July 2003 on combating corruption in the private sector', 2003;
- The Wolfsberg Group, '*Wolfsberg Anti-Bribery and Corruption (ABC) Completion Programme Guidance*', 2023;
- International Chamber of Commerce, '*ICC Rules on Combating Corruption*', 2011;
- Transparency International, '*Business Principles for Countering Bribery, a Multi-Stakeholder Initiative led by Transparency International*', 2013;
- G20 Anti-Corruption Working Group, "Anti-Corruption Action Plan" 2022-2024, 2021.

At the same time, as reference legislation, we point out:

- The articles. 318 ("Corruption in the performance of official duties"), 319 ("Corruption for an act contrary to official duties"), 319-ter ("Corruption in judicial acts"), 322 ("Incitement to corruption") and 322-bis. ("Embezzlement, extortion, undue inducement to give or promise benefits, bribery and

incitement to bribery of members of international courts or organs of the European Communities or international parliamentary assemblies or international organisations and officials of the European Communities and foreign states") of the Criminal Code; Article 2635 ("Bribery between private individuals") and Article 2635-bis ("Incitement to bribery between private individuals") of the Civil Code;

- Legislative Decree 231/2001;
- Law No. 190 of 6 November 2012 - Provisions for the prevention and repression of corruption and illegality in the public administration;
- Law No. 3 of 9 January 2019 - Measures to combat offences against public administration, as well as on the statute of limitations for offences and on the transparency of political parties and movements.

On the other hand, and without prejudice to what has already been mentioned *above* (*supra*, par. 1), as internal regulations/policies of the Cassa di Risparmio Group and the individual companies, it is worth noting:

- the Code of Ethics;
- the 231 Model of the Cassa di Risparmio and its Subsidiaries;
- the "Compliance Model and Non-Compliance Risk Assessment" Policy Document;
- the "Non-Conformity-Risk Control Group Regulation";
- the "Accounting and Balancing" Group Regulation;
- the "Anti-Money Laundering Process" Group Regulation;
- the "Process of Relations with the Supervisory Authorities " Group Regulation;
- the "External Communication" Group Regulation;
- the "Purchases" Group Regulation;
- the "Credit" Group Regulation;
- the "Entity Treasury" Group Regulation;
- the "Personnel Management" Group Regulation.

The systems adopted for reporting violations (so-called *whistleblowing*) are also relevant:

- the Group Regulation "Reporting Violations (Whistleblowing)";
- the "Reporting Violations (Whistleblowing)" Policy Document.

3. Addressees and scope of application

The principles and contents of this *policy* must be known and observed by all those who hold a position or carry out an activity at Cassa di Risparmio and the other companies in the Group.

More in detail:

- members of bodies with strategic supervision, management and control functions;
- individuals with management responsibilities, such as the heads of the various Directorates and Departments;
- employees at all levels;
- employees and suppliers as well as all those who, although external, act in the name and on behalf or in the interest of the Sparkasse Group companies.

The addressees are bound to observe and, as far as they are concerned, enforce the principles contained in this *policy*. Under no circumstances shall the claim of acting in the interest of the companies of the Group justify the adoption of conduct in contrast with the principles set out herein.

As regards the scope of application, the "Corruption Prevention Policy" applies across the board to all the activities carried out and all the services provided by Cassa di Risparmio and the other Group companies.

4. General principles and safeguards adopted

The Cassa di Risparmio Group carries out its activities according to the fundamental principles of honesty, impartiality, legality, transparency, excellence and creation of value for shareholders, as defined and set out in the Code of Ethics.

In line with these principles and in accordance with the principles and rules of conduct defined in the 231 Models of the various companies, the Cassa di Risparmio Group:

- does not tolerate corruption in any form or manner whatsoever;
- does not tolerate any conduct involving the offer or acceptance of money or other benefits - directly or indirectly - with the aim of inducing or rewarding the performance of a function/activity or the omission thereof.

Such conduct shall not be tolerated even with reference to payments of small sums in order to accelerate, favour or ensure the performance of a routine activity or in any event provided for within the scope of the recipient's duties (so-called *Facilitation Payments*).

Within the scope of operations of the Cassa di Risparmio and the Group, the following activities have been identified as being most exposed to the risk of corrupt conduct:

- relations with the public administration;
- giveaways and sponsorships;
- purchase of goods and services, relations with third parties and acquisition of shareholdings;
- accounting entries and records;
- recruitment and management of personnel;
- acquisition, management and disposal of real estate;
- relationship between private individuals.

