WHAT STANDARD ISO 37001 IS?





Standard UNI ISO 37001, entitled "*Anti-bribery management systems- Requirements and directions for use*",was published on 20 December 2016 and is a guide to a management system designed to help companies prevent, track and address corruption and comply with laws on preventing and combating corruption.

In February 2025, the new version of the standard, **"UNI ISO 37001:2025",** was published, with the aim of updating and making corruption prevention and combating practices even more effective, providing organizations with a more robust framework for identifying, mitigating and managing risks related to illegal conduct.

The concept of corruption for the purposes of the Anti-Corruption Management System is much broader than that defined in the Italian penal code.

With **corruption** we mean

“offer, promise, give or accept a financial or other benefit to induce the person receiving it, or another individual, to perform their duties improperly, or give them a reward of any kind for having acted inappropriately, or even when the person receiving the benefit behaves incorrectly by accepting it”.

The benefit may include money, gifts, loans, fees, hospitality, services, discounts, the assignment of a contract or any item of value (e.g.: facilitation payments, acceptance of benefits of any type by other company personnel and of anyone operating on behalf of the company, acceptance or promise of gifts and hospitality of significant value)”.



ANTI – CORRUPTION POLICY



The corruption prevention policy is the manifesto of the principles that the company follows in its business.

The **recipients** of the policy are all individuals who work in the company or on its behalf: managers, officers, attorneys, employees at all levels, seconded staff, volunteers, interns, contractors, external consultants, representatives of third parties and business partners, sponsors, business associates or any other individual associated with the company, wherever it is located.

HOW TO REPORT?

Of particular importance within the ISO 37001 management system is **P-Reports-01 Ordinary Reports**, which is applied to **report in good faith**, **or on the basis of a reasonable belief, any doubts or suspicions regarding the occurrence of episodes of corruption or any violation or deficiency of the ISO 37001 Anti-Corruption Management System** adopted by Cooplat.

The reporter can use the following channels to carry out ordinary reporting:

- **postal service**: COOPLAT, Via Menabrea, 1 – 50136 Firenze – c.a. “Anti-Corruption Compliance” function” or CAC
- **e-mail**: anticorruzione@cooplat.it
- **internet website**: www.cooplat.it filling out the appropriate form on the “ANTI-CORRUPTION” page (with the possibility of sending an anonymous report)



Cooplat has also adopted internal reporting channels on matters relating to "Whistleblowing". Whistleblowing Reports have been regulated and disciplinated by Cooplat, through a specific procedure called P-Reports-02 Whistleblowing, which can be viewed on the company's website www.cooplat.it in the dedicated section.

SANCTIONING SYSTEM

The sanctioning system is contained in the "Disciplinary System", which applies in case of violation of the anti-corruption policy and/or management system and also, to the extent applicable, of the Management Organization Model. If you engage in behavior that is contrary to the anti-corruption policy or the anti-corruption management system in general, sanctions may be applied.

What sanctions are

Verbal or written warning

Financial penalties

Suspension from service without pay

Transfer for disciplinary reasons

Dismissal with indemnity in lieu of notice

Dismissal without notice

WHO THE ANTI – CORRUPTION COMPLIANCE FUNCTION (CAC) IS?



Standard ISO 37001 requires **the anti – corruption compliance function (CAC)** to be named, which:

- supervises the design of the anti-corruption management system;
- provides advice and guidance to staff regarding the anti-corruption system;
- ensures that the system complies with the requirements;
- reports to the Board of Directors on the anti-corruption system.

ANTI – CORRUPTION REGULATION

The company has approved an Anti-Corruption Regulation, which all those who work or have dealings with it must observe. Full compliance with laws and regulations, ethical integrity as well as correctness, transparency and honesty are a constant and continuous commitment and duty of all company staff

