



# ANTICORRUPTION POLICY

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## DEFINITIONS

For the purposes of this Policy, the terms listed shall have the meaning specified below:

**Code of Conduct:** RGI Group Code of Conduct.

**Subsidiaries (or Subsidiaries or also Companies):** Companies, directly or indirectly, controlled by, or affiliated with RGI.

**Bribery:** the conduct of anyone who, directly or indirectly carrying out activities on behalf or in the interest of Group Companies, offers, promises, receives or gives undue benefit and/or compensation to third parties, directly or indirectly (and therefore also through a third party), for personal benefit, or of Group Companies or third parties. For the purposes of the Policy, no distinction is made between "bribery of a Public Official or a Person in Charge of a Public Service" and "bribery of a private individual". For the purposes of this Policy, generally accepted references are also made to the definitions of bribery adopted by Transparency International ("the abuse of entrusted power for private gain") and the World Bank ("offering, giving, receiving or soliciting, directly or indirectly, anything of value to improperly influence the actions of another party").

**Recipients:** Group Personnel worldwide and all those who operate in the name and/or on behalf and/or in the interest of the RGI Group or who have professional or business relations with it.

**RGI Group or Group (or also Group Companies):** RGI S.p.A. and its Subsidiaries.

**Person in charge of Public Service:** a person who in any capacity performs a public service, including that for a national or international agency, as defined by the individual national laws to which the public service relates.

**Anti-Corruption Regulations:** the national regulations applicable in the individual countries where the RGI Group operates, the best practices and guidelines developed by private international organizations (ICC - International Chamber of Commerce, Transparency International, PACI - Partnering Against Corruption Initiative and the United Nations Global Compact, UNI ISO 37001), as well as the following Conventions of international law, listed by way of example and not exhaustive:

- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997);
- Criminal Law Convention on Corruption of the Council of Europe (1999);
- United Nations Convention against Corruption (2004).

**RGI Group personnel or Personnel:** the employees of RGI and the Group companies (managers, middle managers, employees).

**Policy:** the Anti-Corruption Policy adopted by RGI and its Subsidiaries pursuant to paragraph 2.1.

**Public Official:** a person exercising a legislative, administrative or judicial public function, regardless of whether the function derives from appointment, election or succession.

**RGI:** RGI S.p.A.



## INTRODUCTION

RGI Group is aware of the negative effects of corruptive practices on economic and social development. Therefore, the Group, in the pursuit of its activity, is committed to prohibit Corruption and to prevent the risks of illegal practices, at any level and in any geographical area, both through the dissemination and promotion of ethical values and principles, and through the effective provision of rules of conduct and the effective implementation of control processes, in line with the requirements set by applicable regulations and international best practices.

As a concrete implementation of its commitment in this area, the Group has adopted the Code of Conduct, which defines the values on which the Group is based in order to achieve its objectives and the relevant principles in the conduct of its activities, in close integration - where applicable - with the Organizational, Management and Control Models provided for by Legislative Decree 231/01 (which the Group's Italian Companies have defined, taking care of their constant updating) and with the Compliance Programs (implemented by the foreign subsidiaries).

### 1. PURPOSE

As further confirmation of its commitment against illicit conduct, with the introduction of the Policy RGI Group intends to summarize and integrate in a consistent framework the rules of prevention and fight against corruption already in force within the Group and each Subsidiaries, with the aim of further raising the awareness of the Recipients of the rules and behaviors that must be observed.

The Policy is designed to be applied to all the Companies of the RGI Group, in the countries where it operates, providing each Company with a useful framework for the identification, review and achievement of the anti-corruption objectives defined in accordance with the Policy.

### 2. SCOPE OF APPLICATION

The Policy is issued by RGI S.p.A. and its adoption is mandatory for all Subsidiaries.

Compliance with the Anti-Corruption Regulation and the Policy is mandatory for all Recipients.

