

Stevanato Group

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Version 0

Adopted on July 2, 2021

1. INTRODUCTION

This anti-bribery and anti-corruption policy (hereinafter “**Policy**”) sets forth Stevanato Group’s commitment to ensure that Stevanato Group S.p.A. and its subsidiaries (hereinafter “**Stevanato Group**” or “**Group**”) and others acting on Group’s behalf abide by all international and local anti-bribery and anti-corruption laws in countries in which the Group conducts business. As a corporation traded on the New York Stock Exchange, the Group is subject to the U.S. Foreign Corrupt Practices Act (“FCPA”) and other applicable anti-bribery laws worldwide.

Stevanato Group rejects any form of bribery or corruption, whether involving a public official or a private sector company or individual, and whether direct or indirect through a third party representative, as defined below.

Any act of offering, promising, giving, requesting or accepting an undue reward, which could be a financial or other incentive aimed at inducing or rewarding a person to perform their responsibilities or duties improperly to obtain an unfair business advantage, is prohibited under this Policy, irrespective of whether that individual is operating in the public or private sector.

2. DEFINITIONS

For purposes of this Policy, the following definitions apply:

“**Anti-Bribery and Anti-Corruption Laws**” refers to international and local laws that collectively prohibit bribery and corruption. These laws commonly require an organization to have an adequate system of internal financial controls, and to keep accurate and detailed books and records. Violation of these laws may give rise to criminal offenses punishable by fines and imprisonment, and individual liability may extend to those planning, carrying out or condoning prohibited acts.

“**Policy**” means this Anti-Bribery and Anti-Corruption Policy.

“**Public Official**” refers to: (a) any official (elected, appointed or career) or employee of a federal, national, state, provincial, local, or municipal government or any department, agency, or subdivision thereof; (b) any officers or employees of public international organizations (e.g., United Nations, World Health Organization); (c) any person acting in an official capacity for or on behalf of a government or an government department, government agency, government-owned entity, or of a public international organization; (d) politicians and candidates for a political office; (e) any family member of any of the above; or (f) any other person who is considered to be a public official according to applicable laws, regulations and industry codes.

“Third Party Representative” refers to those who are authorized to act for or on behalf of Stevanato Group, and may include distributors, subcontractors, regulatory agents, advisors, consultants, agents, brokers, etc.

3. PERSONS SUBJECT TO THIS POLICY

This Policy must be read in conjunction with other Company policies, procedures and guidelines, including the Stevanato Group Code of Ethics, available on Stevanato Group's website at <https://www.stevanatogroup.com/en/code-of-ethics>. However, to the extent that this Policy is more restrictive, it supersedes the Group's other applicable policies and procedures. This Policy applies to all employees, officers, directors, business partners (also external, e.g. agents, attorneys in fact, business brokers, consultants, dealers), who, for whatever reason, act in the name of and on behalf of the Group (**“Group Agents”**).

Directors, officers, and employees are personally responsible for compliance with this Policy. The personnel of each company of Stevanato Group are also responsible for ensuring that any third party acting on behalf of the Group complies with this Policy.

4. PRINCIPLES AND RULES

4.1. Employment and Consulting Arrangements

Consulting and employment agreements, including agreements, whether paid or unpaid (internships) with employees, agents, consultants, advisors, distributors, public officials, may only be entered into if there is a business need and legitimate for the services to be rendered, in accordance with applicable laws and with this Policy.

Stevanato Group maintains internal controls and applies procedures to provide reasonable assurance that the decisions and motivations made in selecting personnel for each Group company are accurately recorded and stored in accordance with Stevanato Group's policies and procedures in order to be able to demonstrate compliance with anti-bribery and anti-corruption law.

4.2. Gifts, Hospitality and Entertainment

When dealing with customers, suppliers and third parties in general, gifts, hospitality and entertainment are permitted, provided that they are of moderate value, given openly and transparently, properly recorded in the giver's books and records, made for a legitimate business purpose, are not prohibited by applicable laws, and are in accordance with this Policy.

Any case of gifts, hospitality and entertainment or equivalent must be approved in advance in writing by the relative key manager.

However, they must never be given to influence any act or decision in circumstances that could be construed as means to obtain real or apparent benefits of any kind for Stevanato Group or for one's own benefit (e.g. direct or indirect promises of financial benefits, favors, recommendations of support, promises of jobs, etc.).

4.3. Sponsorships, Grants and Donations

Providing funding or other support to third parties, such as through sponsorships, grants, charitable contributions, and donations, directly or indirectly through third parties, may create a heightened risk if such

support is provided – or may reasonably be perceived to be provided – in exchange for an improper business advantage for Stevanato Group or for one's own benefit.

Accordingly, funding or support to third parties may only be provided if permitted by applicable laws and if it follows this Policy.

4.4. Rules relating to Public Officials

Any relationship with Public Officials must be in strict compliance with the rules and regulations to which they are subject, and must be inspired by the principles of transparency, honesty and fairness.

It is forbidden, directly or indirectly, to promise, offer, give, pay, authorize, solicit, or accept anything of value any payment of money, anything of value or other benefits to/from Public Officials to improperly induce that person to affect any act or decision, to do or omit to do any act in violation of their duty, or to secure an improper advantage in a manner that will promote or favor the interests of the Group or in violation of applicable laws.

