

GROUP ANTICORRUPTION POLICY



Group Anticorruption Policy

Release 2021

Message from Chief Executive Officer

Amplifon is firmly committed to carrying out fair, honest and ethical business worldwide, in compliance with applicable laws and regulations wherever the Group operates.

Ethical conduct in business brings a number of benefits, such as improving reputational image, enhancing value proposition to the market and reinforcing Business Partners' confidence.

The Group's Anticorruption Policy presented here is a helpful tool when it comes to performing our daily activities ethically and sustainably, ensuring that we create value while protecting the core principles on which the Group's activities are founded.

Our Policy is aligned with the most recent international best practices and is part of a journey along the road to continuous improvement and strengthening of the internal control system, making sure the Group grows and performs responsibly.

Amplifon has ZERO TOLERANCE FOR CORRUPTION: this statement applies to both public and private sectors.

I firmly believe that teamwork, cooperation and mutual assistance are the only levers on which to rely in order to make things right. Therefore, I strongly count on everyone's active support in adhering to the principles contained in this document to keep improving the Group's ethical approach in the business arena.

WE ALL DO OUR BEST TO ENSURE OUR SUCCESS. AND WE DO IT ETHICALLY.

*Enrico Vita
Chief Executive Officer*

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1 Introduction

1.1 Amplifon's commitment

Amplifon is an international organisation that operates in various institutional, economic, political, social and cultural environments, which are continuously and rapidly evolving. Global presence leads to great challenges and key responsibilities. The ability to abide by all applicable laws, regulations and social responsibilities is one of the main challenges, given the multitude of jurisdictions in which the Group operates.

Many local Governments, as well as other national and supranational organisations around the world, have defined specific anticorruption legislations, aimed at limiting corrupt behaviours and related ethical and business damages, considering that:

- from an ethical point of view, corruption harms the integrity of all those involved and undermines the basic values of the organisations to which they belong;
- from a business point of view, corruption leads to undesired consequences for companies such as legal risks, reputational damage, disruption, financial costs, including fines, business suspensions and debarments.

Amplifon is committed to “doing its part” to combat corrupt practices wherever in the world it operates.

1.2 Definition of Corruption

Corruption can be defined as the direct or indirect offer or acceptance of money or other benefits with a view to influencing the recipient, in either the private or the public sector, in order to induce or reward the performance of an activity or the omission of one.

As defined above, a corrupt activity could be perpetrated actively or passively, by offering or accepting money or other benefits as an inducement or reward for doing or not doing something, in order to pursue an improper advantage. Such conduct may also be perpetrated in an instrumental manner, through scenarios that could set up the conditions, occasions or means for the commission of a corrupt act.

2 The Group's Anticorruption Policy

2.1 Purpose and Objectives of the Policy

The Anticorruption Policy is the document that includes the anticorruption principles and general objectives that Amplifon considers to be essential. The aim is to provide all Amplifon's employees, and to those acting on behalf of the Company, with the provisions and guidelines to be followed in order to ensure compliance with the anticorruption regulations.

The provisions and guidelines contained in this Policy are inspired by the corporate culture and the behavioural principles set out in the Group's Code of Ethics. They address a variety of situations in which risks of corruption may arise and expose the Group to consequences. They promote the highest standards in all business dealings, and require activities to be conducted with loyalty, fairness, transparency, honesty and integrity. They provide specific rules for preventing, detecting and managing the risks of corruption within the Group's sphere of influence.

This Policy is aligned with the requirements of anticorruption regulations and national and international principles of corruption prevention.

2.2 Anticorruption Policy Recipients

This Policy applies to all directors, members of any committee, officers, and employees (permanent and temporary) of Amplifon S.p.A. and its subsidiaries and affiliated companies worldwide, regardless of citizenship or location of employment. Its principles and prohibitions also apply to any companies or individuals that represent or conduct business on behalf of Amplifon, regardless of citizenship or where they conduct business.

The recipients, including Third Parties, are required to be honest, transparent, loyal and professional in all their business conducts, wherever they operate, in order to act in strict compliance with applicable laws and regulations.

Note: external collaborators and any Third Party that have material business relations with the Group (including suppliers), are required to sign specific contractual clauses disciplining the respect and acceptance of the anticorruption principles and the other provisions contained in the Group's Code of Ethics.

3 Amplifon's Values and Principles of Conduct

3.1 The Group's Ethical Values

Amplifon requires its people to operate in compliance with applicable anticorruption laws and regulations and to embrace the Group's values, ethical standards and principles.

Amplifon firmly believes that acting in accordance with the principles detailed in the Group's Code of Ethics and in this Policy as well as with the applicable laws and regulations, will prevent cases of corruption and will contribute to protecting the Group's ethical and responsible business conduct.

Indeed, the Group's Code of Ethics requires, among others, that in the course of business the recipients act in the interest of the Group's companies and carry out their activities in the name of legality, loyalty, honesty, integrity, fairness, transparency and efficiency. Moreover, the Group's Code of Ethics prohibits all forms of corruption, favouritism, collusion and direct or indirect solicitation or promise of personal advantage or career promotion, for both employees and Third Parties.

