



Group Anti-Bribery Code of Conduct

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Letter from the Chairman and Chief Executive Officer

The fight against bribery is one of the fundamental pillars on which the integrity of the Tinexta Group is based. In an economic and regulatory context increasingly oriented towards transparency, legality, and responsibility, we believe it is our duty to strongly reaffirm our commitment to operating in full compliance with the ethical principles that have always guided us.

We therefore present our **Anti-Bribery Code of Conduct**, a fundamental tool for ensuring behavior consistent with the values of fairness, honesty, and transparency in all activities carried out by our Company.

Transparency of conduct is the value that unites us and must be reflected in every choice, both internal and external. Only through the conscious participation and sharing of each individual can we ensure that the principles contained in this **Code** are translated into concrete, daily, and verifiable behavior.

The **Anti-Bribery Code of Conduct** applies to all Tinexta Group companies, its employees, collaborators, business partners, and all those who interact with us. Its provisions provide clear guidance on the conduct to be adopted, helping to ensure that activities are conducted in accordance with the highest national and international standards.

Integrity is a shared responsibility. Each of us, regardless of our role, is called upon to actively contribute to compliance with the principles contained in this **Code**, reporting any violations or behavior that is not consistent with the company's values. To this end, the Group is committed to ensuring effective communication tools, confidentiality, and protection against any form of retaliation. We are convinced that only through collective and constant commitment can we continue to operate with integrity and sustainability, consolidating the trust that customers, institutions, investors, and stakeholders place in Tinexta every day.



Enrico Salza
Chairman
Tinexta S.p.A.



Pier Andrea Chevallard
Chief Executive Officer
Tinexta S.p.A.

GLOSSARY

For the purposes of this Anti-Bribery Code, the terms listed herein shall have the meanings specified below.

Anti-Bribery Officer: an internal person appointed in each Group company with the task of supervising the design and implementation by the organization of control measures for the prevention of Bribery in line with the French Anti-Corruption Agency (AFA) recommendations.

Anti-Bribery legislation: the main international sources on anti-Bribery (e.g., the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions; the Council of Europe Conventions on criminal and civil matters relating to Bribery; the United Nations Convention against Bribery – known as the Merida Convention), as well as the French Criminal Code and Law n° 2016-1691 (Loi Sapin II).

Bribery: offering, promising, providing, accepting, or requesting an undue advantage of any value (which may be economic or non-economic), directly or indirectly, and regardless of location, in violation of applicable law, as an incentive or reward for a person to act or promise to act in relation to the performance of that person's duties (whether in relations with public administrations or private entities). This definition includes both corrupt conduct carried out in the interest or to the advantage of the Company (so-called "active" bribery) and corrupt conduct carried out to the detriment of the Company (so-called "passive" bribery).

Conflict of interest: a legal condition that occurs when an individual has personal or professional interests that may influence their impartiality in decisions that require objectivity.

Due Diligence: Process of analysis and preventive verification of the integrity and reliability of employees, counterparties, business partners, or suppliers, in order to prevent risks of bribery or conflicts of interest.

Facilitator: a natural person who assists the whistleblower in the reporting process, operating within the same working environment and whose assistance must be kept confidential.

Gift: an item of modest value, given or received.

Public Administration: all public law bodies that manage and coordinate the functions of a State in matters within their competence. It includes State bodies and offices that operate to guarantee public services and the collective interest. It also includes private law entities, limited to their activities of public interest.

Recipients: the top management of Tinexta S.p.A., as well as executives, shareholders, employees, and collaborators in any capacity of Tinexta and the Group Companies, as well as those who have contractual relationships, whether paid or unpaid, with Tinexta or the Group Companies.

Third Parties: Individuals outside the Group (suppliers, consultants, partners, agents, intermediaries, etc.) who work on behalf of or in the interests of the Group.

Tinexta Group or Group: the Group companies controlled directly or indirectly by Tinexta S.p.A., company incorporated under Italian law.

Undue Advantage: Any benefit, economic or non-economic, obtained or promised in violation of laws or company policies.

Whistleblower: the natural person who reports violations acquired within their working environment.

