

Corporate Code of Ethics
S-COD0001-0

CORPORATE CODE OF ETHICS

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PREMISES

Since its establishment, BBM Service S.r.l. - hence also "Company" - has been committed to grow its business based on strong human values and solid principles. Such principles are collected in this Code of Ethics - hence also "Code" - to strengthen and disclose the Company's values to internal and external subjects.

The commitments and ethical responsibilities of BBM Service S.r.l., also by means of this Code, are aimed at creating satisfaction for its Customers, and personal growth for Employees and Collaborators. Therefore, the Code constitutes a set of principles whose observance by all recipients is of fundamental importance for the regular functioning, reliability, and image of the Company.

In carrying out its activities, BBM Service S.r.l. acts in compliance with the principles of freedom, dignity of the human person, and respect for diversity. BBM Service S.r.l. repudiates any discrimination based on sex, race, language, personal and social conditions, religious and political beliefs. The company intends to build its growth by consolidating an image that is supportive and faithful to the values of fairness and loyalty in each of its activities, for the purpose of innovation that has always defined the Company's business.

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To this end, BBM Service S.r.l. promotes a work environment inspired by respect, fairness, and collaboration, and allows the involvement and empowerment of all Employees and Collaborators, regarding the specific goals to be achieved and the ways to pursue them. This Code of Ethics has been established with the aim of defining the set of values that BBM Service S.r.l. recognizes, promotes, and shares.

BBM Service S.r.l. will ensure a program of information and awareness on this Code and the application of the same to the subjects to whom it refers, so that all those who work for the Company can carry out their activities and / or their duties according to a constant and strict observance of the principles and values here contained. All those who work in BBM Service S.r.l. are required to be aware of the Code and to comply with the provisions contained in the Code. It is the task of BBM Service S.r.l. to monitor compliance with the Code and to adopt all the necessary prevention and control tools.

CHAPTER I – GENERAL PROVISIONS

Article 1 - Scope and Addressees

1.1 The principles and provisions of this Code constitute exemplary specifications of the general obligations of diligence, fairness and loyalty, which qualify the fulfillment of work performance and behavior in the work environment.

1.2 The principles and provisions of the Code apply to the director of BBM Service S.r.l., for the Employees and for all those who work for the Company, whatever the relationship, even temporary.

1.3 The Code will be brought to the attention of third parties who receive assignments from BBM Service S.r.l. or who have stable or temporary relationships with it.

Article 2 - Information and Communication

2.1 The Company carries out activities with honesty and integrity, and in compliance with the ethical and moral principles contained in this Code, and undertakes to not continue any relationship with anyone who demonstrates not to share its content and spirit.

Therefore, the Recipients must comply with the Code principles of conduct, approved, and published by the Company to help them to behave in a legal and ethical manner.

2.2 BBM Service S.r.l. informs all Recipients about the provisions of the Code, recommending compliance with it. BBM Service S.r.l. provides, also through the designation of subjects whose specific internal functions will be assigned:

- The dissemination of the Code to the Recipients;
- The interpretation and clarification of the provisions contained in the Code.
- Updating the provisions of the Code to needs that may arise from time to time.

Article 3 - Fairness

3.1 Every transaction, understood in the broadest term, must be legitimate, authorized, consistent, congruous, documented, recorded, and at all times verifiable. All those who carry out such operations must guarantee traceability, the reasons that allowed the transaction's execution, the evidence of any authorizations, and the methods of execution of the operation itself.

3.2 Employees and persons who purchase goods and/or services, including external consultancy, on behalf of the Company, must act in compliance with the principles of correctness, economy, quality, and lawfulness, and operate with the diligence of the good father of the family.

The Company, in the choice of its Suppliers, must always follow objective and documentable criteria and adopt behaviors oriented to the maximum competitive advantage for the company, ensuring at the same time to all Suppliers loyalty, impartiality and equal opportunities for collaboration.

3.3 Each Function, Management, Company Area is responsible for the truthfulness, authenticity and originality of the documentation produced, and the information provided in the performance of the activity within its competence.

3.4 The sponsorship activities carried out by the Company must be intended for bodies and / or organizations of sure reliability and ethics, which provide adequate guarantees regarding the correct destination of the sums disbursed. The subjects appointed by the Company to manage these activities are required to verify, as far as they are competent, the correct use of the funds, requesting in any case that the initiatives undertaken are supported by adequate documentation.

Article 4 - Conflict of Interest

4.1 The Recipients pursue, in the performance of their activities and / or assignments, the objectives and general interests of BBM Service S.r.l., in compliance with current legislation and this Code.

