

CORPORATE CODE OF ETHICS

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Premise

Since its establishment, BBM Service S.r.l. - hereinafter also the "Company" - has been committed to basing its business on strong human values and solid principles, collected in this Code of Ethics - hereinafter also the "Code" - in order to strengthen them and make them known to subjects inside and outside the Company.

The commitments and ethical responsibilities of BBM Service S.r.l., also through this Code, are aimed at creating satisfaction for its Customers and personal growth for Employees and Collaborators. The Code therefore constitutes a set of principles whose observance by all those to whom it is addressed is of fundamental importance for the regular operation, reliability of management and the 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. rejects any discrimination based on sex, race, language, personal and social conditions, religious and political beliefs. The company, due to the innovation that characterizes its business, intends to build its growth by consolidating an image of solidarity and faithful to the values of fairness and loyalty, in every process of daily work.

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

BBM Service S.r.l. will ensure an information and awareness program on the provisions of this Code and on the application of the same to the subjects to which it refers, so that all those who work for the Company can carry out their activities and/or their duties according to constant and strict compliance with the principles and values contained in this Code.

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 therein.

It is the duty of BBM Service S.r.l. to monitor compliance with the Code and to this end to adopt all the necessary prevention and control tools.

CHAPTER I - GENERAL PROVISIONS

Article 1 - Scope and Recipients

1.1 The principles and provisions of this Code are exemplary specifications of the general obligations of diligence, fairness and loyalty, which qualify the performance of work and conduct in the workplace.

1.2 The principles and provisions of the Code are binding for the director of BBM Service S.r.l., for the Employees and for all those who work for the Company, regardless of the relationship, even temporary, that binds them to the same.

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 its activities with honesty and integrity and in compliance with the ethical and moral principles contained in this Code and undertakes not to undertake or continue any relationship with anyone who demonstrates, even through their conduct, that they do not share the content and spirit.

The Recipients must, therefore, comply with the principles of conduct of this Code that the Company has approved and published in order to help all recipients behave in a legal and ethical manner.

2.2 BBM Service S.r.l. shall inform all Recipients of the provisions and approval of the Code, recommending compliance with it. In particular, BBM Service S.r.l. provides, also through the designation of subjects to whom specific internal functions will be assigned, through specific acts:

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

Article 3 – Fairness

3.1 Every operation and/or transaction, understood in the broadest sense of the term, must be legitimate, authorised, consistent, congruous, documented, recorded and verifiable at all times. All those who carry out the aforementioned operations must guarantee the traceability of the reasons that allowed them to be carried out, the evidence of any authorisations and the methods of execution of the operation itself.

3.2 Employees and persons who purchase goods and/or services, including external consultants, on behalf of the Company, must act in compliance with the principles of fairness, economy, quality and lawfulness and operate with the diligence of a good family man. The Company, in choosing its Suppliers, must always follow objective and documentable criteria and adopt behaviours aimed at maximum competitive advantage for the company, while ensuring and guaranteeing 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 activities within its competence.

3.4 The sponsorship activities carried out by the Company must be intended for the benefit of bodies and/or organizations of certain reliability and ethics, which provide adequate guarantees regarding the correct destination of the sums disbursed. The persons appointed by the Company to manage these activities are required to verify, within their competence, 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. In particular, 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 responsibilities.

4.3 All the actions and operations carried out and the conduct of each of the Recipients in the performance of their function or assignment are inspired by legitimacy from a formal and

substantial point of view, according to the regulations in force and internal procedures, as well as by fairness, collaboration, loyalty and mutual respect.

4.4 The Recipients shall not use for personal purposes any goods and equipment available to them in the performance of their function or assignment.

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

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

4.7 It is forbidden to carry out actions and behaviours in conflict of interest or in competition with the company's activities or, in any case, contrary to the purposes and interests that it pursues. For the purposes of this Standard, any person who holds, for any reason, an interest contrary to that of the Company is to be considered to be in conflict of interest with the Company. All those who work on behalf of the Company are obliged to refrain from having relations with third parties in the event of such conflicts.

