

COMPLIANCE MODEL
EX LEGISLATIVE DECREE 231 /01
OF
ASSOCIATION ROBERT F. KENNEDY FOUNDATION OF ITALY ONLUS

ANTI-CORRUPTION POLICY



Approved by the Board of Directors on 24th March 2021

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1. INTRODUCTION

1.1. INTRODUCTION

The Global Competitiveness Report prepared by the World Economic Forum identifies corruption as one of the main factors that exposes organizations to the risk of not achieving their operational and transparency objectives and poses a significant threat to sustainable economic growth.

The fight against corruption must therefore be framed as one of the main strategic objectives of both public institutions and private, profit and non-profit organizations worldwide.

The Robert F. Kennedy Foundation of Italy – Onlus (hereinafter the 'ASSOCIATION') considers the fight against corruption and the implementation of the rule of law as a pillar of its mission to protect and promote human rights. Indeed, cannot be separated from a context of economic growth both sustainable and able to remove obstacles to equality.

The ASSOCIATION adheres to the Global Compact by observing and promoting the universal principles of its four areas of interest: human rights, labor, environment and anti-corruption.

The increasingly important role in the Italian education system assumed by the ASSOCIATION, as well as its mission to protect and promote human rights, make it appropriate to adopt an instrument that defines the principles and policies to be adopted in the conduct of the ASSOCIATION's activities, in addition to the other governance and guidance instruments. The activities must be carried out in full compliance not only with national legislation, but also with international conventions and the main international regulations, aimed at preventing and repressing corruption of Public Officials and corruption among private individuals.

This is part of the Compliance Model (the "MODEL") adopted by the ASSOCIATION pursuant to the Legislative Decree no. 231/2001 (the "DECREE") which regulates the administrative liability of companies and entities for a series of predicate offences, including corruption.

In order to emphasize that the conduct of all aspects of its business is in strict compliance with national and international laws and regulations applicable, among others, in the field of corruption and as a further demonstration of adherence to the values set out above, the ASSOCIATION has decided to adopt in addition to the CODE OF ETHICS this "Anti-Corruption Policy" (hereinafter "Policy"). The purpose of this document is therefore to provide a systematic reference framework in the fight against corruption. It also aims to promote within the ASSOCIATION, as well as to all those who work for or on behalf of the ASSOCIATION, the principles and rules to be followed to exclude any kind of corrupt conduct, direct and indirect, active and passive, including incitement. The Policy ensures compliance with the provisions of the CODE OF ETHICS and the applicable "Anti-Corruption" regulations.

1.2. SCOPE OF APPLICATIONS / RECIPIENTS

This Policy applies to members/partners/associates, BOARD OF DIRECTORS members, members of the Advisory Board, Auditors, members of the SUPERVISORY BODY, staff and associates of the ASSOCIATION, as well as all those who work for or on behalf of the ASSOCIATION (hereinafter the "RECIPIENTS").

The ASSOCIATION also promotes the adoption and compliance with the standards set out in this Policy by the bodies in which it participates in the form of partnerships, consortium, temporary association of companies or alternatively the adoption of its own guidelines which ensure compliance with the highest ethical principles.

As of the date of adoption of this Policy, the commitment to comply with the anti-corruption regulations and reference principles contained herein by third parties, acting on behalf of or for the benefit of the ASSOCIATION, will be provided for in specific contractual clauses.

If the provisions of local regulations in one of the countries in which the ASSOCIATION operates are more restrictive than this Policy, the ASSOCIATION undertakes to operate in accordance with them.

2. LEGAL BACKGROUND

2.1. ANTI-CORRUPTION LAWS

The number of countries that have adopted anti-corruption regulations prohibiting and sanctioning corrupt phenomena (against their own Public Officials, Public Officials of other countries, internationally and between private individuals) by entities subject to their jurisdiction is constantly increasing.