4.2 The Recipients are required to avoid any activity or situation of personal interest that constitutes or may constitute a conflict between individual interests and those of the Company. It is forbidden to engage in conduct aimed at exploiting inside-information held by persons belonging to the Company for reasons related to the performance of their corporate functions and skills.

4.3 All actions and operations carried out, and the behaviors held by each of the Recipients in the performance of the function or assignment, are inspired by legitimacy under the formal and substantial aspect, according to current regulations and internal procedures, as well as correctness, collaboration, loyalty, and mutual respect.

4.4 The Recipients do not use for personal purposes goods and equipment at their disposal in the performance of the function or assignment.

4.5 The Recipients are required to diligently comply with laws, the Code, and internal regulations. In no case can the pursuit of the interest of BBM Service S.r.l. justify conduct that is not honest and does not comply with current legislation.

4.6 Employees of BBM Service S.r.l. must refrain from carrying out activities in competition with those of the latter, comply with the company rules and comply with the precepts of this Code, The observance of the Code is also required pursuant to and for the purposes of Article 2104 of the Italian Civil Code.

4.7 It is forbidden to carry out actions and behaviors in conflict of interest or in competition with the activity of the company or, in any case, contrary to the purposes and interests that the same.

For the purposes of this principle, anyone who has, for any reason, an interest contrary to that of the Company, shall be deemed to have a conflict of interest with the Company. All those who operate on behalf of the Company are obliged to refrain from maintaining relations with third parties in the event of such conflicts.

4.8 Each Recipient does not accept, nor does it carry out, for himself or for others, pressures, recommendations or reports, which may be detrimental to BBM Service S.r.l. or undue advantages for himself, BBM Service S.r.l., or third parties.

4.9 If the Recipient receives from a third party an offer or a request for benefits, except for gifts of commercial use or modest value, he must not accept such offer, nor does he adhere to such request. Recipients shall inform their hierarchical superior or the person they are required to report for inappropriate initiatives. The Recipients inform their superiors or contacts without delay of the situations or activities in which they may be holders of interests or conflict. The Recipients respect the decisions that are taken in this regard by BBM Service S.r.l. refraining, in any case, from carrying out operations in conflict of interest.

Article 5 - Confidentiality

It is forbidden to spread false news both inside and outside the Company concerning the Company itself, employees, collaborators, consultants and third parties. All information relating to company data must be managed through institutional channels, ensuring the protection of the processed company data, compliance with professional secrecy and the protection of confidential information.¹

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¹ S-COD0005: Code of Conduct - Privacy.

CHAPTER II - BUSINESS BEHAVIOUR

Article 6 - Business relations, anti-money laundering and anti-fraud provisions

6.1 The Company, in carrying out business relationships, is inspired by the principles of legality, correctness, transparency and efficiency. Employees and Collaborators, whose actions may be in some way referable to the Company itself, must follow correct behavior in the affairs of interest to the Company, and in relations with the Public Administration, regardless of the competitiveness of the market or the importance of the deal. They shall refrain from implementing, legitimizing, accepting or favoring behaviors that are not strictly compliant with current legislation and principles of correctness, diligence and loyalty, referred to in this Code.

6.2 It is forbidden for the Recipients to promise or offer, ask or accept, even through an intermediary person, any type of compensation or personal utility related to the management of the Company's activity. This prohibition refers to money or other benefits given to - or received by - Italian or foreign Public Officials and /or Public Service Officers as well as to / from Customers, Competitors, Suppliers, and other persons with whom the Company has or would like to have business relationships. The same thing applies to any object, service, provision, or favor, except in the case of gifts or other utilities of modest value and, in any case, falling within the ordinary practices and customs. Each employee who receives any form of gift, or benefit that objectively exceeds the modest value, must promptly notify it.²

6.3 Recipients who perform acts on behalf of the Company by virtue of proxies or responsibilities conferred on them, must act within the limits of the same. It is forbidden for the subjects outside the pre-established limits and for all those who do not have proxies, to commit or make believe that they can engage the Company in performances for which they don't have the legitimate power. The Recipients must also ensure that the subjects with whom they have business relationships are in possession of the legitimate powers conferred on them.

6.4 In transposition of the IV Anti-Money Laundering Directive, BBM Service S.r.l. condemns all forms of money laundering. In addition, the Company undertakes to prosecute the author of facts of which it may be a witness.³

6.5 Anyone who is at the origin of a fraudulent act against BBM Service S.r.l., may be prosecuted in the competent offices. The same will happen for any collaborator or person belonging to the Company BBM Service S.r.l. who acts in a personal capacity and who is guilty of fraud to the detriment of a partner or a customer.

