EMPOWER CONSULTING LIMITED
EASY SOLUTION

ECL-CMP-002 REV.00

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

STATEMENT FROM THE MANAGING DIRECTOR

Empower Consulting Limited operates in international business environments where integrity is a fundamental requirement for building trusted relationships with clients, business partners, suppliers, public institutions and local communities.

We recognize that any form of bribery, corruption or improper conduct may compromise not only the reputation of our Company, but also the confidence that our clients and stakeholders place in us.

For this reason, **Empower Consulting Limited** adopts a zero-tolerance approach towards bribery, improper payments and any conduct intended to obtain undue or improper advantages.

All business decisions shall be made solely on the basis of professional competence, the quality of the services provided, transparency and full compliance with applicable laws and regulations.

This Anti-Bribery & Anti-Corruption Policy establishes the principles and standards of conduct that every individual acting on behalf of the Company is required to observe and represents a key component of the Company's Corporate Compliance framework for preventing, identifying and combating all forms of bribery and corruption.

As Managing Director, I reaffirm my personal commitment to promoting a corporate culture in which integrity, legality, transparency and accountability remain fundamental principles guiding every decision and every professional relationship.

I would like to thank everyone whose daily commitment and ethical conduct contribute to protecting the reputation, credibility and integrity of Empower Consulting Limited.

Ennio Luca Domicoli

Managing Director

Empower Consulting Limited

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1. PURPOSE

This Anti-Bribery & Anti-Corruption Policy establishes the principles, commitments and standards of conduct adopted by **Empower Consulting Limited** to prevent, identify and combat all forms of bribery, corruption and other unlawful practices that may compromise the integrity of its business activities.

The Company recognizes that the prevention of bribery and corruption is essential to safeguarding its reputation, maintaining business relationships based on trust and ensuring responsible, transparent and ethically sound business management.

This Policy forms an integral part of the Company's Corporate Compliance framework and shall be read in conjunction with the Code of Ethics and Business Conduct, the Whistleblowing Policy and the other documents forming part of the Company's Integrated Management System.

Through this Policy, **Empower Consulting Limited** reaffirms its commitment to conducting business exclusively in accordance with the principles of legality, fairness, impartiality and transparency, regardless of the country in which it operates.

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2. SCOPE

This Policy applies to every individual acting on behalf of **Empower Consulting Limited,** regardless of their position or the nature of their professional relationship with the Company.

The provisions contained in this Policy are binding upon directors, employees, consultants, contractors, temporary or seconded personnel, suppliers, subcontractors, business partners and any other individual or organization acting in the interests of, or representing, the Company.

All recipients are expected to understand, comply with and uphold the principles set out in this Policy, actively contributing to the prevention of conduct that is inconsistent with the Company's values and reporting any circumstances that may constitute a breach of its provisions.

Empower Consulting Limited promotes the communication of this Policy throughout its organization and encourages its business partners to adopt equivalent ethical standards within their own organizations.

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3. COMMITMENT AGAINST BRIBERY AND CORRUPTION

Empower Consulting Limited adopts a zero-tolerance approach towards bribery and corruption in any form.

The Company strictly prohibits any direct or indirect conduct intended to offer, promise, request, authorize or accept improper advantages for the purpose of obtaining or retaining business, influencing decisions or securing preferential treatment.

All business activities shall be conducted exclusively on the basis of professional competence, the quality of the services provided and full compliance with applicable laws and regulations, without resorting to unlawful practices or conduct that is inconsistent with the principles of fairness and transparency.

The Company is committed to fostering a corporate culture in which every decision is made independently, impartially and responsibly, while implementing proportionate measures to prevent bribery and corruption risks throughout its operations and in its relationships with clients, suppliers, business partners, consultants and public authorities.

Empower Consulting Limited encourages all recipients of this Policy to actively contribute to the prevention of bribery and corruption by promoting ethical conduct and promptly reporting any situation that may pose a risk to the integrity of the Company.