The values and behavioural criteria set out in the Code of Ethics constitute the first safeguard for the prevention of corrupt conduct.

At the same time, Models 231 of Cassa di Risparmio and other Group companies provide for:

- Principles of conduct relating to specific activities that the Addressees are required to observe in the performance of their duties and aimed at limiting the possibility of commission of the offences covered by the provisions of Legislative Decree No. 231/2001. Among these, for the purposes of this *policy*, of particular relevance are those aimed at preventing: (1) offences against the public administration; (2) corporate offences; (3) offences of receiving stolen goods, money laundering and use of money, goods or utilities of unlawful origin as well as self laundering, financing of terrorism; (4) the offence of Inducement not to make statements or to make false statements to the Judicial Authorities;
- the control principles identified in the internal regulations and organisation of the various companies and applicable to each sensitive activity described in the Special Section of Models 231 in order to ensure compliance with applicable regulations, risk prevention and the orderly performance of operations. More specifically, the following constitute control principles: (1) the description of the process and segregation of duties; (2) the existence of established procedures/guidelines/operational practices; (3) traceability and ex post verifiability of the activity by means of adequate documentary and IT support; (4) existing powers; (5) the applicable offences. Regardless of the offences indicated, all control and conduct protocols are always applied in the performance of sensitive processes, since they are useful for the prevention of unlawful activities.

These provisions constitute additional effective safeguards for preventing and combating corruption.

The Cassa di Risparmio Group is also equipped with a complex and articulated system of controls to prevent the risks of using the financial system for the purpose of money laundering and terrorist financing. Mentioned in the Cassa di Risparmio's Model 231, these controls are set out in the "Anti-Money Laundering Process" Regulation, in the "Anti-Money-Laundering" Policy Document and in the related operating rules.

4.1. Relations with the Public Administration

Within the Cassa di Risparmio Group, the assumption of commitments and the maintenance of relations with the Public Administration is reserved to the appointed and authorised corporate functions, in compliance with their reciprocal roles.

Relations with the Public Administration, Supervisory Authorities and any public authority are marked by principles of integrity, independence, fairness and transparency. The Group's employees must refrain from any conduct that may favour crimes of corruption, extortion, fraud to the detriment of the State or other public body, undue receipt of contributions, financing or other disbursements from the State or other public body.

With reference to relations with the Public Administration, the Addressees respect the following principles of conduct:

- it is forbidden to give or promise money or other benefits (e.g. the promise of employment) to public officials, to persons related to public officials by ties of kinship, friendship or to persons reported by public officials, in order to obtain undue advantages (e.g. to influence the decision to enter into agreements, contracts, conventions with the Bank or the Group, to refrain from applying penalties or sanctions against the Bank or the Group for any breach of contract). This prohibition must also be observed if the request comes from a Public Administration official;
- it is forbidden to offer or receive gifts and gratuities, exceeding normal business or courtesy practices, in favour of or from public officials, family members of public officials or persons indicated by them, such as to influence their independence of judgement in order to ensure any undue advantage for the Bank or for the Group Companies;
- it is prohibited to alter or falsify the content of the documentation requested by public bodies (e.g. false declaration or false self-certification);
- it is prohibited to fraudulently omit data or information relating to the documentation to be submitted to the Public Administration;
- all activities relating to participation in tenders must be duly recorded and adequately supported by written or digital documentation, in order to ensure traceability and to enable the correctness and completeness of the documents produced or information provided to be verified at any time;
- it is forbidden to hire, before at least three years have elapsed since the termination of the employment relationship with a public body, former employees of the Public Administration or of the Supervisory Authorities who have been involved in authorisation processes or inspections against the Bank or the other Group companies or have in any way participated in control activities or as a counterparty of the Bank or the other Group companies (the so-called *pantouflage* prohibition);
- within the framework of participation in public tenders and/or competitions called by public bodies, as well as in any negotiation or contractual relationship that is conducted/concluded with them, all internal Addressees involved shall behave in good faith and in compliance with the laws and regulations in force, also ensuring adequate care and filing of official information flows towards public bodies;
- it is prohibited to induce or attempt to induce the public official of the contracting authority to make a mistake as to whether the Bank or the other Group companies meet the requirements set out in the call for tenders or in the private treaty, in order to obtain the undue award of the tender or the contract in the absence of the requirements;
- on the occasion of inspection visits, it is prohibited to induce the public official to omit reporting any irregularities or failures committed by the Bank or the other Group companies;
- when contributions, subsidies or financing are requested from the State, the Region, the Province, another public body or the European Union, the documentation produced in support of the request must be complete and contain correct information; the same rule applies when the request is made on behalf of a third party or if it has a third party as final recipient (e.g. for customers of the Group);
- sums obtained from the State, the Region, the Province, another public body or the European Union must be earmarked for the purposes for which they were disbursed; the same rule applies when the Bank or a Group company has the burden of verifying that the sums are earmarked for the purposes for which they were disbursed.