Furthermore, the fight against corruption is one of the goals of Amplifon's Sustainability Plan, as described in the annual Sustainability Report, and "Ethical Behaviour" is one of the pillars of the Group's Sustainability Policy.

3.2 Prohibition of Corruption

At Amplifon, corrupt conducts such as the use of bribery, kickbacks or other similar practices are never permitted.

The general and mandatory rule is that any form of corruption in favour of anyone is prohibited (i.e., not only in favour of Public Entities, but also in favour of persons acting on behalf of companies or private parties). **Therefore, the offer, promise and giving, as well as the solicitation, acceptance and receipt of corrupt payments (or "anything of value") by Amplifon's personnel and anyone acting in the name or on behalf of Amplifon are prohibited.**

On the basis of this principle, both of the following are strictly forbidden, and will be sanctioned without any tolerance:

- "Active Bribery": offering, promising, giving, paying (or authorising somebody to offer, promise, give or pay), directly or indirectly, an economic advantage or any other benefit in favour of public or private parties;
- "Passive Bribery": accepting a request, solicitation or promise (or authorising someone to accept a request or solicitation) concerning an economic advantage or any other benefit from public or private parties;

when such activities are aimed at inducing, influencing and compensating any unlawful activity either to favour Amplifon or to gain personal advantages.

All such conducts are prohibited even if carried out indirectly through any person acting on behalf of the Company or through a Third Party.

In addition, in certain circumstances, a person could be held responsible if - although "aware" of a corrupt practice - he or she knowingly ignored the warning signs or grounds for suspicion.

It is essential to remember that corruption can take a variety of forms (not just the offer or giving of money or any other valuable asset or benefit). Indeed, even common business practices or social activities - such as gifts and hospitality - could in some circumstances be seen as acts of corruption.

3.3 Prohibition of Facilitating Payments

Amplifon forbids facilitating payments, which means payments in favour of Public Officials aimed at expediting, supporting or securing the realisation of a routine activity, regardless of whether or not local laws allow them.

3.4 Health and Safety Payments

If an employee faces an imminent threat to his or her personal well-being or safety, or to the well-being or safety of a family member or a co-worker, and he or she is compelled to make a payment otherwise prohibited by this Policy, that employee must report the payment and the details regarding the incident to the Chief HR Officer, the Chief Legal Officer and the Group Internal Audit and Risk Management Officer, as soon after the incident as possible.

4 General Principles

In order to prevent and identify misconducts related to applicable anticorruption laws and regulations, Amplifon requires people involved in the Group's daily business activities, whenever possible and applicable, to follow the eight general principles listed below:

1. **Take ownership of their own actions and of those of their co-workers:** employees are responsible, each to the best of their own competence, to be aware of, understand and comply with the Anticorruption Policy and applicable regulations. In particular, Managers must monitor compliance by those who report to them and must take measures to prevent, identify and report potential violations.
2. **Adhere to the principle of Segregation of Duties:** in accordance with the organisational structure, each of the Company's activities must be performed following the principle of Segregation of Duties, which means that authorisation of the activity must be under the responsibility of anyone other than the person carrying out or controlling the activity.
3. **Respect the Group's Delegation of Authority:** authorisations must be in accordance with Amplifon's Powers of Attorney chart and with the Delegation of Authority in place.
4. **Guarantee the formalisation and traceability of the decision-making process:** official acts (e.g., agreements) must be formalised in writing and filed together with all related supporting documentation.
5. **Comply with applicable policies and procedures in place:** all business activities must be carried out in accordance with Group and local policies, procedures and guidelines.
6. **Declare or report any potential conflict of interest:** anyone in a conflict-of-interest situation must report this to his or her immediate superior and avoid participating in the adoption of decisions or activities that may involve his or her own interests or those of Third Parties. Note that, even if the conflict of interest is only potential (i.e., there is only the appearance of a conflict-of-interest situation), the person involved should report this and, if considered appropriate, avoid being involved in any related decision. Third Parties working with the Company must also report any potential situations of conflict of interest they may observe or become aware of.
7. **Guarantee transparency and cooperation in relations with Public Institutions/Authorities:** Amplifon actively cooperates with Public Institutions/Authorities. Relations with public entities are maintained only by people formally appointed for the purpose, in accordance with the principles of transparency expressed in this Policy and generally respecting all provisions of the applicable anticorruption regulations.
8. **Guarantee accuracy, correctness and completeness of accounting records of each business transaction:** no valid transaction must be omitted from, or incorrectly/partially registered in, the accounting records.

5 The Group's Sensitive Areas

According to a risk analysis done with Top Management and on the basis of international best practices¹, the following areas have been identified as potentially exposed to the risks of corruption at Group level.

1. Relationships with Doctors and Members of the Scientific Community.
2. Relations with Representatives of Public Institutions.
3. Managing Agents.
4. Managing Acquisitions and Business Partners.
5. Relations with Suppliers.
6. Relations with Insurance Companies.
7. Managing Gifts, Entertainment Expenses, Free-of-Charge Utilities, Donations and Sponsorships.
8. Managing Human Resources.