The ASSOCIATION carries out its activities mainly in Italy, in the Principality of Monaco and the Republic of San Marino. The ASSOCIATION is also part of a network of associations present and operating in different countries around the world, linked to the Robert F. Kennedy Human Rights Foundation in the USA. The ASSOCIATION and its staff is therefore potentially subject to compliance with Italian regulations and those of the countries in which it operates or may operate in the future, as well as in countries in which the entities belonging to the aforementioned network operate (hereinafter "Anti-Corruption Laws"), including those for the ratification of international conventions, such as by way of example and without limitation:

- The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions signed in 1997 (implemented in Italy since 2001);
- The United Nations Convention against Corruption, adopted by the General Assembly on 31 October 2003 and ratified in Italy by Law no. 116 of 2009;
- The Conventions of the Group of States against Corruption ("GRECO");
- The DECREE and the criminal legislation on corruption of public officials and between private individuals, Law no. 3/2019 of the Italian Republic;
- la Loi n. 1.326 du 22/12/2006 portant approbation de ratification de la Convention pénale sur la corruption du Conseil de l'Europe, of the Principality of Monaco, as subsequently modified and integrated;
- Decree Law 16 June 2014 no.90 – Urgent provisions on preventing and fighting corruption offences, Decree Law 25 July 2016 no.89 LAW 02 August 2019 no.119 – Introduction of the offence of private bribery in the San Marino system, Decree Law 29 June 2016 no.79 – Provisions on protecting witnesses of bribery offences, fighting corruption and transparency of the

Administration, the Council Decree 26 July 2016 no.94 of Ratification of the Criminal Law Convention on Corruption and its Additional Protocol, the Decree-Law 16 June 2014 no.90 – Urgent provisions on preventing and fighting bribery offences, of the Republic of San Marino;

- Federal Decree approving and transposing into Swiss law the Criminal Law Convention of the Council of Europe on Corruption and its Additional Protocol of 7 October 2005, as well as the provisions of the Swiss Criminal Code on Corruption of the Swiss Confederation;
- The American Anti-Corruption Act (AACA) and the US Foreign Corrupt Practices Act (FCPA);
- Spanish “Ley Organica” no.5 of 22 June 2010;
- UK “Bribery Act” issued in the United Kingdom in July 2011;

Anti-Corruption Laws in brief:

- prohibit payments made either directly or indirectly – including those payments made to anyone aware that such payment will be shared with a Public Official or private party– as well as offers or promises of a payment or other benefit for corruption purposes to Public Officials or private parties;
- require entities to establish, keep and maintain books, records and accounting entries that accurately and correctly reflect transactions, expenses (even if not "significant" from an accounting standpoint), acquisitions and disposal of assets.

2.2. INTERNAL REGULATIONS

- CODE OF ETHICS;
- the MODEL adopted by the ASSOCIATION pursuant the DECREE.

2.3. ROLES AND RESPONSIBILITIES

Violation of anti-corruption regulations can seriously damage the ASSOCIATION'S reputation and cause serious harm to its activities such as fines, disqualification from contracting with public administration, confiscation of criminal proceeds, damage claims. Individuals may also be sentenced to imprisonment.

All RECIPIENTS of this Policy are responsible as far as they are concern for compliance with it. In addition, those with supervisory and coordination responsibilities are responsible for monitoring compliance with the Policy by their staff and for taking measures to prevent, identify and report potential violations.

All RECIPIENTS are required to read, understand and fully comply with this Policy, which is available on the ASSOCIATION'S website at: <https://www.rfkitalia.org/>

RECIPIENTS are encouraged to seek support from the General Counsel and the SUPERVISORY BODY if the content of the Policy requires further clarifications, including the Policy application or enforcement with reference to the anti-corruption provisions and regulations of Italy or countries in which the ASSOCIATION operates.

3. GENERAL PRINCIPLES

Pursuant to the provisions of the CODE OF ETHICS, the ASSOCIATION conducts its business with loyalty, fairness, honesty, integrity and transparency.