Whistleblowing Report: reporting of illegal or improper conduct within an organization pursuant to French Law n° 2016-1691 (Loi Sapin II) and Law n° 2022-401 (Loi Wasserman), made in good faith and through the dedicated internal alert channel

1. Introduction

1.1 Purpose and objectives of the Anti-Bribery Code of Conduct

The Tinexta Group, in accordance with the provisions of the Code of Ethics and Conduct and in compliance with the principle of "**zero tolerance**," is committed to combating bribery in all its forms and preventing the risks of illegal practices by promoting a culture characterized by the dissemination of ethical values and principles, as well as the introduction of rules of conduct and an effective control system, in accordance with applicable regulations and international best practices.

The Tinexta Group has adopted this Anti-Bribery Code of Conduct (hereinafter "**Anti-Bribery Code**" or "**Code**"), approved by the Board of Directors on November 12th 2025, in order to promote a system of ethical principles for the identification and prevention of bribery¹.

In this context, the Group, also in line with the principles of *the Global Compact* promoted by the United Nations and the Sustainable Development Goals (SDGs) set out in the 2030 Agenda and in accordance with the Group's Sustainability Policy, contributes to promoting the dissemination of sustainability principles that establish a responsible commitment in the areas of Environment, social and governance issues and, in particular, the fight against bribery.

Each Group company guarantees the application of measures to prevent bribery and is committed to their continuous improvement, including through the performance of verification activities.

The objectives pursued by the Tinexta Group through the adoption of this Code are:

- the prevention of bribery and the promotion, in general, of ethical and honest behavior;
- the rejection of all forms of bribery in accordance with the principle of "zero tolerance";

¹ The term "bribery" generally refers to the offering, promising, or accepting, directly or indirectly, of money or other benefits in order to obtain or maintain an undue advantage for oneself or others. Depending on the subjective position that is relevant, a distinction is usually made between "active bribery" which refers to the conduct of the corruptor who gives or promises money or other benefits, and "passive bribery" which refers to the conduct of the corrupt person who accepts the gift or promise.

- the identification of situations in which unlawful conduct may potentially be facilitated and the adoption of appropriate controls to mitigate the risks identified;
- raising awareness among those subject to the Code of a constant commitment to compliance with the internal regulatory system adopted by the Group, including through training and information initiatives in the field of anti-bribery;
- encouraging a culture of dialogue and communication within the Group by sharing the ability to report, through the internal alert channel, behavior that is not in line with this Code and, in general, illegal conduct.

1.2 Governance

To ensure the maximum dissemination and enhancement of a strong culture based on ethics and legality, the Tinexta Group is constantly committed to verifying the adequacy of its internal control system and implementing appropriate and effective measures to prevent bribery. In this context, the Group has adopted a *corporate governance* system built in accordance with the Corporate Governance Code, in line with *best practices*.

This system focuses on the transparency of management decisions both within the Company and in relation to the market; on the efficiency and effectiveness of the internal control system; on the strict regulation of potential conflicts of interest; and on sound principles of conduct for transactions with third parties involving the Group.

The organization for the prevention of corruption is based on:

- a Committee for Related Party Transactions and Sustainability;
- a Control and Risk Committee;
- the Head of Internal Audit;
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- the Risk & Compliance Function, which is responsible for periodically monitoring and assessing the adequacy and effectiveness of the measures, policies, and procedures adopted to identify and minimize the risk of non-compliance with regulatory obligations and for providing advice to relevant parties in the exercise of their activities and assisting them in fulfilling the Company's obligations;
- the Anti-Bribery Officer, whose task is to supervise the design and implementation by the organization of control measures for the prevention of bribery, ensuring compliance with applicable regulations and best practices.

1.3 Regulatory references and *best practices*

The Anti-Bribery Code is inspired by and must be interpreted on the basis of the principles expressed in the following national and international regulatory framework:

- the 2003 United Nations Convention against bribery (*i.e.*, Merida Convention);
- the Council of Europe Conventions on Anti-Bribery (1999);

- the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997);
- French Law n° 2016-1691 of December 9, 2016, on transparency, anti-corruption, and modernization of economic life (Loi Sapin II);
- The French Criminal Code (Code pénal), with specific reference to provisions governing active and passive corruption, traffic of influence, and unlawful taking of interest in both the public and private sectors (Articles 432-11, 433-1, 435-1, 435-3, 445-1 et seq.);
- French Law n° 2022-401 of March 21, 2022, aimed at improving the protection of whistleblowers (Loi Wasserman);
- The recommendations and official guidelines issued by the French Anti-Corruption Agency (Agence Française Anticorruption – AFA);
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- *best practices* and international standards on combating and preventing Bribery, such as the standard ISO 37001 (Anti-bribery management systems); this standard, applicable in all jurisdictions, makes the management system for the prevention of Bribery certifiable.

