ANTI-CORRUPTION POLICY

(D.Lgs. 231/2001 - Code of Ethics and Conduct)

SAMP conducts its industrial and commercial activities in accordance with principles of fairness, integrity, and transparency, in compliance with the Organizational, Management and Control Model adopted pursuant to Italian Legislative Decree 231/2001 and with its Code of Ethics and Conduct. The prevention of corruption, in all its forms, is an essential condition for business sustainability and the protection of the Company's reputation.

SAMP is committed to:

• comply with the company's model 231 and code of ethics and conduct, which constitute binding references for the behavior of employees, managers, and collaborators;
• comply with all anti-corruption laws, regulations, and standards applicable in italy and in the countries where the company operates, including in relations with customers, suppliers, and supply chain partners;
• pay particular attention to processes most exposed to corruption risk, including supplier qualification and selection, tender procedures, relations with public authorities for permits and plant authorizations, gifts, and donations;
• guarantee the independence and authority of the supervisory body and the compliance function in carrying out their monitoring and control activities;
• promote confidential whistleblowing channels protected against retaliation, enabling the good-faith reporting of suspicious conduct;
• ensure periodic training of personnel, with particular focus on the purchasing, sales, and public relations functions;
• perform due diligence checks on third parties (suppliers, agents, consultants, and business partners) before establishing business relationships;
• prohibit, directly or indirectly, the offering, promising, or giving of money, economic benefits, or other advantages to public or private parties for the purpose of obtaining improper benefits;
• prohibit the acceptance or solicitation of payments, benefits, or personal advantages in exchange for actions contrary to official duties or loyalty obligations towards the company;
• prohibit any form of threat or retaliation against anyone who refuses to engage in corrupt conduct or reports such conduct.

This Policy is applicable to all persons acting on behalf of **SAMP**, including employees at all levels, managers, agents, contractors, external consultants, business partners, and any other individual associated with the Company, both in Italy and abroad.

Any violation of the provisions of this Policy shall result in disciplinary measures, including dismissal or termination of existing contractual relationships, without prejudice to any criminal consequences provided by law. Management at all levels is responsible for ensuring that personnel under their supervision are aware of, comply with, and receive adequate training on this Policy.

Granarolo dell'Emilia (BO), 05/10/2026

Legal Representative

