



**WamBlee**

**CFC**

Company Procedure for Controlling Corruption Phenomena

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## Indice

1 Introduction.....	5
2 Goal.....	5
3 Scope of Application.....	5
4 Definition of Corruption.....	5
5 Fundamental Principles.....	5
6 Prevention Actions.....	5
6.1 Due Diligence su Fornitori e Partner.....	5
6.2 Code of Ethics.....	6
6.3 Financial Operations Control.....	6
7 Monitoring and Control.....	6
7.1 Internal Control System.....	6
7.2 Periodic Auditing.....	6
7.3 Conflict of Interest Verification.....	6
8 Reporting Suspicious Behavior.....	6
8.1 Secure Reporting Channel.....	6
8.2 Report Management.....	6
8.3 Whistleblower Protection.....	7
9 Disciplinary Actions.....	7
10 Training.....	7
11 Monitoring and Updating the Procedure.....	7
12 Responsibility.....	7
13 Conclusions.....	7

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## 1 Introduction

This procedure aims to define the methods for preventing, managing, and controlling corruption within the company, helping to ensure compliance with applicable regulations and preserving the integrity of the organization. The company adopts a zero-tolerance policy towards all forms of corruption.

## 2 Goal

- Prevent corruption within the company.
- Promote a transparent and ethical work environment.
- Ensure compliance with Italian and international anti-corruption laws.
- Protect the reputation of the company and its employees.

## 3 Scope of Application

The procedure applies to all employees, managers, collaborators, consultants, suppliers, and business partners of the company, regardless of their level of responsibility.

## 4 Definition of Corruption

Corruption is defined as behavior involving the offer, acceptance, or request of money, goods, or other benefits to influence business, public, or private decisions in violation of laws and ethical principles.

## 5 Fundamental Principles

- **Integrity and Transparency:** All company activities must be conducted with the utmost transparency, without any kind of unlawful favor or advantage.
- **Responsibility and Ethics:** Every employee and collaborator must always act with honesty, respect for the law, and ethical principles.
- **Training and Awareness:** The company provides periodic anti-corruption training to all employees to raise awareness of the risks and methods of preventing corruption.

## 6 Prevention Actions

### 6.1 Due Diligence su Fornitori e Partner

The company must conduct a preliminary review of its suppliers and partners, verifying their reputation and possible involvement in corruption.

Before entering into contracts with new suppliers or partners, it is necessary to request representations and warranties regarding the absence of unlawful conduct.

## 6.2 Code of Ethics

The company adopts a **Corporate Code of Ethics** that outlines the rules of conduct to be followed, including prohibitions on corruption and conflicts of interest. All employees are required to sign a declaration of commitment to compliance with the Code of Ethics.

## 6.3 Financial Operations Control

Financial transactions, particularly those related to contracts with customers and suppliers, must be conducted transparently and traceably.

Transactions must not be the result of opaque practices, such as unjustified payments or expenses that do not reflect the actual services provided.

# 7 Monitoring and Control

## 7.1 Internal Control System

The company implements internal controls that monitor key risk areas, such as purchasing and sales management, corporate expense management, and supplier selection.

## 7.2 Periodic Auditing

The company conducts regular internal audits to ensure that all activities comply with corporate ethics and anti-corruption regulations.

## 7.3 Conflict of Interest Verification

Staff, particularly those in decision-making roles, must declare any potential conflicts of interest that could affect their impartiality in making business decisions.

# 8 Reporting Suspicious Behavior

## 8.1 Secure Reporting Channel

The company provides a secure and anonymous channel for reporting suspicious behavior, such as attempted bribery, conflicts of interest, or other irregularities. The reporting channel is as follows:

**Anonymous reporting channel:** From the company website; Menu → Company Policy → Reports

## 8.2 Report Management

Reports received must be reviewed by a responsible person (e.g., a compliance representative or HR manager). If the report is confirmed, immediate corrective action must be taken, including disciplinary action.

### 8.3 Whistleblower Protection

The company guarantees the protection of employees who report corruption or violations, avoiding any form of retaliation or discrimination.

## 9 Disciplinary Actions

In the event of a violation of this procedure, the company will take disciplinary action, which may include:

- Internal disciplinary sanctions: warnings, suspensions, or dismissals based on the severity of the violation.
- Termination of contracts with suppliers and partners who fail to comply with anti-corruption regulations.
- Termination of contracts with employees, collaborators, or consultants who are involved in corrupt activities.

## 10 Training

The company ensures that all employees, collaborators, and partners receive annual anti-corruption training to raise awareness of the risks and prevention methods.

## 11 Monitoring and Updating the Procedure

The procedure is monitored annually to verify its effectiveness. Any legislative changes or changes in company operations must be reflected in a review of the procedure.

## 12 Responsibility

The **Chief Compliance Officer** or **another designated individual** (Direction) will be responsible for ensuring the implementation of this procedure, monitoring its effectiveness, and managing reports of corruption.

## 13 Conclusions

Adopting this procedure allows the company to protect its business from legal, economic, and reputational risks arising from corruption, creating a healthy work environment that complies with ethical standards.