In the event that certain applicable provisions of the Anti-Corruption Regulation as well as any Subsidiaries' adopted procedures are stricter than those that can be obtained from the Policy, the same regulatory provisions shall in any case be complied with, and in any case their violation shall also constitute a violation of the Policy.

#### 2.1 Adoption and implementation by Group Companies

The Group Companies, Italian or foreign, adopt the Policy without exception.

If, due to the specificities of the reference context, a Subsidiary should need to adopt its own anti-corruption code or procedure or company documentation on the corruption matter, such document shall in any case comply with the Policy, reflecting its contents as an indispensable basis.

Each Subsidiary adopts any additional prevention and control instrument to deal with its specific risks and regulate the processes characteristic of its activities, having specific regard to the reference legal and operational context.

The Companies of the Group publish a copy of the Policy on their website.

### 3. ROLES AND RESPONSIBILITIES

Violation of the Anti-Bribery Regulations can seriously damage the Group's reputation and cause serious harm to the company's activities, such as fines, disqualification from contracting with public bodies, confiscation of the crime's profit, claims for damages. Individuals may also be sentenced to imprisonment.

All Recipients of the Policy are responsible, each to the extent of his or her competence, for compliance with it, without prejudice to the validity and mandatory nature of the overall procedural system adopted by each subsidiary in the context of combating corruption. In addition, individuals with supervisory and coordination responsibilities are responsible for ensuring that their employees comply with the Policy and for taking measures to prevent, identify and report potential violations.

All Recipients are required to read, understand and fully comply with the Policy available on the Group's institutional website at the address <https://www.rgigroup.com/governance>.

### 4. MAIN PRINCIPLES

In compliance with national and international regulations and in application of the Code of Conduct, the RGI Group does not tolerate Bribery in any form.

In particular, the Recipients of the Policy shall not:

- offer, promise, give, pay, authorize a third party to give or pay, directly or indirectly, undue benefits, economic advantages of any value or other benefits, including non-economic ones, to a third party (whether it is a Public Official, or a Person in Charge of a Public Service or a private person) as an incentive or reward for acting or omitting actions in relation to the duties of such person, regardless of the place where the action is made or offered and the place where the third party or the Recipient operates;
- request or accept, or authorize a third party to request or accept, directly or indirectly, undue benefits, economic advantages of any value or other benefits, including non-economic benefits, from a third party (a private individual or, in the event, a Public Official or a Person in Charge of a Public Service) as an incentive or reward for acting or omitting shares in relation to their duties, regardless of the place where the deed is made or offered and the place where the third party or the Recipient operates.

The conduct referred to in paragraph 5 below is also prohibited.

In application of the "zero tolerance" principle, RGI Group does not allow exceptions to the provisions and prohibitions set forth in this Policy. The belief to act for the benefit of the Group cannot in any way justify the adoption of behaviors in contrast with the above principles.

RGI Group encourages its Personnel to raise any doubts in a timely manner. Personnel who are not sure of the correctness of the conduct to be adopted shall first ask the line manager, the HR or Legal or Compliance or Control function, if present in the organization of the Subsidiary, or contact the Group Compliance Function for assistance, using the dedicated mailbox [group.compliance@rgigroup.com](mailto:group.compliance@rgigroup.com).

Cases of violation, even if only suspected, of the Anti-Bribery Policy or the Anti-Bribery Regulation must be immediately reported as provided for in paragraph 7 below.

For compliance with the Policy, the Group adopts and complies with the following general criteria:

- **segregation of duties:** the performance of the company's activities must be based on principle of separation of functions, whereby the authorization of an operation must be under the responsibility of a person other than the person who performs it operationally and the person who controls it;
- **powers of signature:** the powers of authorization and signature must be: (i) consistent with the organizational and management responsibilities assigned; (ii) clearly defined and known within the Company. The company roles to which the power to engage the Company in certain operations must be defined, specifying their limits and nature;
- **impartiality and absence of conflicts of interest:** the Recipients of the Policy must operate with professionalism, transparency, impartiality and in compliance with the Anti-Corruption Regulations, and must promptly report any situation from which a conflict of interest may arise;
- **traceability and archiving:** all activities must be verifiable, documented, consistent, consistent and properly archived;
- **training:** specific training plans must be provided for Personnel on the anti-corruption measures adopted by the Group with particular reference to those operating in the sensitive areas listed in paragraph 5.

