



PROMOTEC S.R.L.

**ANALYSIS OF BUSINESS PROCESSES FOR THE  
PURPOSE OF IDENTIFYING THE RISKS  
OF THE CRIME OF CORRUPTION  
and  
THREE-YEAR PREVENTION PLAN 2020 - 2022**



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## PROMOTEC S.R.L.

The National Anti-Corruption Plan provides that public economic bodies and bodies governed by private law under public control are required to introduce and implement appropriate organisational and management measures in their anti-corruption prevention actions. The *Corruption Prevention Plans* drawn up pursuant to Italian Law no. 190/2012 must be published on institutional websites.

Significant situations under the anti-corruption law include not only the whole range of crimes against the Public Administration regulated in Title II, Chapter I of the Criminal Code, but also situations in which, regardless of their criminal relevance, a malfunctioning of the company due to the use for private purposes of the tasks assigned is identified.

The first act is the **Risk Assessment**, to detect and assess the areas of risk and their impact, as well as to identify preventive protocols. The risk identification activity requires to identify the possible risks of corruption for each process or phase of the process. These risks emerge considering the external and internal context of the administration, also with reference to the specific organisational positions present.

The risk identification activity is carried out within working groups, with the involvement of the organisational officers in charge of the relevant area of competence, with the coordination of the Prevention Manager with reference to the risk identification phase, based on the results of the monitoring activity on the transparency and integrity of internal controls.

The risk analysis consists in the assessment of the likelihood that the risk occurs and the consequences that the risk produces (likelihood and impact) in order to define the risk level. The risk level is represented by a numerical value. For each risk detected, it is necessary to estimate the likelihood value and the impact value. The likelihood estimate takes into account, among other factors, the controls in place.

For this purpose, control means any control tool used by the local authority to reduce the risk likelihood (such as preventive control or management control or sample controls not provided for by the regulations). The assessment of control adequacy must be made by considering the way the control actually works.

To estimate the likelihood, therefore, we do not consider the abstract prevision of control existence, but its effectiveness in relation to the risk considered.

Therefore, according to the provisions of the National Anti-Corruption Plan, PROMOTEC SRL has carried out a Risk Assessment to identify and assess the areas of risk, the likelihood of occurrence of corruptive events and their impact, in order to implement, if necessary, further prevention measures in addition to those already defined in the management procedures of the certified systems.

The objective of PROMOTEC SRL is therefore to verify the organisational gaps that could create illegal behaviour and to proceed, if necessary, with the review of the existing procedures or the formalisation of new operational procedures.

Please note that PROMOTEC SRL would not be obliged to adopt organisational measures for prevention of corruption, as established by Italian Legislative Decrees 33/2013 and



39/2013, since it is not a public subsidiary and does not perform administrative functions or produce goods or services in favour of Public Administrations.

However, Promotec s.r.l., as beneficiary pursuant to Art. 1, paragraph 125-bis, Law no. 124/2017 on the transparency of public subsidies, is required to publish the amounts received as grants in the notes to the financial statements.

In compliance with the “Regulations governing the granting of ICE-Agency for promotional activities”, Promotec S.r.l. has carried out the Risk Assessment for the preparation of the Three-Year Corruption Prevention Plan, undertaking to adopt all the preventive measures for the commission of corrupt crimes.

With reference to the Risk Analysis mentioned above, it is made according to the criteria contained in the “Risk Assessment Table”, Annex 5 to the National Anti-Corruption Plan - shown below - and has taken into account the existing practices.

| <b>RISK ASSESSMENT TABLE, Annex 5 to National Anti-Corruption Plan</b>                        |   |   |   |
|---|---|---|---|
| <b>LIKELIHOOD ASSESSMENT INDICES</b>  |   | <b>IMPACT ASSESSMENT INDICES</b>  |   |
| <b>DISCRETION</b>   |   | <b>ORGANISATIONAL IMPACT</b>  |   |
| <b>In the Process discretionary?</b>  |   | <b>Compared to the total personnel employed in the single service</b><br>(simple organisational unit) <b>in charge of carrying out the process</b> (or<br>the process phase for which the P.A. is responsible) <b>within the single</b><br><b>P.A., what percentage of personnel is employed in the process?</b> (if<br>the process involves the activities of several services within the same<br>P.A., the percentage must refer to the personnel employed in the<br>services involved) |   |
| No, it is completely bound  | 1 | Up to approx. 20%   | 1 |
| It is partially bound by the law and administrative acts (regulations, directives, circulars) | 2 | Up to approx. 40%   | 2 |
| It is partially bound only by the law   | 3 | Up to approx. 60%   | 3 |
| It is partially bound only by administrative acts   | 4 | Up to approx. 80%   | 4 |
| It is highly discretionary  | 5 | Up to approx. 100%  | 5 |
| <b>EXTERNAL SIGNIFICANCE</b>  |   | <b>ECONOMIC IMPACT</b>  |   |
| <b>Does the process produce direct effects outside the relevant administration?</b>           |   | <b>In the last 5 years, has the Court of Auditors rendered judgements against employees (managers and employees) of the reference P. A. or have judgements been issued on compensation for damages against the reference P. A. for the same or similar types of event?</b>  |   |
| No, the final recipient is an internal office   | 2 | No  | 1 |
| Yes, the result of the trial is directly addressed to external users of the reference P.A.    | 5 | Yes   | 5 |



| PROCESS COMPLEXITY  |   | REPUTATIONAL IMPACT  |   |
|---|---|--|---|
| <b>Is this a complex process involving several administrations (excluding controls) in subsequent phases to achieve the result?</b>               |   | <b>During the last 5 years, articles have been published in newspapers or magazines about the same event(s)</b>  |   |
| No, the process involves only one P.A.  | 1 | No   | 0 |
| Yes, the process involves more than 3 administrations   | 3 | We have no memory of it  | 1 |
| Yes, the process involves more than 5 administrations   | 5 | Yes, on local press  | 2 |
|   |   | Yes, on national press   | 3 |
|   |   | Yes, on local and national press   | 4 |
|   |   | Yes, on local, national and international press  | 5 |
| ECONOMIC VALUE  |   | ORGANISATIONAL, ECONOMIC AND IMAGE IMPACT  |   |
| <b>What is the economic impact of the process?</b>  |   | <b>At what level can the risk of the event (apical, intermediate or low level) be, in other words, is the position/role of the person in the organisation high, medium or low?</b> |   |
| It has exclusively internal significance  | 1 | At employee level  | 1 |
| It involves the attribution of benefits to external persons, but not of particular economic importance (e.g.: grant of scholarships for students) | 3 | At employee or officer level   | 2 |
| It involves the awarding of considerable benefits to external parties (e.g.: award of contract)   | 5 | At level of a non-general office manager or top management or organisational position  | 3 |
|   |   | At general office manager level  | 4 |
|   |   | At head of department/secretary-general level  | 5 |

