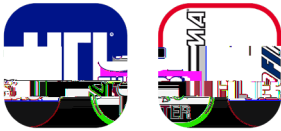


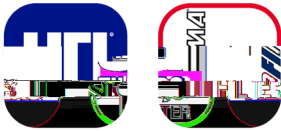


# ANTI-BRIBERY POLICY



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## INTRODUCTION AND POLICY STATEMENT

### 1. Introduction

UFI Filters Group (the “Group”), conscious of the challenges and responsibilities that arise from its global presence, promotes the prevention of bribery practices as one of its guiding principle, willing to strengthening the battle against bribery, a phenomenon that could lead to both ethical and business damages.

Such a willingness has lead UFI Filters Group to adopt a *Code of Ethics* that, together with the Models of Organization, Management and Control, adopted pursuant to the Italian Legislative Decree 231/2001, sets out the values and principles that inspire the Group in the pursuit of its objectives and the key principles underlying its management practices. The introduction of the *Anti-Bribery Policy* (“the *Policy*”) is a further confirmation of UFI Filters Group’s commitment to fight illegal conducts and, in synergy with the existing rules, it ensures the achievement of this purpose.

The *Policy* is addressed to the Headquarter, the Subsidiaries and all their personnel, which include directors, officers, managers,





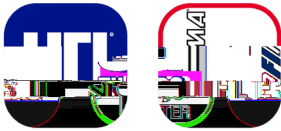


#### 4.4 Facilitation payments

Facilitation payments are strictly prohibited. It is prohibited to make these kinds of payments, irrespective of whether local laws and regulations permit them.

#### 4.5 Gifts, hospitality and other public relations expenses

Gifts, hospitality



UFI Filters Group shall recruit employees whose qualifications meet its requirements, and manage all personnel solely on the basis of professionalism, skills and competence and rejecting any kind of favouritism. In particular, the recruitment process shall comply with the following principles:

- separation between the person who declares that it is necessary to recruit a member of staff, approves the budget for recruitments and selects and recruits the job candidates;
- as a rule, a list of candidates is prepared to cover a position;
- candidates are assessed according to their professionalism, training and aptitude for the job;
- the process must be traceable and supported by appropriated documentation.

#### **4.8 Accounting and financial procedures and controls**

Every UFI Filters Group transactions or operations must be authorized, verifiable, lawful, consistent and fair. Furthermore, it must be properly entered in the Group's accounting system, in accordance with the applicable laws, regulations and accounting standards, in order to reflect accurately the facts of each transaction / operation.

All costs and charges, revenues and proceeds, receipts, payments and commitments have to be entered into the financial information in timely, complete and accurate way and have adequate supporting documentation issued in compliance with any applicable legislation and the relevant internal control system provisions.

UFI Filters Group shall keep adequate and complete supporting documentation for every transactions in its records, to make it possible to:

- enter the amounts in the books accurately;
- determine the characteristics and the reasons for the transaction;
- easily trace back the transaction;
- check the decision-making, authorisation and implementation process, as well as the identification of the various levels of responsibility.

UFI Filters Group directors, officers, managers, employees and workers must give utmost and prompt collaboration to all the internal control bodies (if any), the statutory auditors and the Supervisory Board who



## IMPLEMENTATION

### 5. Training and awareness

UFI Filters Group shall ensure adequate training and awareness programs to reinforce the Group compliance culture and, specifically, to enhance the understanding and awareness of the *Anti-Bribery Policy* and relevant anti-bribery laws and regulations and to enable all participants to identify and manage bribery risks in their daily duties.

Participation in training activities shall be mandatory and it is responsibility of the Human Resources Department to ensure that all personnel follow the planned training and awareness program.

The *Policy* shall be disclosed to the UFI Filters Group personnel and to third parties and shall be available on the UFI Filters Group website.

### 6. Reporting System (Whistleblowing)

The violation or suspected violation of the *Anti-Bribery Policy* and internal procedures or potential misconduct which might lead to a breach of anti-bribery laws and regulations should be promptly reported to the Regional Whistleblowing Committees ("RWC").

Please refer to the provisions of the Whmreib.1wine p.1licy eoms)