Again as a general criterion, they must be considered prohibited (in the same way as the prohibitions mentioned in the Policy itself):

- any other conduct, although not expressly prohibited by the Policy, that has the same purpose as one or more of the prohibitions mentioned in the Policy;
- any way of circumventing the prohibitions mentioned in the Policy (and therefore, merely by way of example: (i) a certain conduct referred to in the Policy is also prohibited in the event that the author uses funds or personal means made available by a third party outside the Group; (ii) an offer of money or other benefits referred to in the Policy is also prohibited if the beneficiary is not the person directly involved in the company's activities - Public Official, supplier, partner, etc.. - (iii) the prohibition to give or receive gifts that are not of modest value<sup>1</sup> also prohibits the same Recipient from giving/accepting - to/from the same person - a

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<sup>1</sup> Modest value does not exceed € 150.00, in accordance with Italian Presidential Decree no. 62 of 16 April 2013 (Regulation containing the code of conduct for civil servants, pursuant to article 54 of Legislative Decree no. 165 of 30 March 2001). This is without prejudice to the possibility for Group Companies to adjust the amount corresponding to local regulations, where more restrictive.



significant number of gifts, each of modest value, within a period of time reasonably appreciable for the purposes of the Policy in order to avoid serial and routine gifts that can be interpreted as constant favours).

Each Company of the Group ensures the knowledge of the Policy also by its business partners, professionals, consultants, collaborators in various capacities and suppliers. Each of these parties is required to sign the declaration in which it certifies that the Policy has been made available and undertakes to comply with it and to ensure that its beneficiaries and contractors comply with it.

## 5. PRINCIPLES OF BEHAVIOR IN THE MAIN SENSITIVE AREAS

With regard to the types of Group activities, the following areas can be identified as being more sensitive to the risk of corruption:

- Gifts, hospitality and entertainment expenses;
- Non-profit initiatives and sponsorships;
- Relations with the Public Administration;
- Facilitation payment;
- Relations with political and trade union organizations;
- Relations with third parties;
  - Entrusting consultancy, specialist and professional assignments;
  - Supply of goods and services;
- Selection and hiring of personnel;
- Accounting records.

In relation to business of the Group and for each area of activity of interest to the Group itself, the Recipients must comply with the provisions of the Code of Conduct, the procedures and protocols defined for compliance with the Anti-Corruption Regulations, provided by each Subsidiaries pursuant to local applicable laws, as well as the following principles of conduct.

### 5.1 Gifts, hospitality and entertainment expenses

Gifts, gifts and other entertainment expenses are allowed as a common practice of professional and commercial courtesy, without prejudice to the prohibition to offer or accept money as well as in compliance with any other Group Policy on the subject and / or procedure or company document that respects the principles of this Policy issued by each Subsidiary in compliance with the applicable local laws.

To this end, gifts, gratuities, gifts, and any other benefit or utility that the Recipients offer to (or accept from) public or private entities must be in relation to the circumstances:

- be appropriate, reasonable and in good faith,

- compromise the integrity and reputation of any party to the relationship, or (ii) create the impression in the beneficiary or an impartial third party that they are intended to acquire, retain or reward undue advantage or to exercise unlawful or improper influence over the beneficiary's activities or decisions,
- be registered and in any case not offered or accepted in a hidden way,
- comply with the Anti-Bribery Regulations and Company procedures and protocols.

Subject to compliance with the above criteria:

- Recipients may offer or accept gifts, gratuities or any other benefit or utility if of modest value, in accordance with the custom of the country of reference.
- Hospitality treatments (transport, accommodation, meals, entertainment, etc.) are permitted for business purposes, to promote the Group's activities and to develop business relationships and partnerships.