At the same time, the Control Principles set out in Models 231 must be observed by all Addressees, as they establish important safeguards:

- the "Process of Relations with the Supervisory Authorities" Group Regulation;
- the "Treasury for Institution" Group Regulation;
- the "Credit" Group Regulation, which provides for specific measures and controls with reference to loans granted to public bodies or in favour of publicly owned companies.

4.2. Gifts and sponsorships

In compliance with the Code of Ethics, in its relations with third parties (private individuals, companies or public bodies), the Cassa di Risparmio Group prohibits the Addressees from soliciting or accepting, promising or providing, for themselves or for others, directly or indirectly, gifts, gratuities, money, recommendations or other benefits, except for occasional gifts of symbolic value or falling within normal courtesy practices and that in any case do not exceed the economic value of € 200.00 (two hundred/00 euros).

In any case, benefits must not be offered or accepted that might compromise the integrity and independence of judgement of the recipient or that might reasonably be deemed as such by an external and impartial observer. In this respect, the limits and prohibitions laid down in other internal regulations must also be observed.

The prohibition and the value limits provided for do not apply to expenses considered as entertainment expenses relating to events and forms of reception and hospitality attended by corporate representatives or employees of the Cassa di Risparmio Group.

In the event that benefits are received in violation of the provisions of this paragraph, and for doubts concerning in particular invitations to *conventions*, trips or similar activities, the Addressees must inform the Head of the Compliance and Anti-Money Laundering Function. Persons who find themselves in such a situation are obliged to fill in the 'Reporting Form for Gifts Received' (Annex 1) and forward it promptly to the Head of the Compliance and Anti-Money Laundering Function.

Similarly, it is prohibited to make donations or gifts to charitable or non-profit organisations aimed at disguising corrupt conduct. Such operations must follow specific processes of deliberation, authorisation and reporting. On the other hand, in accordance with the Code of Ethics, it is forbidden to make any contribution, in any form whatsoever, to political parties, associations or other organisations of a political or trade union nature, including those paid to their representatives.

Sponsorship activities and initiatives involving gifts and donations are entrusted to the competent Department of the Group and must be deliberated within the specific *budget*, following the necessary deliberation *process* and in compliance with the «External Communication» Group Regulation, the «External Communications» operative rules and the Document "Cassa di Risparmio's Basic Principles of *Sponsorship*". Such activities must in any case be traceable and adequately documented.

4.3. Purchase of goods and services, relations with third parties and acquisition of participations

The Cassa di Risparmio Group maintains a large number of relationships with suppliers and third parties. These relationships are based on principles of professionalism, competence, helpfulness, honesty, confidentiality and transparency, as well as compliance with the law and best business practices.

If there is objective information indicating that suppliers are involved in criminal investigations, it is necessary to ensure careful and thorough assessments by the competent Group functions in managing the

related relationships, in order to take the most appropriate action and implement the necessary measures to manage the associated risks and protect the Group's reputation.

When choosing suppliers and managing relations with them, the Addressees are required to comply with the specific internal rules adopted by the Bank and the Group, which, in general terms, provide for:

- the establishment of a Register of Suppliers to which only persons and companies selected according to specific objective and shared criteria, defined in the Group's internal rules, may have access;
- the definition of a specific *procedure for the* assignment of orders, according to objective, impartial and transparent assessments of their professionalism and economic/financial reliability, quality, price and the way in which the service is carried out;
- with regard to the definition of the subject matter of the activity, the relevant order, the amount of the fees and the method of payment, the verification of the regular performance of the activities required, the adoption of processes and systems to ensure the complete regularity and traceability of the various steps.

In this respect, all Addressees are required to comply with the internal regulations adopted by Cassa di Risparmio and the Group, including in particular the "Purchases" Group Regulation, the Code of Ethics and Model 231.