In addition, the Anti-Bribery Code complements and integrates the internal control system adopted by the Tinexta Group, the Anti-Bribery Guidelines and the Code of Ethics and Conduct.

1.4 Recipients

The Anti-Bribery Code applies to the entire Tinexta Group, in any country and at any level of the organization. In particular, the provisions of this Code apply to:

- directors, statutory auditors, and independent auditors;
- shareholders;
- managers and employees;
- collaborators and consultants;
- customers, suppliers, and business partners.

These individuals (hereinafter also referred to as "**Recipients**") are required to observe and enforce the principles outlined in this Code within the scope of their duties and responsibilities.

2. General principles of conduct

All Recipients are required to comply with the Anti-Bribery regulations and this Anti-Bribery Code. For the purposes of compliance with the Code, both in the management of relationships at risk of bribery and in the performance of activities instrumental to bribery, the following general principles must be observed:

- **segregation of duties:** tasks and responsibilities must be adequately segregated to ensure that the person responsible for operations is always different from the person who authorizes and verifies the activity performed;

- **adoption and implementation of adequate internal regulations:** the operating procedures of company processes and relevant activities must always be adequately formalized within the appropriate internal document management system;
- **signatory authority system:** signatory authorities must be formally defined and consistent with the responsibilities identified and assigned within the formalized value limits;
- **impartiality and absence of conflicts of interest:** all Recipients of this Code must operate with professionalism, transparency, impartiality, and in compliance with current anti-Bribery legislation, and must promptly report any situation that could give rise to a conflict of interest.
- **traceability and archiving:** all processes and related controls must be traceable and verifiable *ex post*. In addition, the documentation produced must be properly archived.

These principles embody the Group's commitment to combat bribery in all its forms in order to ensure compliance with the law.

In this context, the Group has adopted a "**zero tolerance**" approach towards any corrupt conduct, whether active or passive, direct or indirect.

As also stated in the Code of Ethics and Conduct, the Group does not tolerate and rejects "*illegal or otherwise improper conduct in relations within and outside the Group, and any form of bribery for the purpose of achieving personal or business objectives.*"

3. Principles of conduct in the main areas of risk

With reference to the activities of the Tinxeta Group, areas with a higher risk of bribery have been identified. In relation to these areas, the general principles mentioned above must be supplemented as indicated below.

3.1 Relations with the Public Administration, Supervisory Authorities, and Control Bodies

In the context of managing relations with the Public Administration, Supervisory Authorities, and/or Control Bodies (hereinafter jointly referred to as "**Authorities**"), all Recipients are expressly prohibited from paying, offering, or promising, directly or indirectly, gifts, money, benefits, or other advantages or benefits of any kind to representatives in order to influence or reward an act of their office (e.g., in order to convince the official to omit or mitigate the application of a sanction, or to favor the adoption of undue authorizations).

It is also prohibited to make, induce, or encourage false statements to the Authorities.

All Recipients are also required to comply with the following principles:

- compliance with the powers of attorney and procedures in place in relation to activities carried out with the Authorities;
- clear and traceable recording of relations with the Authorities in the performance of their duties;

- verification that the data and information sent to the Authorities by the Group Companies concerned are complete, accurate, and timely;
- monitoring of contacts and commercial initiatives undertaken with the Authorities;
- ensuring maximum availability in collaboration with representatives of the Authorities.

3.2 Management of relations with commercial partners

The identification of commercial partners for the purpose of participating in public or private tenders must be guided by the principles of fairness, impartiality, transparency, legality, and non-discrimination.

All Recipients are prohibited from accepting or offering gifts and/or benefits of any kind from/to business partners in order to influence a tender in their own interest and/or to their own advantage. At the same time, no form of favoritism, potential conflict of interest, and/or collusive agreement aimed at illegally influencing the outcome of the tender is permitted.