The ASSOCIATION rejects and prohibits corruption without exception. In detail, it prohibits:

- to offer, promise, give, pay, solicit, authorize someone to give or pay, directly or indirectly, including through a third party, an economic advantage or other benefit to a Public Official or a private individual (Active Bribery);
- accept a request or solicitation from, or authorize / solicit someone to accept, directly or indirectly, including through a third party, an economic advantage or other benefit from any counterpart (Passive Bribery);

when the intent is:

- i) to induce, instigate, even through a third party, a Public Official to take any action of a public nature, or to reward him/her for having performed it;
- ii) to influence an official action (or omission) by a Public Official or any decision in violation of an official duty;
- iii) to induce any private party to omit or perform an action in violation of the obligations inherent to its office or loyalty obligations, or to reward it;
- iv) to obtain or secure an improper advantage in connection with business activities;
- v) to violate applicable laws.

Prohibited conduct includes the offer or receipt by the ASSOCIATION's staff (direct bribery) or by anyone acting on behalf of the company (indirect bribery) of an economic advantage or other benefit in connection with the ASSOCIATION's business activities, including incitement that do not results in the implementation of corruption.

This prohibition is not only limited to payments but also to:

- gifts, sponsorships and donations;
- hospitality expenses provided to third parties, meals and transport;
- supplies, professional appointments, employment or investment opportunities;
- most favorable trading conditions;
- *Facilitation Payments* as defined in paragraph 4.5;
- assistance or support to family members;
- other advantages or other advantages or benefits;

if aimed to bribery.

In addition to compliance with the CODE OF ETHICS and the above, the general principles set out below apply to guarantee an adequate internal audit and risk management system:

- **Segregation of tasks:** the activities are carried out on the principle of separation of roles. The authorization of a transaction shall be under the responsibility of an individual different from those performing and controlling the transaction.
- **Assignment of powers:** authorization and signature powers shall be: i) consistent with the organization chart and management responsibilities assigned; ii) clearly defined and known within the ASSOCIATION. The representatives of the ASSOCIATION shall be identified, specifying the limits of their powers.
- **Transparency and traceability of processes:** Every activity shall be verifiable, documented, consistent, and correctly archived.
- **Adequacy of internal regulations:** the set of internal procedures shall be consistent with operations and organization complexity, and shall ensure the necessary controls to prevent the commission of corruption offences.
- **Staff training:** Specific training plans shall be provided for personnel on the anti-corruption measures adopted by the ASSOCIATION, with particular reference to those operating in the sensitive areas listed below.

4. SENSITIVE AREAS

The following paragraphs identify a number of the ASSOCIATION'S own activities "sensitive area", which in theory may facilitate corruption practices, as well as the rules that the ASSOCIATION'S staff and anyone acting on their behalf must comply with.

4.1. *GIFTS AND REPRESENTATION EXPENSES*

Any gift, economic advantage or other benefits –including hospitality – can be made or received within the limits of standard commercial courtesy. It shall not compromise the integrity and reputation of any of parties involved and it shall not influence the autonomy of judgment of the recipient. It is permitted only if it complies with defined business procedures and shall not be given or received if it violates the ASSOCIATION'S prohibition of bribery and corruption or applicable laws.

Any gift, advantage or other benefits – including hospitality and entertainment expenses – made directly or through third parties shall have the following features:

- Shall not be aimed to illegal influence (e.g. as a form of gift to third parties, public or private, which may influence the independence of judgment of the addressee or induce him/her to secure any undue/improper advantage);
- shall be reasonable and provided in good faith;
- shall be made in relation to legitimate legal purposes and have a modest value;
- shall not be in cash (e.g. cash, cheques, bank transfers, or any other mean of payments);
- shall follow the anti-corruption regulations, local laws and applicable regulations;
- shall be recorded accurately and transparently, and including an appropriate documentation;
- shall always be authorized by top management pursuant to internal procedures.

Any gift, advantage or other benefit received by the RECIPIENTS, directly or indirectly (e.g. by family members), shall comply with the following principles:

- shall be within the limits of standard courtesy conditions and have a modest value;
- shall not be required, demanded or accepted to perform or omit an action relating to the exercise of its duties.

If the RECIPIENTS receives offers or gifts, economic advantages or other benefits – including hospitality – that cannot be considered as acts of commercial courtesy of modest value, he/she shall refuse them and reports, if there are evidence of corruption as described in paragraph 6 of this Policy.

