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ANTARES VISION GROUP ANTI-CORRUPTION POLICY

Approved by Antares Vision Board of Directors on the 31st of January 2023.

INTRODUCTION & PURPOSE

Antares Vision Group conducts its business activities according to principles of legality, integrity, fairness, and transparency as set out in its Code of Ethics. The Code of Ethics, approved by Antares Vision and extended to the companies of Antares Vision Group, reports the guidelines of conduct and the common values, such as legality, correctness, and transparency, which inspires Antares Vision Group for the attainment of its economic, production and social aims.

In this context, Antares Vision Group is aware that corruptive practices, which are often associated also with other forms of crime, such as organised crime and money laundering, are a serious threat to business continuity and to the ethical and legal values in which Antares Vision Group believes and on which it bases its business operations.

This awareness has directed Antares Vision Group towards the adoption of this Policy as an integral part of its social responsibility, to protect itself and its stakeholders.

With this Policy Antares Vision Group aims to express its commitment to countering corruption phenomena, defining general and specific principles to prevent potential corruptive practices, and promoting integrity, traceability, accountability, transparency and good faith in the management of business.

The purpose of this Policy is to avoid all conduct non-compliant with Anti-Corruption Laws is likely to result in the application of sanctions against Antares Vision Group and its staff, with consequent economic, reputational and image damages.

This Policy has been drawn up in compliance with the main international conventions on anti-corruption, as well as the main applicable laws and regulations in each country where Antares Vision Group conducts its business activities.

1. GLOSSARY

Capitalized words in this Policy have the following meanings, whether used in singular or plural form:

Affiliates: means companies in which Antares Vision has a non-controlling interest.

Antares Vision: means Antares Vision S.p.A., with its registered office in Via del Ferro 16, Travagliato (BS), registered at no. 02890871201 on the register of enterprises of Brescia.

Antares Vision Group: means Antares Vision and its Subsidiaries.

Anti-Corruption Laws: means the current, local, and international law and regulation on Corruption and Bribery¹.

Bribe: occurs when one person offers, pays, seeks, or accepts a payment, gift, favour, or a financial or other advantage from another to improperly influence a business outcome, or to induce or reward improper conduct.

Business Partners: means agents, brokers, distributors, and technical services providers.

¹ These include, by way of example and not exhaustive:

- **United Nations Convention against Corruption** (also known as "Merida Convention"), which came into force on 14 December 2005.
- **Convention on combating bribery of foreign Public Officials in international business transactions**, adopted by the Organisation for Economic Co-operation and Development ("OECD") on 21 November 1997.
- **Legislative Decree N. 231/2001** concerning the Italian provisions on administrative liability of legal entities, companies and associations, including those lacking legal personality.
- **UK Bribery Act 2010** concerning the English provisions on prevention of corruption and entered into force on July 2011.
- **U.S. Foreign Corrupt Practices Act (FCPA)** of 1977, as amended.
- **Sapin II**, French Law aimed at combating corruption passed in December 2016.

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Customers: means all those to whom Antares Vision Group sell its goods and services.

Bribery or Corruption: has the meaning ascribed to it in Section 3.

Facilitation Payments: has the meaning ascribed to it in Section 5.1.

Policy means this Anti-Corruption Policy.

Public Authorities: means the public officials, the public service officer or, more generally and without limitation, officials of public administrations, whether international, national, or local, as well as representatives of independent administrative authorities, such as the data protection authority and supervisory authorities.

Recipients: has the meaning ascribed to it in Section 2.

Subsidiaries: means any company in which Antares Vision has a controlling interest. According to Consolidated Financial Statements, Antares Vision controls a subsidiary if, and only if, it has: (i) power over the entity it has invested in (or holds valid rights that give it the current ability to control the significant activities of the entity it has invested in); (ii) exposure or entitlement to variable returns, deriving from its relationship with the entity it has invested in; (iii) the ability to exercise its power over the entity it has invested in to affect the amounts of its returns.

Suppliers: means suppliers of goods and services, including advice and professional services.

Third Parties: means collectively Suppliers, Business Partners, and Customers.

2. SCOPE OF APPLICATION AND RECIPIENTS

The Policy applies to Antares Vision and its Subsidiaries.

Each company of Antares Vision Group must adopt this Policy in compliance with its corporate governance system.

Therefore, the Policy is addressed to all members of the corporate bodies, employees, officers, collaborators, suppliers of goods and services, consultants and in general anyone who has a business relationship with Antares Vision Group, regardless of the legal nature of the relationship (the "**Recipients**").

