PROCEDURE

Management of gifts, donations, charitable acts, sponsorships and partnerships

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DOCUMENT MANAGEMENT PROCEDURES

Issuing company	doValue S.p.A.
Recipient company/companies	All Group Companies
Title	Management of gifts, donations, charitable acts, sponsorships and partnerships
Issue Date	
Start Date	Immediate
Classification	Internal
Document identification code	
Type of document	Procedure
Group Directive	Yes
Drafted by (Owner)	Group Communication & Sustainability
Approved by (Accountable) on	Chief Executive Officer on 18/05/2026
Repealed or replaced norms	PRG14-2023-R01 Management of gifts, donations, charitable acts, sponsorships and partnerships

1. PURPOSE, APPROVAL AND SCOPE OF APPLICATION

This procedure governs the general principles, the operating procedure and the control activities adopted by doValue in the management of gifts, donations, charitable acts and expenses for the management of sponsorships and partnerships; in line with the provisions defined in the Code of Ethics and the Organisation, Management and Control Model pursuant to Italian Legislative Decree 231/2001 (hereinafter MOG 231/2001).

The principles described in this document are applicable to all doValue Group, including its subsidiaries. For regulated entities, regulatory requirements shall take precedence, and the processes and modalities defined in this procedure will be applied in accordance with the legislative provisions and supervisory directives. Where necessary, regulated entities may develop complementary documents to Group Procedure, in coordination and agreement with Group People, Communication & Sustainability (each Legal Entity may align its regulatory framework by following the processes defined in the *'Definition and Management of doValue Group Policies and Procedures'* standards).

2. DEFINITIONS

Donations and Charitable Acts: Cash donations and other charitable activities that Group Companies may allocate to non-profit organisations (in the case of donations, for specific projects and/or initiatives consistent with the values of the Company and/or the Group). It should be noted that the Group normally only uses forms of donation.

Sponsorships: Promotion and enhancement of the Group's image through the stipulation of atypical agreements (in free form, of a financial nature, with corresponding services) with external bodies (for example, trade associations, companies or sports groups that carry out activities, including amateur ones, non-profit organisations), also as part of organised events (e.g., trade fairs).

Partnerships: Participation in spaces and initiatives (such as events and conferences open to the reference sector) in which the Group Companies contribute in terms of know-how, financially contributing to the initiatives organised by the partner.

3. PARTNERSHIPS/SPONSORSHIPS/DONATIONS

3.1 PROCESS STEP

A. INITIATIVE PROPOSAL

In this context, Communication Structures identify initiatives or receive proposals from other internal functions (or from potential beneficiaries in case of donation). The internal sponsor submits: description, location, timeline, partner, and budget estimates (of which they are the owner).

In selecting a Partner and in order to avoid reputational risks, doValue works with certified nationally relevant organisations and recognised Non-Profit organisations (NGOs, Onlus [non-profit] or ETS [charities]) operating nationwide that meet all applicable reliability and transparency requirements.

B. EVALUATION

1. Communication Structures verify eligibility and alignment with criteria and practices in place for each company
2. Group People, Communication & Sustainability performs an assessment to verify alignment with Group ESG purpose and to provide the green light to the local Functions
3. If OK → Communication Structures (or proposing functions) submit an AML check request when applicable
4. Communication Structures (or proposing functions) ensure the partner (or the beneficiary in case of donation) is not a "related party" as per the applicable procedure (including conflict of interest).
5. All documentation archived electronically.

C. FINALISATION

Approval of the initiative is managed in accordance with the system of powers and delegations in force from time to time within the relevant Company (for commercial initiatives, reference is made to the authorized spending limits for services; for initiatives of a social nature, reference is made to the authorized limits for donations)

D. IMPLEMENTATION - PARTNERSHIPS/SPONSORSHIPS

1. Communication Structures (or proposing functions) contact the partner/sponsee to define agreement content.
2. For contracting: use existing templates; if needed → involve Legal for support.
3. First draft shared with counterparty; meetings with Legal may be arranged.
4. The delegated signatory signs the contract together with the counterparty.

IMPLEMENTATION - DONATIONS

- For cash donations: Communication Structures carry out the payment in coordination with Cash Management structures.
- For in-kind donations (goods from non-accepted gifts): Communication Structures coordinate with Focal Points.