Note: the list is not intended to be exhaustive and complete; it focuses on specific sensitive areas applicable at Group level and common to most local businesses.

Each local General Manager / Managing Director must address all relevant sensitive areas at a local level, and define an adequate control system, as well as formalising local operating procedures, if necessary, in order to reduce the risks of corruption effectively.

During the initial analysis aimed at implementing relevant controls, and during the subsidiary's day-to-day activities, the local General Manager / Managing Director must consider any risk indicators that may represent a "red flag" for possible corrupt practices. See **Appendix 2** for a few examples of **Risk Indicators**.

The following paragraphs indicate, for each sensitive area, the main risks where corrupt conduct could be committed. This is an illustrative and non-exhaustive indication of the main interactions and risk situations, as well as the guiding principles and some of the most relevant controls implemented by Amplifon in order to prevent and counter corrupt conduct.

¹ International best practices - sources:

- *United Nations Global Compact*: a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anticorruption.
- *Organisation of Economic Co-operation and Development (OECD)*: the organisation that promotes policies that improve the economic and social well-being of people around the world.
- *Transparency International (TI)*: quantifying the risks of corruption around the world.
- *ISO 37001*: international antibribery management system standard, designed to help organisations fight the risks of bribery in their own operations and throughout their global value chains.

5.1 Relationships with Doctors and Members of the Scientific Community

Amplifon interacts with Doctors and Members of the Scientific Community as providers of medical services. Examples of possible relations are:

- Doctors responsible for medical examinations: Amplifon may stipulate contracts with doctors in order to support the client in his customised integrated experience and in obtaining the necessary medical prescription for acquiring hearing aids.
- Medical consultancy and/or professional services: Amplifon may request medical consultancy or professional services in order to improve knowledge and obtain support on scientific and technical issues strictly related to the Company's business. Doctors, public speakers, universities and local health entities are the main providers.
- Research cooperation: Amplifon may communicate with leading theorists and doctors to cooperate on research related to the phenomenon of hearing loss. These subjects may receive funds for their research and be compensated for their services.

Related Risks of Corruption

- Influencing the activity of prescription through a referral fee, inducing doctors to sponsor Amplifon directly with their patients or customers, or to provide false or unnecessary prescriptions to patients or customers.
- Using expenses for professional services as a mean of creating illicit funds to be used for corrupt purposes with the medical profession, in order to obtain an undue advantage (both financial and reputational) for Amplifon.
- Influencing the outcome of scientific research in order to benefit Amplifon's image or to enhance potential market opportunities.

Guiding principles and main controls

- All relationships with Doctors and Members of the Scientific Community must be regulated by a written agreement or contract, to be signed by people with adequate Powers of Attorney, and these must be transparent, fair and objective.
- Professional services provided by Doctors and Members of the Scientific Community must be real and effective, and the related documentation must be properly filed.
- All payments made to Doctors and Members of the Scientific Community must be consistent with the provisions included within the agreement or contract, approved in accordance with the Delegation of Authority and properly recorded in the Company's books.
- A suitable system for reporting interactions with Doctors and Members of the Scientific Community must be formalised and controlled by the Manager or Director responsible for relations with them.

5.2 Relations with Representatives of Public Institutions

Amplifon may interact with the Representatives of different Public Institutions for:

- Advice on addressing regulatory issues: Amplifon strictly monitors changes in local regulations in all its relevant markets, through its local General Managers / Managing Directors; Amplifon maintains relations with market associations and advocacy firms to communicate with Health and Governmental Institutions, in order to minimise the impact of changes to the regulations concerning the use of medical devices and hearing aids and any subsidies affecting the Company's business.
- Shop requirements and the validation of permits/licences: shops may be subject to requirements concerning equipment and its refurbishment. These requirements may be verified and validated by Public Authorities in order to issue the permits and licences needed to conduct the business.
- Inspections by Public Authorities: Amplifon may be subject to inspections of its headquarters, subsidiaries and shops by Representatives of the Public Institution, in order to verify compliance with applicable laws and regulations.
- Public subsidies: Amplifon may receive public funds and financial support for activities such as research projects and employee training.
- Public tenders: Amplifon may interact with public hospitals and other Public Healthcare Institutions in order to participate in public tenders for the hearing aids and cochlear implants business.

Related Risks of Corruption

- Improperly influencing the regulatory activity of Governmental Institutions, for the purpose of favouring Amplifon's business.
- Obtaining false licences and authorisations to speed up the process or avoid checks on retail outlets.
- Influencing the results of inspections or avoiding an inspection or causing possible irregularities to be overlooked.
- Improperly obtaining public subsidies for eligible activities.
- Favouring Amplifon in a public tender by influencing the representatives responsible for the decision process.

Guiding principles and main controls

- All relations with Representatives of Public Institutions must be managed by identified/appointed people, who must guarantee the correctness and traceability of all activities.
- Whenever possible and applicable, contacts with Representatives of Public Institutions must be undertaken, in the main phases of the negotiation or proceedings, by at least two people.