All Recipients are required to know the provisions of the Policy and to actively contribute to its implementation, reporting any flaws or violations. For this purpose, Antares Vision Group undertakes to promote knowledge of the Policy to all Recipients.

The Policy is also brought to the attention of the Affiliates in order to promote conduct consistent with those adopted by Antares Vision Group. Therefore, Antares Vision Group requires Affiliates to sign a declaration of acknowledgment and knowledge of this Policy, committing themselves to compliance with the principles contained therein.

If the local Anti-Corruption Laws are more stringent than the provisions identified in this Policy, Recipients shall comply with the local Anti-Corruption Laws. At the same time, Antares Vision Group recognizes that local applicable laws and regulations may, in some countries, be less restrictive than the terms of this Policy. In this event, Recipients are required to comply with this Policy even if it prohibits conducts allowed by Anti-Corruption Laws.

3. WHAT IS BRIBERY?

For the purpose of this Policy "**Corruption**" or "**Bribery**" means, without limitation, any corruptive practice involving money or other benefits, facilitation payments and any other unlawful practice such as embezzlement, fraud, nepotism, collusion and abuse of power. For the purposes of this Policy, the terms Corruption and Bribery will be used synonymously.

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Bribery consists in any conduct aimed at obtaining or maintaining an undue advantage through:

- offering, promising or giving – directly or through an intermediary – of money or other utilities, even non-economic, to someone in order to perform, to abstain from or to delay an act that is within the scope of his or her function or office or in breach of his or her duties or obligations (so called “active Corruption”);
- requesting, receiving, or accepting – directly or through an intermediary – of money or other utilities, even non-economic, to/from someone in order to perform, to abstain from or to delay an act that is within the scope of his or her function or office or in breach of his or her duties or obligations (so called “passive Corruption”).

Depending on the counterparty, two different forms of Corruption can be identified:

- Corruption of private entity: Corruption in the context of business relations between Antares Vision Group and any Third Party.
- Corruption of public entity: Corruption in the context of relations between Antares Vision Group and any Public Authority.

Corruption, whether involving Third Parties or Public Authorities, is always prohibited.

Corruption takes place not only through the giving or acceptance of money, but also through any other utility, such as gifts, hospitality and entertainment, funding to political parties or charitable donations, as well as any other benefit that may improperly influence a Third Party, such as the offer of employment or the sponsorship of an event.

Corruption occurs even if the corrupt process is denied or interrupted or fails to provide the expected effects.

Corruption exists with the intent or desire to wrongfully influence a recipient, even if the offer, promise or payment itself is denied or interrupted or fails to provide the expected effects.

4. GENERAL PRINCIPLES

Antares Vision Group has an approach based on the principle of “zero tolerance” to all form of Corruption and promotes fairness in engaging in its business activities.

In no way, the belief of acting in Antares Vision Group’s interest justifies conducts contrary to this principle.

Antares Vision Group forbids giving, promising, requesting or accepting money or other utilities in the context of relations with public or private parties, to improperly obtain or retain a business relationship or any other undue advantage in favor of Antares Vision Group.

In particular, Antares Vision Group carries out its business activities according to the following principles:

- **legality and integrity**: each activity must be performed in compliance with all applicable laws and regulations, both domestic and foreign. The activities must also take place in compliance with the procedures and policies adopted by each company part of Antares Vision Group and the lack of adequate knowledge of the regulatory and procedural context cannot be justified in any way.
- **impartiality**: business activities must be conducted with professionalism, transparency, and impartiality.
- **segregation of duties**: generally, this means that no one person should have the ability to: (i) initiate a transaction, (ii) approve a transaction, (iii) record a transaction, (iv) reconcile a balance, (v) handle or have custody and/or authority over assets, and (vi) review reports over those same transactions/assets. At least two sets of eyes are required for any transaction.

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- **accountability:** signatory powers must be consistent with the responsibilities assigned, adequately formalized, and clearly defined, possibly providing for spending limits.
- **traceability:** all activities must be properly tracked, and the related documentation properly archived.

Recipients must avoid any situation that may constitute or give rise to a conflict (actual or potential) between personal interests (economic or otherwise) and the duties performed or function held.

Each company of Antares Vision Group shall adopt specific procedures for managing of any conflict of interest, in coordination with Antares Vision.