The Tinexta Group adopts and requires its business partners to adhere to the highest standards of compliance and commitment to the fight against bribery in line with this Code of Conduct.

In particular, the following minimum standards of conduct must be observed when selecting a business partner:

- ensuring the traceability of the business partner selection process;
- carry out adequate anti-Bribery *due diligence* in order to verify the reliability, reputation, and suitability of partners before establishing a business relationship;
- contractually commit the counterparty to comply with the relevant anti-Bribery legislation and the principles contained in the Code of Ethics and Conduct, the Anti-Bribery Guidelines and in this Code, with the right for the Group Company concerned, in the event of non-compliance, to request early termination of the relationship and compensation for any damages;
- pay the utmost attention to conduct and information concerning business partners that could even give rise to suspicion of bribery and report them promptly in accordance with the procedures set out in Paragraph 5 of this Code.

3.3 Procurement of goods and services and provision of consulting and professional services

Recipients involved in the various processes relating to the procurement of goods and services and the provision of professional advice and services must act in compliance with the *governance* system, the company organization, and the internal authorization processes of the Group company in which they operate.

The selection of suppliers and consultants by the Group must be carried out in compliance with the criteria of:

- cost-effectiveness, efficiency, timeliness, and fairness;
- free competition, equal treatment, non-discrimination, transparency;
- proportionality and publicity;

- risk minimization and value maximization.

The selection of third parties and the determination of contractual economic conditions must be carried out on the basis of a comparison between several parties with predetermined characteristics and an assessment (*due diligence*) of the quality, usefulness, and price of the goods and services requested, as well as the counterparty's ability to promptly supply and guarantee goods and services of a level adequate to the needs expressed by the Group.

Furthermore, in accordance with the provisions of the Group's Anti-Bribery Guidelines and the qualification procedure, the selection of suppliers must be preceded by adequate *compliance* and reputational *due diligence*, paying the utmost attention to any conduct or information concerning suppliers and/or consultants that could even give rise to legitimate suspicion of the commission of corrupt practices.

The fees to be paid to suppliers and consultants must be exclusively commensurate with the service specified in the contract, and payments may not under any circumstances be made to a party other than the contractual counterparty or in a third country other than that of the parties or of performance of the contract.

Compliance by suppliers and consultants with anti-bribery legislation and the principles expressed in this Code must be expressed in an anti-bribery clause to be included in the agreements signed by each Group company with the latter. This clause shall provide, in particular, for the right to suspend or terminate the relationship in the event of formal acts by the Judicial Authority indicating the involvement of the third party in proceedings for bribery offenses.

3.4 Management of gifts, sponsorships, and donations

The Group and its companies undertake to support the community of reference also through the provision of donations and/or sponsorship of events, initiatives, and organizations in accordance with the principles of transparency, verifiability, traceability, reasonableness, and cost-effectiveness.

Donations and sponsorships must be made in accordance with the following principles:

- verification of the identity and reputational requirements, honorability, and integrity of the recipients of the initiative;
- legitimacy of the initiative;
- verification of compliance with the prohibition on granting benefits/entering into contracts with persons included in the reference lists relating to the financial fight against terrorism or belonging to organizations included in those lists;
- verification of the nature, importance, or notoriety of the event, project, or activity;
- *ex post* verification of the beneficiary's use of the donation for the stated purposes;
- approval by the competent bodies of the amount of the donation or sponsorship.

Gifts exceeding a modest value, to be defined in internal regulatory documentation, are not permitted; if of modest value, they must always be adequately justified and authorized, and attributable solely to acts of mutual courtesy within the context of proper business relations.

It is therefore prohibited to offer, even indirectly or through an intermediary, or to accept gifts, gratuities, benefits of any other kind, or forms of entertainment and hospitality if even one of the following circumstances applies:

- it is not appropriate, reasonable, and in good faith;
- it does not fall within the normal practices of professional and commercial courtesy;
- it could be understood as a means of persuasion with the aim, even implicit, of improperly obtaining favorable treatment;
- it could, even potentially, cause reputational damage to the Group;
- it is motivated by the desire to exert undue influence or by the expectation of reciprocity.