E. MONITORING - PARTNERSHIPS/SPONSORSHIPS

1. Communication Structures (or proposing functions) verify correct execution of the agreement.
2. In case of breaches → escalation to Legal.
3. Update of the annual report (Annex 5).

4. Ongoing monitoring of anomalies with possible AML involvement.

MONITORING - DONATIONS

1. Communication Structures record and store the declaration of payment to the beneficiary, together with:

- all documentation relating to the individual initiative;
- adequate documentation confirming the successful outcome of the initiative, issued by the beneficiary.

2. Group Communication & Sustainability/Local Communication updates the specific reporting table with data and information relating to provided donations and charitable acts *(Annex 4)* and sends it to the Supervisory Bodies for doValue S.p.A. on yearly basis.
3. Communication Structures in other countries manage any similar local obligations.
4. Focal Points record donated goods in the gift log.
5. Communication Structures and Compliance investigate any anomalies.

Please note the operational handling at country level remains with the local Communication Function or any other structure designated locally to act as the pivot for these initiatives

4. GIFTS MANAGEMENT

This process applies only to Countries where the acceptance of Gifts is permitted

4.1 PROCESS STEP

A. RECEIPT OF GIFT

Receives the item and notifies the recipient.

- If recipient is absent: External Logistics or Branch Office Manager delivers to desk or ensures custody.
- For employees seconded abroad: Local office Reception follows the same procedure.

B. GIFT ASSESSMENT

Recipient verifies the nature of the item and estimates its value.

- Value ≤ €150 (only for Italian Companies) AND compliant with regulatory requirements → **ACCEPTABLE**
- Value > €150 (only for Italian Companies) OR non-compliant → **NOT ACCEPTED**

C. ACCEPTED GIFTS (if accepted)

Recipient collects the gift and does NOT keep it on company premises beyond the day of receipt

D. NON-ACCEPTED GIFTS (if not accepted)

1. Recipient sends communication to donor using standard template (Annex 1).
2. Recipient emails the Focal Point: date of receipt, item description, estimated value, donor name.
3. Item placed in designated storage areas (managed by Focal Point).

4. Focal Point coordinates with Communication Structures to define destination to non-profit organizations and manages/arranges shipment. The Communication structures monitor their actual donation to non-profit organisations and associations, electronically storing the acknowledgement of receipt of the delivery to the beneficiaries.
5. Focal Point records the item in the log of non-accepted gifts.
6. Any anomalous situations identified must be investigated, in agreement with the Compliance & DPO Function, also in order to assess any subsequent reporting to the Supervisory Bodies of the Group Companies.

E. MONITORING

1. Focal Point and Communication Structures (each for their respective country/scope) monitor potential anomalies and, if needed, involve the relevant Compliance function.
2. Group Communication & Sustainability submits the annual "branded gifts" report (Annex 3) to the Supervisory Body for doValue S.p.A.
3. Communication Structures in other countries handle any similar local requirements.

5. GENERAL PROVISIONS

5.1 MANAGEMENT OF SPONSORSHIPS AND PARTNERSHIPS

- Sponsorship and partnership initiatives aim to promote the doValue Group's name, products, and services
- They must align with the Group's values, Sustainability Plan and Policy, comply with local laws, and prioritize high-quality and effective events
- Group Companies must select initiatives that reinforce the Group's image and reputation, avoiding any personal or corporate conflicts of interest
- Sponsorships or partnerships are not permitted when they:
    - compromise the integrity or reputation of the Group;
    - provide unlawful advantages or serve illegal purposes;
    - support: entities involved in legal disputes or violating human/environmental rights; political parties or movements; private individuals; gambling- or weapons-related events; recreational groups or private schools (except for initiatives of strong social, cultural, or scientific value); initiatives already receiving donations or charitable contributions.
    - Cash donations made without any expectation of return do not qualify as sponsorships or partnerships.