² S-COD0002: Code of Conduct - Gifts.

³ S-COD0003: Code of Conduct - Anti-Corruption.

Article 7 - Protection of competition

BBM Service S.r.l. supports the principle of market economy; undertakes to exercise fair competition and recognizes the same right to other companies.

The Company supports competition laws that aim to protect this principle. In particular, BBM Service S.r.l.:

- Establishes its own commercial policy independently and does not set any price in agreement or collusion with competitors;
- It does not allocate customers, territories or markets in agreement or collusion with competitors;
- It establishes fair relationships with its customers and suppliers, in accordance with the laws governing competition.

Article 8 - Relations with customers

8.1 The Company pursues its business success on the markets through the offer of quality products and services at competitive conditions and in compliance with the rules set to protect fair competition.

8.2 The Company acknowledges that the appreciation of those who request products or services is of primary importance for its business success. BBM Service S.r.l., therefore, undertakes to:

- Observe internal procedures for managing customer relationships;
- Provide high quality products that meet or exceed the reasonable expectations of the customer, with efficiency and courtesy, and within the limits of the contractual provisions;
- Provide accurate and comprehensive information about products and services, so that the customer can make informed decisions;
- Stick to truth in advertising or other communications.

Article 9 - Relations with suppliers

The selection of suppliers and the determination of purchasing conditions shall be based on an objective assessment of the quality and price of the good or service, as well as guarantees of assistance and timeliness. In supply relationships, BBM Service S.r.l. undertakes to:

- Observe the internal procedures for the selection and management of relationships with suppliers;

- Do not preclude any supplier company, in possession of the required requirements, from competing to win a supply at BBM Service S.r.l., adopting objective evaluation criteria in the selection, according to declared and transparent methods;
- Obtain the collaboration of suppliers in constantly ensuring the satisfaction of the needs of BBM Service S.r.l. customers in terms of quality, cost and delivery times, to an extent at least equal to their expectations;
- Maintain a frank and open dialogue with suppliers, in line with good business practices. ⁴

CHAPTER III - HEALTH, SAFETY AND ENVIRONMENT

Article 10 - Environmental protection

As part of its activities, BBM Service S.r.l. is inspired by the principle of environmental protection and pursues the objective of protecting the safety and health of the Recipients. The activities of BBM Service S.r.l. must be managed in full compliance with current legislation on prevention and protection.

Research and technological innovation must be dedicated to the creation and promotion of products and processes that are increasingly compatible with the environment and characterized by an ever-greater attention to the safety and health of the Recipients.

Article 10a - Health and safety at work

BBM Service S.r.l. promotes the culture of health and safety in the workplace, considers personnel and human resources as the most important corporate asset, and is committed to creating and maintaining safe environments and workstations for every Employee.

In strict compliance with current risk prevention legislation, BBM Service S.r.l. works to prevent accidents and occupational diseases, adopting safety management systems focused on prevention, aiming to introduce a strong culture of safety at work at every level of the company. BBM Service S.r.l. provides its employees - at all levels and frameworks - with training, general and specific information, and any other support that allows them to work in health and safety conditions, and to implement their culture.

The Company ensures that risk assessments are carried out and that appropriate corrective measures are taken to avoid risks to health, human safety and to the company's own activities.

With the monitoring of aspects of the company's work activities, BBM Service S.r.l. works so that machines, processes, systems, and work practices are constantly improved, to optimize performance in terms of safety and risk prevention.

The Company requires not only its suppliers to adopt similar safety standards, but also third parties operating in its facilities, which must be adequately equipped to safely perform their duties within the BBM Service S.r.l. environments.

CHAPTER IV - INTERNAL POLICIES

Article 11 - Labor and equal opportunities policies

11.1 The Company offers all workers the same job opportunities, so that everyone can enjoy fair treatment based on merit criteria. The identification and choice of personnel must be assumed by evaluating the specific skills, the professional profile and the technical and psycho-attitudinal skills of the candidate responding to the needs and requirements of the company. All the information acquired during the selection phase of the candidates is closely linked to the verification of the required requirements, respecting the person and his opinions.

11.2 The Company provides ethical training for all company personnel, in order to disseminate the principles and rules of conduct contained in this Code, and useful for the prevention of any crimes, also ensuring continuous updating and adequate and constant information.

11.3 BBM Service S.r.l. undertakes not to use forced or constrained labor. The Company does not engage in any type of child labor, in accordance with the founding rules of the ILO and the Principles of the United Nations Global Compact. BBM Service S.r.l. does not hire personnel under the age of 16, unless it is part of a professional internship, or apprenticeship program authorized by the Government and of manifest utility for the participant. Society does not tolerate the use of any disciplinary practice involving the use of physical violence and opposes any form of trafficking in human beings.