No gifts or gratuities and, in any case, gifts exceeding the modest value are allowed between employees of the Group in a reciprocal relationship of hierarchical super ordination.

## **5.2 Non-profit initiatives and sponsorships**

Non-profit initiatives and sponsorships are within the company's discretion according to common business practices. The above activities are carried out by Group Companies in compliance with the Anti-corruption Regulation, as well as procedures and internal protocols and authorization processes in force.

Among the aspects to be considered in the choice of proposals to adhere to, the Group Company concerned must pay attention to any possible personal and corporate conflict of interest.

According to criteria of reasonableness and proportionality with respect to the size of the economic commitment envisaged for the Group, it is necessary that the nature and relevance of the initiative, the identity and reputation of the recipients of the sponsorship or contribution (promoters, organizers, etc.) be ascertained in advance, and that the concrete progress of the initiative itself and in particular its consistency with the program proposed to the Group Company concerned be verified.

In addition:

- the amount paid by the Group company must be recorded in the books and records in a correct and transparent manner;
- the documentation relating to any sponsorship carried out or contribution to supported non-profit initiatives must be archived, guaranteeing its traceability over time.

## **5.3 Relations with the Public Administration**

The relations that the Group maintains with representatives of the Public Administration (P.A.), understood in all its possible forms, must be inspired by strict compliance with the Anti-Corruption Regulations and cannot in any way compromise the integrity and reputation of the Group.

The assumption of commitments and the management of relations of any kind with representatives of the Public Administration and/or bodies of public importance are reserved exclusively to the corporate figures and functions appointed and authorized for this purpose.

In such relationships, the Group must not seek to improperly influence the decisions or actions of the institution concerned, either directly or through the mediation of third parties (real or vaunted).

All reports by Group Company personnel involving representatives of the Public Administration must be conducted in compliance with the Group's Code of Conduct and this Policy in accordance with the following principles and minimum standards:

- RGI Group Personnel must operate in compliance with all relevant legislative and internal requirements;
- relations with the Public Administration must be based on maximum transparency and correctness;
- it is forbidden to offer, directly or through intermediaries, sums of money or other benefits in order to influence the activity of the Public Official in the performance of his duties;
- appropriate written and correctly filed reports on relations with representatives of the Public Administration must be ensured;
- meetings must be attended, where possible, by at least two representatives of the Company or by specially delegated persons.

With particular reference to relations with Independent Administrative Authorities, Supervisory and Control Bodies, the Group undertakes to strictly observe the rules dictated by the latter for compliance with the regulations in the areas of its competence. The Group's employees will comply with every request of these Bodies in their inspection functions, collaborating in the relevant activities.

### **5.4 Facilitation payment**

The term "facilitation payment" refers to payments made to Public Officials and/or officials of Public Authorities or Supervisory Authorities or to Persons in Charge of a Public Service for the purpose of expediting, facilitating or securing an intended activity within the scope of their duties, such as, by way of example and without limitation:

- obtaining licenses, certifications, permits, other official documents or other types of authorizations necessary for operations;
- awarding public contracts, allocating disbursements and/or public funds, revoking negative measures and sanctions.

Facilitation payments constitute a form of Bribery and are therefore prohibited in any form, regardless of any laws or customs of the country in which the Group operates.

### **5.5 Relations with political and trade union organizations**

The Group does not make contributions of any kind, directly or indirectly, to political parties, movements, committees and political and trade union organizations, nor to their representatives or candidates, both in Italy and abroad, without prejudice to what is established and permitted by applicable regulations.

## 5.6 Relations with third parties

Relations with third parties in the performance of business activities must be based on criteria of maximum fairness, transparency and traceability, as well as ensuring compliance with the Anti-Bribery and Anti-Corruption Regulations and all other applicable regulations.