For the economic limits and type of gifts, representation expenses, please refer to the relevant internal procedures.

4.2. SPONSORSHIPS

Sponsorships are made by contributing in favor of an activity or event in order to promote the image and the activities of the ASSOCIATION. Sponsorships may relate to events of various kinds, which contribute to the promotion of the legacy of Senator Robert F. Kennedy, as well as the promotion and protection of human rights. In order to avoid being considered a disguised form of conferring a benefit to a third party, aimed to obtain an advantage for the ASSOCIATION, sponsorships shall comply with the following principles:

- they shall be carried out in accordance with the approved budget, and be authorized in accordance with proxies and powers of attorney granted within the ASSOCIATION;
- *partners* in sponsorship contracts shall be well-known and trusted entities or individuals. Preferably nonprofits, or if companies or other institutions, engaged for the occasion in non-profit activities and promotion of the values of the ASSOCIATION'S *mission*;
- The sponsorship approval process shall be set forth and ensure an adequate description of the nature and purpose of each sponsorship. The potential

sponsoring *partner* shall be identified and the compliance with the applicable laws shall be checked;

- an investigation on the potential conflicts of interest related to the sponsored event there shall be investigated ;
- the sponsorship agreement shall be in writing and shall include:
 - the commitment of the counterparty to use the agreed amount of money exclusively for the sponsor event;
 - an adequate description about the nature and purpose of each event, the compensation, terms and conditions of payment;
 - an obligation counterparty to comply with the Anti-Bribery Laws and applicable laws;
 - the right of the ASSOCIATION to terminate the agreement, suspend payments and receive compensation for damages in case of a breach by the other party of the obligations and representations set forth above, or in the event of a violation of the Anti-Bribery Laws or anti-corruption commitments under the agreement;
- the amount paid in accordance with the sponsorship agreement shall be recorded in the books and records in a fair and transparent manner;
- payments shall be made only as indicated in the sponsorship agreement, after verification that the service has actually been provided;
- the documentation of each sponsorship shall be archived and traceable over time.

4.3. POLITICAL CONTRIBUTIONS

Political contributions may constitute a bribery offence as they could be used to maintain or obtain a business advantage, such as winning a bid or obtaining a permit or a license.

In relation to these risks, in line with the provisions of the adopted CODE OF ETHICS, the ASSOCIATION refrains from any direct or indirect pressure, through its managers, employees or associates, on political representatives and does not make

contributions of any kind, directly or indirectly, to political parties, movements, committees and political organizations, nor to their representatives or candidates, both in Italy and abroad, excluding contributions due on the basis of specific regulations.

The ASSOCIATION may establish relationships with trade unions including of a commercial nature only strictly within the scope of its core institutional activities.

4.4. CHARITABLE CONTRIBUTIONS AND NON-PROFIT INITIATIVES

Gifts and/or contributions to charitable organizations, foundations, non-profit organizations ("contributions") are fully within the mission of the ASSOCIATION; however they present the risk that funds or assets of value may be used for the personal use or benefit of a Public Official or private individual.

In accordance with the CODE OF ETHICS the ASSOCIATION can only accept requests for contributions limited to proposals from non-profit organizations and associations or those of high cultural or charitable value, always with transparency and aimed to promote the ASSOCIATION'S values and mission.

All contributions shall be made in accordance with the anti-corruption regulations, by adhering to the following minimum standards:

- can only be made in favor of entities of proven reliability and recognized reputation for honesty and integrity;
- contributions shall be carried out in accordance with the approved budget and be authorized in accordance with proxies and powers of attorney granted within the ASSOCIATION;
- the approval process for contributions shall be followed and for this approval there shall be an adequate description of the nature and purpose of the each event . The potential beneficiary shall be identified and the legitimacy of the initiative must be verified following the applicable laws??
- potential conflicts of interest in the charitable events shall be verified;
- the contributions shall be paid within the limits of the amounts approved for the specific event;

- payments to the beneficiary entity shall be made only to the bank account named with the beneficiary; no payments may be made to numbered accounts or in cash;
- contributions shall be recorded truthfully and transparently in the books and records of the ASSOCIATION;
- the beneficiary shall undertake to record the contributions received in its books and records in an appropriate and transparent manner.