11.4 BBM Service S.r.l. relates to employees by promoting a relationship based on social dialogue: with employees, with workers' representatives and with trade union representatives.

11.5 As per Law 68 of 1999 on targeted placement, the Company undertakes to integrate within its staff the percentage of invalid civilians and subjects belonging to the protected categories provided for by current legislation.

11.6 BBM Service S.r.l. is committed to the enhancement of the over 50s, promoting initiatives in favor of the quality of life and well-being of the most mature people to ensure an active aging of the workforce.

11.7 BBM Service S.r.l. undertakes to guarantee working conditions in compliance with Article 36 of the Italian Constitution, recognizing its employees all the elements of remuneration provided for in Article 2099 of the Italian Civil Code.

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Article 12 - Harassment behaviour in the workplace

BBM Service S.r.l. requires that internal and external employment relationships do not give rise to harassment, meaning as such:

- The creation of an intimidating, hostile, or isolated working environment towards individuals or groups of workers;
- The unjustified interference with the execution of work performance of others;
- The obstacle to individual job prospects of others, for mere reasons of personal competitiveness.⁴

Article 13 - Alcohol or drug abuse

BBM Service S.r.l. requires its Recipients to contribute to maintaining the work environment respectful of the sensitivity of others. It will therefore be considered conscious assumption of risk, in the course of work and in the workplace:

- Serve under the effects of alcohol, narcotics or substances of similar effect;
- Consume or transfer to any thiol narcotic substances in the course of work performance.

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BBM Service S.r.l. undertakes to promote the social actions envisaged in the field of collective bargaining.

Article 14 - Smoking

Without prejudice to the general prohibition of smoking in all workplaces, according to the specific policy adopted by the Company in this regard, except for the places expressly intended for this purpose.

BBM Service S.r.l. will take into particular consideration the condition of those who feel physical discomfort in the presence of smoke and ask to be preserved from contact with the so-called "passive smoke".

Article 15 - Accounting control and transparency

15.1 The Company condemns any conduct aimed at altering the clarity, correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications required by law, directed to shareholders or the public. All the subjects called to the formation of such acts are required to verify, with due diligence, the correctness of the data and

⁴ S-COD0006: Code of Conduct - Discrimination, Harassment, Sexual Harassment and Mobbing.

information that will be transposed for the drafting of the acts indicated above. All budget items, the determination and quantification of which presupposes discretionary assessments of the Functions / Departments in charge, must be supported by appropriate documentation and by legitimate sustainable choices.

15.2 Any type of corporate transaction likely to cause unfair damage to creditors is prohibited. It is forbidden to engage in any conduct aimed at causing an injury to the integrity of the company's assets.

15.3 The Company requires that the Directors, Consultants and Employees behave correctly and transparently in order to provide truthful and correct information and to satisfy any request made by the various corporate bodies, in the exercise of their respective institutional functions. The recipients must follow the same rules of conduct on checks and inspections by the competent Public Authorities, thus maintaining an attitude of maximum availability and collaboration towards the inspection and control bodies. It is forbidden to hinder, in any way, the functions of the Public Supervisory Authorities that meet the Company due to their institutional functions.

CHAPTER V - DISCLOSURE

Article 16 - Implementing provisions

This Code must be brought to the attention of the Corporate Bodies and its members, the Company's Employees, the Consultants and Collaborators, the Attorneys and all those who may act on behalf of the Company. This Code is published in the corporate network.

All the subjects are required to learn the contents and to respect its rules. Any application doubts related to this Code must be promptly discussed.

CHAPTER VI - DISCIPLINARY CONSEQUENCES

Article 17 - Sanctioning provisions

17.1 Compliance with the rules of the Code must be considered an essential part of the contractual obligations of employees for the purposes of Article 2104 of the Italian Civil Code. Violation of the rules of the Code may constitute a breach of the primary obligations of the employment relationship, in compliance with the procedures provided for in Article 7 of the Italian Workers' Statute, with any consequence of the law, including those related to the preservation of the employment relationship, and may result in compensation for damages deriving from it.

17.2 Compliance with the Code must be considered an essential part of the contractual obligations assumed by the Collaborators and / or by the subjects having business relations with the company. Violation of the rules of the Code may be considered a breach of contractual obligations, with any consequence of the law, including those related the termination of the contract and / or the assignment, and may result in compensation for damages deriving from it.

CHAPTER VII - FINAL PROVISIONS

Article 18 - Amending measures

Any modification and/or integration to this Code must be made in the same manner as for its initial approval.