

ANTI-BRIBERY POLICY

(UNI ISO 37001:2016)

NIDEC ASI S.p.A. (below also "**NIDEC ASI**" or the "**Society**"), in accordance with the Anti-Bribery Code of the Nidec Group, is committed to a constant monitoring of instruments and controls aimed at combating all forms of corruption, whether active and passive, direct and indirect involving the personnel of NIDEC ASI and any person who performs out activities on its behalf.

It also guarantees compliance with current regulations, both in relations between private individuals and with the Public Administration, observing the controls contained in the Organizational Model pursuant to Legislative Decree 231/2001.

To strengthen this commitment, the Company has adopted its own anti-bribery management system in accordance with the UNI ISO 37001 – Management System for the Prevention of Corruption standard, published in 2016, of which this Policy is an integral part. This is the only internationally recognized standard that allows the implementation of a management system aimed at preventing and combating corruption within the company and which specifies the measures and controls that can be adopted by an organization to monitor its business activities and increase the effectiveness of prevention of the phenomenon.

This Anti-Bribery Policy (hereinafter the "**Policy**") is an integral part of a broader system of business ethics and internal control, aimed at ensuring compliance with national and international norms and standards and protecting the reputation of the company. It contributes to increasing the degree of general compliance with applicable laws, regulations and international best practices and, in order to give concrete implementation to a corporate culture inspired by the value of honesty, ethically correct behavior, prevention and fight against corruption.

Each person who performs activities on behalf of NIDEC ASI is required to read and understand the contents of this Policy and to behave in accordance with its provisions.

NIDEC ASI personnel, as provided for in the Nidec Employee Handbook on The Policy of Business Ethics of NIDEC, must carry out their activities, respecting the ethical principles of transparency, clarity, fairness, integrity and equity.

In particular, in business dealings and relationships, collusive behavior and practices, payments that may appear unlawful, attempts at corruption and favoritism, solicitations, direct or indirect, of personal and career advantages for oneself or for others and more generally acts contrary to applicable laws and regulations are prohibited.

The governing body of NIDEC ASI is committed to ensuring an adequate internal control system and to guiding the entire organization in achieving the expected performance for the prevention of corruption in accordance with the following guidelines:

- guarantee a continuous commitment to conduct its activities in full compliance with regulatory obligations, constantly verifying the correct and adequate application of the rules on combating corruption and the requirements of the Anti-Bribery Management System;
- prohibit all forms of corruption and indeed encourage employees to report suspicions in good faith without fear of retaliation and consider transparency and legality an added value, integrating into their processes the controls and improvement actions necessary to manage the prevention of corruption;
- take appropriate disciplinary or legal action against persons who have behaved unlawfully in contrast with the principles of this policy.

These guidelines are translated into operational objectives defined in a specific document, constantly monitored during the Top Management Review and communicated to the entire organization in the appropriate means and channels.

The Company undertakes to continuously improve its Management System for the Prevention of Corruption and guarantees the authority (defined through the responsibilities attributed to the function and made known to all company personnel) and the independence of the Compliance Function for the prevention of corruption, appointed by the Top Management.

Those who work in the name and on behalf of NIDEC ASI are aware of incurring, in the event of corruptive behavior and violation of the Law on corruption, in offenses punishable not only on the criminal and administrative level, but also on the corporate disciplinary level.

NIDEC ASI requires its "Business Partners" to comply with the laws in force, the code of ethics and this Policy, on the basis of clauses whose non-observance implies the termination of the contract.

NIDECASI, considering the effective reporting tool to combat the corruption phenomenon, encourages reports, even anonymously, of alleged corruption phenomena through a "whistleblowing" procedure that regulates the management and verification of reports, to guarantee the confidentiality of the content of the reports, the identity of the reporter and the reported and to protect the whistleblower from any discrimination or retaliation.

The reports in question can be sent in the following way:

- E-mail to the address: nidec_hotline_europe@nidec.com;

The NIDEC ASI Top Management gives this Policy the widest dissemination, ensuring that it is understood and implemented by all employees; for this purpose it is made available on the company website.