| PROCESS DIVISIBILITY  |   |
|---|---|
| <b>Can the final result of the process also be achieved by carrying out a number of operations of small economic value which, taken as a whole, ultimately ensure the same result (e.g.: several small operations)?</b> |   |
| No  | 1 |
| Yes   | 5 |

| CONTROLS  |   |
|---|---|
| <b>Also on the basis of past experience, is the type of control applied to the process adequate to neutralise the risk?</b> |   |
| Yes, it is an effective neutralisation instrument   | 1 |
| Yes, it is highly effective   | 2 |
| Yes, for approximately 50%  | 3 |
| Yes, but to a minor extent  | 4 |
| No, the risk remains unchanged  | 5 |

NOTES: (1) Likelihood indices must be indicated on the basis of the working group assessment. (2) The impact indices must be estimated on the basis of objective data, i.e. what is known to the administration. (3) Control means any control instrument used in the P.A. that is suitable to reduce the risk likelihood (and, therefore, both the system of legal controls, such as preventive control and management control, and other control mechanisms used in the P.A., e.g. sample controls in cases not provided for by the regulations, the findings relating to the outcome of judicial remedies against the P.A.). The assessment of control adequacy must be made by considering the way the control actually works on the P.A. To estimate the likelihood, therefore, we do not consider the abstract prevision of control existence, but its effectiveness in relation to the risk considered.

| LIKELIHOOD VALUES AND FREQUENCIES  |
|--|
| 0 no likelihood 1 unlikely 2 low likelihood 3 likely 4 very likely 5 highly likely |
| IMPACT VALUES AND SIGNIFICANCE   |
| 0 no impact 1 negligible 2 minor 3 threshold 4 serious 5 superior                  |
| OVERALL RISK ASSESSMENT = FREQUENCY VALUE X IMPACT VALUE                           |



## 1. FOREWORD

The purpose of this Three-Year Corruption Prevention Plan, including the section dedicated to the Three-Year Program for Transparency and Integrity, is to highlight the actions taken by PROMOTEC SRL in the field of anti-corruption and transparency with reference to the regulations in force, such as:

- Law no. 190/2012 containing *“Provisions for the prevention and repression of corruption and illegality in public administration”*;
- Guidelines set out in the National Anti-Corruption Plan, approved by ANAC (ex C.I.V.I.T) with resolution no.72/2013;
- Legislative Decree no. 33/2013 - *“Reorganisation of provisions concerning the obligations of disclosure, transparency and dissemination of information by public administrations”*;
- CIVIT resolution of 4 July 2013, no. 50 - *“Guidelines for updating the Three-Year Transparency and Integrity Programme”*.

PROMOTEC SRL has a traditional top management organisational structure consisting of a Board of Directors and a Board of Auditors which carries out the accounting control activities.

## 2. PURPOSE AND SCOPE

The Three-Year Corruption Prevention Plan is one of the instruments introduced by Law 190/2012 to prevent administrative corruption, and implements the outcomes of the Risk Assessment drawn up according to the criteria defined in the National Anti-Corruption Plan.

**With this Three-Year Plan, PROMOTEC SRL aims to:**

1. identify the activities carried out by the Company with the highest risk of corruption;
2. provide for mechanisms for definition, implementation and control of decisions, suitable to prevent the risk of corruption;
3. provide for communication obligations for the Manager in charge of supervising the operation of the Plan;
4. monitor compliance with the deadlines, provided for by law or regulations, for conclusion of the procedures;
5. increase the ability of the Company to prevent cases of corruption;
6. create an environment that discourages corruption, inspired by the principles of ethics, integrity and transparency through monitoring actions on processes at risk, and personnel awareness interventions on the rules and principles to be complied with

**The addressees of the Plan are:**



- a) Administrative Body
- b) Employees with fixed-term assignment;
- c) Collaborators/Professionals

## 3. COMPANY DUTIES AND RESPONSIBILITIES FOR PREVENTION OF CORRUPTION

### 3.1. BOARD OF DIRECTORS

- Entrusts the Head of Prevention of Corruption,
- Approves the adoption of the Three-Year Corruption Prevention Plan and its updates
- Entrusts the Head of Prevention of Corruption with the publication of the Three-Year Plan

### 3.2. HEAD OF PREVENTION OF CORRUPTION

- Prepares the annual report on the activity carried out and ensures its publication;
- prepares the proposal of three-year corruption prevention plan and its subsequent updates;
- checks the plan implementation effectiveness and adequacy as an instrument for identifying the changes to be implemented both when significant violations of the requirements are ascertained and when significant changes occur in the organisation or in the administration activity;
- verifies, in collaboration with the Department Managers, the implementation of the possible rotation of assignments in the departments in charge of carrying out activities, where there is a higher risk of corruption crimes, pointing out that the small size of the organisation does not currently allow to implement this measure;
- checks that the procedures in force are appropriate and properly understood by personnel working in sectors particularly exposed to corruption;
- Acts as Transparency Manager and has recourse, in particular, to the Head of the Integrated Quality and Environment Management System, as well as the General Manager;
- The Manager, with his/her measure, can assign investigation and procedural responsibilities to employees;
- He/she is appointed by the Administrative Body as Head of Prevention of Corruption, as well as Head of Company Transparency;



### **3.3. GENERAL MANAGER**

- Provides information, for his/her area of specific competence, to the Manager;
- Participates in the risk management process;
- Proposes prevention measures;
- Ensures compliance with the Code of Conduct and verifies the hypotheses of violation;
- Adopts management measures, such as the initiation of disciplinary proceedings, suspension and possible rotation of personnel, and complies with the measures contained in the Three-Year Corruption Prevention Plan;
- Ensures the timely communication of information to the Head of Prevention of Corruption, in accordance with the provisions of the anti-corruption plan of the Company;
- He/she is responsible for the correct execution of the obligations laid down therein.

