

# DONATION GUIDELINES

Extract from the Donation Guidelines, approved by the BoD on 30 November 2017.

## 1 – RECITALS

### **Definitions**

The term "**Donations**" means a voluntary and charitable contribution of funds, in favour of non-profit third parties, as defined in detail in the "recipients" paragraph below.

Donations shall only be disbursed to initiatives that are relevant to the statutory purposes and, therefore, those consistent with the business purpose and instrumentally connected to the same.

## 2 – EVALUATION CRITERIA, RECIPIENTS AND TRACEABILITY

### **Evaluation criteria**

The evaluation of the received donation requests takes into account:

- > the degree of pertinence to S.A.C.B.O.'s business purpose;
- > the degree of possible positive impacts on the business activities of S.A.C.B.O. and on its image in the territory within which the Company conducts its business;
- > the level of the initiative and/or the promoting body;
- > the quality of the initiatives to be sponsored, favouring those that generate a higher return of image in the area of the provincial territory impacted by the airport facilities, given their landscape, environmental, cultural and social relevance, along with study or research activities of phenomena directly or indirectly related to the airport sector;
- > the level of reliability of the promoter Body/Individual;
- > the opportunity to give priority to initiatives carried out and with greater repercussions in the areas most pertinent to the airport activities. To this end, it will be necessary to take into account the following percentages, with respect to the approved budget when defining the donation amounts:
  - 1) 50% (fifty percent) to the initiatives carried out in the Boroughs most affected by airport noise (commensurate with the actual noise footprint on the ground);
  - 2) 33% (thirty-three percent) to the initiatives carried out in the territory of the City of Bergamo;
  - 3) 17% (seventeen percent) of the initiatives carried out in the territory of the remaining Boroughs in the province of Bergamo.

Donations on a multiple year basis are excluded.

### **Recipients**

Donations can be disbursed to:

- voluntary associations, recognised or unrecognised, with a social/ethical/educational/therapeutic or cultural purpose;
- associations created for the purpose of sports activities in amateur events related to the purposes listed in the previous paragraph;
- moral, charitable institutions;
- foundations;
- non-profit organisation (the list of recognised non-profit associations is available and comparable on the Inland Revenue website);
- public bodies, institutions;
- various committees and organisations with purposes related to the development of the socio-economic situation, along with the enhancement and protection of the artistic, historical and architectural heritage.

This excludes:

- enterprises of any legal form;
- entities and organisations whose Articles of Association in force at the time of the request, do not highlight their non-profit purpose;
- political parties, movements, committees and trade union organisations or their representatives (see S.A.C.B.O. Code of Ethics, paragraph 3.3);
- associations/foundations/entities whose business purpose has no direct correlation with that of S.A.C.B.O.

#### **Traceability of donation requests**

Requests for donations must be submitted to "Il Caravaggio" Airport in Orio al Serio in writing on plain paper and signed by the legal representative of the applicant. Requests should be addressed to the Marketing & Communication department and are registered by the Protocol Unit upon receipt.

#### **Allocation of corporate financial resources to be designated to donations**

OMISSIS

#### **Approval Procedure**

OMISSIS

#### **Reporting Procedure**

OMISSIS

### 3 – RULES AND CONTROLS

#### **Request assessment rules**

Requests for donations relating to a project and/or initiative shall be assessed within the six-monthly deadlines set as 15 February and 15 August of each year, accompanied by appropriate documentation so as to:

- a) identify the recipient and the nature of the same;
- b) describe the project for which the donation is sought and the pursued objective;
- c) indicate any benefits for S.A.C.B.O. foreseen by the project;
- d) document the costs incurred (invoices, tax and non-tax receipts) and the payments effected (transfers) to carry out the project;
- e) describe the estimated project costs and timelines for which donations are requested of S.A.C.B.O. .

In the case where the purpose of the donation is the construction/extraordinary maintenance of premises, the purchase of plant facilities and equipment for public use, the beneficiaries of the charitable donation shall submit suitable documentation that obliges them not to change the intention for public use of the donated amounts.

Every donation request shall be accompanied by:

- > in the case of recognised bodies: the Deed of Incorporation, the Articles of Association and details on the legal representative;
- > in the case of unrecognised bodies, associations and entities: documentation proving the relative purposes, and details of the person authorised to record and issue receipts for the donations received;
- > documentation proving the reliability of the applicant along with the experience gained in the relative business sector and the implementation of other projects.

#### **Cash Flow Statements**

The donation of the amounts shall be effected by S.A.C.B.O. following receipt of the suitably documented statement, submitted by the recipient, with a detailed account of the activities carried out, prior to the disbursement, accompanied by all related tax documentation and a copy of the transfers made.

In the event of specific and particular requirements, 50% of the donations may be paid in advance, or in instalments, whereby the recipient undertakes to provide evidence on how the amounts were used so as to guarantee S.A.C.B.O. due knowledge of the actual destination of the same according to the submitted project.

Payments to the beneficiary shall be effected exclusively to the account registered in the name of the recipient; it is not permitted to effect payments in cash, or to any subject other than the recipient.

Once the donation has been received, the recipient shall issue S.A.C.B.O. with proof of payment.

The approved donations shall be financially expensed within the year following the year of approval, [without prejudice to the fact that any amounts disbursed in the following year shall be charged to the budget of that same year].

S.A.C.B.O. reserves the right to recover, in accordance with the laws in force, any donations already granted if the recipients of such disbursements have not complied with the declared intended use, or if they fail to fulfil the perpetual maintenance obligations on all plant facilities and equipment for uses available to the general public.

S.A.C.B.O. reserves the right to appoint its own representatives as members of the committees promoting the subsidised initiatives to verify the progress of the financed projects.

#### **Process control and compliance with the Leg. Decree 231/01 Protocols**

S.A.C.B.O. reserves the right to assign its Internal Auditing team to conduct random audits c/o the donation recipient, to verify consistency between the documentation initially submitted and the actual operations of the same, to ensure the correct application of the provisions of Legislative Decree no. 231/01.

A copy of the report, prepared and updated by Marketing & Communications and addressed to the Board of Directors, as referred to in the paragraph "Reporting Procedure" shall be sent to the 231 Supervisory Body, highlighting the results for the period compared to the budget, creating a flow of information useful for monitoring and preventing the risk/crime of corruption between private individuals and the Public Administration.