The selection of suppliers and external collaborators as well as the execution of the related contracts are characterized by transparency, certainty and written form. Suppliers and external collaborators are selected according to procedures in compliance with applicable laws and constantly based on criteria of transparency, competitiveness and efficiency.

Any suspicion of violation of anti-corruption provisions by third parties must be immediately notified as indicated in paragraph 7 of this Policy.

### a) Assignment of consultancy, specialist and professional assignments

RGI Group Companies can avail themselves of the support of consultants and professional service providers in carrying out their business. It is important to make an assessment of them and to be able to determine whether each of them has undertaken or there is a reasonable possibility that they may undertake activities prohibited by the Group's Code of Conduct and by the policies set out in this Policy, as well as applicable laws.

Providers of such services must be trustworthy and of excellent reputation for honesty and integrity, and selection and contracting must be approved in accordance with corporate procedures.

Contracts and/or agreements entered into with selected professionals must provide full, clear and adequate details of the services required and the criteria for accrual of the agreed-upon fees.

The selection process of the professionals, the contracts and agreements stipulated with them and the services rendered must be documented and justified.

### b) Supply of goods and services

In carrying out their activities and managing relations with suppliers, the Group Companies scrupulously comply with the law, the principles of the Code of Conduct and internal procedures, identifying the supplier with absolute impartiality, transparency and independent judgement.

The choice of suppliers must be based on predetermined evaluations that aim to identify and select suppliers of proven quality, professionalism, integrity and reliability in possession of the necessary legal requirements. In particular:

- the selection process must be objective and transparent;
- the choices must be traced and the records that prove compliance with internal procedures and the purpose of the purchase must be properly archived;
- the stipulation or continuation of any relationship must be interrupted, through the insertion of appropriate clauses, in the event of suspicion of corrupt conduct - held directly and/or

indirectly - by the supplier or belonging to or facilitating criminal organizations or other criminal conduct sanctioned by the same.

### **5.7 Selection and Recruitment of Personnel**

The selection and hiring of RGI Group Personnel are guided by the principles of fairness and impartiality.

The Group hires resources whose profiles effectively meet the company's needs, making choices exclusively based on criteria of professionalism and competence and banning any form of favoritism.

Moreover, already during the selection process, candidates must declare, in compliance with applicable regulations, the possible existence of situations and circumstances that the Group deems relevant for the assessment of the possible continuation of the selection process (e.g., family relationships with persons belonging to the Public Administration, incompatibility, conflicts of interest).

The HR structure of each Group Company is responsible for ensuring that the selection and recruitment processes comply with the above principles and criteria without exception, including in the case of applications submitted by Recipients.

### **5.8 Accounting records**

Every operation or transaction of the Group must be correctly recorded in the company accounting system according to the criteria indicated by the law and the applicable accounting principles. Every operation or transaction must be authorized, verifiable, legitimate, consistent and appropriate.

In order for the accounting system to meet the requirements of truth, completeness and transparency, adequate and complete documentation supporting the activity carried out must be kept in the Group's records for each operation.

Each Recipient, to the extent of his or her competence and in relation to the tasks assigned to him or her, is required to provide maximum cooperation so that the management facts are correctly and promptly represented in the company accounts.

## **6. TRAINING**

The Group promotes the knowledge of the Policy, the Code of Conduct and the Anti-Bribery and Anti-Bribery Regulations by all Personnel.

Each Group Company plans and manages training in this area to ensure that its employees understand, in relation to and with respect to their role:

- the Corruption risks to which they and the organization to which they belong may be exposed;
- the policy for the prevention of Corruption;
- the aspects, relating to their role within the Group, of the management system for the prevention of Corruption;
- the preventive actions to be taken and the reports to be made in relation to the risk or suspicion of illegal practices.

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Participation in training activities is mandatory.

The HR function of each Company monitors that the planned training path is used by all personnel.

The Policy is communicated to all Personnel and made available on each Subsidiaries' intranet.