- Advocacy must not be misused for any corrupt or illegal purposes, or to improperly influence any decision, and must always be used in accordance with applicable laws and regulations.
- There must be no tolerance of actions of any kind aimed at undermining the integrity or reputation of Representatives of Public Institutions.

5.3 Managing Agents

Amplifon operates in different markets with various business models. In some markets, the Group uses Agents as Shop Managers, operating autonomously in performing day-to-day business activities.

Depending on the nature of the agreements in place, the Agents represent the Group and act on its behalf.

Related Risks of Corruption

Agents may:

- Perform actions that could be considered as not complying with laws and regulations or conduct activities with the intention of creating illicit funds for corrupt purposes.
- Indulge in misconducts, or provide, promise or accept a request for money, gifts or other benefits, indirectly exposing Amplifon to corruption-related risks which could potentially damage the Group's reputation and image.

Guiding principles and main controls

- Agents must not have any kind of conflict of interest involving the Representatives of Public Institutions, which may have an impact on the business or the industry.
- Relations with Agents must be regulated by a written agreement/contract, to be signed by people with adequate Powers of Attorney, and this must be transparent and fair.
- The scheme for remunerating Agents as provided for in such contracts must be adequate, fair and in line with market standards.
- Agents must abide by the standards and principles of behaviour of this Policy and the Group's Code of Ethics.
- Agents must operate in compliance with the laws of the countries where they conduct their business, and they must act with integrity, honesty and transparency.
- Actions by Agents that may be considered as unlawful or not in compliance with the Group's internal rules and Amplifon's Code of Ethics must be monitored and reported through the dedicated Whistleblowing channels.
(Please refer to the dedicated section 6.4).

5.4 Managing Acquisitions and Business Partners

The Group may pursue external growth through the acquisition of companies, shop chains and single shops, or may finalise Joint Venture and Franchising agreements.

Amplifon looks for potential target companies, shop chains and single shops, in order to identify opportunities for acquisition or other agreements and to increase its market coverage.

When a Joint Venture or Franchising agreement/contract is entered into, Amplifon's local Business Partners will manage the business locally.

Related Risks of Corruption

- Providing, offering, promising or accepting a request for money, gifts or other benefits to or from acquisition targets or potential Business Partners in order to speed up the transaction processes in favour of Amplifon.
- Performing activities not in compliance with laws and regulations or aimed at creating illicit funds to be used for corrupt purposes, also when performed by Business Partners.

Guiding principles and main controls

- Amplifon must use proper Due Diligence as a preventive measure to check out potential acquisition targets and Business Partners.
- Business Partners must act with integrity, professional ethics, honesty and transparency.
- All transactions must be formalised in writing, must include reasonable and adequate compensation and provisions for compliance, and they must be executed by employees with adequate Powers of Attorney.
- Amplifon must provide Business Partners and purchased companies with the Group's Code of Ethics, the Group's Anticorruption Policy and all other applicable policies and procedures, as considered appropriate on a case-by-case basis.

5.5 Relations with Suppliers

Amplifon engages in relations with suppliers to obtain the necessary products and services in order to carry out its business activities.

Related Risks of Corruption

- Providing, offering, promising or accepting a request for money, gifts or other benefits to/from suppliers in order to:
 - obtain favourable conditions for Amplifon, at both Corporate and local level, or to gain personal benefits and advantages;
 - obtain, provide or disclose confidential information.

- Using disbursements as a mean of creating illicit funds for corrupt purposes.
- Conducting activities of risk with Third Parties, in particular through suppliers and external consultants.

Guiding principles and main controls

- All relations with suppliers must be maintained in a fair, ethical, and transparent manner.
- Screening activities and background checks of significant suppliers must be conducted to identify possible risks. The results must be duly documented and filed.
- All relations with Suppliers must be regulated by written agreements, including all applicable compliance clauses. Only people with adequate Powers of Attorney must commit the Company with Suppliers through written agreements.
- The receipt of services or goods must be properly documented.
- All payments must be made on the basis of the provisions of the agreement, approved in accordance with the Delegation of Authority and appropriately recorded in the Company's accounting system.
- A process must be implemented for monitoring the performance and behaviour of suppliers, and any irregularities must be reported and investigated.
- The principle of Segregation of Duties must be followed in all phases of the procurement process.

5.6 Relations with Insurance Companies

Amplifon manages relevant relations with Insurance Companies in order to be eligible as a privately subsidised supplier of hearing aids, in those countries where the Insurance Companies manage the system for reimbursing expenses related to hearing aids.

Related Risks of Corruption

- Providing, offering, promising or accepting a request for money, gifts or other benefits to/from personnel responsible for the decision process, in order to favour Amplifon in tenders and/or negotiations with Insurance Companies.

Guiding principles and main controls

- All relations with Insurance Companies must be managed by identified and competent employees.
- All documentation required for tenders and/or negotiations must be complete, correct and approved by people with adequate Powers of Attorney, and correctly filed.
- The executed agreements must report the same values, terms, and conditions as stated in the bidding documents.