In this context, in order to combat any form of offering and/or accepting of gifts, gratuities, or other benefits that are not permitted, and to give concrete form to this commitment, each Group company has adopted and implemented a specific internal policy on gifts, sponsorships, and donations.

3.5 Human Resources and Travel Management

The selection, recruitment, and incentivization of the Group's human resources are based on the principles of fairness, impartiality, objectivity, competence, professionalism, and equal opportunities. When selecting and hiring personnel, the Tinexta Group works to ensure that resources correspond to the profiles actually necessary to fully meet the company's needs, avoiding favoritism and preferential treatment and valuing merit, skills, and technical and professional *know-how*. All those involved in any capacity in the process in question must therefore operate in accordance with the values expressed in internal regulations, this Anti-Bribery Code, and the Group's Code of Ethics and Conduct.

Furthermore, during the selection process, candidates must declare, in compliance with applicable regulations and assuming full responsibility for the truthfulness of their statements, the existence of any situations and circumstances relevant to their possible recruitment (such as, for example, situations of conflict of interest—current or potential—or family relationships with persons belonging to or representing the public administration).

The following principles must be observed in the selection, recruitment, and incentivization of human resources:

- separation between those who:
 - expresses the need to hire personnel;
 - approves the recruitment budget;
 - selects and hires candidates.
- adoption of objective, verifiable, and non-discriminatory criteria in identifying profiles and selecting candidates in relation to the company's needs and the tasks to be performed, consistent with educational qualifications, professional skills, and previous experience;
- comparative assessment of candidates based on criteria of professionalism and suitability for the tasks for which they are being hired;
- evidence of the outcome of candidate assessments, the relative choice, and the financial offer;

- clear prior identification and traceability of the criteria for awarding bonuses/benefits/salary increases, as well as the choices made in awarding them.

During the personnel selection phase, checks are also carried out on candidates for roles with spending powers or who have responsibility for activities that may be subject to bribery, by asking them to declare any circumstances that the Group considers relevant for the purposes of continuing the selection process (e.g., family relationships with individuals belonging to the public administration, situations of incompatibility, *etc.*).

The remuneration and incentive system is based on the principles of fairness, transparency, equal opportunities, and correctness, and those involved in personnel management activities must therefore ensure neutrality and impartiality in their treatment of employees, promote meritocracy, and, in any case, avoid behavior that could give rise to favoritism.

The following principles must be observed in the management of travel and expense reimbursements:

- management of travel expense reimbursement requests in compliance with the segregation of roles and existing authorization powers;
- traceability and archiving of expenses incurred by means of invoices, receipts, or other suitable supporting documents;
- reasonableness and proportionality of the expense incurred to the nature of the travel and consistent with the role and level of responsibility of the employee and/or collaborator;
- verification of the completeness of the reporting of supporting documents relating to expenses and the consistency between the expenses incurred, the work activities carried out, and the supporting documentation;
- periodic monitoring of reimbursements paid to staff.

3.6 Accounting management

As part of its accounting management, the Tinexta Group has established an internal control system and carries out appropriate accounting checks to ensure that every operation or transaction is correctly recorded in accordance with applicable accounting principles and, in any case, in compliance with current legislation.

Accounting records must be authorized, verifiable, legitimate, consistent, and appropriate.

Furthermore, in order for the accounting to meet the requirements of truthfulness, completeness, and transparency, for each transaction, the Group companies must ensure adequate and complete documentation supporting the activity carried out, so as to allow:

- accurate accounting records;
- the immediate determination of the characteristics and reasons underlying the transaction itself;
- the easy formal reconstruction of the transaction;

- verification of the decision-making, authorization, and implementation process, as well as the identification of the various levels of responsibility.

Each Recipient is therefore required to cooperate, within the scope of their competence, to ensure that every fact relating to the management of the Group is correctly and promptly recorded in the accounts.

3.7 Management of extraordinary transactions

The Tinexta Group carries out numerous extraordinary corporate transactions with a view to expanding its business.

The management of an extraordinary transaction may present risks in terms of bribery (for example, a potential investor may engage in corrupt behavior towards a representative of the Group in order to conclude the transaction).