### **3.4. STAFF MANAGEMENT**

- conducts disciplinary proceedings within its competence;
- carries out mandatory communications to the judicial authorities;
- proposes the Code of Conduct update;
- participates in the risk management process and observes the measures contained in the Three-Year Corruption Prevention Plan,
- ensures compliance with the Code of Conduct;
- reports situations of offence to the General Management or to the Head of Prevention of Corruption, in cases of personal conflict of interest.

### **3.5. EMPLOYEES**

- They are involved in the risk management process, in relation to their areas of expertise;
- They must comply with the measures contained in the Three-Year Corruption Prevention Plan;
- They report situations of offence to their Department Manager or to the Head of Prevention of Corruption, in cases of personal conflict of interest;

### **3.6. COLLABORATORS / PROFESSIONALS**

- They must comply with the measures contained in the Three-Year Corruption Prevention Plan;
- They operate in compliance with the provisions contained in the Code of Conduct;
- They report situations of offence to the Head of Prevention of Corruption.





## 4. PROCEDURES FOR THE ADOPTION AND DISSEMINATION OF THE PLAN

By 30 September of each year, each Department Manager sends his/her proposals, aimed at identifying the activities in which the risk of corruption is higher, to the Head of Prevention, specifying:

1. the actual organisational measures to be taken to contrast the risk identified.
2. the necessary economic resources
3. the human resources to involve

### The Head of Prevention:

- prepares updates to the Corruption Prevention Plan, indicating the financial and instrumental resources required for its implementation (*by 15 December*);
- draws up the report containing the results of the activity carried out (*by 15 December*);
- proposes to the General Management any changes to the Plan, also during the year, if significant breaches of the provisions have been ascertained, or when significant organisational changes or changes in the Company activities occur;
- sends updates of the Prevention Plan to the Administrative Body.

### The Administrative Body:

- approves the Three-Year Plan by 31 January of each year, unless otherwise specified by law;
- entrusts the persons in charge of its publication on PROMOTEC SRL website.

## 5. CRITERIA ADOPTED FOR RISK MAPPING AND ASSESSMENT

The activities carried out by PROMOTEC SRL Personnel involving greater risk of corruption concern:

1. Personnel recruitment
2. Career progression
3. Entrusting assignments and consultancy
4. Participation in calls for tenders to support the exhibition system
5. The procurement of goods and services through methods other than the call for tenders

On the basis of the values resulting from the risk analysis carried out according to the criteria of the National Anti-Corruption Plan, 4 levels of risk have been identified, which describe the way in which the two essential risk aspects (likelihood and impact) interact and combine with each other, allowing to determine with greater precision the priorities for intervention to be implemented in order to prevent the risk properly



| RISK               | VALUE             | COMBINATIONS OF L x I  | DESCRIPTION  |
|--------------------|-------------------|--|--|
| <b>CRITICAL</b>    | <b>20 &gt; 25</b> | <i>(5x4) (4 x 5) (5x5)</i>   | All L and I values are greater than the average value (3).   |
| <b>SIGNIFICANT</b> | <b>12 &gt; 16</b> | <i>(4x4) (4 x 3) (3x4)<br/>(5x3) (3x5)</i>   | The minimum L and I value is 3   |
| <b>MINOR</b>       | <b>5 &gt; 10</b>  | <i>(2x5) (5x2) (3x3)<br/>(2x4) (4x2) (2x3)<br/>(3x2) (1x5) (5x1)</i>                       | L and I can have a maximum value of 5, but when one of them reaches this value the other does not exceed the threshold of 2. |
| <b>NEGLIGIBLE</b>  | <b>1 &gt; 4</b>   | <i>(1 x 1) - (2 x 1) - (1 x 2)<br/>- (3 x 1) (1 x 3) - (2 x 2)<br/>- (4 x 1) - (1 x 4)</i> | The maximum value reached by L and I does not exceed 4   |

During the first application of the Three-Year Corruption Prevention Plan, it was decided to proceed in the following ways:

## **5.1 RISK MANAGEMENT**

**It concerns processes falling within “NEGLIGIBLE” and “MINOR” risk levels**

For “negligible” levels, annual monitoring of the effectiveness of management and control procedures of processes at risk will be carried out

- For “marginal” risk levels, these risks are considered “acceptable” and, therefore, do not require any prevention intervention.
- Processes falling within this level will be monitored annually.
- Sessions will also be organised to discuss and update the various phases of the process with the Personnel involved, with the aim of identifying improvement actions in the recording of the various activities.



## 5.2 TREATMENT OF THE RISK FOR CRIME PREVENTION

It concerns processes falling within “SIGNIFICANT” and “CRITICAL” risk levels

The risk treatment phase consists in identifying and initiating interventions aimed at eliminating or, if not possible, at least reducing the risk by defining priorities and implementation timeframe.

