

GLOBAL
ANTI-BRIBERY AND
ANTI-CORRUPTION
POLICY

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Campari Group rejects bribery and corruption in any form. Campari Group believes that bribery and corruption damage the business environment, are unlawful and unethical in all respects, and expose Campari Group to unacceptable reputational and financial risks.

Camparistas must abide by all applicable laws relating to bribery and corruption, including local laws in each country in which we do business.

Camparistas' behaviour and conduct contribute to Campari Group's overall business success and reflect the Campari Group brand and reputation.

1. Why have a policy?

Campari Group is committed to conducting business with the utmost integrity and transparency. This includes implementing and enforcing systems to ensure that bribery and corruption are excluded from our business, as well as from our relationships with third parties, such as, individuals or organizations with whom we come into contact during our work activities.

This global anti-bribery and anti-corruption policy (the "Policy") explains the concepts of corruption and bribery and outlines Campari Group's position on these matters, including setting out guidelines for what does and does not constitute acceptable behaviour when conducting business. The Policy forms part of Campari Group's wider compliance policy framework, including Campari Group's Code of Ethics and other associated policies.

In accordance with Campari Group's values included in our Global Code of Ethics, the aim of the Policy is to:

- a) provide the tools and support necessary to identify and avoid corruption and bribery risks;
- b) guide Camparistas to the right answer - or to ask the right question; and
- c) demonstrate to all those with whom we deal and interact, the conduct we expect from them.

2. Who does this Policy apply to?

This Policy applies to each Camparista in Campari Group. For the purposes of this Policy only, Camparistas include:

- all employees of Campari Group;
- members of the Campari Group's boards of directors, when they act in their capacity as directors;
- or any business partners, sponsors, or any other person associated with Campari, wherever located.

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3. What is corruption?

Bribery and Corruption can exist in many forms, including when dealing with government / public officials as well as with commercial partners. This Policy prohibits corruption in dealings with counterparties in both the public and commercial sectors.

Below are the key definitions for Camparistas to keep in mind:

Corruption: a dishonest or fraudulent abuse of entrusted power, position, or authority for private gain. Corruption practices may have different forms, including bribery.

Bribery: offering, promising, giving, soliciting or receiving anything of value as a means of influencing the actions of an individual holding decision-making power. Also bribery may occur in different manners, including in the form of a bribe itself, as well as of a facilitation payment.

Bribe: a benefit of any kind offered, promised or provided to gain any business, commercial, contractual, regulatory or personal advantage. Bribes can take the form of gifts, loans, fees, rewards, hospitality, offers of employment or other advantages.

Facilitation payments: unofficial, low value payments to public or government officials or employees designed to expedite or facilitate routine government actions.

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All the above types of conduct are prohibited: you must never give, offer, promise, accept, request or authorise a bribe, whether directly or indirectly. Even if a bribe is not actually given, just promising to give, or agreeing to receive, a bribe is an offence. If you are uncertain about whether something could be construed as a bribe, you should contact the Legal & Compliance Team for guidance.

NOTE: The term "Anything of value" goes beyond cash payments. For example, it may include:

- cash equivalent (e.g. gift cards);
- gifts, hospitality, travel and entertainment expenses;
- business opportunities;
- offers of employment opportunities (including unpaid internships);
- donations and sponsorships; and
- political contributions.

4. Who are Government / Public officials?

Government / Public Officials are those who exercise an administrative, legislative, executive or judicial function, those working for a government body or government-controlled entity in the broadest sense, as well as individuals holding or performing a public function for a public agency, organization, or providing a public service ("**Public Officials**").

Public Officials include, by means of example, members, employees, officials or contractors of:

- government and government bodies (including military and police, as well as ministries);
- government or state-controlled companies;
- customs or port authorities;
- judicial bodies;
- labour unions.

Camparistas may engage with governments, regulators and industry associations globally, as required for business purposes.



However, Camparista must never accept, give, offer, or cause the giving of anything of value involving corruption to Public Officials anywhere in the world. This prohibition includes payments to third parties where it is reasonable to know that the third party will offer, use or promise any part of the payment for bribes to a Public Official.

Dealings with Public Officials

- Prior to any scheduled meeting with a Public Official, you should take note of:
- The name and role of the person you are meeting;
- The location of the meeting; and
- The nature and purpose of the meeting.

Your company is struggling with import restrictions on Campari Group's products, as the customs agents claim they contain ingredients that are not compliant with local laws. You know that this is not the case, but you have been told that by paying a very small amount of money to the customs agent you can overcome this obstacle. This is apparently a customary and accepted practice locally. Can you do so?