Among the relations with third parties that could expose the Group to particular corruption risks is the activity performed by credit brokers. Without prejudice to the fact that such parties are required to comply with the internal regulations adopted by the Group such as the Code of Ethics and Model 231, the relationship with brokers is governed by the "Credit mediation" Regulation, that defines the procedures relating to the broker's agreement to offer the relevant products and the monitoring of the agreement.

Further relations with third parties that are relevant for corruption risks concern the case of acquisitions or disposals of shareholdings in other companies (or other *assets*, such as *non-performing loans* or business units) and any merger or *joint venture* transactions. The Group does not tolerate non-transparent conduct or conduct aimed at obtaining or granting favourable treatment. These operations are governed by specific internal regulations that provide for: (1) a study and evaluation phase of the operation, (2) the management of pre-contractual relations and the performance of preparatory activities (such as *due diligence*), and (3) the management of the fulfilments necessary to define and conclude the operation. These activities are governed by the operating rules and, in particular, by the Policy Document "Internal Policies on Participations in Non-Financial Companies", the Group Regulation "Participations" and the Group Regulation "Major Transactions (OMR)".

4.4. Accounting entries and records

In accordance with the Code of Ethics, the Cassa di Risparmio Group ensures the truthfulness, accuracy and completeness of information useful for the purposes of accounting records and for the correct and transparent keeping of accounts relating to the Group companies.

To this end, those involved work together to ensure that the registrations and transactions carried out are reflected in the Group's management and administrative system, making it possible to verify their content and regularity at any time.

More specifically, in accordance with the principles and rules of conduct defined in Models 231:

- in the management of accounting activities, the rules of correct, complete and transparent accounting must be observed, in accordance with the criteria established by the law and the applicable accounting principles, so that each operation is correctly recorded and can be authorised and verified in its legitimacy, consistency and congruity;
- each accounting entry must accurately reflect the findings of the supporting documentation;
- in preparing the financial statements and related documents, appropriate and proper conduct must be maintained, so as to ensure the completeness, transparency and clarity of the information provided, as well as the accuracy of the data and their processing, in accordance with the criteria established by the law and the applicable accounting standards;

- for the preparation of financial statements and other accounting documents, documents and information must be provided that are true, complete, correct and correspond to the entries made, so as to prevent any alteration of the results indicated;
- It is prohibited to enter untrue information in accounting records or to conceal any relevant information and data.

At the same time,

- the 'Accounting and Balancing' Group Regulation
- must be observed by all Addressees, as it regulates relevant processes and establishes important safeguards.

4.5. Staff recruitment and management

The Cassa di Risparmio Group selects, hires, remunerates and manages its staff according to merit and competence criteria, without any discrimination or favouritism, and in full compliance with the law, employment contracts, internal regulations and best market practices.

In the performance of personnel recruitment and management activities, the Addressees are required to comply with the specific internal rules adopted by the Bank and the Group, which provide:

- the prohibition of promising employment to public officials, to persons related to public officials by ties of kinship, friendship or to persons reported by public officials, in order to obtain undue advantages (e.g. to influence the decision to enter into agreements, contracts, conventions with the Bank or with the individual Group companies, to refrain from applying penalties or sanctions against the Bank or the Group for any breach of contract). This prohibition must also be observed if the request comes from a Public Administration official;
- the prohibition to hire, before at least three years have elapsed since the termination of the employment relationship with a public body, former employees of the Public Administration or of the Supervisory Authorities who have been involved in authorisation processes or inspections against the Bank or the individual Group companies or have in any way participated in control activities or as a counterparty of the Bank or the individual Group companies (the so-called *pantouflage* prohibition);
- the definition of a specific process for the identification of personnel needs, the search and selection according to identified criteria, the recruitment decision and the regular formalisation of the relationship;
- the adoption of appropriate processes and systems to ensure the complete regularity and traceability of the different steps of this process.

In this respect, all Addressees are required to comply with the internal regulations adopted by Cassa di Risparmio and the Group, including in particular the "Personnel" Group Regulation.

4.6. Acquisition, management and disposal of real estate

The Cassa di Risparmio Group manages its real estate assets in a manner that ensures the regularity and transparency of transactions and prevents the risk of preferential treatment.

Within the Group, real estate assets are managed by Sparim S.p.A., (tax code **01743620211**) an instrumental company that deals with the management and valorisation of the latter, providing *property management*, *facility management* and project development and management services.

The Addressees are required to comply with the specific internal rules adopted by Sparim S.p.A., which provide:

- specific processes for the acquisition, management and disposal of real estate assets, including active and passive leasing activities, with the definition of specific roles, responsibilities and spending delegations;
- the definition of specific *procedures* for the selection of properties, real estate transactions to be carried out and counterparties;
- the adoption of appropriate processes and systems to ensure the complete regularity and traceability of the various steps of the processes followed.

