



ANTI-BRIBERY MANAGEMENT SYSTEM POLICY

The fight against corruption has become increasingly significant in recent years, and almost all countries, either at the local level or through international agreements, have promoted regulatory frameworks aimed at discouraging corruptive acts.

ICTS ITALIA S.R.L. A SOCIO UNICO rejects and opposes all forms of corruption in the broadest meaning of the term, that is, any form of abuse for private purposes or as dishonest practices, integrated with promise, inducement, instigation, request, offer of incentives or other benefits as a reward to a person to act or omit actions, whether due or not.

The Company has defined this "Anti-Bribery Management System Policy" (hereinafter "the Policy") in order to minimize the risk of engaging in active and passive corrupt conduct, committing itself to preventing and countering the occurrence of wrongdoing in the performance of its activities, taking as one of its primary values that of business ethics, through which it transmits messages of loyalty, fairness, transparency, honesty and integrity.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

ICTS ITALIA S.R.L. A SOCIO UNICO has established this Anti-Bribery and Corruption Policy by establishing its objectives and the principles it intends to follow by actively contributing to the fight against corruption and conflict of interest. This is done by implementing a set of rules, procedures, people and actions:

- Adoption and dissemination of the Code of Ethics and Discipline, which conveys the principles of behaviour to which all personnel and all those who have dealings with the Company must adhere;
- Adoption and dissemination of the Anti-Bribery and Corruption Policy that lays out the commitment in achieving anti-corruption goals;
- Adoption and dissemination of the Conflict-of-Interest Policy that requires a duty of disclosure of any potential conflict of interest by all business associates;
- Adoption of Model 231, which establishes the set of internal organizational rules and procedures to prevent the perpetration of crimes including those of corruption;
- Strengthening the system of internal controls with specific measures to prevent, counter and detect external and internal bribery actions;
- Adoption of a Supervisory Board to oversee the suitability and implementation of the Organization, Management and Control Model;
- Establishing the Corruption Prevention Function to oversee and ensure the implementation and performance of the Anti-bribery Management System;
- Implementation of a secure reporting channel to be used for any suspected attempted, certain, alleged act of corruption;
- Adoption of rules that safeguard the reporting party;
- Training, briefing and communication of the measures put in place by the Company, the areas for improvement and reporting tools;

- Setting specific penalties that affect violations of the control system in place to prevent and combat corruption and the adopted organizational model.

Objectives of the Anti-bribery and Corruption Policy

This Anti-Bribery Policy aims to achieve the following objectives:

- prohibit bribery and ensure the achievement of the highest compliance with national and international anti-corruption regulatory standards;
- Ensure the sustainability, honesty and transparency of its business by contrasting all dishonest business practices;
- Contribute to the diffusion of the culture of doing business by upholding loyalty, integrity, honesty, competition and transparency as the foundational element of work;
- Promote and develop ethics in financial relations to protect the market, countering all forms of illegality;
- Adopt the Anti-Bribery Management System as a tool for effectively countering corruption by requiring continuous management commitment and leadership and strengthening the system of controls at every level of the Organization;
- Develop awareness of the commitment to preventing and countering corruption from all stakeholders;
- Create an integrated set of controls, easily comprehensible and understandable, that can be implemented and monitored to ensure the effectiveness and efficiency of the preventive function of the control itself;
- Promote and develop commitment to continuous improvement of the management system for the prevention of corruption;
- Recognize that due diligence on the stakeholders is necessary in order to reduce the risk of corruption, with levels of thoroughness the greater the potential crime risk;
- Encourage reports of any suspected attempted, certain, or alleged act of corruption by means of dedicated channels and methods that, while still in compliance with the protection of the Company's reputation and image, allow, on the one hand, for investigations and in-depth analyses to be carried out in order to assess their justification and prepare effective countermeasures and, on the other hand, to guarantee protection for the notifier from any form of retaliation.

Anti-bribery compliance function

ICTS ITALIA S.R.L. has established and appointed the specific Anti-bribery compliance function assigned to the Compliance Manager Melania Marguglio with autonomous powers and resources with the task of supervising and ensuring the correct implementation of the anti-bribery management system.

The following functions are assigned to the Anti-bribery compliance function:

- Check the status of the updates of management system documentation;
- Monitor, measure, analyse, and evaluate system performance;
- Monitor the status of implementation of anti-corruption measures;
- Evaluate the suitability, adequacy and implementation of preventive measures;



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- Provide the Senior Management and the Governing Body with the report containing information on the performance of the management system (status of implementation and effectiveness of actions taken, opportunities for improvement);
- Receive reports of attempted, alleged, or actual acts of bribery;
- Send specific information to the Supervisory Board should they become directly aware of facts, acts or situations relating to the risk of committing corrupt offenses;
- Assess reports received regarding acts of corruption/violation of the anti-bribery management system and carry out investigations;
- Advise the Organization's resources on the operation of the management system and how to properly report information.

Reporting

ICTS ITALIA S.R.L. A SOCIO UNICO encourages reports of any suspected attempted, certain, alleged act of corruption, as well as any alleged or overt violation of this Policy and of the Anti-Bribery Management System.

Reports can be made through the website of ICTS Italia <https://ictsitalia.com> under the section "Whistleblowing" o via email to odv@ictsitalia.com.

With respect to the person who reports suspicions in good faith or the person who reports on the basis of reasonable or confidential convictions, no form of retaliation or discrimination affecting working conditions shall be allowed on grounds related to the report, meaning by discriminatory measures any unjustified disciplinary action, harassment in the workplace, and any other form of retaliation resulting in intolerable working conditions.

It must, likewise, be pointed out, however, that any form of abuse of the reporting such as, by way of exemplification, intentional defamation or slander, improper use or intentional manipulation of the institution that is the subject of this Policy, is firmly prohibited. The Company reserves the right to pursue evidently distorted use of this Tool, considering how abuse of the reporting system significantly risks undermining the entire management system.

Disciplinary System

The perpetration of acts in violation of the Anti-Corruption Policy, as well as, more generally, the violation of the rules of the anti-bribery management system and abuse in reporting activities constitutes non-compliance with contractual obligations and non-compliance with corporate rules and shall result in the issuing of sanctions as stipulated in the corporate system in addition to criminal and civil consequences.

Monitoring and review

The Supervisory Board (OdV) and the Anti-bribery compliance function will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

Date 01 July 2022

Signature

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