

Better Silver Spa adopts a policy that does not tolerate any form of corruption.

This Anti-Corruption Policy sets out rules of conduct that must be respected to reduce the risk of corruption.

It requires compliance with the provisions of Italian and European regulations and all other laws against bribery and corruption in force in the countries in which the company operates.

It complies with the requirements of the RJC COP standard on corruption and facilitator payments.

People who work for Better Silver Spa:

- they must never promise, offer or pay a bribe
- they must never request or accept a bribe
- they will not be penalized in any way or suffer negative consequences for refusing to pay or receiving bribes, even if the refusal would result in a loss of business opportunities for the company.

The Management has approved these principles which are applied in all countries in which the company operates, regardless of local customs and practices.

This policy applies to anyone who works for Better Silver Spa, anywhere in the world. This includes all employees, regardless of the type of employment contract, and any other representative of the company.

Better Silver Spa requires third parties who provide services on its behalf to comply with all provisions of local anti-corruption laws in any business relationship and may also require third parties to comply with this policy.

A bribe offer is defined as the promise, proposal, grant, request or acceptance of an advantage for the purpose of inducing or rewarding inappropriate behavior.

The benefit can be a benefit of any kind or something that has any value, actual or perceived, for the person to whom the bribe is offered. It doesn't have to be a sum of money.

Inappropriate behavior is illegal, dishonest behavior or a violation of professional obligations.

The bribe can be offered directly or through a third party. The offer of a bribe is still to be considered a crime, even if the bribe is refused or does not have the desired effect.

Corruption means the abuse of one's position within our company, or the abuse by third parties of the power or position deriving from the role they hold, in order to obtain personal advantage. This may result from a conflict of interest between the individual's private affairs and the role he or she plays.

Bribery and corruption can involve both the public and private sectors.

Facilitating payments are unofficial payments or gifts of limited value made to public officials to perform their duties or speed up their performance. Facilitative payments are bribes and are illegal.

Our company can be held liable in the event of corruption perpetrated anywhere in the world by those who provide services or act on our behalf. This can include contract staff, business partners, suppliers, contractors, agents, consultants, as well as any employee.

What you should and shouldn't do

Bribery and corruption

Everyone must follow standards of conduct that minimize the risk of corruption for Better Silver Spa. All our interactions with public officials or private individuals and companies must be open, transparent and conducted in an appropriate manner, in line with our business processes. This will ensure that no cases of bribery or corruption occur and avoid creating the impression or suggesting that we are behaving inappropriately.

You must:

- comply with the indications of this policy
- take reasonable steps to ensure that the agency, intermediary or any other business partner with whom you wish to deal is honest and not inclined to accept bribes
- keep correct, complete and accurate documentation and records
- always use approved commercial channels to make payments and never use cash or offshore accounts
- report any doubtful situations to the Management.

You must not:

- promising, offering or giving a bribe of any kind, either directly or through any third party
- request or accept a bribe of any kind, either directly or through any third party
- make facilitating payments on behalf of Better Silver Spa
- allow a private interest to influence your work for Better Silver Spa or avoid disclosing the connection to a person or company with whom we have a business relationship
- use your official position within the company for personal benefit.

If you are in doubt as to whether or not something is considered a bribe or whether or not an action is appropriate, you should contact Management.

Gifts and hospitality

They could be considered a form of bribery: offering or accepting gifts, hospitality, invitations to shows or events, donations for charity, or sponsorships to encourage or reward inappropriate behavior.

You must:

- Notify Management immediately if you (or your partner or relative) are offered a gift, tip, or hospitality and the donor agrees to expect something in return. Do not accept the offer as it could be a bribe.

You must not:

- request any gift from an individual or a company with which Better Silver Spa has a business relationship
- offering or accepting gifts, hospitality, donations for charity or sponsorship in order to influence a decision or to conceal a bribe
- offer or accept gifts in cash or cash equivalent, such as shares, gift vouchers or vouchers
- offer or accept gifts or hospitality that are not permitted by Better Silver Spa
- make any kind of donation for political purposes on behalf of Better Silver Spa, in cash or in kind (e.g. free use of premises owned by the company).

The main question to ask is the following: "Do I expect the business relationship to be improperly affected as a result of the gift, hospitality offer, donation or sponsorship in question?"

If the answer is "yes", it could be a bribe offer, so avoid proceeding. If you are unsure whether to offer or accept a gift or hospitality, you are required to contact the Management.

Consequences

Under Italian law, bribery and bribery are a crime. Your compliance with the principles set out in this policy and all applicable bribery and bribery regulations is therefore essential to protect both you and the company.

Everyone has a personal obligation to follow the provisions of this policy. Any violations may give rise to disciplinary action in accordance with the provisions of the CCNL applied. Better Silver Spa has the right to report any violations to the competent authorities.

In any case, no employee or collaborator may ever suffer sanctions or negative consequences for having identified aspects related to suspected corruption in good faith, for refusing to participate in corruption or to make a facilitator payment, even if such behavior could cause losses to the company.

If a business partner does not comply with the provisions of this policy, Better Silver Spa has the right to terminate the business relationship.

Bressanvido, 8th January 2026.

Better Silver SpA