- All relations and/or meetings and/or activities with Insurance Companies must be conducted in compliance with the Group's ethical values.

5.7 Managing Gifts, Entertainment Expenses, Free-of-Charge Utilities, Donations and Sponsorships

Amplifon may provide gifts, free-of-charge utilities and donations, and engage in sponsorship activities to promote its products and services to potential customer segments. Amplifon may also organise and host corporate events and meet hospitality and entertainment expenses.

These activities, in particular for marketing and medical marketing purposes, may represent a benefit for the medical profession, Business Partners and other Third Parties (public or private).

Possible misconducts related to Gifts, Entertainment Expenses, Free-of-Charge Utilities, Donations and Sponsorships (“GEFDS”) may be considered instrumental to corrupt purposes.

Related Risks of Corruption

- Providing, offering, promising or accepting a request for money or other benefits through gifts, free-of-charge utilities, donations, sponsorships, hospitality and entertainment expenses, contrary to local laws and common practices, in order to obtain undue advantages for Amplifon’s business, to influence the independence of judgement and the actions of any counterparty, or in order to remunerate Amplifon’s personnel for the illicit or omissive performance of their activities in favour of Third Parties.
- Using gifts, donations and sponsorships as a mean to create illicit funds to be used for corrupt purposes.

Guiding principles and main controls

- GEFDS activities must be solely intended as common courtesy or in favour of the Community and must not compromise the integrity and reputation of the Group.
- Amplifon's employees must screen potential GEFDS recipients, depending on the amount of the transaction, and collect information on their background, to avoid that such initiatives could be used for improper purposes, and to respect applicable policies and procedures.
- Gift and free-of-charge utilities must be of moderate value and aligned with local regulations and/or practices and with the Group’s guidelines.
- All gifts and free-of-charge utilities offered and accepted must be other than cash, reasonable and *bona fide*, and in compliance with applicable local laws and regulations. Gifts and free-of-charge utilities received, which have a value exceeding what is locally considered acceptable, must be returned.
- Each local subsidiary, in compliance with the Group’s guidelines and local applicable regulations, must define adequately approved thresholds for the acceptable values of gifts and free-of-charge utilities, and adopt efficient measures to verify that the rules are followed.

- All sponsorships, donations, and hospitality activities must be regulated by written agreements to be signed by people with adequate Powers of Attorney. All payments must be made as stated in the agreement and correctly recorded.
- All entertainment expenses must be approved in accordance with the Delegation of Authority, correctly recorded on the accounting system and the related supporting documentation must be complete, correct and properly filed.

5.8 Managing Human Resources

Amplifon may employ audiologists, technical experts and other professionals to carry out its business activities.

Related Risks of Corruption

- Providing, offering or promising jobs, career promotions, bonuses and recognition of MBOs to close relatives of doctors or public officials, in order to obtain undue advantages for Amplifon.
- Remunerating (also through gifts or other benefits) Amplifon's employees for the illicit or omissive performance of their activities, related to the management of human resources area, in favour of Third Parties.
- Using the Company's benefits as a mean to perform corrupt practices.

Guiding principles and main controls

- Decisions concerning recruitment, selection processes, career promotion and performance bonuses must be based on objective and unbiased factors such as performance evaluation, technical and professional competences and assessment of talent.
- Multi-position functionaries and/or officers and/or managers must be involved during the selection, hiring and evaluation processes.
- All processes must be traceable, the decisions formalised and the supporting documentation complete and correct.
- Checks must always be done on previous professional experience and on suitability for the role (in accordance with and as permitted by applicable local laws), and the presence of any potential conflicts of interest or relationships with doctors, Representatives of Public Institutions and other relevant public or private parties must be considered and disclosed.
- All employment relations must be regulated by written agreements to be signed by people with adequate Powers of Attorney.
- Performance bonuses, targets and other incentivizing elements of remuneration must always be authorised in accordance with the Delegation of Authority, and periodically reviewed.

6 System of governance

The Anticorruption Governance System is based on the following processes:

1. Anticorruption readiness assessment.
2. Monitoring of changes of business and regulatory requirements.
3. Design and update of procedures.
4. Non-compliance notifications - Whistleblowing channels.
5. Auditing activities.
6. Reporting to the Management and the Board of Directors.
7. Training and awareness.
8. Communication.
9. Disciplinary measures.

Local General Managers / Managing Directors must be fully committed to the implementation of the Anticorruption Governance System.

The Group Internal Audit and Risk Management Department provides guidelines to local General Managers / Managing Directors for the implementation of the Anticorruption Governance System.

6.1 Anticorruption readiness assessment

Each local subsidiary evaluates the existence and effectiveness of the anticorruption controls, as indicated in this Policy, by completing and keeping updated the “Anticorruption readiness assessment”. The purpose of this tool is to help local General Managers / Managing Directors to perform their assessment, by identifying sensitive areas and related controls applicable to the Country, as defined at Group level in this Policy. In any case, should any other sensitive area be relevant for the subsidiary and be potentially prone to corrupt practices, each local General Manager / Managing Director must identify and implement adequate controls to mitigate it.