As set forth in the CODE OF ETHICS in relations with interest bearing associations??? (e.g. trade associations, environmental organizations, etc.) no manager, employee or associate shall promise or pay sums, promise or grant goods in kind or other personal benefits, to promote or favor the ASSOCIATION.

4.5. FACILITATION PAYMENTS

The ASSOCIATION prohibits so-called "facilitation payments", i.e. payments or other benefits to Public Officials, public service employees and/or Public Administration officials aimed at facilitating and/or speeding up decisions and performances of activities within the scope of the office.

Such payments are intended to influence only the timing of public officials' actions not their outcome. They are prohibited even if they are permitted by local laws in some countries.

4.6. RELATIONS WITH PUBLIC OFFICIALS

The several interactions with government agencies can increase the risk that the ASSOCIATION may be held liable for corruption undertaken or attempted against public officials, who may seek improper benefits to act inconsistently with their duties or in violation of their office obligations.

The possible interactions with bodies or representatives of the Public Administration mainly concern:

- management of activities aimed at requesting disbursements, contributions, grants, public funding or other facilities and their subsequent reporting;
- relations with the Public Administration as the principle project: these activities are related to: i) participation in public tenders or private negotiations called by contracting authorities; ii) the negotiation and execution of contracts and agreements with contracting authorities;
- relations with the Public Administration and Independent Administrative Authorities in Italy and abroad, for the performance of activities regulated by law (e.g. Revenue Agencies; Tax Authorities; Customs; Authority for the supervision of public contracts for works, services and supplies; Italian Data Protection Authority) and related obligations (e.g. preparation and sending of data required by the regulation of the sector, management of appeals);
- obtaining/renewal of administrative measures, licenses, concessions and other administrative measures necessary for the exercise of the main activities of the ASSOCIATION and/or for the performance of instrumental activities to those typical and subsequent verification activities (for example: qualification as a training institution, agreements and permits relating to the headquarters at Le Murate, Florence, and the International House);
- fulfillment of obligations towards the Public Administration including: communication or reporting of data and/or information in response to requests made by the Public Administration in accordance with legal and contractual obligations; fulfillment of obligations regarding the production or disposal of waste; fulfillment of obligations regarding urban hygiene and environmental protection deriving also from the exercise of construction; fulfillment of obligations regarding the mandatory placement for the inclusion and integration of disabled people and personnel belonging to protected categories;
- checks and/or controls by the Public Administration;
- relations with the Judicial Authorities for the management of judicial and extra-judicial disputes involving the ASSOCIATION;
- management of invoicing and credit relations with the Public Administration, also with reference to the monitoring of overdue receivables;

- management of contributions/compensation granted to public bodies: these are the activities related to the management of agreements with national and foreign public bodies, that provide for the disbursement of contributions to the latter.

All RECIPIENTS' relations involving Public Officials shall be conducted in accordance with the CODE OF ETHICS and this Anti-Corruption Policy by adhering to the following principles and minimum standards:

- RECIPIENTS shall operate in compliance with all relevant legal and internal requirements;
- relations with the Public Administration shall be based on maximum transparency and fairness;
- it is forbidden to offer, directly or through intermediaries, sums of money or other benefits to Public Officials or persons in charge of a public service, in order to influence their activity in the performance of their duties;
- it shall be ensured appropriate written and correctly filed reports of relations with Public Officials;
- the persons authorized to carry out activities in relation to public officials shall be formally delegated to carry out such activities;
- Meetings are attended, where possible, by at least two representatives or specially delegated persons.

As set forth in the CODE OF ETHICS relations with officials of public institutions shall be limited to the appropriate corporate functions/organizational units, expressly delegated in strict compliance with legal and regulatory requirements, and may in no way compromise the integrity and reputation of the ASSOCIATION.

4.7. RELATIONS WITH THIRD PARTIES

There is also a risk that the ASSOCIATION may be involved in corrupt conduct in its dealings with third parties (suppliers, customers, consultants, business partners), in particular if they act in the interest or on behalf of the ASSOCIATION or have dealings with public officials.

