INTESA Spa is one of the leading Italian companies specializing in the design and development of digital services and is part of Havant Group.
The company's mission is to support businesses in their digital transformation with an agile and scalable approach, identifying and implementing the most suitable technological ecosystem to evolve business processes in compliance with current regulations.

Reference values are:



INTESA is fully aware that corruption is a serious obstacle to the economic, political, and social development of a country and a significant distortion of the rules, fairness, and transparency of markets. In this sense, the company is fully committed to ensuring actions and behaviors based exclusively on criteria of transparency, fairness, and moral integrity, which prevent any attempt at corruption.
In application of this commitment, the company management has determined that the Anti-Corruption Policy is aimed at pursuing the following general objectives:

- Strict and full compliance with current legislation on the prevention and fight against corruption, in Italy and in any country where the company operates, involving employees, collaborators in any capacity, and all subjects operating for and/or under company control;
- Absolute prohibition of engaging in behaviors that may constitute corruption or attempted corruption;
- Identification, within the activities carried out by Intesa Spa, of areas of potential risk and identification and implementation of actions suitable to reduce/minimize such risks;
- Provision of a clear framework for identifying, reviewing, and achieving anti-corruption objectives;
- Commitment to plan and implement its policies and actions so as not to be involved in any way in corrupt practices or attempts, and not to risk involvement in unlawful situations with public or private entities;
- Awareness-raising activities among suppliers and collaborators so that they adopt, in their specific activities, policies and actions for the prevention of corruption phenomena, in compliance with legal requirements and consistent with those of the company;
- Awareness and training of its employees on issues related to the prevention of corruption;
- Provision of methods for reporting suspicions in good faith, or based on reasonable belief, without fear of retaliation;
- Presence of a compliance function for the prevention of corruption, which is guaranteed full authority, independence, and an adequate budget;
- Commitment to the continuous improvement of the anti-corruption management system.

In continuity with the anti-bribery policies adopted since January 2024, culminating in the achievement of the ISO 37001 certification, Company Management believes that the most suitable strategy for their achievement now consists in the full implementation of the Havant-Intesa Code of Ethics, which represents today's corporate ethical foundation and dictates the rules of conduct and reporting for personnel.

Turnin, 3rd July 2026
THE MANAGEMENT