

Policy Anticorruption Kube Partners Italy S.r.l.

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1. Introduction

Kube Partners Italy is committed to conducting its business with integrity, transparency, and in compliance with all applicable laws and regulations. This Anti Bribery & Anticorruption Policy aims to prevent, detect, and address acts of corruption and ensure that all employees, officers, and third parties acting on behalf of the company are aware of their responsibilities.

2. Scope

This policy applies to all Kube Partners Italy employees, directors, officers, and third parties acting on behalf of the company, including agents, consultants, contractors, and suppliers.

3. Prohibition of Corruption

Kube Partners Italy prohibits all forms of corruption, including bribery, kickbacks, and any other form of unethical business conduct. No employee, officer, or third party may offer, give, request, or accept any financial or other advantage with the intention of inducing or rewarding improper conduct or influencing a decision.

4. Gifts and Hospitality

Kube Partners Italy acknowledges that the exchange of gifts and hospitality can be a normal part of business relationships. However, all gifts and hospitality must be reasonable, proportionate, and transparent. Employees and officers must not accept or offer gifts or hospitality that could be perceived as intended to influence a business decision or create a conflict of interest.

4. Third Parties

Kube Partners Italy expects all third parties acting on its behalf to comply with this Anti-Corruption Policy. The company will conduct appropriate due diligence on third parties and monitor their compliance with anti-corruption laws and regulations.

5. Reporting

Employees and officers have a responsibility to report any suspected or actual instances of corruption to their supervisor, the company's compliance officer, or through an anonymous reporting mechanism, if available. Kube Partners Italy is committed to protecting those who report in good faith from retaliation or discrimination.

6. Training and Communication

Kube Partners Italy will provide training on this policy and anti-corruption laws to employees and officers as needed. The policy will be communicated to all employees and third parties, and it will be made available on the company's website or internal communication platforms.

7. Monitoring and Review

Kube Partners Italy will regularly review and update this policy to ensure its effectiveness in preventing and detecting corruption. The company will also monitor compliance with this policy and take appropriate action in the event of any violations.

8. Penalties for Non-Compliance

Violations of this policy may result in disciplinary action, up to and including termination of employment or termination of the business relationship with third parties. In addition, individuals may be subject to legal penalties under applicable laws and regulations.