4.8 Each Recipient does not accept, nor does he/she 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 for third parties.

4.9 If the Recipient receives an offer or request for benefits from a third party, except for gifts of commercial use or of modest value, he or she does not accept such offer, nor does he or she accede to such request. He immediately informs his hierarchical superior or the person to whom he is required to report for the appropriate initiatives. The Recipients shall inform their superiors or contact persons without delay of situations or activities in which they may have interests or in conflict with those of the Company (or if they are the holders of such interests close to relatives) and in any other case for reasons of convenience. The Recipients shall comply with the decisions taken by BBM Service S.r.l. in this regard, refraining, in any case, from carrying out transactions in conflict of interest.

Article 5 – Confidentiality

It is forbidden to spread false news both inside and outside the Company concerning the Company itself, the Employees, Collaborators, Consultants and Third Parties who work for it. All information relating to company data must be managed through institutional channels,

ensuring the protection and protection of the company data processed, respect for professional secrecy and the safeguarding of confidential information¹.

¹ S-COD0005: Code of Conduct - Privacy

CHAPTER II - CONDUCT IN BUSINESS

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

6.1 The Company, in carrying out business relations, is inspired by the principles of legality, fairness, transparency and efficiency. Employees and Collaborators, whose actions may in any way be attributable to the Company itself, must behave correctly in matters of interest to the Company and, in particular, in relations with the Public Administration, regardless of the competitiveness of the market or the importance of the business dealt with, refraining from implementing, legitimizing, accepting or encouraging conduct that is 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 for or accept, even through an intermediary, any type of remuneration or personal benefit related to the management of the Company's business. 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, performance or favor, except in the case of gifts or other utilities of modest value and, in any case, falling within ordinary practices and customs. Any employee who receives any form of gift, gift or benefit that objectively exceeds the modest value must promptly notify it.²

6.3 The Recipients who carry out acts on behalf of the Company by virtue of proxies or powers of attorney conferred on them must act within the limits of the same. It is forbidden for such persons outside the pre-established limits and for all those who do not have powers of attorney or proxies, to commit or make believe that they can engage the Company in the performance of their duties and activities. The Recipients must also ensure that the subjects with whom they have business relationships are in possession of legitimate powers conferred on them.

6.4 In compliance with the Fourth Anti-Money Laundering Directive, BBM Service S.r.l. condemns all forms of money laundering. In addition, the Company undertakes to prosecute the perpetrator of acts that he or she may witness.³

6.5 Anyone who is at the origin of a fraudulent act of which BBM Service S.r.l. is a victim may be prosecuted in the competent courts. 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.

Article 7 - Protection of competition

Service S.r.l. supports the principle of the market economy; it 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.:

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

Article 8 - Relations with customers

8.1 The Company pursues its success as a company on the markets by offering quality products and services at competitive conditions and in compliance with the rules protecting fair competition.

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

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

Article 9 - Relations with suppliers

The selection of suppliers and the determination of purchase conditions are based on an objective assessment of the quality and price of the good or service, as well as guarantees of assistance and timeliness. In its 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 the possibility to compete for a supply from 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.'s 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 practices²

² S-COD0004: Code of Conduct - Suppliers.

CHAPTER III - HEALTH, SAFETY AND ENVIRONMENT

Article 10 - Protection of the environment

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 in particular to the creation and promotion of products and processes that are increasingly compatible with the environment and characterized by an increasing 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 staff and human resources as the most important corporate asset and is committed to creating and maintaining safe environments and workstations for each employee.

In strict compliance with current accident prevention regulations, 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 classifications - with training, general and specific information and any other support that allows them to work in health and safety conditions and to implement the relevant 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.

By monitoring all aspects of the company's work activities, BBM Service S.r.l. works to ensure that machines, processes, systems and working practices are constantly improved in order to optimize performance in terms of safety and accident prevention.

