

## **OBJECTIVES**

Gruppo Strazzeri has as its primary macro-objective to become an international landmark in the management consulting, auditing and training sector in relation to functionality, quality of services and respect of timing and methods of service provision, and considers anti-bribery as one of its key elements, promoting commitment in the fight against bribery.

This macro-objective is achieved by final customer's full satisfaction, identification of customer's needs, continuous improvement of company processes, internal and/or external collaborator's satisfaction and by the consistency with the Code of Ethics and the knowledge of ethical principles and values at all levels.

All the necessary resources will be identified in various reviews of the Organisation to achieve human, infrastructural and economic objectives, as well as efficiency.

## **COMMITMENTS AND MEANS**

To achieve its targets, the Organisation:

- maintains legislative compliance and professional ethics;
- satisfies customer requirements;
- maintains the UNI EN ISO 9001: 2015 certification - Quality Management Systems;
- maintains the UNI ISO 37001: 2016 certification – Anti-Bribery Management Systems;
- maintains rigorous and full respect of legislative compliance with current Italian and foreign anti-bribery legislation where the Organisation operates, involving employees, collaborators and anyone operating on behalf of the Organisation, having implemented an Organisational, Management and Control Model pursuant to Italian Legislative Decree 231/01 in order to monitor specific types of corruption;
- prohibits any kind of conducts that can be constituted as bribery or attempt of bribery or other crimes in general, as already specified in the Code of Ethics adopted years ago;
- identifies, as part of the activities of the Organisation, the areas of potential risk and the suitable actions to reduce / minimize those risks, having them analysed and evaluated through a specific Risk Assessment;
- implements its policies and actions in order to avoid getting involved in bribery situations or attempts of bribery and not to risk any involvement in illicit situations with public or private subjects, thanks to specific preventive and periodic Due Diligence activities;
- complies with all the requirements of the Anti-Bribery Management System pursuant to UNI ISO 37001: 2016 Standard;
- raises awareness among business associates, in the activities of specific competence, in order to adopt anti-bribery policies in compliance with legislation and coherent with Gruppo Strazzeri's objectives, spreading its principles, signing specific contractual clauses and through specific Due Diligence;
- promotes the awareness and training of its employees about anti-bribery principles by using GIACC (Global Infrastructure Anti-Corruption Centre) informative materials as its main tool;
- promotes the provision of whistleblowing procedures and modalities in good faith or on the basis of reasonable belief, without fear of retaliation, having established suitable communication channels via Web and directly towards the Supervisory Body according to the Legislative Decree 231/01 and the Compliance Function according to ISO 37001:2016;
- pursues any conduct non-compliant to the Anti-bribery and quality policy applying the Organisation's Disciplinary System, already in force for years, as being part of the implemented Organisational, Management and Control Model pursuant to Italian Legislative Decree 231/01;
- provides an Anti-Bribery Compliance Function, to which is guaranteed full authority and independence;
- is committed to continuous improvement of anti-bribery activities, thanks to monitoring activities established in the Anti-Bribery Management System in accordance with UNI ISO 37001: 2016 standard;

- maintains appropriate "Review and Audit" procedures in order to prevent and/or immediately remove causes of non-conformity regarding both the characteristics of the service and the timing and costs agreed with the customer;

The tools that the company will identify as necessary to achieve its objectives involve the entire Organisation in an integrated corporate vision in which the Quality and Anti-Bribery aspects are combined, in a perfect balance, with all the aspects contributing to outline the corporate strategies.

### **PROCESS INDICATORS**

During the Management Review the "Objectives-Goals-Process Programs" have been defined and reported in (ALMS-QABMS 6-2)/1, in order to define the process macro-objectives, the necessary activities to achieve them and their evaluation indicators with the indication of the target values and the gained ones.

The achievement or the deviation of the final period values compared to the target values will be the concrete and global judgment element to evaluate the effectiveness of business, in terms of real satisfaction of the defined company policy.

This Anti-Bribery and Quality Policy is released to all company levels: through direct distribution and company Intranet system, for employees and collaborators, through the publication on the official website of the Organisation and the insertion of specific contractual clauses in the contracts, regarding business partners, suppliers and other business associates.

Catania, 30/04/2021

Top Management