***NO!** We must never engage in conduct which may amount to corruption, regardless of local practices. Seek advice from the Legal & Compliance Department in case of doubt.*

Your company needs to apply for licences and permits to carry out a specific activity, as soon as possible. You know that by providing a number of Campari Group's premium spirits to the relevant authority, you will have a fast track as well as a green light for your application. Can you do so?

***NO!** We must never engage in conduct which may amount to corruption. Seek advice from the Legal & Compliance Department in case of doubt.*

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5. Political contributions and donations

No political contribution and donation must be offered or made on behalf of the Group **in breach** of any applicable laws or regulations, including the local laws or in breach of this policy.

In fact, Campari Group's general practice is not to make, either directly or indirectly, political contributions and donations. This is intended to maintain the Group's independence and to avoid allegations of improper contributions or political donations. **Any exceptions** to this **must be approved in advance** by Public Affairs, Communications and Sustainability and Legal & Compliance Functions. **In any case**, political contributions and donations must **never** be made for the purpose of **influencing public officials or in exchange for** obtaining or retaining a business or other **improper advantage** for the benefit of the Group.

For the purposes of this policy:

- **political contributions** are direct or indirect (i.e. through intermediaries) contributions made to support political parties, committees or candidates for public office.
- **political donations** include donations to political candidates, political parties, party officials and other political organisations, including campaign contributions, providing services, volunteer time, publication of election material or political sponsorships.

6. Commercial Bribery

Bribery involving commercial parties is also prohibited under this Policy. A Camparista shall not directly or indirectly, through a **Third Party**, give, offer, authorize or promise anything of value to any employee, agent, or representative of another commercial party, or to a customer, business partner, vendor or any other third party, with the intent to: **(i)** exert improper influence over the recipient; **(ii)** induce the recipient to violate his/her duties or improperly perform his/her activities; **(iii)** secure an improper advantage for Campari Group; and/or **(iv)** improperly reward the recipient's performance.

Gifts and other advantages may be provided to commercial counterparties or their representatives, provided that no corrupt intent exists in connection with such actions, and in compliance with the other local or group relevant policies.

Your company is negotiating a business transaction to acquire an important strategic partner for Campari Group. You are aware that by paying a small sum to the manager of the potential partner, who has decision-making authority regarding the acquisition, Campari Group will definitely be chosen over a competitor. Can you do so?

***NO!** We reject all kind of conduct that may entail corruption, including those connected to commercial and private counterparties. Seek advice from the Legal & Compliance Department in case of doubt.*

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NOTE: The term "Third Party" means any external individual or organization that a Camparista engages during his/her work, and includes actual or potential clients, advisers, agents, contractors, suppliers, distributors, business contacts, joint venture partners, or anyone acting in a fiduciary capacity.

7. Third Parties Due Diligence

Camparistas should undertake due diligence on Third Parties prior to establishing business relations, including assessing legal and financial information, legitimacy, and public perception, to assure oneself that the Third Parties will not bribe or perform a corrupt act on Campari Group's behalf, or for which Campari Group may be held responsible.

8. Key Do's and Don'ts

DOs

- i.** Approach relationships with Public Officials and commercial counterparties with integrity and transparency;
- ii.** Reject any demand for a bribe immediately and report it to the Legal & Compliance Department;
- iii.** If you have any doubts, consult your Legal & Compliance Department;

- iv. Make charitable contributions on behalf of Campari Group only after having received the appropriate approval and only if it is for genuine charitable purposes – to be approved by Local Management or Local Head of Public Affairs;
- v. Obtain prior approval from Local Management or Local Head of Public Affairs before giving or accepting a gift, hospitality, entertainment, political contributions and donations, or sponsorship; such hospitality or gift may be approved if reasonable and proportionate in the circumstances. The intention behind it should always be considered; additional Local policies may require the recording of any such gift or hospitality;
- vi. Select consultants, partners and employees in a transparent and appropriate manner, that documents the justification for the decision to appoint them;
- vii. Appropriately manage and disclose any situations of conflict of interest involving Camparistas and Public Officials who may make decisions that are relevant to the Company's activities;
- viii. Ensure you perform appropriate due diligence on Third Parties with whom Campari Group deals (being also mindful of public perception).