The Anticorruption readiness assessment is updated at least once a year or in the event of significant changes.

6.2 Monitoring of business and regulatory requirements changes

Amplifon is eager to comply with anticorruption laws and regulations of each country where it operates.

For this purpose, local General Managers / Managing Directors, with local legal support, are required to monitor applicable anticorruption laws and changes in relevant related business activities, assessing on a continuous basis the specific local requirements. Relevant issues identified should also be reported to the Group Internal Audit and Risk Management and to the Group Legal Departments.

6.3 Design and update of procedures

Local General Managers / Managing Directors must, when necessary, formalise anticorruption operating procedures in compliance with the Group's Anticorruption Policy and best practices, and update them in accordance with changes in business activities, local laws and regulatory requirements.

6.4 Non-Compliance notifications - Whistleblowing channels

Amplifon is eager to be aware of any potential misconduct that could lead to breaches of the Group's Anticorruption Policy. Should anyone reasonably believe that a behaviour might be risking a violation of the law or the Group's principles, he or she must promptly report the matter through the available Whistleblowing channels.

The preferred channel for reporting any potential misconduct to the Whistleblowing Committee is the Digital Whistleblowing System, as specifically designed to ensure ease of use for the best protection of whistleblowers.

Alternative channels are also available as indicated below:

- e-mail to the following address: wbccommittee@amplifon.com (accessible only by members of the Whistleblowing Committee);
- ordinary mail to the attention of one of the members of the Whistleblowing Committee at the following address:

Amplifon S.p.A.

Via Ripamonti, 133

20141 Milano – Italy

All reports will be dealt with in a confidential manner, to the extent possible under local law and in order for Amplifon to investigate the reported issue. Amplifon is committed to protecting all whistleblowers' identities and the confidentiality of the information contained in the reports.

The Whistleblowing Committee duly collects, verifies and deals with violations reported in a timely manner.

Retaliation against any individual who reports a violation in good faith, or who provides information or otherwise assists in any inquiry or investigation of potential misconduct, is prohibited. Amplifon will take all reasonable measures to protect individuals reporting violations from any type of retaliation.

Please refer to the "Group Whistleblowing Policy" for further details.

6.5 Auditing Activities

The Group Internal Audit and Risk Management Department conducts periodic audits to check on:

- compliance with the guidelines of the Group, including this Policy;

- whether measures and operating procedures in place to prevent corruption risks are adequately designed and working effectively;
- non-compliance notifications received.

6.6 Reporting to the Management and the Board of Directors

The Group Internal Audit and Risk Management Officer is responsible for reporting the results of activities related to the Group's Anticorruption Policy to the Control, Risk & Sustainability Committee and the Board of Directors periodically, providing all interested parties with accurate information, including proposed corrective actions.

6.7 Training & Awareness

Training and awareness activities are necessary for effectively implementing the Anticorruption Program and ensure that everyone is fully aware of the Group's Anticorruption Policy. For this purpose, on a regular basis Amplifon develops training, awareness material and activities at Group level to enhance the understanding and continuous updating of anticorruption requirements, risks and expected behaviours. At local level, training and awareness activities are developed, coherently with the initiatives of the Group, to meet specific needs and requirements.

Everyone is required to be proactively informed about the Company's policies, and to attend the above-mentioned training activities. There must be a process in place to ensure the traceability of the activities performed.

6.8 Communication

The Policy is available on the internal communication channels (e.g., intranet website) and made available to each recipient.

The Group's Anticorruption principles are also available for Third Parties on the Company's website, as well as being referenced in the contractual clauses.

6.9 Disciplinary Measures

▪ Internal disciplinary measures

Amplifon's personnel are all required to comply with the principles contained in this Policy. Any violation of the Group's Anticorruption Policy constitutes a breach of the Group's values, and might lead to disciplinary actions, evaluated on a case-by-case basis.

▪ Third Parties disciplinary measures

Third Parties are all required to comply with the principles of the Group's Anticorruption Policy. Any violation constitutes a breach of the Group's values, and might jeopardise the continuation of the contractual relationships, as provided for in the contract, evaluated on a case-by-case basis.

7 Conclusion

Amplifon has ZERO TOLERANCE FOR CORRUPTION: this statement applies to both public and private sectors.

In accordance with Amplifon's values expressed in the Group's Code of Ethics, in the Sustainability Plan and in all of the Company's applicable policies and procedures, all recipients of this policy are encouraged to:

SPREAD THE WORD

Be the first example for colleagues in carrying out day-to-day activities. Help Amplifon to promulgate a sensitive anticorruption culture ensuring everyone is aware of potential risk situations so that we can effectively combat corruption as a team.

PLEASE SPEAK UP

When you suspect that someone is behaving illegally or unethically, please speak up.

It is the right thing to do, for you, for us, for everyone.

ASK FOR ADVICE

This Policy as well as local operating procedures, do not address every situation you may encounter in the day-to-day working life.

For this reason, if you have any doubts about how to behave, please remember the values of the Group and act in compliance with them.

If you wish to seek advice, please contact one of the following:

- Whistleblowing Committee.
- Group Internal Audit and Risk Management Officer.
- Group Legal Officer.
- Group HR Officer.