Therefore, the procedures that fall within these risk levels will be treated according to an Intervention Plan that will define the following parameters:

1. Activities and risk areas
2. Actions to be taken
3. Objectives
4. Implementation timeframe
5. Implementers
6. People involved in the implementation
7. Indicators
8. Methods for monitoring the prevention actions to be taken. The table below

shows the recording methods of the risk treatment.

| <b>Table 4 - CORRUPTION RISK TREATMENT PLAN</b>          |                                |                   |                  |                 |                           |                   |   |
|--|--------------------------------|-------------------|------------------|-----------------|---------------------------|-------------------|---|
| <b>Activities and areas with intervention priorities</b> | <b>Actions to be initiated</b> | <b>Objectives</b> | <b>Timeframe</b> | <b>Managers</b> | <b>Personnel involved</b> | <b>Indicators</b> | <b>Methods for monitoring the actions taken</b> |
|  |                                |                   |                  |                 |                           |                   |   |
|  |                                |                   |                  |                 |                           |                   |   |
|  |                                |                   |                  |                 |                           |                   |   |
|  |                                |                   |                  |                 |                           |                   |   |
|  |                                |                   |                  |                 |                           |                   |   |
|  |                                |                   |                  |                 |                           |                   |   |
|  |                                |                   |                  |                 |                           |                   |   |
|  |                                |                   |                  |                 |                           |                   |   |

Considering that, to date, PROMOTEC SRL has not identified any corruptive phenomena within it, for the year 2020, and that all the processes subject to risk analysis according to Annexes 2 and 5 of the National Anti-Corruption Plan

P.N.A. have fallen within “negligible” and “marginal” levels, the Company has not included these processes in the Corruption Risk Treatment Plan (Table 4), as they are considered as falling within the category of “acceptable risk”, not to mention the fact that PROMOTEC S. R.L. is not included in the recipients of the legislation in question.



Please refer to the next update for any changes and the possible inclusion of areas that fall within risk levels above “negligible” and “marginal” in the Treatment Plan.

## 6. RESULTS OF RISK ANALYSIS

The risk management process has developed through the following phases:

1. process mapping and identification of risk areas;
2. risk assessment;
3. Identification of improvement actions for risk management.

These aspects are highlighted in the table contained in this plan.

### **6.1 MANDATORY RISK AREAS**

In accordance with the content of Annex 2 of the National Anti-Corruption Plan, the following business processes have been implemented and analysed:

#### **A. PERSONNEL ACQUISITION AND PROGRESSION AREA**

1. Recruitment
2. Carrier progression
3. Collaboration assignments

#### **B. AREA OF ASSIGNMENT OF WORKS, SERVICES AND SUPPLIES**

1. Definition of the assignment subject
2. Identification of the instrument/institution for the assignment
3. Qualification requirements
4. Awarding requirements
5. Evaluation of offers
6. Verification of any anomaly in the offers
7. Negotiated procedures
8. Direct assignments
9. Withdrawal of the invitation to tender
10. Time schedule
11. Variants during the performance of the contract
12. Subcontracting
13. Use of dispute resolution remedies alternative to legal remedies during the execution of the contract



## **C. AREA OF MEASURES EXTENDING THE LEGAL SPHERE OF THE RECIPIENTS WITHOUT DIRECT AND IMMEDIATE ECONOMIC EFFECT FOR THE RECIPIENT**

1. Administrative measures bound in the an
2. Administrative measures with bound content
3. Administrative measures bound in the an and with bound content
4. Administrative measures with discretionary content
5. Discretionary administrative measures in the an
6. Discretionary administrative measures in the an and in the content

## **D. AREA OF MEASURES EXTENDING THE LEGAL SPHERE OF THE RECIPIENTS WITH DIRECT AND IMMEDIATE ECONOMIC EFFECT FOR THE RECIPIENT**

1. Administrative measures bound in the an
2. Administrative measures with bound content
3. Administrative measures bound in the an and with bound content
4. Administrative measures with discretionary content
5. Discretionary administrative measures in the an
6. Discretionary administrative measures in the an and in the content

PROMOTEC SRL operates in: *i)* promotion and professional organisation of trade fairs and specialised exhibitions, in Italy and abroad; *ii)* performance of market surveys, promotional campaigns and public relations; *iii)* publishing activities related to books, catalogues, magazines and single issue magazines with both proprietary and third-party newspapers; *iv)* provision of promotional, organisational, survey and study services for the industries concerned and to the specialised public, and repair assistance of means of transport in general, as well as in new and retreaded tyres.

In the light of this, the risk analysis of Points C and D has not been carried out, as the activities carried out by PROMOTEC SRL do not include the implementation of measures extending the legal sphere of the recipients, both in case of direct and immediate economic effect for the addressee and in its absence.

In other words, with reference to Annex 3 of the National Anti-Corruption Plan “List of risk examples”: in section C) Area: measures extending the legal sphere of the recipients without direct and immediate economic effect for the recipient, the risks mentioned as example are not related to the activity carried out by PROMOTEC SRL (e.g. “abuse in granting authorisations in areas where the public office has exclusive or prominent control functions in order to facilitate certain entities” e.g.: controls aimed at ascertaining the possession of requirements for opening shops)

in section D) Area: measures extending the legal sphere of the recipients with direct and immediate economic effects for the recipient, the risks mentioned as examples are not related to the activity carried out by PROMOTEC SRL (e.g. “undue granting of unemployment benefits to citizens who do not meet



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the legal requirements in order to facilitate certain entities” or “use of false documentation to facilitate certain entities in accessing EU funds”).

Below is the summary of the analysis performed according to Annex 2 and Annex 5 of the National Anti-Corruption Plan.



