

Corporate Anti-bribery Policy

Liberty Lines SpA carries out public service activities through maritime passenger transportation mainly with the Sicilian minor islands by virtue of public service agreements. In the exercise of its connections, LIBERTY LINES must, among other things, apply to users rates no higher than those set by the Public Administration; must implement the General Conditions of Transport for passenger services in compliance with what is stated in its Service Charter (a document which, in addition to providing general information about the company, indicates the safety and cleanliness standards of the vessels as well as the services provided and the duties of the traveler). In order to better realize its maritime transport service and guarantee the service continuously, the Company uses its own shipyard, where it carries out most of the maintenance and repair activities of the high-speed craft. The shipyard also carries out design and construction activities for new avant-garde naval units.

Liberty Lines recognizes the primary importance of conducting its business activities in compliance with the law and with integrity, transparency and fairness in the area in which it operates towards the various stakeholders.

Liberty Lines promotes an Anti-bribery Policy in line with its Ethical Code and actively supports all initiatives aimed at strengthening the standards and principles that must govern the conduct of its managers and all staff, in compliance with the relevant regulations, so that the behavior of these subjects does not constitute a prejudice, even if only in terms of image or reputation, for the Company.

In order to guarantee the high professionalism of its human resources and the quality of the service provided, the Company, over time, has invested significant resources in the training of its staff and has decided to continue the management path undertaken with an approach also oriented to the Management System for the Prevention of Corruption in accordance with UNI ISO 37001: 2016.

Liberty Lines adopts an anti-corruption program inspired by the "zero tolerance" objective.

The Company's Anti-bribery System is based on the following principles:

- Any type of corruption in any form or manner, in any jurisdiction, involving not only Public Officials, but also private individuals is prohibited;
- Any anomalous, arrogant and aggressive behavior with a character of arrogance, prevarication and oppression and any other behavior / attitude aimed at obtaining an undue advantage for oneself and / or for the Company is prohibited;
- All corporate transactions must be accurately accounted for, in compliance with accounting principles, in a complete and transparent manner in order to be able to trace all collections, payments and all transactions in general.

Liberty Lines defines the measures suitable for the pursuit of the principles set out above, applies all the procedures necessary to verify compliance with this Policy, the Ethical Code and the applicable Anti-corruption laws and it constantly reviews and monitors the content of its Anti-bribery Management System, in accordance with the UNI ISO 37001: 2016 principles.

Commitments

The Governing Body (the BoD), the Top Management (the CEOs and the GM), employees, as well as the remaining interested parties, collaborators, suppliers and business partners, who directly and indirectly, permanently or temporarily, establish relationships and relationships with Liberty Lines, each within the scope of their functions and responsibilities, through adherence to the Company's Ethical code, undertake to comply with this Policy and to pursue its objectives.

Each function is responsible for supervising compliance with the Antibribery System by its collaborators.

Interested parties are encouraged to behave in accordance with this Policy and the Anti-Corruption Laws in all circumstances and will not be subject to disciplinary sanctions or retaliation of any kind in the event of reporting potential corruption.

Interested parties are encouraged to report any violation of the Anti-bribery System of which they have become aware, even indirectly in the course of their business and the reporting parties are guaranteed protection from any form of retaliation, discrimination or penalization, without prejudice to legal obligations.

Reports of any corruption phenomena can be sent to the following addresses:

- E-mail: anticorruzione@libertylines.it
- Ordinary mail: Liberty Lines S.p.A C.A. FCPC via G. S. Vulpitta n. 5, 91100 Trapani

Any employee or collaborator who does not act in accordance with this Policy, will be subject to disciplinary sanctions, commensurate with the seriousness of the violation made.

Any partner or supplier who fails to act in accordance with this Policy, will be subject to a contractual penalty.

For the above, Top Management and the Compliance Function for the Prevention of Corruption undertake to:

- Prohibit corruption;
- Ensure verification of compliance with legislative requirements;
- Carry out a careful analysis of the context and risk analysis by periodically assessing possible risks in work activities, and analyzing the events that have occurred and / or related to external and internal change processes;
- Periodically ensure the review of the Company's Anti-Corruption Policy;
- Ensure verification of the adequacy of the Anti-bribery Management System for continuous improvement..

Aims

In pursuing the general objective of "zero tolerance" of any corruption phenomena, the Company aims to achieve the following objectives:

- Maintain and continuously improve the Anti-bribery Management System, in compliance with UNI ISO 37001: 2016;
- Guarantee an adequate level of training and information to all personnel and their constant consultation for the purpose of improving the Anti-bribery Management System;
- Operate in compliance with applicable legislation and regulations;
- Ensure the proper management of any Non-Conformities found during the implementation of the Management System for the Prevention of Corruption, including those relating to non-compliance with the Corruption Prevention Policy.

The Top Management, with the commitment and objectives set out above, by virtue of the authority and independence conferred on it, will appoint the Compliance Function for the Prevention of Corruption in order to:

- Supervise the design and implementation of the Anti-bribery Management System;
- Provide guidance and advice to staff on issues related to corruption and the Anti-bribery Management System;
- Ensure that the Anti-bribery Management System for the Prevention UNI ISO 37001: 2016;
- Report on the performance of the Anti-bribery Management System to the Governing Body and Top Management in the most appropriate way.

Everyone, whether working in the administrative or operational areas, is responsible for achieving adequate levels of corruption prevention, therefore there is a strong desire that the Anti-bribery Management System is an integral part of company management and that this Policy is disseminated to all staff, to anyone who works on behalf of Liberty Lines and to anyone who requests it in order to make employees and collaborators aware and inform all interested parties of the LL's commitment to minimizing the risk of corruption.

The Company, for the implementation of the Anti-bribery System, implements what is reported in the sanctioning system of the OMM pursuant to Legislative Decree 231/2001 to which reference is made.

This Policy, approved by the Board of Directors on 10/04/2020, regularly reviewed and applied, is disseminated and illustrated to all the Interested Parties and integrates the Company's Policy in compliance with ISM CODE, UNI EN ISO 9001: 2015 and UNI ISO 45001: 2018..