

Anti-Corruption Policy

Introduction

Società Italiana Brevetti S.p.A. (hereinafter “SIB”) offers comprehensive intellectual property consultancy and management services to Italian and foreign companies, universities, research centres, and start-ups. Such services include the drafting and filing of patent, trademark, design, and plant variety applications at both national and international level; the management of intellectual property portfolios; prior art searches and monitoring; strategic valuations; licensing; and legal defence in cases of counterfeiting or usurpation. In particular, the main services offered by SIB are:

- Preparation of applications for the grant or registration of intellectual property rights
- Strategic management and enhancement of IP rights
- Searches and monitoring
- Legal advice and assistance
- Valuations and due diligence
- Contracts and licensing

In this context, in coordination with the principles and provisions set out in the Code of Ethics, and inspired by best practices in the field of corruption prevention, the SIB Board of Administration (hereinafter “BoA”) has prepared and approved this Anti-Corruption Policy (hereinafter “Policy”) in order to prevent acts of corruption and minimize the risk of conducts that may fall within corruption-related offenses.

1. Recipients

The recipients of this Policy are the Board of Administration, the Board of Statutory Auditors, employees, and collaborators as defined in Article 2 of the Code of Ethics.

2. Principles of the Policy

The following general principles, in addition to those set out in the Code of Ethics, must guide the performance of activities carried out within SIB:

- Clarity and simplicity to enable control activities;
- Impartiality and absence of conflicts of interest, so that SIB personnel may avoid situations that could compromise their ability to act in SIB’s interest and in accordance with applicable regulations;
- Traceability of activities to enable controls.

3. Areas of Risk

3.1 Relations with Suppliers

Supplier selection methods must comply with the principles of transparency, cost-effectiveness, traceability, and free competition. In particular, they must:

- Adopt objective and transparent evaluation criteria in selecting suppliers;
- Comply with applicable law during the selection process;
- Observe principles of fairness and good faith in relations with suppliers.

The management of negotiations and the execution of contracts with suppliers are reserved to the designated company functions under the supervision of the Chief Executive Officer and/or the BoA. In particular, the management of such relations must avoid any conduct contrary to fairness and the law, including offering or requesting, directly or indirectly, money, gifts, or other benefits.

3.2 Relations with the Public Administration or Other Public Authorities

Relations with representatives of the Public Administration (hereinafter “PA”), supervisory authorities, public officials, or persons entrusted with a public service must be conducted in accordance with the principles of fairness, transparency, impartiality, and cooperation. It is strictly prohibited, during such relations, to seek or establish relationships of favour, influence, or interference with the aim of directly or indirectly influencing their activities.

4. Prohibitions

It is prohibited to promise, provide, or offer, in any form, payments, benefits of any kind, or other advantages with the aim of influencing the conduct of representatives of the PA. Gifts in the form of money are prohibited regardless of their value.

5. Gifts

Receiving gifts in the context of customary courtesy relations is permitted only if they are of modest value and such as not to compromise the integrity and reputation of the parties. Such gifts must not be capable of being interpreted as acts intended to obtain undue advantages or favours.

6. Donations and Contributions

Monetary donations may be made in favour of third parties, organizations, associations, or third-sector entities to support humanitarian and social initiatives. Such donations must be made via bank transfer or through officially recognized and authorized intermediaries in order to ensure traceability.

7. Internal Monitoring

The BoA implements monitoring to verify compliance with the principles and rules of conduct set out in this Policy, where appropriate based on the indications of the Board of Statutory Auditors.

8. Conflicts of Interest and Preventive Measures

Conflicts of interest and preventive measures are governed by Articles 5 and 10 of the Code of Ethics.

9. Disciplinary Provision

Compliance with this Policy forms part of the contractual obligations of employees and, more generally, of all recipients referred to in Article 1. Violations, once confirmed following a thorough assessment, may result in the application of disciplinary measures proportionate to the severity of the breach, the applicable legal framework, and any provisions set out in the company employment contract.

Approved by the Board of Administration on 25 September 2025.