5. AT-RISK AREAS

Antares Vision Group has defined specific principles aimed at combating Corruption, identifying the following areas of activity that could potentially expose Antares Vision Group to the risk of Corruption:

- relations with Public Authorities;
- business relations with Third Parties;
- gifts and business hospitality;
- donations and sponsorships;
- contributions to political parties and trade unions;
- managing human resources;
- record keeping.

All Recipients are required to conform their behaviours to the specific principles described below, promoting the highest standards of conduct in all business relations.

5.1. RELATIONS WITH PUBLIC AUTHORITIES

Antares Vision Group's relations with Public Authorities must be based on the strictest compliance with Anti-Corruption Laws.

These relations must not compromise in any way Antares Vision Group's integrity and reputation, and they must be managed according to principles of fairness, loyalty, and maximum transparency.

Antares Vision Group does not tolerate relations with Public Authorities that could appear or be perceived as ambiguous or inappropriate.

Antares Vision Group does not unduly influence the autonomy of judgement and the objectivity of public authorities to obtain or encourage the obtaining of any undue advantage.

The relations with Public Authorities are exclusively reserved for previously identified and authorised company figures. These relations must always be based on fairness, traceability, absolute transparency, and cooperation, in the strictest compliance with Anti-Corruption Laws.

For this purpose, it is prohibited to:

- give or promise, directly or indirectly, money or other utilities to Public Authorities or to persons close to or reported by them;

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- force or induce Third Parties, directly or indirectly, to give or promise money or other utilities to Public Authorities or to persons close to or reported by them;
- propose, directly or indirectly, employment or business opportunities that may unduly benefit Public Authorities or persons close to or reported by them.

With particular reference to relations with Public Authorities, Antares Vision Group undertakes to strictly observe local regulations, comply with any request from these authorities in their inspection functions, with a collaborative spirit.

Inspection visits must be managed by Antares Vision Group's authorised personnel, with correctness and transparency, with an absolute prohibition on hindering the regular course of the inspection activities.

All relations with Public Authorities must be traced and the related documentation must be appropriately archived.

In many countries Facilitation Payments are a common practice to obtain or expedite a practice with Public Authorities, such as a visa, a customs clearance, a license, or other types of authorization. For the purpose hereof "**Facilitation payments**" means payments, generally of low value, made to a public official to facilitate or expedite nondiscretionary actions or services, within the scope of the public official's own duties.

However, Facilitation Payments are a type of Bribe; therefore, Antares Vision Group **expressly prohibits** any form of Facilitation Payments, **even if permitted by local laws**.

5.2. BUSINESS RELATIONS WITH THIRD PARTIES

Antares Vision Group is committed to establishing business relations with Third Parties in a transparent and ethical manner and to conducting business relations with Third Parties that comply with Anti-Corruption Laws and that, more generally, demonstrate integrity in business.

Antares Vision Group has defined general principles to be applied in business relations with Third Parties, as described below.

Relations with Third Parties must be transparent, fair, based on mutual loyalty and cooperation and must take place in compliance with the Anti-Corruption Laws.

Antares Vision Group establishes relations only with reputable Third Parties who are engaged in lawful activities.

Relations with Third Parties must be managed on written agreements (*e.g.*, orders, offers, contracts or letters of assignment), signed by persons with adequate powers of attorney, complying with the current regulations. These agreements shall indicate the object of the contract, the fees, and the payment methods.

Subcontracting must be authorised.

The economic conditions must be adequate, fair, and aligned to market conditions.

The conclusion or renewal of any agreement with a Third Party must be suspended if corrupt conduct is observed or suspected, pending the investigation by the competent functions.

Antares Vision Group manages relations with Third Parties avoiding all corruptive practices.

Payments not deriving from an agreement or intended for a party other than the one indicated in the agreement are not allowed unless the assignment to a Third Party has been expressly agreed between the parties of the agreement.

It is forbidden to make or accept cash payments to or from a Third Party beyond the thresholds provided for by current legislation. Payments exceeding such amounts must be made exclusively using channels that ensure traceability and transparency, in accordance with law provisions.

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All relations with Third Parties must be traced and the related documentation must be appropriately archived.

This Policy must be brought to the attention of Third Parties when signing the agreements.

In addition to the general principles set forth above, Antares Vision Group has also defined specific principles to be applied in business relations with Third Parties, as described below.

5.2.1. SUPPLIERS

Antares Vision Group undertakes not to preclude Suppliers, if they meet the requirements, from competing for an agreement.