In this respect, all Addressees are required to comply with the internal regulations adopted by Cassa di Risparmio and the Group, including in particular the "Property Management Process" Regulation and the related operating rules.

4.7. Relationship between private individuals

Pursuant to Article 2635 of the Italian Civil Code, bribery between private individuals is understood as the solicitation or receipt, for oneself or others, of undue money or other benefits, in order to perform or omit an act in breach of the obligations inherent in one's office or obligations of loyalty.

The persons who may perform or omit the act within the Cassa di Risparmio di Bolzano Group are the Board of directors, general managers, executives, auditors, liquidators and all employees.

In general, the conduct typical of corruption in relations with the Public Administration can also be integrated with reference to corruption between private individuals. Therefore, the risk of such conduct arises abstractly in all those Group activities in which a corrupt event may occur, even subsequently, such as

- the procurement of goods and services and the assignment of professional appointments;
- the management of relations with intermediaries;
- the administrative management of the sales process (active cycle) and of the purchasing or investment process (passive cycle);
- the management of collections and payments;
- the management and granting of gifts and gratuities;
- the application for and management of financing (including leasing);
- the management of recruitment of employees and para-subordinate staff;
- the management of promotions, career advancements, raises, allocation of "fringe benefits" granted to employees;
- the sponsorship of events.

Pursuant to Article 2635 bis of the Civil Code, incitement to bribery among private individuals is also punishable.

In this regard, all Addressees are required to comply with the internal regulations adopted by Cassa di Risparmio and the Group governing the mentioned activities exposed to the risk of corruption between private individuals. In this respect, of particular importance is also the "Credit" Group Regulation, which governs the main activities of the Group's banks.

5. Roles and responsibilities

The bodies, functions and structure of the Cassa di Risparmio and of the other individual Group companies do their utmost to ensure the adoption of adequate safeguards for preventing and combating corruption.

The Compliance and Anti-Money Laundering Function is responsible for the operational coordination and verification of compliance with the anti-corruption controls, as set out in this *policy*.

In this context, without prejudice to the competences of each body and function, the following roles and responsibilities should be noted.

The Board of Directors of the Parent Company:

- determines the principles, internal rules and responsibilities for establishing anti-corruption safeguards, and approves the relevant *policy*;
- ensures the ongoing adoption of possible improvements to internal regulations, processes and procedures of the Group;
- approves, where required, the activities necessary at group level for the implementation of these safeguards;
- participates in regular training sessions on anti-corruption risks and safeguards.

The Board of Directors of the Subsidiaries:

- ensures the transposition and implementation of the anti-corruption measures indicated by the Parent Company;
- ensures the continuous adoption of possible improvements in internal regulations, processes and procedures within its competence.

The Supervisory Board of the Parent Company and Subsidiaries:

- participates in the preparation of internal rules and regulations for the purposes of preventing and combating corruption, including this *policy*;
- in cooperation with the Compliance and Anti-Money Laundering Function, within the framework of the periodic analysis of corporate risks with regard to the administrative liability of entities, defines a specific *risk assessment* with reference to the risk of bribery offences or corrupt conduct;
- ensures the control within its competence on the proper adoption and effective implementation of Model 231, also with specific reference to the risks of corrupt conduct;
- receives reports and information flows from the structure useful for the implementation of its control measures;
- proposes amendments or additions to this *policy* and other relevant internal documents and regulations;
- evaluates and proposes improvements to the processes and procedures adopted by the Group to ensure more effective anti-corruption oversight;
- in coordination with the competent functions, oversees the correct information and training on anti-corruption matters in favour of the structure, in particular - where appropriate - of the Departments or Directorates most directly concerned, and of the management bodies.

The Compliance and Anti-Money Laundering Function:

- is responsible for operational coordination and verification of compliance with anti-corruption safeguards;
- in cooperation with the Supervisory Board, within the framework of the analysis of corporate risks relating to the administrative liability of entities periodically carried out by the latter, defines a specific risk assessment with reference to the risk of bribery offences or corrupt conduct;
- ensures the control of corruption risk by proposing amendments or additions to this *policy*, as well as to other relevant internal documents and regulations;
- carries out checks and controls according to its competences, in the field of preventing and combating corruption;
- transmits reports or information flows in this regard to the Supervisory Board and the Board of Auditors, as well as to the Board of Directors of the Parent Company, to the extent applicable.

