



**COMPLIANCE WITH LAWS POLICY
OF
A.S. ROMA S.P.A. (THE "COMPANY")**

In force from December 7, 2021



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Società Soggetta ad attività di direzione e coordinamento da parte di NEEP Roma Holding S.p.A.

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1. Purpose

- 1.1. The purpose of this “*Compliance with laws policy*” (the “**Policy**”) is to promote the Company’s compliance with all Italian and international, including European, laws and regulations applicable to the Company and its business.

2. Scope

- 2.1. This Policy applies to all Company Associates (as defined below) and Business Partners (as defined below), regardless of where in world they work. All Associates and Business Partners are required to read, understand and comply with this Policy. The Company’s Legal & Compliance Department interprets this Policy.

3. Definitions

- 3.1. The following definitions apply:
 - “**Associate**” is any member of the corporate bodies, top management and employees of all levels of the Company;
 - “**Business Partner**” is any third-party individual or entity working with or on behalf of the Company, including joint-venture partners, agents, intermediaries, contractors, subcontractors, consultants, professional advisors, representatives, wholesalers, distributors, supply-chain partners and any other people or organization that perform services for or on behalf of the Company;
 - “**Code of Ethics**” is the “Code of Ethic” adopted by the Company.

4. Policy

- 4.1. All Associates and Business Partners will comply with all Italian and international, including European, laws and regulations applicable to the Company and its business.
- 4.2. Associates and Business Partners will not take any action that is intended to circumvent the application of the abovementioned laws or regulations.
- 4.3. All violations or suspected violations of the abovementioned laws or regulations are to be immediately reported to the Company’s Legal & Compliance Department.

5. Key points

- 5.1. To promote compliance with applicable laws and regulations, Associates should conduct their everyday business activities with integrity, consistently with the values of the Company and its group and in compliance with the Code of Ethic and any other internal policy and/or procedure adopted by the Company. All Associates should familiarize themselves with any internal policy and/or procedure adopted by the Company as well as

with the training materials on the laws and regulations applicable to the Company and its business.

- 5.2. Business Partners will also adopt a conduct compliant with the values of the Company and its group and with the Code of Ethic and any other internal policy and/or procedure adopted by the Company.
- 5.3. An Associate may come across a situation of uncertainty on the applicable laws or regulations. In these instances, Associates should always seek advice from the Company's Legal & Compliance Department.

6. Breaches of the Policy

- 6.1. Failure to comply with this Policy may result in disciplinary action and serious employment consequences, up to and including termination of employment or even criminal prosecution.
- 6.2. The Company may terminate its relationship with Associates and Business Partners in case of breach of this Policy.

7. Reporting obligations

- 7.1. Associates and/or Business Partners who know of, or reasonably believe there is, or imminently will be, a violation of this Policy must report such information immediately to the Company's Legal & Compliance Department.
- 7.2. Associates and Business Partners will be protected from retaliation for reporting concerns in good faith. The Company does not tolerate any act of retaliation against Associates who report potential or actual violations of this Policy or of applicable law in good faith.

8. Procedures and other related documentation

- 8.1. This Policy should be read in conjunction with the following policies and procedures as well as with any other internal policy and procedure of the Company:
 - Organizational, management and control model pursuant to Legislative Decree no. 231/2001;
 - Code of Ethic;
 - Anti-bribery and Anti-corruption Policy;
 - Employee Handbook;
 - Whistleblowing and Reportable Events Policy.