The selection of Suppliers and the determination of purchasing conditions must be based on objective criteria assessing the quality of the goods or services purchased, the price and the ability to guarantee the highest standards of supply.

The Supplier selection process must be objective, transparent and, to the extent possible, must guarantee the competitive comparison between several Suppliers.

Suppliers must be verified in order to assess their technical and operational capabilities and their good standing.

Before proceeding with the payment, the effectiveness of the services rendered by Suppliers must be verified, as well as ascertained the adequacy of the fees to be paid. The fees paid to Suppliers must be consistent with market conditions and adequately documented.

In relations with Suppliers, it is forbidden to accept or offer gifts, gratuities, benefits, or other utilities, unless they are not of low value, related to normal business or courtesy practices and provided that Antares Vision Group's integrity and reputation are not compromised.

This is in order to avoid improperly influencing relations with Suppliers themselves.

In particular, it is forbidden to give or promise money or other benefits to the employees and/or representatives of a Supplier in order to obtain an undue advantage (e.g., an unjustified discount). Similarly, it is forbidden to accept money or other benefits in exchange for granting most favourable conditions in the conclusion of a supply contract.

5.2.2. BUSINESS PARTNERS

The selection of Business Partners must be based on objective criteria in order to verify and assess their capabilities and good standing.

If commissions are provided to them, the calculation methods must be predefined.

All payments to a Business Partner must be authorized by a person with adequate powers of attorney, after verification of the execution of the services.

5.2.3. CUSTOMERS

With respect to the relationship between Antares Vision Group and its Customers applied prices, discounts and promotions must be managed in accordance with company procedures and must be duly authorized by the competent functions. Economic conditions must be adequate, fair and aligned to market conditions.

It is forbidden to accept or offer gifts, gratuities, benefits, or other utilities, unless they are not of low value, related to normal business or courtesy practices and provided that Antares Vision Group's integrity and reputation are not compromised.

It is forbidden to give or promise money or other utilities to Customers in order to apply conditions not justified by the contractual relationship, as well as to facilitate irregularities or fraud. For example, it is forbidden to give money or other

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utilities to a Customer in order to encourage him to make purchases or to accept certain prices. Similarly, it is forbidden to accept money or other benefit in exchange for granting certain discounts to the Customer.

5.3. GIFTS AND BUSINESS HOSPITALITY

Antares Vision Group recognizes that, in some circumstances, gifts and forms of hospitality are an established practice for building or maintaining good business relations.

However, caution is always necessary, as offering or accepting gifts or forms of hospitality could be seen as an attempt to inappropriately influence a business behaviour or decision.

Antares Vision Group does not prohibit the offering or accepting of gifts or forms of hospitality. However, the following principles and local applicable laws must be observed.

5.3.1. GIFTS

No gifts, which could even be interpreted as exceeding normal business or courtesy practices aimed at obtaining preferential treatment in the conduct of any activity connected to Antares Vision Group, are permitted.

Gifts must be of small value and cannot be in cash or cash equivalent (such as gift vouchers), regardless of the value.

A gift is considered of small value when the amount is reasonable and proportionate, related to normal business or courtesy practices and provided that Antares Vision Group's integrity and reputation are not compromised.

However, it is forbidden to offer or accept to/from the same person several small gifts in a short time frame.

Gifts, offered and accepted, must also be:

- appropriate and in good faith;
- such that they do not (i) compromise the integrity and reputation of any of the parties to the relationship, or (ii) engender the impression that they are aimed at acquiring, maintaining or rewarding undue benefits or exercising an unlawful or improper influence over the activities or decisions of the beneficiary;
- offered or accepted in Antares Vision Group's name;
- traced and duly authorised by the hierarchical superior.

Gifts received may be shared and redistributed within the company, in the most democratic and inclusive way possible (e.g., gifts received on Christmas holidays).

It is always forbidden to offer or accept any form of gifts to/from national or foreign Public Authorities or to/from anyone close to or reported by them.

If the gift does not comply with this Policy, it is necessary to refrain from giving it or, if received, it must be refused or returned, informing the hierarchical superior.

Each company of Antares Vision Group shall adopt specific procedures on gifts, setting amount limits, types allowed and related authorisation levels, in coordination with Antares Vision.

5.3.2. BUSINESS HOSPITALITY

Business hospitality means any form of convivial occasion, food and lodging offered or received, in the context of business activities, such as meals, travel expenses, invitations to sporting, musical, cultural events and any other occasion of entertainment.

