



## ANTI-CORRUPTION POLICY

### **1. Anti-Corruption**

Employee relations with customers and suppliers should be fair and honest, in strict compliance with contractual undertakings and applicable laws and regulations.

The giving or receiving of gifts or entertainment should remain within acceptable limits, having regard to what is customary and the provisions of anti-corruption legislation.

In case of doubt, employees shall obtain the approval of their management. Under no circumstances may employees solicit gifts or invitations.

Employees are prohibited from offering, promising, giving or receiving anything of value to/from any person or entity, in any manner, in the course of seeking or retaining business for the company, or for directing company business to such people or accepting business from such people on behalf of the company. Secret or illegal payments, favors, kickbacks, bribes or any other payment in any form whatsoever, to obtain benefits for the company will not be tolerated. All placements and acceptance of company business must be awarded purely on business considerations by the company.

Cheil Italy obtained the Anti-Bribery certification in 2020.

### **1.2 Provision of bribes for foreign officials**

- Prohibition of corrupt acts including offering bribes to public officials, etc.

### **1.3 Provision of bribes under the direction of clients or by contractors**

- Obligation to refuse bribes given or offered by the client
- Notify to the HQ Legal & Compliance Team
- No request to a vendor to offer bribes by proxy
- Execution of special covenants prohibiting corrupt acts with



vendors

✘ Compliance with the prohibition of money transactions

- No transaction with a vendor located in a tax heaven

- No transactions under the name of third party instead of vendor