



**CHARITABLE DONATIONS 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. Introduction

- 1.1 The present policy (the "**Policy**") defines the standards for the management donations incurred by the Associates (as defined below) of the Company, in order to preserve the highest levels of integrity and reputation.
- 1.2 It is the duty of all Associates (as defined below) to know and comply with this Policy.
- 1.3 Violating the Policy represents a violation of Company internal regulations and will result in disciplinary actions against those who (in accordance with the provisions of the applicable national collective labor agreement) have not complied with this Policy, without prejudice to any criminal action.

2. Purpose

- 2.1 The Company may choose to use funds or resources to enhance the social welfare, sustainability and quality of life in the communities where it does business.
- 2.2 The purpose of this Policy is to ensure that all charitable donations made by the Company or on behalf of the Company are consistent with all the applicable laws and regulations as well as with the other related Companies' policies and procedures, including the organizational, management and control model pursuant to Legislative both Decree no. 231/2001, the "Code of Ethics", the "Gratuity Policy", the "Compliance with Laws Policy" and the "Anti-Bribery and Anti-Corruption Policy".

3. Application

- 3.1 The Policy applies to all those who act in the name of and/or on behalf of the Company, including, but not limited to, directors, auditors, employees, athletes and registered personnel, technical and medical staff, consultants and suppliers (the "**Associates**").

4. Policy

- 4.1 Charitable donations and financial support for community or philanthropic programs must never be a condition for, or to influence any Public Official, with respect to, a government action or decision or to secure any improper business advantage for the Company.
- 4.2 Without prejudice to the provisions of the Gratuity Policy, the Company permits such contributions or donations on its behalf in compliance with the following principles:
 - the Company's charitable donation shall reflect the Company's interests and not those of any individual Associate. The Company will report all charitable donations as required under any applicable laws;
 - charitable donations must comply with applicable laws and regulations;

- charitable donations may include, but are not limited to, contributions of money, time, services or entertainment.

5. Charitable donations

- 5.1 Charitable donations must comply with applicable laws and with this Policy. No charitable donations shall be given in anticipation of, or in return for any official act or improper business advantage for the Company.
- 5.2 Charitable donations can be proposed by Associates through a proposal to be submitted to the Corporate Managing Director (the “**Manager**”) by means of a written request (also via email) to the latter who shall approve, also via email, the proposal.
- 5.3 The Manager may delegate all or part of his/her functions under this Policy to the Company's Legal & Compliance Department.
- 5.4 To obtain approval, the requesting Associate must provide documentation describing the charity, identity of the requesting party, amount of the proposed donation, names of individual beneficiaries of the charity (if any) and any other relevant information. In coordination with the Company's Legal & Compliance Department, a background check shall be performed to show that the charity is, in fact, a *bona fide* organization.
- 5.5 All charitable donations must be accurately recorded in the Company's books and filed to Company's records.
- 5.6 This Policy does not govern a Company Associate's decision to make charitable donations and/or participate in charitable activities on his/her own behalf utilizing his/her own time and resources. The Company does not discourage the individual participation of any Associate in charitable activities. However, if or when an Associate speaks publicly on any issues, where appropriate, the Associate should make clear that his/her comments/statements are his or her own and do not reflect those of the Company. If an Associate has a question as to whether his or her contribution or activity would be considered personal or not, he or she should consult with the Company's Legal & Compliance Department.
- 5.7 The monitoring and verification activities regarding the compliance with the provisions of the present Policy are assigned to the Supervisory Body (*Organismo di Vigilanza*).

6. Procedures and other related documentation

- 6.1 The principles set forth by the present Policy are contained in the Company's Code of Ethic and shall also be included in the Organizational Model adopted by the Company pursuant to Legislative Decree no. 231/2001.