## COMMON AND MANDATORY RISK AREAS (Annex 2 - National Anti-Corruption Plan)

| SENSITIVE ACTIVITY                                 | COMPANY DEPARTMENTS INVOLVED  | RISK = L * I          |   |                                       |   | MANAGEMENT AND CONTROL PROTOCOLS IN PLACE | IMPROVEMENT ACTIONS   |  |                        |
|--|---|-----------------------|---|---------------------------------------|---|---|---|--|------------------------|
| <b>Area: PERSONNEL ACQUISITION AND PROGRESSION</b> |   |                       |   |                                       |   |   |   |  |                        |
| <b><u>RECRUITMENT</u></b>                          | <ul style="list-style-type: none"> <li>• B.o.D.</li> <li>• CEO</li> <li>• Department Manager</li> </ul> | <b>LIKELIHOOD</b>     |   | <b>IMPACT</b>                         |   | <b>RISK</b>                               | Consolidated practice in the field of Personnel Selection and Hiring  | Formalisation of a procedure. Monitoring and verification, on a six-month basis, of the operating procedures defined in the reference procedure. |                        |
|  |   | Discretion            | 4 | Organisational                        | 2 |   |   |  | <b>3x2=6<br/>MINOR</b> |
|  |   | External significance | 2 | Economic                              | 1 |   |   |  |                        |
|  |   | Process complexity    | 1 | Reputational                          | 1 |   |   |  |                        |
|  |   | Economic value        | 1 | Organisational, economic on the image | 4 |   |   |  |                        |
|  |   | Process divisibility  | 1 |                                       |   |   |   |  |                        |
|  |   | Controls              | 2 |                                       |   |   |   |  |                        |
| <b><u>CARRIER PROGRESSION</u></b>                  | <ul style="list-style-type: none"> <li>• B.o.D.</li> <li>• CEO</li> <li>• Department Manager</li> </ul> | <b>LIKELIHOOD</b>     |   | <b>IMPACT</b>                         |   | <b>RISK</b>                               | Consolidated practice in the field of Personnel Selection and Hiring  | Formalisation of a procedure. Monitoring and verification, on a six-month basis, of the operating procedures defined in the reference procedure. |                        |
|  |   | Discretion            | 5 | Organisational                        | 2 |   |   |  | <b>3x2=6<br/>MINOR</b> |
|  |   | External significance | 2 | Economic                              | 1 |   |   |  |                        |
|  |   | Process complexity    | 1 | Reputational                          | 1 |   |   |  |                        |
|  |   | Economic value        | 1 | Organisational, economic on the image | 4 |   |   |  |                        |
|  |   | Process divisibility  | 1 |                                       |   |   |   |  |                        |
|  |   | Controls              | 5 |                                       |   |   |   |  |                        |
| <b><u>COLLABORATION ASSIGNMENTS</u></b>            | <ul style="list-style-type: none"> <li>• B.o.D.</li> <li>• CEO</li> <li>• Manager</li> </ul>            | <b>LIKELIHOOD</b>     |   | <b>IMPACT</b>                         |   | <b>RISK</b>                               | Consolidated practice for definition of contracts and for accounting and financial information of management. | Formalisation of a procedure. Verify, through periodic audits, the suitability of the parameters used in the field                               |                        |
|  |   | Discretion            | 4 | Organisational                        | 1 |   |   |  | <b>3x2=6<br/>MINOR</b> |
|  |   | External significance | 5 | Economic                              | 1 |   |   |  |                        |
|  |   | Process complexity    | 1 | Reputational                          | 1 |   |   |  |                        |



# PROMOTEC S.R.L.

|  |                      |   |                                       |   |  |  |   |
|--|----------------------|---|---------------------------------------|---|--|--|---|
| Administration<br>• Department Manager | Economic value       | 5 | Organisational, economic on the image | 4 |  |  | of assignments to professionals.<br>Perform, with defined periodicity, discussion activities between CEO and the Administrative Manager |
|  | Process divisibility | 1 |                                       |   |  |  |   |
|  | Controls             | 2 |                                       |   |  |  |   |

## COMMON AND MANDATORY RISK AREAS (Annex 2 -. National Anti-Corruption Plan)

| SENSITIVE ACTIVITY   | COMPANY DEPARTMENTS INVOLVED | RISK = L * I          |   |                                       |   | MANAGEMENT AND CONTROL PROTOCOLS IN PLACE | IMPROVEMENT ACTIONS   |  |
|--|------------------------------|-----------------------|---|---------------------------------------|---|---|---|--|
| <b>Area: ASSIGNMENT OF WORKS, SERVICES AND SUPPLIES (1)</b>                |                              |                       |   |                                       |   |   |   |  |
| <b>1. DEFINITION OF THE ASSIGNMENT SUBJECT</b>                             | • B.o.D.<br>• CEO            | <b>LIKELIHOOD</b>     |   | <b>IMPACT</b>                         |   | <b>RISK</b><br><br>3x2=6<br>MINOR         | Consolidated practice for definition of contracts and for accounting and financial information of management. | Formalisation of a procedure.<br>Monitoring, on a six-month basis, of the operating procedures that define the sensitive activity within the specific procedures and protocols, in order to make improvements and updates. |
|  |                              | Discretion            | 4 | Organisational                        | 1 |   |   |  |
|  |                              | External significance | 5 | Economic                              | 1 |   |   |  |
|  |                              | Process complexity    | 1 | Reputational                          | 1 |   |   |  |
|  |                              | Economic value        | 3 | Organisational, economic on the image | 5 |   |   |  |
|  |                              | Process divisibility  | 1 |                                       |   |   |   |  |
|  |                              | Controls              | 3 |                                       |   |   |   |  |
| <b>2. IDENTIFICATION OF THE INSTRUMENT/ INSTITUTION FOR THE ASSIGNMENT</b> | • B.o.D.<br>• CEO            | <b>LIKELIHOOD</b>     |   | <b>IMPACT</b>                         |   | <b>RISK</b><br><br>3x2=6<br>MINOR         | Consolidated practice for definition of contracts and for accounting and financial information of management. | Formalisation of a procedure.<br>Monitoring and verification, on a six-month basis, of the operating procedures defined in the reference procedures.   |
|  |                              | Discretion            | 4 | Organisational                        | 1 |   |   |  |
|  |                              | External significance | 5 | Economic                              | 1 |   |   |  |
|  |                              | Process complexity    | 1 | Reputational                          | 1 |   |   |  |
|  |                              | Economic value        | 5 | Organisational, economic on the image | 4 |   |   |  |
|  |                              | Process divisibility  | 1 |                                       |   |   |   |  |





# PROMOTEC S.R.L.

|                                      |   |                       |   |                                       |   |                |   |  |
|--------------------------------------|---|-----------------------|---|---------------------------------------|---|----------------|---|--|
|                                      |   | Controls              | 2 |                                       |   |                |   |  |
| <b>3. QUALIFICATION REQUIREMENTS</b> | <ul style="list-style-type: none"> <li>B.o.D.</li> <li>CEO</li> </ul> | <b>LIKELIHOOD</b>     |   | <b>IMPACT</b>                         |   | <b>RISK</b>    | Consolidated practice for definition of contracts and for accounting and financial information of the management. | Formalisation of a procedure.<br>Monitoring and verification, on a six-month basis, of the operating procedures defined in the reference procedures. |
|                                      |   | Discretion            | 4 | Organisational                        | 1 |                |   |  |
|                                      |   | External significance | 5 | Economic                              | 1 |                |   |  |
|                                      |   | Process complexity    | 1 | Reputational                          | 1 |                |   |  |
|                                      |   | Economic value        | 5 | Organisational, economic on the image | 4 |                |   |  |
|                                      |   | Process divisibility  | 1 |                                       |   |                |   |  |
|                                      |   | Controls              | 3 |                                       |   |                |   |  |
|                                      |   |                       |   |                                       |   | 3x2=6<br>MINOR |   |  |

