

Policy

Fraud Prevention, Anti-Bribery & Anti-Corruption

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Approval

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1 Purpose & Scope

1.1 Purpose

The purpose of this Policy is to outline Penta’s commitment to prevent acts of fraud, bribery and corruption from taking place and to comply with applicable anti-corruption and anti-bribery laws and regulations.

1.2 Scope

This Policy applies to all members of the Board of Directors, the President, to all Penta employees, collaborators and external consultants (hereafter collectively referred to as “Penta Staff Members”) and to all Penta stakeholders.

2 Definitions

Term / Acronym	Definition
Bribery	The offering, promising, giving, accepting or soliciting of money, gifts or other advantage as an inducement to do something that is illegal, where a payment is not legitimately due, where it is offered with the intention of influencing a person in the exercise of their duties, or where it is a breach of trust in the course of carrying out an organisation’s activities
Collaborators	Any person directly employed by Penta through a coordinate continuous collaboration contract
Corruption	The misuse of entrusted power for private gain
Fraud	fraud is civil or criminal deception, which includes but is not limited to, intent to gain unfair or unlawful financial or personal benefit or to cause loss to another party
Stakeholders	Individuals or groups, with or without a legal personality, who directly or indirectly, voluntarily or involuntarily, contribute to, participate in or benefit from, in any way, the actions, programmes and activities of Penta

3 Policy Statement

Penta is committed to the highest possible standards of transparency, honesty, fairness and accountability, and is determined to promote and maintain a culture of ethics and integrity.

Based on this commitment, this Policy establishes the principles to prevent, report and manage fraud, bribery and corruption. These principles reinforce our core values set out in the Penta Code of Ethics.

All Penta Staff Members are expected to comply with applicable laws related to anti-bribery and anti-corruption. If there is a real or apparent inconsistency or conflict between the requirements of laws and Penta policies, employees are required to comply with the most restrictive standard.

3.1 Preventing Fraud, Bribery & Corruption

Penta Staff Members conduct themselves with integrity and demonstrate awareness of the importance of ethical practices in their day-to-day work. Everyone in Penta has a responsibility as well as obligation to contribute to the management of fraud, bribery and corruption risks.

Penta expressly prohibits all Penta Staff Members from promising, offering, making, authorising, soliciting or accepting, directly or through an individual or legal entity, any payments or any other form of benefit, to or from anyone, regardless of whether they are government officials or work in a private sector entity, which is intended:

- To corruptly influence any acts or decisions.
- To secure an improper advantage in the conduct of business.
- As gratitude for having acted or made a decision in a way that benefited improperly the individual or entity giving the item of value.

The above provisions do not apply to “courtesy” or “customary” gifts or gratuities of a modest value, which are in line with normal practice, and always provided that they do not breach any rules of law and that they comply with Penta’s policies. Penta Staff Members who are offered money, gifts or any other forms of benefit, not attributable to routine courtesy, must take all appropriate steps to refuse the offer and immediately inform their Line Manager.

Penta expressly prohibits all Penta Staff Members from profiting from their position to obtain any personal benefit.

When interacting with funders, partners, contractors and suppliers, it is prohibited to engage in fraudulent conduct and practices, acts of corruption, favouritism and, more generally, any conduct that is contrary to the law, to industry regulations, to internal regulations and to Penta Code of Ethics.

In any interactions with governmental officials, it is prohibited to:

- Offer or accept any item, service, performance or favour of value to obtain more favourable treatment.
- Offer jobs to employees of the Public Administration involved in the relationship or to their relatives.
- Solicit or obtain confidential information that could compromise integrity or reputation.

Concerning public grants and contributions, it is prohibited to:

- Submit false declarations to funders to obtain grants, contributions or subsidized loans, or to obtain concessions, authorizations, licences or other administrative benefits.
- Allocate amounts received as grants, contributions or loans to purposes other than those for which they were awarded.

Penta must keep books and records that accurately and fairly reflect Penta's transactions in reasonable detail and maintain internal controls to prevent and detect potential violations of Penta's policies or applicable laws. No false or artificial entries may be made in the books and records for any reason, and all payments and transactions, regardless of value, must be recorded accurately.

3.2 Reporting Misconduct

Penta Staff Members shall report any reasonably suspected fraud or misconduct, presenting any available supporting evidence, to the Supervisory Body, according to whistleblowing procedure described in the "Penta Organization, Management and Control Model".

Anyone reporting a potential fraud must act in good faith and have reasonable grounds for believing that the information disclosed constitute a potential fraud. Misconduct must be reported using the following methods:

- by e-mail to odvfpenta@gmail.com.
- by ordinary mail to the following address:
via Orazio Marinali n. 22, 35061 Bassano del Grappa (VI), Italy.
- verbally.

Supervisory Body must assess whistleblowing report for seriousness and relevance, and when required, must conduct appropriate investigations. These are carried out in complete independence, objectivity and confidentiality. The name of the person that reported the suspected fraud must be kept confidential.

Where an investigation confirms that an illegal act of fraud was committed, Penta shall take immediate actions to mitigate the potential loss of Penta's reputation and credibility with donors and partners who are involved in funding or delivering work in the particular context in question. In the case of substantiated fraud, Penta shall pursue disciplinary, legal action, and criminal prosecution if appropriate.

Penta Staff Members must be protected from retaliation or discrimination for reporting concerns in good faith.

4 Responsibilities

4.1 Compliance, Monitoring & Reporting

It is the responsibility of all Penta Managers to adhere to this Policy within his or her area of functional responsibility, to lead by example, and to provide guidance to those Penta Staff Members reporting to him or her.

All Penta Staff Members are responsible for adhering to the principles and rules set out in this Policy.

Quality Assurance Manager and Supervisory Body must ensure that compliance with this Policy is regularly monitored following established audit procedures.

Any Penta Staff Member, who learns of a potential deviation from this Policy, is required to report his or her suspicion promptly to the Supervisory Body.

5 References

Penta Organization, Management and Control Model

Penta Code of Ethics

6 Appendices

Not applicable.