



ACCIAI
SPECIALI
TERNI

POLICY FOR THE PREVENTION OF CORRUPTION

Aware of the negative impacts that the corruption phenomenon is able to entail not only on social and economic progress, but also on business, Acciai Speciali Terni S.p.A. with a Sole Member (hereinafter referred to "AST") allows no form of corruption.

In particular, any conduct (wrong doing) that consists in offering, promising, paying, receiving, claiming, authorizing - directly or indirectly - undue advantages of any kind (such as, for example, goods, money or other benefits) that can be considered suitable to illicitly influence the relations between AST and its counterparties whether public or private is prohibited.

Therefore, as part of its business, the Company constantly invests in preventing and combating illegal phenomena, including those of a corrupt nature, as well as in spreading a corporate culture that, at every level, is based on the values of integrity, honesty, transparency, fairness, reliability and compliance with the laws of both international and national matrix applicable to their organization and voluntarily undertaken commitments.

AST's *vision* in the fight against corruption is based on three pillars.



#LEADBYEXAMPLE

Lead by example

AST's Board and Top Management are constantly committed to preventing and fighting corruption and being a virtuous example for the community.

AST concretely promotes the dissemination of the values of integrity, transparency and sustainability also through participation in national and international tables for the fight against corruption (such as, for example, OECD and Transparency International) and the presence on the Territory for the development of control systems in local companies.

Acciai Speciali Terni S.p.A.

con Unico Socio

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#ZEROTOLERANCE

Zero Tolerance

AST does not admit and pursues any misalignment with respect to objective, clear and impartial rules.

AST also makes explicit the consequences of any violations by identifying them, among other things, in the loss of freedom and rights, respect and credibility and work.



#EQUILIBRIUM

Equilibrium

For AST there is no trade-off between performance and control, results and rules, business and values.

The "profit maximization" has ethical, compliance and common-sense limits, which must be recognized and pragmatically integrated into the business philosophy.

In the perspective of being able to become a "No Corruption Zone", AST has implemented a *framework* consisting of five elements.



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1. **Value system:** by adopting the concept of CIES - "Commitment on integrity and ethical standard", AST undertakes daily in spreading the culture of integrity - also in relation to the local, national and international community -, adopts the principle of transparency in the relations with business partners and assesses the impact of one's actions also on a social level.
2. **Certain rules and perception of consequences:** AST has defined and disseminated clear and objective rules and a sanctioning system based on the concepts of zero tolerance, impartiality and gradual sanctions. AST has initiated awareness programs aimed at making people perceive the consequences deriving from illegal behaviour or not in line with corporate values as real, close and certain.
3. **Integrated ICS and digital compliance:** AST uses and undertakes to constantly improve an Internal Control System structured to manage the risk of corruption with a selective and integrated approach, using the new enabling technologies (i.e. big data, analytics, artificial intelligence) in order to ensure continuous monitoring on the totality of the data (i.e. implementation of an Anti-fraud Model).
4. **Whistleblowing:** engaged in the promotion of the "Speak-up Culture", AST encourages the reporting of potentially illegal behaviours and, to this end, provides the necessary tools to allow the timely and effective communication of suspects ensuring the maximum protection of the reporting subject and the reported in terms of confidentiality, anonymity and retaliation.
5. **Free information:** exogenous element to the Organization, to be understood as press freedom.

Furthermore, AST wanted to implement a Management System for the Prevention of Corruption in compliance with the UNI ISO 37001:2016 Standard (hereinafter referred to as the "System") with the aim of harmonizing the prevention and anti-corruption measures already implemented, as well as to increase awareness among its stakeholders of the rules and behaviours to be observed.

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The AST Board defines the strategy and the guidelines of the System, which are implemented by the Chief Executive Officer and the Chief Financial Officer (as company Compliance Manager) entrusting its coordination to the Governance Function, endowed with adequate human and economic resources.

The Governance Function is responsible for enabling the synergies between all the System's stakeholders and for raising any problem or suspicion concerning acts of corruption to Senior Management.

AST undertakes to periodically review the System with a view to continuous improvement.

The recipients of this Corruption Prevention Policy are the personnel employed by AST and all the Company's stakeholders.

Terni, 23/05/2019

Chief Executive Office

Mr. Massimiliano Burelli

Board of Directors

Mr. Klaus Keysberg

Mr. Massimiliano Burelli

Mr. Torsten Schlueter

Mr. Daniel Wodera

#NOCORRUPTIONZONE #LEADBYEXAMPLE #ZEROTOLERANCE #BALANCE #CIES
#DIGITALCOMPLIANCE #CONTINUOUSMONITORING #WHISTLEBLOWING #VIGILANTMEDIA #ISO37001

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