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It is not forbidden to offer or accept business hospitalities. They can be considered as acts of courtesy intended to develop better business relationships; however, they should not influence, or appear to be an attempt to influence, the beneficiary.

Therefore, the expenses related to business hospitality must be:

- of modest value and occasional;
- transparently paid or accepted;
- paid or accepted in Antares Vision Group's name;
- authorized by the hierarchical superior and properly traced;
- not in cash.

It is always forbidden to offer or accept any form of business hospitality from/to national or foreign Public Authorities or from/to anyone close to or reported by them.

If the business hospitality does not comply with this Policy, it is necessary to block the expense or refuse the invitation, informing the hierarchical superior.

Each company of the Antares Vision Group shall adopt specific procedures on business hospitality and any reimbursement of employees' travel expenses, setting amount limits, types allowed and related authorisation levels, in coordination with Antares Vision.

5.4. DONATIONS & SPONSORSHIPS

5.4.1 DONATIONS

Donations are designed to provide material or financial support to a work or a person to carry out charitable activities without any fee in exchange for Antares Vision Group or for one of its employees (and not even for a low value).

Donations must not be made if they could be interpreted as a way of influencing the independence of judgement or of obtaining preferential treatment or undue advantage.

Cash donations are not allowed.

Donations can only be made to charitable organizations and non-profit organizations, established in compliance with current legislation, well-known, reliable in terms of transparency, honesty, and fair business practices.

Donations must be approved by persons with adequate powers of attorney.

Donations to accounts other than that of the beneficiary are not allowed.

All donations must be traceable and appropriately documented. In particular:

- the recipient must be adequately identified;
- the nature and reasons underlying the donation must be adequately traced.

The provisions of this Section are not intended to replace the requirements of Antares Vision Group's donations & sponsorships policy, which also must be observed.

5.4.2 SPONSORSHIPS

Sponsorships consist in the provision of either material or financial support to a person, organization or event with the aim of promoting one or more Antares Vision Group brands.

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Antares Vision Group allows to carry out sponsorships initiatives with the aim of institutional promotion of the corporate image, creation of visibility and good reputation.

Sponsorships shall not create even just a potential conflict of interest with Antares Vision Group. This means that there must be no conflict of interest, even if only potential, between the beneficiary of the sponsorships and Antares Vision Group. Conflicts of interest arises when an interest interferes or even appears to interfere with the best interests of Antares Vision Group.

Sponsorships must be approved by persons with adequate powers of attorney.

To avoid that sponsorships can be considered as disguised benefits in favour of a Third Party to obtain an undue advantage, sponsorships must be regulated by written contracts signed by persons with adequate powers of attorney.

Sponsorships must comply with criteria of reasonableness and proportionality in relation to the amount of the estimated financial commitment.

It is required to preventively ascertain the nature and relevance of the initiative, the identity and reputational profile of the recipients of the sponsorship and the consistency of the initiative with the values of Antares Vision Group.

In addition, the real implementation of the initiative itself and its consistency with the proposed programme must be verified.

The provisions of this Section are not intended to replace the requirements of Antares Vision Group's donations & sponsorships Policy, which also must be observed.

5.5. CONTRIBUTIONS TO POLITICAL PARTIES AND TRADE UNION

Antares Vision Group does not make contributions of any kind, either directly or indirectly, to political parties, political organisations and trade unions and their representatives or candidates, whether local or foreign, except to the extent established and permitted by local laws and provided that the contribution cannot be interpreted as an attempt to obtain preferential treatment or undue advantage.

5.6. MANAGING HUMAN RESOURCES

The selection, recruitment and management of human resources must take place according to principles of fairness and impartiality, in full compliance with the law.

The selection of candidates must be based exclusively on criteria of professionalism and experience, avoiding any form of favouritism.

In the management of human resources, the following principles must be respected:

- the recruitment must be justified by real and concrete needs or necessities proven and authorised by subjects with decision-making power;
- the selection process must be formalised and guarantee the absence of favouritism between the recruiter and the candidate;
- the periodic assessment of employees, the granting of fees, bonuses, gratifications, and career advancement must be based on objective, verifiable and transparent criteria.

No employees may be hired, nor a career advancement or salary increase may be recognized on the basis of recommendations by Third Parties and/or in exchange for favours or other advantages for Antares Vision Group.