Relations with third parties in the performance of the ASSOCIATION's activities shall be based on criteria of maximum fairness, transparency and traceability as well as ensuring compliance with the Anti-corruption Laws and all other applicable regulations. This obligation shall be made explicit before signing agreements, through a specific clause that will require the other party to comply with this Policy and its CODE OF ETHICS. This clause includes the ASSOCIATION's right to terminate the agreement, interrupt payments and receive compensation for damages in the event of breach.

The selection of suppliers and external collaborators as well as the execution of the relevant agreements are characterized by transparency, certainty and written form. Suppliers and external collaborators are selected according to procedures that comply with applicable laws and are constantly based on criteria of transparency, competitiveness and efficiency. The selection is made in compliance with internal procedures and is recognized to participants who meet the necessary requirements, equal opportunity to participate in the selection.

Any suspected violation of anti-corruption provisions by a third party shall be reported immediately as set forth in paragraph 6 of this Policy.

4.8. SUPPLIERS AND CUSTOMERS

The ASSOCIATION may be held liable for bribery and corruption by suppliers providing services on behalf of the ASSOCIATION and its subcontractors.

To reduce this risk, the ASSOCIATION is committed to ensuring that personnel involved in procurement activities are adequately trained in anti-corruption matters.

The ASSOCIATION is committed to ensuring that the award of contracts is fair and transparent and that the roles and responsibilities of the main parties involved in this activity are clearly identified.

The procurement process and the related activities are regulated in details by the company procedures that identify the roles and responsibilities of the main players involved, in order to have a correct and transparent selection of suppliers and management of the relevant process documentation.

Fundraising and the selection of beneficiaries of the ASSOCIATION'S financial contributions or services are considered sensitive activities because of the inherent risk that such activities may be carried out in a corrupt manner. As well as the additional risk that a supporter may attempt to force the ASSOCIATION to work with a supplier or to benefit a person, with whom the supporter has some relationship in order to obtain personal benefits.

Performance of works is considered sensitive in the area of corruption due to the potential risks associated with relations between technical personnel and contractors, as well as the possibility of a fair remuneration of works/services and/or remuneration of unperformed works. Performance of works/services is residual for the ASSOCIATION, but cannot be excluded in relation to public contracts, especially with respect to training, and the management of the headquarters at Le Murate, Florence.

4.9. CONSULTANTS AND PROFESSIONAL SERVICE PROVIDERS

The ASSOCIATION can rely on the support of professional consultants and service providers in carrying out its activities. It is important to evaluate them and be able to determine whether each of them has undertaken, or may engage in activities prohibited by the CODE OF ETHICS and the policies set forth in this Anti-Corruption Policy. Providers of such services shall be individual, legal entities, trustworthy and of excellent reputation for honesty and integrity; selection and contracting shall be approved in accordance with corporate procedures.

4.10. PARTNERS

The ASSOCIATION collaborates with individuals and legal entities in order to pursue its mission, with particular reference to fund raising, training activities and special projects. The ASSOCIATION also participates in public tenders through consortiums and temporary association of organizations.

The ASSOCIATION develops partnerships only with counterparts of consolidated reputation and experience, who share the same values promoted by the ASSOCIATION,

and sets up such relationships in compliance with current legislation and the principles of the CODE OF ETHICS.

It is important for the ASSOCIATION to know its potential partners and to be able to assess existing or potential risks arising from activities that are not in line with its internal regulations and/or ethical principles. In such respect, all RECIPIENTS involved shall pay particular care and attention to the selection and evaluation of partners by carrying out an adequate prior verification in order to have a true and complete representation of their status, and to ascertain their commercial and professional reliability.

Partners shall adhere to the entire contractual documentation submitted by the ASSOCIATION, which will include the obligation to comply with the guiding principles of the CODE OF ETHICS, this Policy, as well as other voluntary rules of conduct that the ASSOCIATION has prepared and communicated for this purpose, which will provide for the taking of specific measures in the event of violation of the same.