4.5. Political Contributions and Lobbying Activities

Stevanato Group may not make direct or indirect contributions in violation of current regulations, in any form whatsoever, to political parties, campaigns, party officials, political and trade union movements and organizations, or to their representatives and candidates, made with a view to obtaining material, commercial or personal advantages.

Lobbying activities must always be compliant with applicable laws and regulations, and may not be made with the intent to improperly influence the decision of a person or group of people to purchase, prescribe, use or recommend any Stevanato Group product, or to improperly provide any other favorable treatment to the Group.

4.6. Facilitation Payments

Stevanato Group prohibits offering or authorizing the offer of facilitation payments: unofficial payments to public officials to expedite the performance of routine governmental actions.

4.7. Third Parties

In accordance with certain Anti-Bribery and Anti-Corruption Laws, the Agents of each company of Stevanato Group and Third Party Representatives may not give or accept any gifts, gratuities or entertainment from companies, such as vendors, that have business dealings with the Group, except those that are part of normal, ethical business practices.

Whenever contact is made with a third party, prior to signing any contract, a preliminary check must be made to exclude any potential risk of corruption.

Compliance with the provisions of this Policy, formalized in the Group's contracts or in general terms and conditions through the inclusion of a specific clause, is an essential part of the obligations of third parties (suppliers, experts, business partners, etc.) who have business relations with the Group. Consequently, any violation of these principles by third parties offering goods or rendering services in favor of the Group may constitute a cause of breach of contract with all the legal consequences.

4.8. New Business and Joint Ventures

Before entering into an agreement for acquiring a new business or entering into a joint venture, Stevanato Group considers and evaluates the potential risks posed by an acquisition target under Anti-Bribery and Anti-Corruption Laws and the potential impact such risks could pose to the Group.

4.9. Books and Records and Internal Controls

The Group Agents of the Stevanato Group must prepare and maintains books and records that reflect financial transactions and dispositions of assets in a fair, accurate and reasonably detailed manner. "Off the books" accounts and false or deceptive entries in any companies of Stevanato Group book and records are strictly prohibited.

Stevanato Group maintains internal controls and applies procedures to provide reasonable assurance that the Group's transactions are accurately recorded in its books and records in accordance with local financial and accounting policies and procedures in order to be able to demonstrate compliance with the law.

5. REPORTING VIOLATIONS OF THE POLICY

The management of reports of violations of this Policy is regulated by each company of the Group on the basis of its own internal procedures, in accordance with the reference legislation and in compliance with the principles and provisions of this Policy.

In any case, all reports about any act or behavior that has occurred or could potentially occur, even if only suspected, as well as any request received from third parties to act in violation of this Policy, shall be submitted to the Compliance Local Correspondent through specific communication channels identified by each company of the Group, which guarantee the confidentiality of the report.

By way of example and without limitation, the following violations are noted:

- abnormally high or unjustified fees or commissions to third party agents or consultants;
- requests for cash payment;
- high risk region for bribery and corruption issues;
- lack of written agreements or refusal to put terms agreed in writing; and
- refusal to comply with information and due diligence requests, including any refusal to confirm compliance with the Stevanato Group's Code of Ethics and/or this Policy.

Reports may also be submitted to the Group CSR & Compliance as follows:

- by sending an email to the CSR & Compliance department of Stevanato Group S.p.A. via the email address csr-compliance@stevanatogroup.com. It should be noted that this is an email box with a password known only to the head of the department and not accessible by third parties;
- by sending a letter to the ordinary mail address Stevanato Group S.p.A. - CSR & Compliance Department, via Molinella, 17 35017 Piombino Dese (PD).

In the event of a report, the Local Compliance Correspondent/CSR & Compliance guarantees the necessary confidentiality in its investigations in order to protect the person who has reported in good faith company facts of alleged violation of the Policy from possible forms of retaliation and discrimination, such as disciplinary actions, demotion without justification, harassment in the workplace, and any other form of retaliation that leads to uncomfortable or intolerable working conditions.

6. PENALTIES FOR VIOLATIONS OF THE POLICY

Each company of the Group undertakes to prepare and implement organizational verification and monitoring measures to ensure compliance with this Policy in all actions, operations, and negotiations.

Violations of this Policy by personnel of any company of Stevanato Group may result in disciplinary action up to and including termination of employment, as well as the potential for prosecution, fines or imprisonment in accordance with applicable laws. Any Third Party Representatives who violate this Policy may face termination of contracts and business relations with the Group.

7. DISCLOSURE OF THE POLICY

Each company of the Group undertakes to communicate this Policy to its employees and all interested parties, including providing the appropriate training for the correct interpretation of its contents and the tools to facilitate its application.

Moreover, this Policy is available on Stevanato Group's website at <https://www.stevanatogroup.com/en/code-of-ethics>.

8. POLICY APPROVAL, REVIEW AND UPDATE

This Policy is approved by the Board of Directors of the Stevanato Group S.p.A. and applies to any companies of Stevanato Group.

Stevanato Group will consider making any revisions and/or updates to this Policy, taking into account any changes in applicable laws and regulations, the effectiveness of the Policy in practice, and any changes in the corporate structure of the Group.

In any case, each company of the Group is allowed to adopt its own anti-bribery and anti-corruption policy, provided that it does not conflict with the principles and values contained in this Policy.