## COMMON AND MANDATORY RISK AREAS (Annex 2 - National Anti-Corruption Plan)

| SENSITIVE ACTIVITY  | COMPANY DEPARTMENTS INVOLVED  | RISK = L * I          |   |                                       |   | MANAGEMENT AND CONTROL PROTOCOLS IN PLACE | IMPROVEMENT ACTIONS   |   |
|---|---|-----------------------|---|---------------------------------------|---|---|---|---|
| <b>Area: ASSIGNMENT OF WORKS, SERVICES AND SUPPLIES (2)</b> |   |                       |   |                                       |   |   |   |   |
| <b>4. AWARDING REQUIREMENTS</b>                             | <ul style="list-style-type: none"> <li>B.o.D.</li> <li>CEO</li> </ul> | <b>LIKELIHOOD</b>     |   | <b>IMPACT</b>                         |   | <b>RISK</b>                               | Consolidated practice for definition of contracts and for accounting and financial information of the management. | Formalisation of a procedure.<br>Monitor, on a six-month basis, the application and effectiveness of the criteria adopted in the evaluation of the awarding requirements. |
|   |   | Discretion            | 4 | Organisational                        | 1 |   |   |   |
|   |   | External significance | 5 | Economic                              | 1 |   |   |   |
|   |   | Process complexity    | 1 | Reputational                          | 1 |   |   |   |
|   |   | Economic value        | 5 | Organisational, economic on the image | 4 |   |   |   |
|   |   | Process divisibility  | 1 |                                       |   |   |   |   |
|   |   | Controls              | 2 |                                       |   |   |   |   |
|   |   |                       |   |                                       |   | 3x2=6<br>MINOR                            |   |   |
|   |   | <b>LIKELIHOOD</b>     |   | <b>IMPACT</b>                         |   | <b>RISK</b>                               |   |   |



# PROMOTEC S.R.L.

|   |  |                       |   |                                       |   |                |   |   |
|---|--|-----------------------|---|---------------------------------------|---|----------------|---|---|
| <b>5. EVALUATION OF OFFERS</b>                        | <ul style="list-style-type: none"> <li>• B.o.D.</li> <li>• CEO</li> <li>• Administration Manager</li> <li>• External consultant</li> </ul> | Discretion            | 4 | Organisational                        | 1 | 3x2=6<br>MINOR | Consolidated practice for definition of contracts and for accounting and financial information of management. | Formalisation of a procedure.<br>Monitor, on a six-month basis, the evidences of the criteria adopted by the professionals involved in this process, also checking their effectiveness.   |
|   |  | External significance | 5 | Economic                              | 1 |                |   |   |
|   |  | Process complexity    | 1 | Reputational                          | 1 |                |   |   |
|   |  | Economic value        | 5 | Organisational, economic on the image | 5 |                |   |   |
|   |  | Process divisibility  | 1 |                                       |   |                |   |   |
|   |  | Controls              | 2 |                                       |   |                |   |   |
| <b>6. VERIFICATION OF ANY ANOMALIES IN THE OFFERS</b> | <ul style="list-style-type: none"> <li>• B.o.D.</li> <li>• CEO</li> <li>• Administration Manager</li> <li>• External consultant</li> </ul> | <b>LIKELIHOOD</b>     |   | <b>IMPACT</b>                         |   | 3x2=6<br>MINOR | Consolidated practice for definition of contracts and for accounting and financial information of management. | Formalisation of a procedure.<br>Provide evidence, in the procedures adopted, of the criteria and operating procedures implemented by the professionals involved in the process, for verification of the presence of any anomalies in the offers. |
|   |  | Discretion            | 2 | Organisational                        | 1 |                |   |   |
|   |  | External significance | 5 | Economic                              | 1 |                |   |   |
|   |  | Process complexity    | 1 | Reputational                          | 1 |                |   |   |
|   |  | Economic value        | 5 | Organisational, economic on the image | 5 |                |   |   |
|   |  | Process divisibility  | 1 |                                       |   |                |   |   |
|   |  | Controls              | 3 |                                       |   |                |   |   |

## COMMON AND MANDATORY RISK AREAS (Annex 2 -. National Anti-Corruption Plan)

| SENSITIVE ACTIVITY  | COMPANY DEPARTMENTS INVOLVED   | RISK = L * I          |   |                |   | MANAGEMENT AND CONTROL PROTOCOLS IN PLACE | IMPROVEMENT ACTIONS   |   |
|---|--|-----------------------|---|----------------|---|---|---|---|
| <b>Area: ASSIGNMENT OF WORKS, SERVICES AND SUPPLIES (3)</b> |  |                       |   |                |   |   |   |   |
| <b>7. NEGOTIATED PROCEDURES</b>                             | <ul style="list-style-type: none"> <li>• B.o.D.</li> <li>• CEO</li> <li>• Administration Manager</li> <li>• External consultant</li> </ul> | <b>LIKELIHOOD</b>     |   | <b>IMPACT</b>  |   | 4x2=8<br>MINOR                            | Consolidated practice for definition of contracts and for accounting and financial information of management. | Formalisation of a procedure.<br>In the existing procedures, describe in detail the operating methods adopted, as well as |
|   |  | Discretion            | 2 | Organisational | 1 |   |   |   |
|   |  | External significance | 5 | Economic       | 1 |   |   |   |
|   |  | Process complexity    | 1 | Reputational   | 1 |   |   |   |