AML function provides the results obtained from the audits, and any evidence on legal representatives and/or beneficial owners related to crimes against cultural heritage, particularly the offenses of illicit import of cultural property and illicit use of cultural property

5.2 MANAGEMENT OF DONATIONS AND CHARITABLE ACTS

- doValue allows donations and charitable actions only when motivated by genuine charitable intent, whether in cash or goods
- Beneficiaries must be non-profit entities with proper founding documents and of clear cultural or social value
- doValue collaborates only with reliable, certified, nationally recognized NGOs/Non-Profit organizations that meet transparency requirements
- Beneficiaries are selected across areas such as social, religious, cultural, environmental initiatives, ensuring rotation and avoiding excessive concentration of donations
- Donations are not allowed if they imply expectations of benefits, nor can they be promotional, compromise the Group's reputation, be political in nature, overlap with sponsorships, or be directed to individuals
- Excluded beneficiaries: private individuals, political parties/movements, entities involved in human rights or environmental controversies, and profit-making or recreational associations (unless tied to initiatives of particular social, cultural, or scientific value)

AML Function performs checks on legal representatives and beneficial owners and provides feedback

5.3 GIFTS MANAGEMENT

- The doValue Group prohibits requesting, offering, or accepting gifts that exceed normal business courtesy or could influence independent judgment
- Gifts are not allowed if they are of more than modest value, linked to specific requests, or convertible into cash
- For Italian Group companies, the maximum allowed value for a single gift is €150.Only low-value branded items aimed at promoting the Group's image are permitted
- Any gift offered outside these circumstances is not allowed

6. THE SANCTIONS SYSTEM

Internal and external parties must observe and act in compliance with the provisions of this document, as well as the applicable regulatory provisions aimed at combating corruption in all its forms. In this regard, any violation of the Group's Anti-Corruption Policy pursuant to the "Anti-Corruption Policy of doValue S.p.A. drawn up pursuant to the UNI ISO 37001: 2016 Standard", as well as any conduct in contrast with the relevant regulatory provisions, including the facilitation of an act of a corrupt nature, may expose the Group not only to serious damage to its reputation, but also to sanctions, fines, requests for compensation, as well as other types of measures, including those of a restrictive nature. In consideration of this, internal and external parties who act in violation - as described *above* - may be subject to sanctions, regardless of the start of legal proceedings, as well as to any further legal consequences imposed by the

competent Authorities. On this point, based on the type of party that committed the violation (i.e. internal, and in this case the Company to which it belongs, or external), the sanctions envisaged by the regulatory/contractual system applicable from time to time are applied.

ANNEXES – applicable only for doValue S.p.A. perimeter and Italian subsidiaries

ANNEX 1 - Response templates: non-acceptance of gifts

Dear *[Title / Name]*

We thank you for the gift received and we would like to inform you that doValue, as part of the Group's Sustainability policies, has been supporting social initiatives for several years aimed at making a contribution to the local area where it operates.

In compliance with these policies, your gift will be donated to charitable organisations and bodies.

doValue is a Partner of various charities and organisations active in the fight against educational and material poverty among children and supports the study and scientific research on diseases that affect a large part of the italian population.

Thanks to your precious gesture, you have thus contributed to strengthening the commitment that the doValue Group has been pursuing for some time.

Sincerely,

[Signature]

ANNEX 2 - Gifts not accepted: list of Focal Points and dedicated spaces

Headquarters and Registered Office	Dedicated Space	Relevant Focal Point
Rome, Lungotevere Flaminio 18	Stationery room at basement floor 1	Giorgio Urli (Facility)
Milan, Viale Brenta 18/b	Archive room at basement floor 1	Tullio Ronzoni (Facility)
Verona, Viale del Commercio, 47	Storage room/Phone booth room on the ground floor	Emanuele Fabris (Facility)
Other offices	*Ref.* Branch Office Manager (BOM) of reference	

ANNEX 3 - Gifts made during the year

"BRANDED" GIFTS / GADGETS MADE IN THE YEAR 20XX					
Description of the good					
Project	**no. of goods**	**Amount (gross of VAT)**	**Donation date**	**Amount/sum planned in annual budget**	**Supplier**

ANNEX 4 - Report on donations and charitable acts provided

DONATIONS MADE IN THE YEAR 20XX				
Name of initiative / beneficiary				
Project	**Amount**	**Donation date**	**Amount/sum planned in annual budget**	**Beneficiary entity**
[Project Description]	*[Disbursement amount]*	*[disbursement date]*	*[percentage]*	*[name of beneficiary entity]*

ANNEX 5 - Report on sponsorships and partnerships carried out during the year

Name of the initiative				
Project	**Amount**	**Date of donation**	**Amount/sum planned in annual budget (%)**	**Beneficiary**
[Project description]	*Amount of the initiative*	*[Date of donation]*	*[percentage value]*	*[beneficiary name]*