



*BE BETTER: Today better than yesterday,  
tomorrow better than today!*

*ESSERE MIGLIORE: Oggi migliore di ieri, domani migliore di  
oggi!*

# Bribery and Corruption Policy

## Introduction:

At Talent I Rozwój Fabrizio Bertocchi, we are committed to conducting our business with the highest ethical standards and integrity. We recognize that bribery and corruption can undermine our values, reputation, and business success. To this end, we are launching a Bribery and Corruption Policy that aims to prevent, detect, and address bribery and corruption risks in our operations.

## Policy Statement:

Talent I Rozwój Fabrizio Bertocchi prohibits any form of bribery or corruption, whether committed by our employees, agents, representatives, or business partners. We will not offer, promise, give, solicit, or accept bribes or other improper advantages, whether directly or indirectly, to gain business or personal advantages. We will comply with all applicable laws, regulations, and international conventions related to bribery and corruption.

## Policy Principles:

*Prohibition:* We will prohibit all forms of bribery and corruption in our operations, including but not limited to cash payments, gifts, entertainment, and favors. We will not tolerate any behavior that violates our policy.

*Risk Assessment:* We will conduct a risk assessment to identify and evaluate the bribery and corruption risks in our operations. We will use this information to develop risk-based controls and monitoring procedures.

*Due Diligence:* We will perform due diligence on our business partners, including suppliers, contractors, consultants, and agents, to ensure that they are reputable and comply with our policy. We will also require them to comply with our policy and notify us of any potential bribery or corruption risks.

*Training and Communication:* We will provide training and communication to our employees, agents, representatives, and business partners to increase their awareness of our policy and the risks and consequences of bribery and corruption. We will also communicate our policy to stakeholders, such as customers and suppliers.



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*Reporting and Investigation:* We will establish procedures for reporting and investigating potential breaches of our policy. We will encourage and protect whistle-blowers who report potential violations in good faith. We will also take appropriate disciplinary and remedial actions against violators of our policy.

*Monitoring and Review:* We will monitor and review our policy and procedures regularly to ensure that they remain effective and up-to-date. We will also evaluate our program's effectiveness and make improvements as necessary.

### Conclusion:

At Talent I Rozwój Fabrizio Bertocchi, we are committed to conducting our business with the highest ethical standards and integrity. We believe that bribery and corruption have no place in our operations and can undermine our values, reputation, and business success. By implementing this Bribery and Corruption Policy, we are taking an important step towards preventing, detecting, and addressing bribery and corruption risks in our operations. We expect all our employees, agents, representatives, and business partners to comply with our policy and uphold our values of honesty, integrity, and transparency.

The Founder

Fabrizio Bertocchi