# PROMOTEC S.R.L.

|                              |  |                       |   |                                       |   |                |  |
|------------------------------|--|-----------------------|---|---------------------------------------|---|----------------|--|
|                              |  | Economic value        | 5 | Organisational, economic on the image | 5 |                | evaluation criteria used<br>In case of “negotiated procedures”.<br>Monitor on a six-month basis the application of the methods defined in the procedure verifying cases and amounts of the assignments through procedure.<br>Check the possibility to adopt the “rotation” criterion   |
|                              |  | Process divisibility  | 5 |                                       |   |                |  |
|                              |  | Controls              | 3 |                                       |   |                |  |
| <b>8. DIRECT ASSIGNMENTS</b> | <ul style="list-style-type: none"> <li>• B.o.D.</li> <li>• CEO</li> <li>• Administration Manager</li> <li>• External consultant</li> </ul> | <b>LIKELIHOOD</b>     |   | <b>IMPACT</b>                         |   | <b>RISK</b>    | Consolidated practice for definition of contracts and for accounting and financial information of management.<br><br>Formalisation of a procedure.<br>In the existing procedures, describe in detail the operating methods adopted, as well as evaluation criteria used in case of “direct assignments”<br>Monitor on a six-month basis the application of the methods defined in the procedure verifying cases and amounts of direct assignments<br>-- Check the possibility to adopt the “rotation” criteria |
|                              |  | Discretion            | 2 | Organisational                        | 1 | 4x2=8<br>MINOR |  |
|                              |  | External significance | 5 | Economic                              | 1 |                |  |
|                              |  | Process complexity    | 1 | Reputational                          | 1 |                |  |
|                              |  | Economic value        | 5 | Organisational, economic on the image | 5 |                |  |
|                              |  | Process divisibility  | 5 |                                       |   |                |  |
|                              |  | Controls              | 3 |                                       |   |                |  |



## 7. OBSERVATIONS ON RISK ANALYSIS FINDINGS

The OUTCOMES OF THE ANALYSIS performed lead to the conclusion that, basically, PROMOTEC SRL has consolidated practices and operating procedures that make the verification of a risk attributable to hypotheses of corruption completely negligible, a fortiori considering the legal nature and type of activity carried out by the Company.

In particular, PROMOTEC SRL has defined, and made operational for the management of business processes, the following procedures:

With reference to the areas at risk of crime defined by the National Anti-Corruption Plan, the operational procedures analysed show, in particular, the following aspects:

- joint participation of several company departments in the decision-making processes;
- accurate definition of the methods, responsibilities and criteria defined for the development of the individual phases that make up the company processes analysed;
- identification of authorisation, expenditure and decision-making levels according to the company job and the powers assigned to it.

Therefore, as mentioned above, with reference to the criteria adopted in the risk weighing, the activity to be implemented basically concerns:

- ✓ periodic monitoring of what has been defined, in order to keep the effectiveness under control also in terms of corruption prevention;
- ✓ the periodic and systematic arrangement of meetings and refreshers between General Management, Department Managers and personnel involved in areas at risk of crime, in order to analyse the management trend of the activities defined and their effectiveness in preventing the risk of crime.

However, PROMOTEC SRL has accurately defined a set of measures to be adopted in order to prevent corruption crimes.

## 8. GENERAL METHODS FOR DEFINITION; IMPLEMENTATION AND CONTROL OF ADMINISTRATION DECISIONS

PROMOTEC SRL has defined **principles of conduct** and **management methods** divided by operational areas/processes.



## 8.1. CONTRACTUAL ACTIVITY

The General Manager, the Administration Manager, the Department Manager and the Personnel in general involved in all phases that make up the process for the procurement of goods and services must:

1. Respect the prohibition of artificial fractioning or increase of the contractual amount; [L] [SEP]
2. Use the negotiated procedures, with or without prior publication of a notice, in the cases expressly provided for by law;
3. Reduce the area of direct assignments only to the cases permitted by law;
4. Apply, whenever possible, the rotation between companies of timework contracts; [L] [SEP]
5. Ensure the rotation among professionals in assignments with value below the threshold of the open procedure; [L] [SEP]
6. Observe the principles of proportionality and adequacy with regard to additional provisions and requirements during the tender. Specifically, the tender notice - like the invitation letter - consists of a set of rules laid down in the current legislation on procurement, which makes up its minimum content;
7. Guarantee free competition, by monitoring the effectiveness of the requirements for participation to tenders, defined in the reference procedures, even unofficial, and for the evaluation of offers, which are clear and adequate; [L] [SEP]

## 8.2 ANTI-CORRUPTION TRAINING AND INFORMATION

- The choice of personnel to be assigned to the sectors identified as being at risk by Article 1, paragraph 16, of Italian Law no. 190/2012 must primarily fall on personnel specifically selected and trained. [L] [SEP]
- For this purpose, each year, the Department Managers propose to the Head of Prevention of Corruption the names of the personnel to be included in the training programmes to be carried out in the following year, for their assignment to the sectors at risk.
- The Head of Prevention draws up the list of personnel to be primarily included in the annual training programme and communicates this to those directly concerned.
- Participation in the training plan by the selected personnel is mandatory. [L] [SEP]
- By 30 November of each year, the Head of Prevention of Corruption defines, after consulting the General Manager and the Head of Accounting, Finance and Control, the annual training programme to be carried out in the following year.
- The Department Managers and any other employee, who is obliged to provide information or communication to the Head of Prevention of Corruption, must comply with this obligation without delay and in an exhaustive manner.
- The Head of Prevention of Corruption, after receiving the mandatory communication, must analyse it within 30 days, with the power to forward suggestions and recommendations



to the Manager/employee concerned.

## 8.3 ENTRUSTING CONSULTANCY ASSIGNMENTS AND PROCUREMENT OF GOODS AND SERVICES

- When entrusting consultancy assignments to external parties, provide formal evidence in Meeting Minutes or other recording documents of the lack of internal professionalism and the skills to be sought. [SEP]
- Each employee operating in this field and playing a role with decision-making powers is obliged to refrain from taking part in the adoption of decisions or activities of any kind in administrative proceedings which may involve, directly or indirectly, his/her own interests or those of his/her relatives and in-laws up to the fourth degree, or of his/her cohabitants, or of third parties with who he/she usually hang out, generally for reasons not related to his/her job.