4.11. ACQUISITIONS, MERGERS AND DIVESTMENTS

In case of extraordinary transactions, such as a merger, acquisition or disposal, a due diligence shall be carried out on the counterparty and the object of the transaction, in order to have a true and complete representation of its status, to ascertain its commercial, reputational and professional reliability and to identify the main risk factors, including those of corruption.

The entire process is developed by ensuring compliance with the principles of transparency, traceability in the relevant phases, fairness and timeliness, in line with the corporate policies, with environmental, health and safety guidelines, with the provisions of the MODEL, and with the rules of conduct referred to in the CODE OF ETHICS.

4.12. BOOKKEEPING

The main Anti-Corruption Laws impose specific requirements on the subject of keeping accounts, aimed to discourage and disclose payments and collections made for corrupt purposes.

The ASSOCIATION ensures, also through training activities, that RECIPIENTS are aware that they shall constantly operate in compliance with the principles of truthfulness, completeness and promptness of information, both inside and outside the ASSOCIATION.

By virtue of these principles, each operation/transaction shall be authorized, verifiable, legitimate, consistent, consistent and must be correctly and promptly detected/recorded in the ASSOCIATION'S accounting system according to the criteria indicated by law and on the basis of the applicable accounting principles.

All the RECIPIENTS involved shall comply with the legal, regulatory and procedural provisions on corporate accounting and must keep detailed and complete accounting records of each transaction. It is forbidden to engage in conduct that may prejudice the transparency and traceability of financial statement information.

All costs and charges, revenues and receipts, income, payments and expense commitments shall be entered in the financial information promptly, completely and accurately and have adequate supporting documents.

A system of internal controls in relation to financial information has been put in place to provide reasonable assurance that the risk of their occurrence is reduced to a significantly low level, and that inaccurate accounting records caused by error or fraud, are not identified in a timely manner.

The Auditors verify, at least on a quarterly basis, that the accounts are kept regularly and that the transactions are correctly recorded in the accounting records.

During the year, the ASSOCIATION'S Treasurer monitors the control system on the recording of accounting and corporate documents and verifies compliance with administrative and accounting procedures, through testing activities aimed at verifying the effectiveness of the controls.

4.13. *MANAGEMENT OF FINANCIAL RESOURCES*

The ASSOCIATION requires that the management of financial resources complies with the principles of transparency, verifiability, traceability and consistence to the ASSOCIATION'S business. With reference to both incoming and outgoing flows, the ASSOCIATION shall comply with the following principles:

- To make payments within the limits of an authorized budget based on internally defined powers;
- To use only authorized operators who certify that they are equipped with manual and computer and/or digital devices to prevent illicit corruptive phenomena and money laundering;
- To implement adequate instruments for the planning of income and expenditure as well as periodic reports to verify the consistency between what has been planned and what has been achieved;
- To carry out checks on the counterparts to which the payments are directed to verify the full correspondence between the name of the supplier/customer and the holder of the account to which the payment is sent/accepted;
- To ensure that financial transactions are always authorized by persons with adequate powers and support each financial transaction with adequate supporting documentation;
- To ensure that the cash desk maintains the defined level of stock and provide for periodic checks on the stock itself in order to make the movements that have taken place traceable.

This Policy also provides for the prohibition of:

- carrying out transactions with unrecorded counterparties or on the basis of incomplete information (e.g. in the absence of identification data);
- acquiring incoming payments for which adequate supporting documentation is lacking (e.g. no sales invoice);
- accepting collections from non-identifiable persons (name/denomination, address and account number);

- adopting payment methods that are anomalous with respect to the nature of the operations or split payments not in line with what is contractually agreed upon;
- making payments in countries other than that in which the supplier has established its registered office or operational and commercial branch;
- making payments to third parties that are not adequately justified in the context of the contractual relationship established with them;
- using cash in excess of the amount permitted by applicable laws or other bearer financial instruments, as well as anonymous or fictitiously registered current accounts or keeping books.

5. SELECTION AND STAFF RECRUITMENT

The ASSOCIATION recognizes the central role of human resources in the pursuit of its mission and has adopted selection procedures and methods based on respect for human values, autonomy and responsibility of personnel.

