

Anti-corruption Policy



ASCENDI has zero tolerance for any form of corruption.

ASCENDI's ethical culture, formalised in its Code of Conduct, and its commitment to preventing and combating corruption, provided in particular in its Anti-corruption Governance Manual and in the Plan for the prevention of risks of corruption and related infractions (PPR), promotes the highest standards of corporate responsibility and integrity, including them in its relations with all stakeholders, whether internal or external.

Scope and Objectives

Establish the principles and guidelines by which ASCENDI is governed with a view to:

- (i) Prevent any type of corruptive practices by its Employees or by Third Parties related to it;
- (ii) Enforce applicable anti-corruption laws and regulations,
- (iii) Protect Ascendi's reputation by not accepting corruptive conduct, and,
- (iv) Assert a solid culture of integrity.

This Policy applies to all the entities that make up ASCENDI, to all its employees, regardless of the nature of the contractual relationship, function or place where they carry out their activity, and to any Third Parties that relate to them, namely service providers, suppliers, partners and other stakeholders

Principles

ASCENDI strives to comply with all laws, regulatory conditions and normative requirements to fight and prevent corruption through the adoption, namely, of the following Principles:

- Promotion of a corruption-free business environment;
- Implementation of an anti-corruption management system;
- Observance of strict anti-corruption principles in all business dealings and interactions with external parties, including partners, government agencies and any other stakeholders;
- Establishment and continuous improvement of a system to fight and prevent corruption through, in particular, the implementation of a regulatory compliance programme that includes the adoption of a Code of Conduct, a whistleblowing channel and a PPR, available through ASCENDI's institutional website, as well as a training programme for its employees;
- Defence of the values of transparency and good governance in matters of corruption, which translates into the adoption of an Anti-corruption Governance Manual;
- Appointment of an internal, independent person responsible for ensuring compliance with the system for combating and preventing corruption.
- Encourage the initiation of disciplinary proceedings and the possible participation in criminal or civil proceedings under the terms and based on the applicable law, to any employees who fail to comply with the rules and obligations related to corruption contained in the Code of Conduct or in the law.

- Promote the application of contractually provided mechanisms in the event that a Third Party, with which ASCENDI has a relationship, adopts corruptive conduct that is not in line with this Policy or with the provisions of our Code of Conduct, whenever it is found that those Third Parties are bound by these documents through a contract entered into with ASCENDI.