## 7. ENTRY INTO FORCE, REPORTING SYSTEM AND SANCTIONS

This Policy shall come into force from the day of its publication on the Group's corporate intranet and integrates to all intents and purposes the obligations under the employment contract of each RGI Group employee.

Group Companies must publish the Policy translated in each mother-tongue on their intranet within 2 weeks from its publication on the RGI Group intranet web page. Moreover, each Group Company adopts proper actions for the deployment to their employees, monitor relevant training and controls.

Failure to comply with this Policy may result in severe civil and criminal penalties, both for RGI Group and for individual employees, officers and directors, as well as severe reputational damage to RGI Group.

Failure to comply with this Policy is a serious matter from which disciplinary action may result, up to and including termination of employment. Violations of Anti-Corruption Regulations may also have legal consequences for those involved, including civil and penal fines.

### **Recipients are expected to report any suspected violations of this Policy.**

*Speak up!*

Employees must report any violation to the line manager, HR or Legal or Controlling Function, if applicable, or contact directly the Group Compliance Function or report to the Group reporting line **Speak Up! Line**, which allows Recipients to report their concerns internally at: [speak.up@rgigroup.com](mailto:speak.up@rgigroup.com).

Any form of retaliation, discrimination or penalization, directly or indirectly, against those who have made a report is prohibited. Any violation of this prohibition is subject to the application of sanctions. At the same time, the Group shall ensure that the confidentiality of the identity of the whistle-blower and the reported is protected, without prejudice to legal obligations and the protection of the rights of the Group or of persons accused wrongly and/or in bad faith.

Any reports made with intent or gross negligence that prove to be unfounded are subject to the application, where possible, of sanctions.

The Recipients also undertake to maintain the documentation and/or information necessary to prove the above reports. The RGI Group also reserves the right to verify such documentation if it deems it necessary. If the violation of this Policy fully integrates a criminal offense punished by the local regulations applicable to a Subsidiary for which a system of reporting the violation is provided for by law, the Subsidiary's Employees will be required to reporting to the reporting channel provided by the Subsidiary. In case such report was addressed to the Group's Speak Up! Line, it will be immediately transmitted to the competent entity of the Subsidiary in charge of carrying out the consequent investigations, without prejudice to the possibility of evaluating the report also for the purposes of this Policy.

If the violation of this Policy fully integrates a criminal offense punished by the local regulations applicable to a Subsidiary for which a system of reporting the violation is provided for by law, the Subsidiary's Employees will be required to reporting to the reporting channel provided by the Subsidiary. In case such report was addressed to the Group's Speak Up! Line, it will be immediately transmitted to

the competent entity of the Subsidiary in charge of carrying out the consequent investigations, without prejudice to the possibility of evaluating the report also for the purposes of this Policy.

### **7.1 Disciplinary sanctions**

Violation of the Policy by Group employees will result in disciplinary action being taken by the Company concerned. The Group will also ensure its full cooperation with the competent Authorities. Any violation will be prosecuted with the application of appropriate and proportionate disciplinary sanctions, also taking into account the possible criminal relevance of the conduct carried out.

### **7.2 Contractual remedies**

The violation by third parties of the principles or provisions of the Policy may result, on the basis of specific assessments by the Group Company concerned, in the failure to establish or terminate contractual relations.

## **8. AUDITS AND MONITORING**

Group companies are equipped with an internal control system, which provides for verification that the provisions of the Policy are applied.

RGI's Compliance Function periodically reviews the Policy to ensure its maximum effectiveness. It may recommend improvements to the Policy based on emerging "best practices" as well as assess whether, in the event of violations, revisions and amendments to the Policy and internal regulations could help prevent the repetition of the violation.

The Board of Directors of RGI is responsible for adopting subsequent amendments and additions to the Policy.

Each Company of the Group guarantees the fulfilment of the general requirements of its management system for the prevention of corruption risk, and is committed to the continuous improvement of the said system.





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