8 Glossary

Bribery

Offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties.

Conflict of interests

Whenever a person, in a situation or in the performance of a specific function, is in a real, potential or apparent situation in which a secondary interest might interfere with his or her ability to act in accordance with his or her duties and responsibilities in the Company.

Facilitating payments

Payments in favour of Public Officials aimed at expediting, supporting or securing the realisation of a routine activity (e.g., the issue of permits, licences or other official documents, the preparation of government documents, such as visas or other work orders and the deployment of security forces to provide security).

Kickbacks

A "Kickback" is the return of a sum already paid as part of a legal contract, as a reward for making or fostering business arrangements.

Gifts and free-of-charge utilities

Anything of value or any benefit provided to a Third Party as an act of commercial courtesy, which is free of charge.

Hospitality, entertainment & representation expenses

Any activity or benefit (e.g., in favour of doctors) undertaken for commercial purposes (e.g., meals and travel).

Improper Advantage

Something to which an individual or company is not legally or properly entitled, such as preferential treatment with regard to pricing, delivery of goods or services, taxation, customs, procurement, obtaining a licence, permit, or government approval, or other executive, regulatory, judicial, or legislative action.

Public official and/or Representatives of Public Institutions

- Whoever has been elected or appointed to exercise a legislative, judiciary or administrative function;
- Whoever acts - on an official basis - on behalf of (i) a national, regional or local Public Administration, (ii) an agency, office or body of the European Union or of a (national or foreign, regional or local) Public Administration, (iii) an enterprise controlled or participated by a (national or foreign) Public Administration, (iv) a public international organisation (e.g., the International Monetary Fund) or (v) a political party, a member of a political party or a candidate for a (national or foreign) political office;

- Any person responsible for a public service and, as a consequence, anyone who performs a public service, where public service means any activity that – even if ruled by the same provisions applicable to public functions - does not imply the use of those powers pertaining to a public function. This definition does not include ordinary functions or material activities.

Third Parties

Unless a different definition of “Third Parties” is provided for by applicable local laws, for the purposes of this Policy the term “Third Parties” means any external party, with whom the Amplifon company has some form of business relationship (e.g., joint ventures, joint venture partners, consortium, consortium partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries and investors).

Business partners

The term “Business Partners” includes, but is not limited to, Joint Ventures and Franchisee Networks acting for and with Amplifon or promoting Amplifon’s commercial and/or business interests.

Joint venture

Any agreement and/or contract aimed at establishing a joint venture, consortium, partnership (including temporary associations between companies), agreements and/or contracts of collaboration or any further entity (whether legal or not), in which Amplifon has an interest.

Suppliers

All the Companies or professionals from whom Amplifon and its subsidiaries purchase materials, equipment and all other goods or services necessary for carrying out their activities.

Appendix 1 - Overview

Provisions and guidelines of the Group

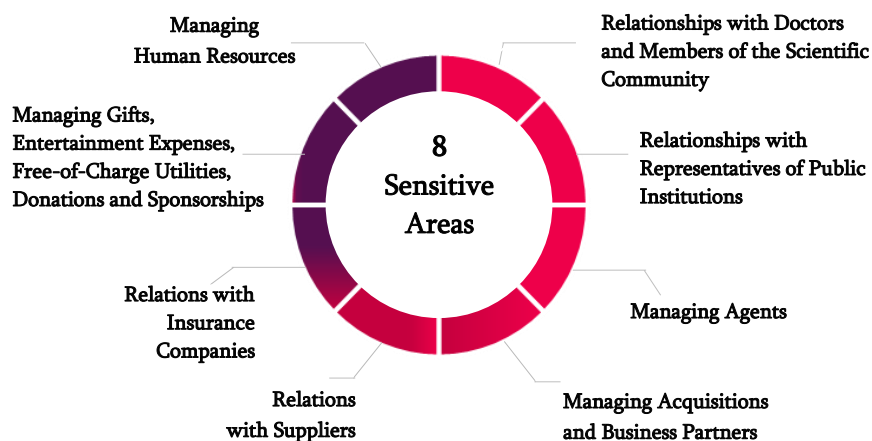
“Amplifon promotes the highest standards in all business dealings, conducting activities with **Loyalty, Fairness, Transparency, Honesty and Integrity**, and provides specific rules for preventing, detecting and managing the risks of corruption within the Group’s sphere of influence.”

General Principles

- 1 Taking ownership of their own actions and of those of their co-workers
- 2 Adhering to the Principle of Segregation of Duties
- 3 Respecting Group Delegation of Authority
- 4 Guaranteeing formalisation and Traceability of the decision-making process
- 5 Complying with current applicable Policies and Procedures
- 6 Declaring or reporting any potential conflict of interest
- 7 Guaranteeing Transparency and Cooperation in relations with Public Institutions/Authorities
- 8 Guaranteeing the Accuracy, Correctness and Completeness of the Accounting Records of every business transaction

Please refer to Section 4 for details

The Group’s Sensitive Areas



Please refer to Section 5 for details of Related Risks of Corruption and guiding principles and main controls



“CALL FOR ACTION”

The Group’s Anti-Corruption Policy serves as an effective support for actions to be taken locally, starting with identified values, principles and controls.

