



ANTI-CORRUPTION POLICY	Code
	ALL 4
	Rev.: 0 Date: 23.11.22 Page: 1/3

CM TRADING SRL confirms its commitment to fighting corruption by creating a reference system aimed at implementing a concrete anti-corruption policy over time. The fight against corruption is paramount within the company, addressing both the cases normatively defined as corruption and the connotations of maladministration. The Company repudiates and actively opposes all phenomena of a corrupt nature. The Company's relations with the Public Administration are based on the utmost transparency and correctness.

THE COMMITMENT AGAINST CORRUPTION

Code of Ethics – Ethical and behavioural principles

The Company adopts a general prevention strategy against all corrupt phenomena, extending its scope of application not only to crimes against the Public Administration, but also to situations in which – regardless of criminal relevance – a malfunction of the administration becomes evident due to the private use of assigned functions, or the contamination of administrative action from outside, whether such action succeeds or remains at the attempted level.

For these reasons, recipients of the Policy and the code of ethics are prohibited from giving or promising money or other benefits to administrators, general managers, executives responsible for drawing up company accounting documents, auditors, liquidators or to parties subject to the direction or supervision of the latter, belonging to companies or consortiums of clients, agents, distributors, franchisees, commercial partners, certifiers, consultants, service providers, suppliers in general, etc., from which a violation of official duties and loyalty by the corrupt party could result, causing harm to the third-party company.

It is not permitted, either directly or indirectly or through an intermediary, to offer money, gifts or compensation in any form, nor to exert illegal pressure, nor to promise any object, service, benefit or favour to managers, officials or employees of the Public Administration or to their relatives or cohabitants for the exercise of their own functions or powers, or to induce them to perform any act contrary to the duties of the Public Administration, carried out in favour of or in the interest of the Company.

The Company is committed to developing a culture of legality and integrity also among its own staff. The Company endeavours to ensure internal information flow, dialogue and consultation among all interested parties.

Gruppo CMT è un marchio di C.M.Trading S.r.l. | Tel.: +39068125553 – fax: +39068860148 – e_mail: amministrazione@cmtrading.it | www.gruppocmtrading.it

C.M.Trading S.r.l. | Via dei Prati Fiscali, 201 00141 Roma | P. Iva IT04077341008 | Reg. Imprese RM n. 04077341008 | Cap. Sociale € 200.000,00 i.v.

ANTI-CORRUPTION POLICY	Code
	ALL 4
	Rev.: 0 Date: 23.11.22 Page: 2/3



INVOLVEMENT OF MANAGERS/EMPLOYEES IN SPREADING THE ANTI-CORRUPTION CULTURE

The employee/manager observes the measures necessary for the prevention of unlawful acts within the Company. In particular, they observe the provisions contained in the Policy, provide their cooperation to the Corruption Prevention Officer and, while remaining subject to the obligation to report to the judicial authority, report to their direct hierarchical superior any situations of unlawfulness within the Company that they have become aware of. Staff are required to report any possible violation, presumed or declared, and/or of internal and/or external regulations, of ethical principles, of the Organisation and Management Control Model, by the Company, a colleague, a collaborator or a third party, including requests or offers of improper payments received from these.

The Company has implemented a structured organic system with the aim of guaranteeing, in particular, the protection of the confidentiality of the identity of the reporter and the prohibition of discrimination/penalisation/retaliation against them. The failure of an employee to report a known or suspected unlawful act of which they have become aware will, in itself, expose the employee to possible disciplinary action.

The holders of Processes/Activities at corruption risk identified in this Policy are required to:

- ▶ carry out information activities with respect to the RPC, ensuring the completeness and timeliness of the information flow;
- ▶ participate in the risk management process, collaborating with the Officer to identify prevention measures;
- ▶ ensure observance of the Code of Ethics and the Code of Conduct and the implementation of the planned prevention measures;
- ▶ adopt management measures aimed at managing the risk of corruption, such as the initiation of disciplinary proceedings, suspension and staff mobility;
- ▶ verify and guarantee the accuracy and completeness of data published/to be published;
- ▶ periodically update the RPC on the state of implementation of the ABMS or on any critical issues/violations encountered;
- ▶ carry out a reconnaissance of data possibly published in other sections of the site, reporting to the RPC in order to make the data published consistent, including through the use of IT solutions.

CM TRADING SRL has established an Anti-corruption Officer with the task of overseeing the operation and observance of the Model, to whom any conduct inconsistent with what is indicated in the Code of Ethics or the anti-corruption policy is to be reported, by sending the relevant correspondence directly to: Anti-corruption Officer – email: v.denti@cmtrading.it
Gruppo CMT è un marchio di C.M.Trading S.r.l. | Tel.: +39068125553 – fax: +39068860148 – e_mail: amministrazione@cmtrading.it | www.gruppocmtrading.it

ANTI-CORRUPTION POLICY	Code
	ALL 4
	Rev.: 0 Date: 23.11.22 Page: 3/3

All of this in compliance with the provisions for the protection of the authors of reports of crimes or irregularities of which they have become aware within the context of a public or private employment relationship. (Official Gazette, General Series no. 291 of 14-12-2017)

ROMA – 23.11.2022