The obligation of refraining is absolute, regardless of any personal relationship in case of conflict of interest, even potential, without prejudice to the duty of the employee to report any conflict situation to the Head of Prevention of Corruption.

- Each employee operating in this field and playing a role with decision-making powers is obliged to report to the Head of Prevention of Corruption, without delay, any family or in-law relationship existing between him/her and the owners, directors, shareholders and employees of entities that conclude contracts with PROMOTEC SRL, or which are interested in procedures for authorisation, granting or payment of economic benefits of any kind.
- Pursuant to Article 35-bis of Italian Legislative Decree no. 165/2001, as introduced by Article 46 of Law no. 190/2012, those who have been convicted, even with a judgement which is not yet final, of the offences specified in Chapter I of Title II of Book II of the Criminal Code (*offences of public officials against the Public Administration*):
  - Cannot take part, even with secretarial tasks, in commissions for the access or recruitment of personnel for PROMOTEC SRL;
  - Cannot be assigned, even with managerial functions, to the departments responsible for management of financial resources, procurement of goods, services and supplies;
  - Cannot be part of commissions for the selection of the contractor for the award of works, supplies and services.
- The employee, both with permanent or fixed-term contract, is required to inform - as soon as he/she becomes aware of it - the Head of Prevention, that he/she has been subject to prevention proceedings or criminal proceedings for crimes referred to in Chapter I, Title II of Book II of the Criminal Code.



## 8.4 HUMAN RESOURCES

### 8.4.1. ROTATION OF ASSIGNMENTS

Personnel employed in sectors at risk must, where possible, be subject to periodic rotation.

Please note that PROMOTEC SRL workforce does not allow the actual application of the rotation criterion.

In other words, there are no perfectly fungible professionals within PROMOTEC SRL, however, the obligation to rotate employees who have incurred disciplinary sanctions for breach of the Code of Conduct, relating to offences falling within the category of corruption offences, remains.

### 8.4.2. PROTECTION OF WHISTLEBLOWERS

- An employee who reports to/informs the judicial authorities, the Court of Auditors, his/her immediate superior unlawful conduct, of which he/she has become aware due to the employment relationship, cannot be sanctioned, dismissed or subjected to a discriminatory measure, direct or indirect, affecting working conditions for reasons directly or indirectly related to the report.
- Within the disciplinary proceeding, the identity of the whistleblower cannot be revealed without his/her consent, provided that the disciplinary action objection is based on separate and additional verifications with respect to the report.
- If the objection is based, in whole or in part, on the report, the identity can be revealed if its knowledge is absolutely essential to defend the accused.
- an employee who believes he/she has been discriminated because of his/her offence report must promptly inform the Head of Prevention of Corruption using the email address: [segnalazioni@autopromotec.it](mailto:segnalazioni@autopromotec.it)
- The employee who has been discriminated can also take legal action against the employee who has made the discrimination and the administration to obtain:
  - a urgent judicial measure aimed at ending the discriminatory measure and/or restoring the previous situation;
  - compensation for material and non-material damage resulting from discrimination

### 8.4.3. CODE OF CONDUCT

The “*Anti-Corruption Code of Conduct*” is valid for all personnel of PROMOTED SRL.

**The employees are required to:**

1. collaborate in the process for risk assessment and management, if and as involved



2. observe the prevention measures provided for in the Three-Year Corruption Prevention Plan;<sup>[L]</sup><sup>[SEP]</sup>
3. comply with the obligations of the Anti-Corruption Code of Conduct;
4. make the communications required on conflict of interest and obligation to refrain, according to the direction provided by the Head of Prevention of Corruption;<sup>[L]</sup><sup>[SEP]</sup>
5. report possible (criminal, disciplinary, administrative-accounting) offences of which they become aware;
6. For the purposes of this Plan, “employees” means those who are classified, with any qualification/category or contractual form, within the roles of PROMOTEC SRL.

## **Collaborators are required to:**<sup>[L]</sup><sup>[SEP]</sup>

1. observe the prevention measures provided for in the Three-Year Corruption Prevention Plan;<sup>[L]</sup><sup>[SEP]</sup>
2. report possible (criminal, disciplinary, administrative-accounting) offences of which they become aware.<sup>[L]</sup><sup>[SEP]</sup>

For the purposes of the Plan, “collaborators” are those who, by virtue of self-employment or other relationships, other than those that characterise the employment relationship, are included, for professional reasons, in the workforce of PROMOTEC SRL.

## **9. INDICATORS FOR RISK PREVENTION MONITORING**

The Head of Prevention of Corruption, in compliance with the provisions of Italian Law no. 190/2012, by 15 December each year draws up an annual report describing the effectiveness of the prevention measures defined by the Three-Year Corruption Prevention Plans.

According to the national anti-corruption plan, this document must contain a minimum core of indicators on the effectiveness of prevention policies in the following areas:

### **Risk management**

- Actions taken to address corruption risks
- Controls on corruption risk management
- Process automation initiatives put in place to reduce the corruption risks

### **Anti-corruption training**

- Anti-corruption training provided in days/hours
- Type of contents offered





- Definition of anti-corruption training recipients
- Definition of trainers for anti-corruption training

## **Code of conduct**

- Implementation of integrations to the code of conduct
- Reports of breaches of the code of conduct
- Activities of the department in charge of issuing opinions on the application of the code of conduct

## **Other initiatives**

- Number of assignments and areas subject to rotation of assignments
- Outcomes of verifications and controls on the causes of non-assignability and incompatibility of assignments
- Forms of protections for whistleblowers
- Use of arbitration according to disclosure and rotation criteria
- Initiatives in the field of public contracts
- Indication of the initiatives provided for in the field of competitions and personnel selection
- Indication of the initiatives provided for in the field of inspection activities

## **Sanctions**

- Number and type of sanctions applied

## **10. SANCTIONS**

- Breach by employees of the company of the prevention measures provided for in this plan is a disciplinary offence.
- The breach of duties related to the implementation of the Corruption Prevention Plan is also relevant for the purposes of civil, administrative and accounting liability whenever the same responsibilities are related to the breach of duties, obligations, laws or regulations.