Local commitment

“Each local General Manager / Managing Director must address all sensitive areas relevant at local level, defining an adequate **control system**, also creating local operating procedures, if necessary, in order to effectively reduce the risks of corruption.



Comprehension

- **Understanding the Group’s provisions and guidelines** regarding business conduct, ethical values and controls to reduce the risks of corruption
- Analysing local context and **identifying specific Sensitive Areas** to be considered and addressed



Design

- **Defining an adequate control system** to address all applicable sensitive Group and local areas and inspired by the general principles of this Policy
- **Defining**, if necessary, **local Policies, Procedures and guidelines**



Implementation

- **Monitoring** commercial and regulatory requirements **changes** relating to risks of corruption, **providing on-time information** to the Group
- **Reporting behaviours at risk** of violating laws or the Group’s principles through the dedicated **Whistleblowing channels**

Appendix 2 - Risk Indicators

Within sensitive areas, particular attention should be paid to certain facts or circumstances that constitute warning signs in relation to the risk of corruption (the so-called "Risk Indicators"). These indicators exist whenever a fact or circumstance suggests that the specific operation, relationship or commitment may carry a risk of corruption.

Below is a list that illustrates possible Risk Indicators, in the presence of which it is appropriate to carry out additional in-depth analysis:

- use of non-traceable ways of payment (e.g., cash), in particular for conspicuous transactions;
- expensive or luxurious gifts or entertainment activities involving a public or private subject;
- payments or expenses not properly documented;
- overbilling or not invoicing for a service provided and/or goods received;
- invoices processed for payment without an adequate indication of the services performed;
- lack of documentary evidence of the services/supplies received and lack of traceability of the checks carried out;
- transactions with Third Parties that use non-traceable payment methods;
- request to structure the commercial operation in such a way as to circumvent the applicable regulations;
- relationships with consultants, suppliers/contractors who are not qualified or who do not have the experience, organisation and resources necessary to perform the services for which they have been engaged;
- relationships with a Third Party that is a newly formed company or characterised by a lack of transparency of the shareholding or of which no historical information can be found;
- relationships with a Third Party that has been involved in previous corruption cases or other violations of the law;
- refusal by the Third Party to sign the anticorruption clauses provided for by Amplifon in the agreement;
- request by the Third Party for unusual contractual terms or payment methods, that are not in line with applicable regulations;
- compensation granted to or expenses incurred by the Third Party that exceed the usual amount for similar transactions carried out in the same geographical area or the amounts paid by the Company in relation to similar transactions in different geographical areas;
- systematic issuing of purchase orders under emergency conditions (e.g., not following the standard procedures and/or authorisations required because of an emergency) or immediately before the start of the service requested;
- frequent recourse to similar purchase orders to the same supplier, all immediately below the approval threshold, that could be issued all together as a single purchase request of higher value;
- changes in the contractual conditions during the life of the agreement, consisting of a change in the original services, an extension of the deadlines for the completion of the works, services or supplies, renewals or

extensions outside the regulatory cases provided for in the contract, or a significant increase in the amount contractually defined;

- issuing of a receipt for services not actually performed;
- repeated disbursements (also on a regular basis) of the same amount to the same person and/or entity, without good reason;
- donations to recipients with whom Amplifon conducts regular business relations;
- disbursements made with general reasons given as to the purposes and recipients not clearly identifiable;
- payments of membership fees to associations or bodies for a higher amount than expected;
- receipt/handout of gifts not declared by the employee;
- receipt/handout of repeated gifts of modest value which are in total of high value;
- excessive entertainment expenses, or expenses not in compliance with local policies and/or procedures or common practice;
- selection of personnel who do not appear to have the required professional skills;
- refusal and/or reluctance to declare the absence of any conflict of interest and/or causes of incompatibility;
- career promotions or awarding of bonuses in the absence of formal performance assessments, or based on seemingly non-objective assessment criteria;
- career promotions or awarding of recognized bonuses to employees who are the subject of serious disciplinary proceedings and/or are involved in legal proceedings in which the Company is interested;
- repeatedly awarding bonuses to the same employee;
- setting personal goals not proportionate to the professional framework and the role played without adequate justification;
- definition of objectives that do not meet criteria of efficiency, efficacy and cost-effectiveness, or that are aimed not at achieving the Company's mission but at rewarding particular interests;
- awarding prizes and incentives in the absence of a formal performance assessment or for a value above the average for the category to which the employee belongs, without adequate justification;
- no traceability of the selection procedure of consultants or of the activities they perform;
- assignment of tasks to professionals unqualified or without the necessary experience;
- frequent assignments of services to Third Parties in the absence of competitive bidding procedures;
- agreements with a generic or untruthful subject;
- recognition of reimbursements of expenses not provided for in the contract, which exceed the permitted threshold or are undocumented;
- assignments of services to Third Parties, also when internal resources are available.