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4. STANDARDS OF CONDUCT

Empower Consulting Limited requires that all business activities be conducted with integrity, fairness, transparency and accountability.

Every individual acting on behalf of the Company is expected to conduct themselves in accordance with the principles set out in this Policy, avoiding any action that may constitute, facilitate or even appear to constitute an act of bribery or corruption.

The following standards define the conduct expected in the performance of professional activities and provide the framework for all business decisions.

4.1 PROHIBITION OF BRIBERY

Empower Consulting Limited strictly prohibits all forms of bribery and corruption, whether in the public or private sector.

No recipient of this Policy may, directly or indirectly, offer, promise, authorize, request or accept money, goods, services, benefits or any other advantage for the purpose of obtaining an improper benefit, influencing a decision or securing preferential treatment.

This prohibition applies regardless of the value of the benefit involved and even where such practices are considered customary or socially acceptable in the country in which the Company operates.

All business relationships shall be based exclusively on the quality of the services provided, professional competence and full compliance with applicable laws and regulations.

4.2 GIFTS, HOSPITALITY AND ENTERTAINMENT

Empower Consulting Limited recognizes that, within the context of normal business relationships, the exchange of modest corporate gifts or reasonable business hospitality may represent an accepted business practice.

However, such practices shall never influence, or appear to influence, the independence, impartiality or objectivity of business decisions.

Gifts, invitations, hospitality or other forms of business courtesy may only be offered or accepted where they are:

- Of modest value.

- Occasional in nature.
- Compliant with applicable laws and regulations.
- Consistent with accepted business practices.
- Not intended to obtain any improper advantage.

Under no circumstances shall cash, cash equivalents or any other benefit that could reasonably be interpreted as an attempt to influence a professional or business decision be offered or accepted.

4.3 FACILITATION PAYMENTS

Empower Consulting Limited strictly prohibits the making of facilitation payments, meaning payments, regardless of their value, made for the purpose of expediting or facilitating routine administrative actions or services performed by public officials or other individuals.

The Company recognizes that such practices may be tolerated in certain operating environments; however, they are inconsistent with the principles of integrity, transparency and legality upon which **Empower Consulting Limited** conducts its business.

Should any recipient of this Policy be requested to make an improper payment, the matter shall be reported immediately to Management so that it may be assessed and managed in accordance with the Company's procedures and applicable legal requirements.

4.4 POLITICAL CONTRIBUTIONS

Empower Consulting Limited maintains a position of strict political neutrality.

The Company does not make direct or indirect political contributions using corporate funds or resources, except where expressly permitted by applicable law and specifically authorized by Management.

Any personal political activities undertaken by recipients of this Policy shall remain entirely separate from the Company's activities and shall not compromise, or appear to compromise, the independence, impartiality or reputation of **Empower Consulting Limited.**

4.5 CHARITABLE DONATIONS

Empower Consulting Limited recognizes the value of social, cultural and humanitarian initiatives and may support charitable activities that are consistent with the Company's values and ethical principles.

All charitable donations shall be made transparently, properly documented and verifiable, exclusively in favour of legitimate organizations and for lawful purposes.

Charitable donations shall never be used, directly or indirectly, as a means of obtaining commercial advantages, influencing business decisions or circumventing the principles established in this Policy.

4.6 SPONSORSHIPS

Sponsorship activities undertaken by **Empower Consulting Limited** shall pursue legitimate objectives, be consistent with the Company's values and corporate image, and contribute to professional, educational, cultural or social initiatives.

All sponsorships shall be subject to appropriate evaluation, authorization and documentation.

The Company prohibits any sponsorship that could be used as a means of obtaining improper advantages or concealing unjustified or inappropriate payments.

4.7 CONFLICTS OF INTEREST

All recipients of this Policy shall avoid situations in which personal, family or financial interests may conflict, or appear to conflict, with the interests of **Empower Consulting Limited.**

Any actual, potential or perceived conflict of interest shall be promptly disclosed to Management so that it may be assessed objectively and managed in a fair and transparent manner.