The ASSOCIATION also regulates the recruitment process in order to ensure that operational activities are carried out in accordance with the principles of professionalism, transparency and fairness, in compliance with applicable laws and regulations.

The process is managed according to the following principles:

- the employment shall be proven by specific plans or contingent needs authorized by persons with the relevant power;
- the candidates shall be evaluated by several persons and the results of the entire evaluation process must be adequately traced;
- checks shall be made to ensure that the proposed qualification is consistent with the position to be filled;
- there shall be checks on the candidates' references and previous professional experience, including, during the selection phase, questions regarding any personal or economic relationships with representatives of the Public administration, that shall be evaluated internally;

- compliance with the laws of the country in which the hiring takes place shall be ensure (e.g. with regard to compulsory hiring, presence and validity of residence permits, etc.).

6. TRAINING AND INFORMATION

All internal RECIPIENTS are informed and trained, when recruited and thereafter through refresher courses, in order to understand the responsibilities and risks to which they may be exposed in the performance of their duties.

Recruits and permanent consultants are given a copy of the Anti-Corruption Policy, as well as copy of the MODEL CODE OF ETHICS, and shall execute a declaration of commitment to the principles contained therein.

The ASSOCIATION requires all its internal RECIPIENTS to carry out an anti-corruption training program in order to ensure adequate knowledge of this Policy and the importance of compliance with it, and of Anti-Corruption Laws.

Within the first six months of the date of employment and whenever necessary (e.g., following significant changes), training on this Policy and the Anti-Corruption Laws shall be provided in order to spread the principles, commitments and how to implement them.

The training activity is managed by the General Counsel in agreement with the SUPERVISORY BODY. The contents planning of the training are defined by the General Counsel who is also responsible for the continuous monitoring of the entire training process in terms of: rate of participation in the initiatives, satisfaction rate, degree of learning. The General Counsel is also responsible for filing attendance sheets containing the details of the training carried out, the modules of evaluation of satisfaction, any documentation of evaluation of learning, as well as materials distributed to participants during the training classes.

The CODE OF ETHICS and this Policy are also brought to the attention of all those who have contractual relations with the ASSOCIATION, and are available for all stakeholders on the ASSOCIATION's website at: <https://www.rfkitalia.org/>

7. REPORTINGS

RECIPIENTS of this Policy are required to report, including anonymously, any alleged violation of applicable law or this Anti-Corruption Policy by employees of the ASSOCIATION and/or its subsidiaries, associates or third parties working for or on behalf of the ASSOCIATION.

In order to facilitate the receipt of reports, the ASSOCIATION has established appropriate communication channels, which are outlined in the appropriate procedure available to all stakeholders on the ASSOCIATION's website at: <https://www.rfkitalia.org/>.

Failure by a RECIPIENT to report a known or suspected wrongdoing of which he/she has become aware, may lead to a possible disciplinary and/or legal action, particularly when it appears that such omission has actually made the wrongdoing possible.

Anyone who reports in good faith possible misconduct or offers information or otherwise assists in any investigation or investigation of possible misconduct is protected from retaliation.

As specified in the reporting procedure, the ASSOCIATION ensures that "*bona fide*" whistleblowers are protected against any form of retaliation, discrimination, or penalty (application of sanctions, demotion, dismissal, transfer or submission to another organizational measure that has a direct or indirect adverse effect on working conditions) for reasons related, directly or indirectly, to reporting compliance with this Policy and/or Anti-Corruption Regulations.

8. DISCIPLINARY SYSTEM

The policies and procedures contained in this Policy are an integral part of the MODEL.

The ASSOCIATION will use all reasonable efforts to prevent any conduct that violates the Anti-Corruption Laws and/or this Policy and to stop and sanction any misconduct.

Any person who unreasonably fails to detect or report any violations, or who threatens or retaliates against others who report any violations, will be subject to disciplinary and/or legal action. The action will be commensurate with the materiality of the violation (including penalties under the collective bargaining agreement or other applicable national laws, including potential termination of employment) or alternatively, in relation to partners or third parties, termination of the agreement, claim for damages or other measures deemed appropriate.