



ANTI-FRAUD POLICY

The aim of this anti-fraud policy is to set the basis for the identification and prevention of actual and/or potential frauds against the ILTOM GROUP.

ILTOM GROUP has zero tolerance towards fraudulent conduct and undertakes to respect the principles and ethical behaviour set forth in the Group Code of Ethics. All people concerned by this policy are required to adopt the same behaviour and commitment.

This policy applies to all employees of the ILTOM GROUP, as well as to consultants, suppliers, contractors and, generally, to all the corporate stakeholders.

Fraud shall mean any illegal and intentional action characterized by trickery, concealment or violation of the relationship of trust, carried out with the aim of obtaining an unauthorized and unfair advantage and/or of damaging the ILTOM GROUP, mainly through:

- Misappropriation of tangible and intangible assets;
- Commercial frauds;
- Corruption (*see the ILTOM GROUP anti-corruption policy*);
- Fraudulent misrepresentation and false declarations.

All individuals concerned are required to report any suspicion of potential frauds or any irregularities to the office in charge, by sending an email to **sicurezza@iltom.it**

All information received, as well as the person's identity, will be kept confidential, as far as possible; anyone reporting any suspicion or fraudulent activities, will be protected by the Company against any retaliation.

This policy is communicated and available to all employees and made available to all stakeholders on the corporate website.

Romanengo, 19/02/2020
The ILTOM Group MANAGEMENT