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

CHAPTER IV - INTERNAL POLICIES

Article 11 - Employment and equal opportunities policies

11.1 The Company offers all employees the same employment opportunities, so that everyone can enjoy fair treatment based on merit criteria. The identification and choice of personnel must be undertaken by assessing the specific skills, professional profile and technical and psycho-attitudinal skills of the candidate that meet the needs and requirements of the company. All the information acquired during the selection phase of candidates is closely linked to the verification of the requirements, respecting the person and his or her 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, constrained or forced labour. The Company does not engage in any type of child labour, in accordance with the founding standards of the ILO and the Principles of the United Nations Global Compact. BBM Service S.r.l. does not employ staff under the age of 16, unless it is part of a professional internship of a training or apprenticeship program authorized by the Government and of manifest benefit to 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 regarding targeted placement, the Company undertakes to integrate within its workforce the percentage of disabled 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 older 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 Constitution, granting its employees all the elements of remuneration provided for in Article 2099 of the Civil Code.

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11.8 BBM Service S.r.l. recognizes and is committed to promoting the value of gender diversity as a key to innovation and growth. The Company is firmly committed to maintaining gender balance within its organization. This commitment extends not only to maintaining a significant female presence, but also to promoting women's professional growth. The Company's management is committed to staying up to date and promoting a culture of gender equality. The culture of BBM Service S.r.l. is strongly focused on inclusivity. The company strives to avoid any form of discrimination. The ultimate goal is to promote a work environment that is not only fair, but also welcoming and inclusive for all.

Article 12 - Harassing behaviour in the workplace

BBM Service S.r.l. requires that no harassment be given rise to internal and external employment relationships, meaning as such:

- The creation of an intimidating, hostile or isolating work environment towards individuals or groups of workers;
- Unjustified interference with the performance of the work of others;
- The obstacle to the individual job prospects of others for mere reasons of personal competitiveness³.

Article 13 - Abuse of alcoholic or narcotic substances

BBM Service S.r.l. requires its Recipients to contribute to maintaining the work environment that respects the sensitivity of others. It will therefore be considered conscious assumption of the risk of prejudice to these environmental characteristics, during work and in the workplace:

- Perform service under the influence of abuse of alcohol, drugs or substances of similar effect;
- Consume or transfer drugs to any type during the course of work.

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

³ S-COD0006: Code of Conduct - Discrimination, Harassment, Sexual Harassment and Mobbing.

Article 14 - Smoking

Without prejudice to the general ban on smoking in all workplaces, according to the specific policy adopted by the Company in this regard, except for the premises expressly designated for this purpose.

BBM Service S.r.l. will take into particular consideration the condition of those who feel, in any case, 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, by anyone, 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 upon to draw up the aforementioned documents are required to verify, with due diligence, the correctness of the data and information that will be received for the drafting of the above-mentioned documents. All budget items, the determination and quantification of which presupposes discretionary assessments by the Functions/Departments in charge, must be supported by appropriate documentation and legitimate, shared and sustainable choices at all times.

15.2 Any type of corporate transaction likely to cause unjust damage to Creditors is prohibited. It is forbidden to engage in any conduct aimed at causing damage 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 also on the occasion of 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 obstruct, in any way, the functions of the Public Supervisory Authorities that come into contact with the Company due to their institutional functions.

CHAPTER V - DISSEMINATION

Article 16 - Implementing provisions

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

All the aforementioned subjects are required to learn its 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 provisions of the Code must be considered an essential part of the contractual obligations of Employees pursuant to and for the purposes of Article 2104 of the Civil Code. Violation of the provisions of the Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, in compliance with the procedures provided for in Article 7 of the Workers' Statute, with all legal consequences, including with regard to the maintenance of the employment relationship, and may result in compensation for damages arising from the same.

17.2 Compliance with the Code must be considered an essential part of the contractual obligations assumed by the Collaborators and/or by the persons having business relations with the company. Violation of the provisions of the Code may be considered a breach of contractual obligations, with all legal consequences, including with regard to the termination of the contract and/or assignment and may result in compensation for damages resulting from the same.

CHAPTER VII - FINAL PROVISIONS

Article 18 - Amendments

Any amendments and/or additions to this Code must be made in the same manner as those adopted for its initial approval.