Business decisions shall always be made on the basis of professional judgement and solely in the best interests of the Company and its clients, free from personal interests or preferential relationships.

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5. THIRD-PARTY RELATIONSHIPS

Empower Consulting Limited recognizes that bribery and corruption risks may arise not only from its own activities but also through third parties acting on behalf of the Company or with whom the Company maintains business relationships.

Accordingly, the selection, appointment and ongoing management of suppliers, consultants, subcontractors, business partners and any other third party shall be based on objective criteria including competence, reliability, integrity and compliance with the Company's ethical principles.

The Company is committed to conducting business exclusively with organizations and individuals who share its commitment to legality, transparency, fairness and ethical business conduct, avoiding any relationship that could expose **Empower Consulting Limited** to bribery, corruption, fraud or reputational risks.

All contractual relationships shall be established transparently, appropriately documented and supported by legitimate business purposes and services actually performed.

Where reasonable grounds exist to believe that a third party has engaged in conduct inconsistent with this Policy, the Company reserves the right to take any appropriate action, including the suspension or termination of the contractual relationship, in accordance with applicable laws, contractual obligations and the Company's internal procedures.

Empower Consulting Limited further encourages its third parties to establish and maintain policies, procedures and internal control systems consistent with the principles set out in this Policy, thereby contributing to the promotion of a business environment founded on integrity, transparency and accountability.

6. REPORTING VIOLATIONS

Empower Consulting Limited promotes a corporate culture founded on integrity, transparency and individual accountability by encouraging the timely reporting of any conduct that may constitute a breach of this Policy or applicable laws and regulations.

Any recipient who becomes aware of suspected acts of bribery or corruption, requests for improper payments, unlawful offers, undisclosed conflicts of interest or any other conduct inconsistent with the principles of this Policy is encouraged to report such concerns promptly through the reporting channels established by the Company.

Reports shall be made in good faith and based on reasonable grounds.

Empower Consulting Limited ensures that all reports will be handled with the utmost confidentiality, respecting the dignity of the individuals involved, applicable legal requirements and the principles of fairness and impartiality.

The Company strictly prohibits any form of retaliation, discrimination or adverse treatment against any individual who, in good faith, reports suspected misconduct or potential violations.

The procedures governing the reporting and management of concerns are set out in the Company's **Whistleblowing Policy**.

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7. MANAGEMENT RESPONSIBILITIES

The Management of **Empower Consulting Limited** actively promotes the implementation of this Policy and is committed to ensuring that its principles are fully integrated into the Company's decision-making processes, operational activities and corporate culture.

Management ensures that this Policy is effectively communicated, understood and implemented throughout the organization by promoting awareness and training initiatives aimed at strengthening the culture of legality, integrity and the prevention of bribery and corruption.

Management promotes a working environment in which every individual can act with integrity, professionalism and transparency, encouraging recipients to seek guidance, raise concerns and report suspected misconduct without fear of retaliation, in accordance with the principles of confidentiality, impartiality and good faith.

The example set by Management is one of the most effective means of strengthening a corporate culture founded on ethics, accountability, transparency and full compliance with applicable laws and regulations.

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8. REVIEW, UPDATE AND CONTINUAL IMPROVEMENT

This Policy shall be reviewed periodically to ensure its continued effectiveness, suitability and alignment with changes in applicable legislation, business risks and internationally recognized best practices for the prevention of bribery and corruption.

Any revisions or updates shall be approved by Management and communicated to all relevant recipients through appropriate corporate communication channels.

Empower Consulting Limited considers the continual improvement of its anti-bribery and anti-corruption framework to be essential for maintaining the confidence of its clients, business partners, suppliers, public institutions and all other stakeholders.

DOCUMENT INFORMATION

FIELD	CONTENT
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