

HQBuild S.p.A.

Anti-Corruption Prevention Policy — Edition 01 – 11/12/2025

HQBuild is committed to preventing any form of corruption and to promoting a culture of integrity, transparency and lawfulness, in line with ISO 37001:2025. This policy is inspired by the "principles for an anti-corruption corporate culture" and defines the guidelines and responsibilities at all levels of the organisation and throughout the value chain.

1. Leadership Commitment

HQBuild's leadership ensures that the Anti-Corruption Prevention Policy is appropriate to the context and objectives of the Organisation, communicated to all staff and accessible to stakeholders.

Management provides the necessary resources to implement and maintain the anti-corruption management system, promoting behaviour consistent with ethical values and company strategies.

2. Employee Involvement

The Organisation promotes the active participation of employees so that they share the values of integrity, lawfulness and transparency.

Periodic training programmes are provided, aimed at corruption prevention, calibrated according to role and risk level.

3. Integrity in Work and Business Relationships

All decisions and actions must be guided by honesty and impartiality. The Organisation does not tolerate any form of corruption or improper behaviour, either in internal relations between employees or in external relations with customers, suppliers, commercial partners and public or private authorities.

It is prohibited to offer, promise, receive or accept gifts, donations, hospitality, facilitation payments or any other advantage of value, directly or indirectly, for the purpose of influencing decisions or obtaining improper benefits.

Any situation that could involve a conflict of interest must be immediately declared and managed according to company procedures, ensuring impartiality and transparency in decision-making.

4. Transparency and Traceability

Every process, supplier selection or contract management must be transparent and documented, avoiding favouritism, conflicts of interest or improper practices.

5. Whistleblowing and Reports

The Organisation provides secure channels for reporting suspected or non-compliant behaviour, guaranteeing confidentiality and protection of reporters. Reports are assessed impartially and promptly, and corrective actions are taken when necessary.

6. Supplier and Partner Involvement

The policy extends throughout the entire value chain. Suppliers and partners are selected also on the basis of their ethical conduct and compliance with anti-corruption principles. The Organisation promotes training, communication and continuous monitoring.

7. Management System and Continuous Improvement

An Anti-Corruption Prevention Officer (R_ABMS) has been appointed, responsible for:

- monitoring the effectiveness of the anti-corruption management system;
- managing reports and non-conformities;
- promoting continuous improvement of the system.

The Organisation conducts periodic internal and external audits to verify compliance with the standard and to take any necessary corrective actions.

8. Review and Communication

This policy is reviewed annually or when regulatory or process changes occur, or following significant reports. It is communicated and distributed to all staff through the company network and by posting on the dedicated noticeboard, and to all stakeholders through publication on the company website.

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Management Signature: Artur Hamitaj