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All processes related to human resources management must be traceable, the decisions formalized and the documentation complete and properly archived.

5.7. RECORD KEEPING

Antares Vision has been listed on the Euronext Growth Milan stock exchange and, therefore, effectively transparency requirements should be adopted by all the companies in Antares Vision Group, notably regarding the financial information.

Each company of Antares Vision Group adopts internal control systems and specific procedures able to provide reasonable assurance that Antares Vision Group's transactions are accurately recorded in accounting records in compliance with local laws.

The accounting department at Antares Vision coordinates, monitors, and instructs all relevant companies to prepare a timely and complete disclosure of their financial figures to provide the market with a true and fair view of the assets and liabilities, results, and financial position of the issuer and of the group of companies included in the consolidated financial statements.

Every operation or transaction has to be correctly recorded in the accounting system, in accordance with the criteria indicated by Antares Vision Group Accounting Manual, the applicable accounting standards and the law. It must also be authorised, verifiable, lawful, consistent, and proper.

Supporting documentation that is suitable for facilitating accounting entries, enabling the transaction to be constructed and identifying any responsibility must be kept in the records for each transaction.

Each receipt and payment must be:

- adequately justified;
- verified and authorized by the reference manager;
- properly and promptly recorded in accounting records.

Accounting records can only be made by entitled persons.

Persons in charge of verifying the correctness of the registration process and the accuracy of the transactions that flow into the balance sheet must be identified.

6. REPORTING VIOLATIONS

Recipients must promptly report any actual or suspected violations of the Policy or any other corruptive practice.

Reports should be made in writing, preferably in a non-anonymous way. Reports must be made in good faith and must be both specific and detailed. In any event, the information provided will be treated confidentially.

For this purpose, any violation of the Policy must be reported through Antares Vision Group's whistle blower reporting process, accessible at the following link: <https://www.antaresvision.com/whistleblowing>

The confidentiality of the identity of people making reports is in any case guaranteed. Any measures of retaliation or discriminatory nature adopted against the person who made the report are in no way tolerated.

In particularly, Antares Vision Group guarantees that no one will be discriminated against in any way for having (i) refused to carry out unlawful conduct, even if that refusal results in prejudicial consequences for Antares Vision Group, or (ii) having made a report in good faith.

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If the report was made in good faith, no sanctions may be applied against the whistle-blower, even if the report turns out to be unfounded.

7. COMMUNICATIONS AND TRAINING

Antares Vision Group promotes the awareness of the Policy among all Recipients. For this purpose, the Policy must be made available to all Recipients, according to the procedures defined by Antares Vision Group.

The Policy is also published, in Italian and English version, on the website of Antares Vision Group.

Any doubts concerning the application of this Policy shall be addressed to Antares Vision CFO and to Antares Vision General Counsel.

Antares Vision Group must develop appropriate training and awareness programs regarding this Policy, to strengthen its internal compliance culture and to increase understanding and awareness of Anti-Corruption Laws and the Corruption risks potentially present in the conduct of business among the entire group.

8. DISCIPLINARY MEASURES

Antares Vision Group sanctions violations of this Policy in accordance with local laws.

Failure to comply with this Policy may lead to the application of disciplinary measures against the employee, in accordance with the applicable local law, with any legal consequences, also with regard to the preservation of the employment relationship and any compensation for damages arising from the violation itself.

Compliance with the provisions of this Policy should be considered as an essential part of the contractual obligations taken by any other subject having business relations with Antares Vision Group. Therefore, any violation of the Policy may constitute a breach of contract, with any legal consequences, with regard to the termination of the contract and the consequent compensation for damages arising.

It is Antares Vision Group's responsibility to ensure that Recipients contractually agree to comply with this Policy.

9. MONITORING

Each company of Antares Vision Group ensures that its internal control system is consistent with the requirements established by the Anti-Corruption Laws and with the principles contained in this Policy.

Corporate procedures must ensure appropriate preventive measures against Corruption, according to a criterion of proportionality with respect to the (i) risk of commission of corrupt acts and (ii) nature, size and complexity of the activities performed.

In order to verify compliance with this Policy, Antares Vision Group occasionally carries out preventive monitoring towards all Recipients.

10. APPROVAL AND REVIEW

This Policy is approved by the Board of Directors of Antares Vision. Any updates to the Policy will be promptly brought to the attention of the companies of Antares Vision Group, for appropriate adoptions by the respective administrative bodies.