DON'Ts

- i. Give, offer, promise, accept, request or authorise Corruption and Bribery, whether directly or indirectly;
- ii. Give cash gifts to Public Officials;
- iii. Provide gifts, hospitality, kickbacks, or investment opportunities non proportionate and unreasonable in the circumstances, in order to improperly induce the purchase of Campari Group's goods or services;
- iv. Give or accept gifts, hospitality, entertainment, political contributions and donations, sponsorship, over and above that allowed by Campari Group's policies;
- v. Grant benefits, of any type (e.g., jobs, etc.) to Public Officials or their relatives and acquaintances which may influence their independence of judgement or persuade them to ensure any advantage for Campari Group;
- vi. Induce, solicit or support, materially or morally, a Public Official so that he/she violates the duties inherent to his/her office or service;
- vii. Take advantage of relationships of kinship, friendship, affinity or any other nature with Public Officials, in order to obtain for yourself, for the companies of the Campari Group, or for anyone else, any undue benefit, even if it is non-financial in nature;
- viii. Request services from consultants, suppliers and partners in general that go beyond the boundaries of the working relationship with these partners;
- ix. Submit false declarations to public entities to obtain public funding, grants or subsidised loans;
- x. Use funding, grants or loans from public entities for purposes other than those for which such monies were allocated;
- xi. Mention to Third Parties - without there being a valid and legitimate reason - the existence (actual or even merely alleged) of relationships or proximity relationships of any kind with public or governmental officials, or public service officers.

 **Additional matters to consider:****9. Record-keeping**

Campari Group ensures the correct and accurate corporate, business, and relevant information/documentation record-keeping.

Pursuant to the Campari Group's Code of Ethics, Camparistas shall comply with applicable laws and best practices on the accurate recording of any relevant event, fact or information.

10. Penalties for engaging in corruption and bribery

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all Camparistas.

Many countries have, or are in the process of, implementing legislation that aims to prevent bribery and corruption. The penalties for failing to comply with these laws are significant and can affect Camparistas individually, as well as Campari Group. The consequences may include:

- serious fines and penalties for companies of Campari Group;
- individual civil and criminal liability for Camparistas (including fines and imprisonment); and
- operational and reputational costs.

ENFORCEMENT OF THIS POLICY

1. Recipients, Availability, Training

The application of this Policy is set out in section 2. The Policy is available on the Campari Group Intranet and on Campari Group's official corporate website.

All Camparistas and new joiners must undertake the general e-learning training on this Policy. Certain functions or groups will be required to attend additional specific trainings.

2. Where to seek advice or further information

The Legal & Compliance Department is your first point of contact if you have questions or concerns regarding the contents, interpretation or application of this Policy.

3. Our Compliance Management System

Organization: the Legal & Compliance Department oversees compliance management, advice and support in Campari Group at Global, Regional and Country Level. However, Compliance management is a shared responsibility of all Camparistas, and each individual Camparista plays a key role in ensuring the effectiveness of and compliance with this Policy.

Policies and Procedures: Campari Group adopts Global, Regional and Local policies and processes in order to provide guidance on compliance matters. Policies are intended to provide general principles or rules of conduct, while processes describe how a specific activity should be conducted. These documents will be available on the Campari Group Intranet, some also on the camparigroup.com web sites. Local policies will prevail on Global policies as they generally pose more stringent standards of behaviour on Camparistas.

Each Camparista should be familiar with all policies and processes applicable to their role.

Training and Communication: the Legal & Compliance Department, in cooperation with HR and Communications, is responsible for ensuring proper integration of compliance policies and principles in the business and general day to day operations through adequate training and communication initiatives. Each Camparista should actively participate in relevant training sessions (in person or e-learning), as well as paying attention to communications relating to these matters.

Monitoring and Reporting: Campari Group will establish monitoring and reporting systems to support integration into the business and general day to day implementation of compliance policies and principles. Each Camparista must actively support monitoring activities.

Audit: compliance policies and application of principles will be subject to dedicated audits and be part of the integrated compliance management process at Campari Group. Each Camparista is must actively support audit activities.

4. Breach of this Policy

Breaches of this Policy may result in disciplinary measures for employees with the potential for termination, according to the nature of the breach. Any Third Party who breaches this policy may have their contract terminated with immediate effect. This policy does not form part of any employee's contract of employment and we may amend it at any time. It will be reviewed regularly.

5. Whistleblowing

If you see something that is, or may be, in conflict with any provision of this Policy, please speak up!

You may address your concern to your line manager, to another manager that you trust, to the HR Department, to the Legal & Compliance Department, or use the Campari Safe Line under the Whistleblowing Policy. The Campari Safe Line is your "safe harbour", which ensures that your notification is treated with confidentiality in accordance with the Whistleblowing Policy and, if so requested, you may remain anonymous. You can always choose to go straight to the Campari Safe Line without reporting any matter internally. For more information please see the Legal & Compliance Section on our intranet.

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