The Internal Audit Function:

- carries out checks and controls on the set-up and functioning of the measures adopted to prevent and combat corruption;
- report any corrective or improvement actions with respect to the adopted safeguards;
- transmits reports or information flows in this regard to the Supervisory Board and the Board of Auditors, to the Compliance and Anti-Money Laundering function and to the Board of Directors of the Parent Company, to the extent applicable.

Consistent with the activity or function performed, Group structures:

- maintain conduct that avoids any risk of corrupt conduct;
- ensure compliance with the law of internal regulations relevant to the prevention of corruption;

- observe the Group's processes and procedures, recognising them as an effective safeguard for the orderly and regular performance of their duties, thus reducing the risks of unlawful conduct.

6. Information and training

The Cassa di Risparmio Group ensures the widest possible dissemination of this *policy*, including through publication on its website and on the corporate *intranet*.

Every new employee, director, auditor or collaborator receives adequate information in this regard at the time of recruitment, commencement of employment or appointment.

The Cassa di Risparmio Group also ensures that specific training sessions are carried out by the structure and corporate bodies according to criteria of proportionality and efficiency.

7. Reports

Any exponent, employee or collaborator of the Cassa di Risparmio Group who is the recipient of, or becomes aware of, a request or offer of money or other benefits, from whomever formulated, aimed at the performance or omission of a function or activity, must immediately report it to his supervisor; the latter in turn is obliged to forward the report received to the Supervisory Body, also using the specific e-mail address (ODV231sparkasse@sparkasse.it) and to the Head of the Compliance and Anti-Money Laundering Department for the appropriate assessments.

This is without prejudice to the possibility of using the systems for reporting violations adopted by the Group (so-called *whistleblowing*), as governed by the "Reporting Violations (Whistleblowing)" Group Regulation, by the related Policy Document and by the Models 231.

8. Penalties in the event of infringement

Failure to comply with the principles and rules contained in this *policy* shall entail the application of sanctions in accordance with the Disciplinary System Policy Document.

In the event of violations by members of the Group Companies Boards of Directors, the Supervisory Board is obliged to inform the other members of the Board of Directors, who will take the appropriate steps in accordance with the law.

If collaborators, consultants or other third parties who are bound to the Group by a non-employee contractual relationship commit disciplinary offences, this may result in the application of penalties or termination of the contractual relationship, without prejudice to any claim for compensation if the infringement results in damage to the Group, even irrespective of the termination of the contractual relationship.

Sanctions must in any case take into account the principles of proportionality and appropriateness with respect to the alleged breach, respecting, with particular regard to employees, the rules set out in Article 7, Law No. 300 of 20 May 1970 and the National Collective Labour Agreements.

9. Glossary

"BANK": referred to the banks indicated in the section "Concerned Companies"

"Cassa di RISPARMIO": Cassa di Risparmio di Bolzano s.p.a., parent company of the Cassa di Risparmio di Bolzano Banking Group.

"CODE OF ETHICS": the document adopted by the Group that identifies the ethical and behavioural principles to which each person working on behalf of the Bank or the other Group companies must adhere.

"LEGISLATIVE DECREE 231/2001" means Legislative Decree No. 231 of 8 June 2001, as amended.

"ADDRESSEES": all persons required to comply with the principles and provisions contained in this policy, as better defined in paragraph 3.

"CASSA DI RISPARMIO GROUP" or **"GROUP"**: the group of companies controlled by Cassa di Risparmio di Bolzano s.p.a., which acts as parent company.

"MODEL 231": the organisation, management and control model provided for by Article 6, paragraph 1, letter a, of Legislative Decree no. 231/2001 and adopted by the Parent Company and by the Group companies.

"SUPERVISORY BODY": the Body of the Bank and of the Group companies responsible for supervising the operation of and compliance with the Model and its updating pursuant to Article 9 of Legislative Decree no. 231/2001.

"SUBSIDIARIES": Sparim S.p.A., Raetia SGR S.p.A. and Sparkasse Haus S.r.l.

"DISCIPLINARY SYSTEM": the document adopted by the Cassa di Risparmio di Bolzano Group which, on the basis of the provisions of the applicable CCNL (national collective labour agreement), regulates the types of sanctions that may be imposed with reference to violations committed by its employees concerning the provisions of Legislative Decree no. 231 of 8 June 2001, the Model adopted and the provisions laid down in the internal regulations.