



GENESIS PROPERTY

ANTI-CORRUPTION POLICY

Last update: 14 October 2022

Purpose

Genesis Property conducts its business in a professional, ethical and honest manner that has zero tolerance for any form of corruption.

A bribe is an inducement or reward offered or requested, accepted or promised, to obtain in an improper, unethical, illegal manner, a commercial, contractual or personal advantage. The bribe can be given in money, gifts, services, commissions or any other kind of advantage or benefit, all these forms of bribery being strictly prohibited.

Corruption is the abuse of a power or position entrusted to a person for the purpose of obtaining a personal advantage.

This policy applies to all persons working for or on behalf of Genesis Property in any capacity, including employees (permanent and temporary), directors, managers, staff contributors, consultants and volunteers.

Genesis Property prohibits the giving or receiving of gifts and favors with the intent to:

- Inappropriately influence (or be influenced by) a third person to obtain or retain a commercial advantage; or
- reward (or be rewarded for) providing or retaining a business or commercial advantage, or in explicit or implicit exchange of favors or benefits of any kind.

Genesis Property allows giving or receiving reasonable gifts to/from partners for the purpose of developing and maintaining good business relationships. Our procedures provide guidance on what is considered normal and appropriate, considering specific legislation and general standards of behavior.

The General Directors and/or administrators of Genesis Property companies are responsible for approving any charitable contributions and sponsorships. When considering a charitable donation, each General Director and/or administrator takes care to ensure that it is not dependent on winning new business or obtaining any other kind of commercial advantage or to reward in any way such practices.

Responsibilities and Management

The prevention, detection and reporting of bribery and any other form of corruption or other specific misconduct is the responsibility of everyone working for or on behalf of Genesis Property companies. It is the obligation of each individual to inform his superior manager or the human resources manager as soon as possible, verbally or in writing to the email address sesizare@genesisproperty.net.

Confidentiality

We are committed to ensuring the confidentiality of the content and the identity of the persons mentioned in the notification. No one shall suffer as a result of refusing to take part in an act of corruption or because of his suspicion that an actual or potential crime of corruption has taken place or may take place in the future.

The effectiveness of this policy and the various measures we adopt is analyzed annually, in order to minimize the risks through which acts of corruption can damage the good reputation of our companies.

The content of this document is updated annually or whenever deemed necessary, based on the results obtained and the experience gained.