Personnel involved in the management of extraordinary transactions must not accept or respond to any requests for money or other undue benefits and, in any case, must perform their duties and manage relations with the counterparty to the transaction in full compliance with the following principles:

- fairness, transparency, and impartiality;
- compliance with the required authorization procedures;
- carrying out a due diligence assessment of the counterparty to the transaction, including checks on economic, financial, and organizational aspects, as well as compliance (e.g., compliance with applicable anti-bribery laws) and reputational aspects;
- ensuring the traceability of the activity and the checks carried out.

3.8 Customer relationship management

In its relations with its customers, the Tinexta Group bases its business relationships on the principles of transparency, legality, and contractual good faith in compliance with current legislation and the Group's Code of Ethics and Conduct.

In customer relations, it is prohibited to improperly influence the decisions of the other party, as well as to promise or offer such parties or their relatives payments, goods, and/or other benefits to promote or favor the interests of one or more Group companies.

3.9 Management of relations with third parties and intra-group relations

In managing relations with third parties, including Related Parties, and in intra-group relations, the following principles must be observed:

- identification of roles and responsibilities in the drafting and verification of intra-group contracts;
- verification that the terms of intra-group contracts are in line with market conditions, based on assessments of mutual economic convenience;

- verifying that intra-group contracts are signed on the basis of the system of delegated powers and powers of attorney in force and consistent with purchasing or sales requirements;
- verify, on a preliminary basis, that there are no conflicts of interest in the management of intra-group relations and with third parties;
- traceability and archiving of documentation relating to the management of intra-group and third-party relationships.

In this context, intra-group contracts must include specific clauses whereby each company undertakes, vis-à-vis the other, to comply strictly with its own Codes of Ethics and this Anti-Bribery Code, which the parties declare they are familiar with and accept.

4. Communication, information, and training

In order to establish and maintain a culture conducive to the prevention of all types of bribery, the Tinexta Group invests significantly in training, communication, and awareness-raising on the subject for all staff and members of corporate bodies.

In this context, communication actions include:

- the publication of the Anti-Bribery Code on *the company website* and *intranet*;
- making this Code available to the entire company population and distributing it to new hires upon hiring, with a signature certifying receipt and commitment to comply with the relevant principles.

Awareness-raising and training on anti-Bribery issues take place on a regular basis through *online* courses made available to all company personnel.

5. *Whistleblowing*

The Tinexta Group encourages all Recipients to report any conduct that violates the law, as well as this Anti-Bribery Code and the Code of Ethics and Conduct.

Reports may be submitted by email to the following address: alerte@euroquality.fr.

This email address is dedicated exclusively to receiving reports concerning any situation or conduct that may constitute a breach of applicable laws, this Code, or the Company's ethical standards (including, but not limited to, fraud, corruption, discrimination, harassment, etc.). All reports will be handled confidentially and in accordance with the applicable laws and regulations.

Furthermore, the reporting party:

- if they have not received a response to the report made;
- has reasonable grounds to believe, based on concrete circumstances and information that can actually be obtained, that if they were to make an internal report, it would not be effectively followed up or could lead to the risk of retaliation;

- has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest;

may use the external reporting channel provided by the French Defender of Rights (Défenseur des Droits), the AFA, or the competent French judicial authorities, in full compliance with the Loi Waserman.

The Tinexta Group – also in compliance with personal data protection legislation—guarantees the confidentiality and protection of the personal data of the person making the report and of the persons involved and/or mentioned in the report, as well as of the so-called facilitators.

The protection of the person making the report against retaliatory, discriminatory, or otherwise unfair conduct resulting from the report is also guaranteed.

6. Disciplinary system

Violations of the principles of conduct outlined in this Anti-Bribery Code will result in disciplinary sanctions that are appropriate and proportionate to the offense committed, also taking into account the possible criminal relevance of such conduct and the initiation of criminal proceedings in this regard. All Group companies apply the provisions contained in the National Collective Labor Agreements and in the Supplementary Company Agreements applicable from time to time.

In this regard, please refer to the provisions on disciplinary sanctions in the Group's Code of Ethics and Conduct.

Any conduct by employees, auditors, consultants, *partners*, counterparties, and other external parties, that is in conflict with the Code or the Anti-Bribery Regulations may result in the suspension or early termination of the contractual relationship for just cause, as well as the possible filing of a claim for compensation for damages suffered by the Parent Company or another Group company.

