



## **Anti-Corruption Code of Conduct**

**Our group is currently adopting the Middenext “anti-corruption” code of conduct.**

**This document summarizes and presents the principles and beliefs on which this Code is based.**

Integrity in business contributes to the group's good reputation. One of the most important elements within this is acting flawlessly with stakeholders.

The Code of Conduct has been designed to guide behavior in business and to provide practical advice, examples and links to further useful information.

- It is intended for all employees, members of executive and management committees and to the group's corporate officers.
- It establishes principles that employees should respect within the context of their professional activities. It outlines the rules, procedures and norms defined in each country to which employees should continue to refer.
- Any person acting on behalf of the group will be obliged to comply with this Code of Conduct, regardless of their location or the nature of their work.
- The group will ensure that its partners share the same values

The detailed Code describes the fundamental rules concerning the following topics in particular:

- Gifts, gestures of courtesy and hospitality, entertainment
- Specific guidelines for public officials
- Donations to charities or political organizations
- Sponsorship and patronage
- Facilitation payments
- Third-party surveillance

However, no single document is able to address or foresee all cases of corruption that may potentially occur in the context of the daily actions of group employees.

This Code does not exempt you from using your own judgement and common sense. Should you have any doubts about the correct behavior to adopt, the group will implement tools to offer help and advice.

Respecting the Code of Conduct is a condition of employment for all employees of the group and no breaches will be tolerated. The Code will be given to all employees joining the group and handed out to all current staff. All employees must read, understand and respect the code. Employees should be aware of the serious consequences that would follow a breach of the Code of Conduct, both for the group and for themselves. Since any misdemeanor or failure to comply with the rules outlined in the Code has the potential to seriously damage our image and cause financial loss, employees should exercise extreme vigilance with respect to the rules set out in the Code.