

# ANTI-BRIBERY POLICY

One of the key factor in the reputation of MASSIMO CAVALLI 1883 SRL company is the ability to conduct business with correctness, integrity, transparency, honesty in accordance with laws, regulations, that apply to the company's business. This Anti-bribery procedure is adopted with the intention of providing a systematic framework of Anti-bribery standards and procedures.

This Anti-bribery procedure is inspired by the principles of conduct involved in the Ethical Code and aims to provide employees with the rules to be followed to ensure compliance with the Anti-bribery Policy and Laws.

MASSIMO CAVALLI 1883 SRL adopts a firm and absolutely prohibited approach to any form of corruption. This anti-bribery policy applies to employees and associates of MASSIMO CAVALLI 1883 SRL who must comply with the highest standards of fairness in their conduct and moral integrity.

It's in fact the express choice of MASSIMO CAVALLI 1883 SRL to comply with all the laws, rules and regulations regarding the fight against corruption, in Italy as it operates in this country. The company is conducting its business activities and affairs in such a way that it is not involved in any corrupt act and that it does not facilitate or risk the involvement in illegal situations.

In particular, it is absolutely forbidden to:

- offer, promise, give, pay or authorise anyone to give or pay, directly or indirectly, money or other economic advantage or benefit of any kind to employees of customers/suppliers, managers of customers/suppliers or anyone representing customers/suppliers;
- accept the request or authorise someone to accept or solicit, directly or indirectly, a payment or economic advantage or other benefit from employees of customers/suppliers, customers/suppliers' managers or those representing customers/suppliers;

with the purpose of:

- induce the other party to perform its function incorrectly, in relation to the activity developed by MASSIMO CAVALLI 1883 SRL or in order to reward an activity developed with regard to MASSIMO CAVALLI 1883 SRL; influence the execution of an act or its omission in the interest of the company MASSIMO CAVALLI 1883 SRL; obtain, secure or retain a certain business or an unfair or unjustified advantage in relation to the conduct of the business of the company MASSIMO CAVALLI 1883 SRL.

It is also forbidden for all receivers to receive or obtain the promise of money or benefits, for themselves or for others, to commit or omit acts in violation of the obligations inherent in their office or the obligations of loyalty, even causing damage to the company itself.

All the limitations described concern not only cash payments but also any indirect benefits such as, for example: gifts, confidential information on products, courtesy expenses to third parties such as hospitality, meals, transport, entertainment.

MASSIMO CAVALLI 1883 SRL gives to the Anti-bribery policy the maximum diffusion among employees and partners, ensuring that it is understood and implemented by all. It is the responsibility of MASSIMO CAVALLI 1883 SRL to check that the document has been understood by the employees and, if necessary, to provide the requested clarifications

Yours faithfully,

Massimo Cavalli 1883 Srl

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