Anti-Corruption Policy

Zero tolerance: we do not ask for, promise, offer or accept gifts or advantages in order to obtain favours.

AT A GLANCE

What this is about
The rules by which La Molisana Trasporti S.r.l. prevents corruption and handles reports of misconduct.

Who it applies to
Corporate bodies, managers, employees, internal and external collaborators, and third parties dealing with the company.

What to do
Read and apply the anti-corruption procedures. If you have a doubt or a suspicion, report it: you are protected.

How to report
Online platform (the “Reports” section of the website) or confidential mail to C.da Lecine 30, 86014 Guardiaregia (CB).

What corruption is

Corruption is the abuse of power by those who hold it, in order to obtain a personal benefit. Corrupt conduct can be recognised by two elements:

Distorted use of power
The power a person has been given is used improperly.

Personal benefit
The advantage goes to the person abusing the power or to a third party: a spouse, a relative or in-law up to the 2nd degree, a de facto partner or a person with whom they have an emotional bond.

In this document the following are relevant:

Violations
Violations of the Company's Code of Ethics, of the law, and of internal and external regulations.

Unlawful payments
Offering or receiving any payment, gift, loan, fee, prize, compensation or advantage of any kind, as an incentive to do, avoid or influence a decision.

Our values

The Company is committed to ensuring actions and conduct based solely on transparency, fairness and moral integrity, which prevent any attempt at corruption. In this way we comply with anti-corruption laws and with the commitments we have voluntarily undertaken by adopting our Code of Ethics.

What is not allowed

It is forbidden to request, promise, offer or receive gifts, favours or benefits, potential or actual, from or to parties outside the Company.

The ban applies to Personnel, to Partners and to anyone acting on behalf of the Company. External parties may be public officials, persons in charge of a public service, government representatives, public employees or private citizens, Italian or from other countries.

Gifts and benefits that lead to unlawful conduct, or that an impartial observer could read as a way of obtaining an advantage, even a non-economic one, regarded as significant by custom and common belief, are forbidden. Also covered are facilitations or guarantees of obtaining services that are in any case due in the course of business.

Every employee, director, manager, business partner and other external interested party must read, understand and apply the procedures and protocols of the anti-corruption management system, and behave accordingly.

Never

- ✕ request gifts, favours or benefits
- ✕ promise gifts, favours or benefits
- ✕ offer gifts, favours or benefits
- ✕ receive gifts, favours or benefits

Always

- ✓ read, understand and apply the procedures and protocols of the anti-corruption system
- ✓ report suspected cases in good faith
- ✓ immediately disclose any conflict of interest, actual or potential
- ✓ keep accurate and detailed accounting records

Our commitments

The whole organisation must know and share the company anti-corruption policy, which is based on these commitments:

Commitment of Top Management
Preventing corruption. Zero tolerance, appropriate procedures, an active role for management and effective communication are the framework for defining and achieving improvement objectives.

Reporting without fear
We encourage the good-faith reporting of suspected cases and we protect those who report in every way.

Sanctions

Any failure to comply with the prevention procedures and the contents of this policy is sanctioned.

Prevention Officer (RPCT)

The role of Officer for the Prevention of Corruption and Transparency (RPCT) is assigned to internal resources with adequate status, authority and independence: the Human Resources Manager, together with the Sole Director. They manage, handle and archive reports of improper or corrupt practices. If a report concerns the RPCT, it is handled by the Sole Director, who is the superior body.

Continuous improvement

We continually improve the processes for managing and preventing corruption risks.

Accurate accounting

Books and accounting records must be accurate and detailed. Inaccuracies or omissions, even without corrupt purposes, must be investigated and may breach this document, with responsibility for those who committed them. False entries may also give rise to tax and legal liability.

Partners of proven reputation. To avoid being involved through the conduct of third parties, agents, intermediaries, consultants and business partners, we work only with companies of proven reputation. Every business partner and supplier must comply with the Code of Ethics and the Supplier Code of Conduct and pass a mandatory ethical-requirements check.

Conflicts of interest

A conflict of interest exists when a person's personal interest or activity interferes, or may interfere, with the interests of the Company. **Every conflict situation must be disclosed promptly and assessed.**

For example, the following may give rise to a conflict of interest (non-exhaustive list):

- ⚠ economic and financial interests of the employee, the spouse, their relatives and in-laws, cohabiting partners and persons within their emotional sphere, as customers or suppliers of the company;
- ⚠ abuse of one's position in the Company or of information acquired through work;
- ⚠ pre-existing relationships with senior management;
- ⚠ work for suppliers or competitors;
- ⚠ acceptance of money, favours or benefits, on any basis, from parties who are or wish to become involved with La Molisana Trasporti.

How to report

Online platform
Access it via the link in the “Reports” section of the corporate website.

Mail
Ordinary or registered mail with return receipt, to: **La Molisana Trasporti S.r.l., C.da Lecine n. 30, 86014 Guardiaregia (CB)**, marked “personal and confidential – Reports/Whistleblowing”.

You report
In good faith, through the online platform or confidential mail.

The RPCT handles it
The Human Resources Manager and the Sole Director manage, handle and archive the report.

If it concerns the RPCT
The report is handled by the Sole Director, the superior body.

Confidentiality and no retaliation. We guarantee the confidentiality of sources and of the information reported, subject to legal obligations. We do not retaliate against or discriminate against those who have reported suspicious events or situations in good faith, or who have refused to take actions contrary to this policy, even if the refusal had economically negative consequences for the Company.

Document revisions

Rev. 00 · 02.12.2026
Drafted by Diego Carnevale. Approved by Margherita Berardini.

Our final commitment

We are convinced that this policy contributes decisively to improving overall management and to preventing corruption seriously and firmly. For this reason we undertake to make it known to all interested parties, together with the company's general rules formalised in the Code of Ethics.

Guardiaregia, 02.12.2026

The Sole Director
Margherita BERARDINI