



CODE OF ETHICS

Approved by the Board of Directors
on 21 June 2023

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INTRODUCTION

This Code of Ethics is prepared and approved by the Board of Directors of Bomi Italia s.p.A., and adopted by each company of the Bomi Group in order to communicate, to all parties involved, the Bomi Group's principles of business ethics in the performance of its work. Each update to this Code shall be approved by the Board of Directors of Bomi Italia s.p.a. and will be disclosed to each Group company, as well as published on the Bomi Group's website.

Each Bomi Group company not only complies with the laws and regulations in force in all countries in which it operates, but also intends to observe high ethical standards in the day-to-day conduct of its business: these standards, and their guiding principles, are set out in this Code of Ethics (hereinafter referred to as the code). The code is a supplementary tool to the rules of conduct dictated by legislators: mere compliance with the law, although a fundamental condition, is often not sufficient for the Bomi Group, which expects all business decisions and the conduct of its personnel to be based on ethical rules, even in cases where they are not codified by law.

The term "personnel" refers to all persons working in or for the Bomi Group: employees, directors and collaborators in various capacities.

The code expresses the commitments and ethical responsibilities assumed by those who, in various capacities, collaborate in the realisation of the objectives of each company of the Bomi Group, towards: shareholders, employees, collaborators, external consultants, suppliers, clients and other subjects. Subjects who, as a whole, are defined by the term stakeholder, as the bearers of interests related to Bomi Group's activities.

Every person working for the Bomi Group is required to act in accordance with the provisions of this Code of Ethics at all times.

Particular attention is required of the Directors and other Managers who are responsible for monitoring compliance with the code: they are called upon to ensure that the adopted principles are constantly applied and to maintain a conduct that sets an example to employees and collaborators.

The code is made available to clients, suppliers and other third parties interacting with the companies of the Bomi Group: in particular, it is brought to the attention of third parties who receive assignments from the companies of the Bomi Group, or who have lasting relationships with them, formally inviting them to comply with its principles and criteria of conduct, within the framework of the relationships they have with them.

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SCOPE OF THE CODE AND DISCIPLINARY SYSTEM

All persons working for the achievement of the Bomi Group's business objectives, whether they are persons in top management positions, such as directors or persons with management and representative functions, or employees, external collaborators and consultants, suppliers and business partners, are required without exception to observe this Code of Ethics in the conduct of business and corporate activities.

Observance of the Code of Ethics shall be considered an essential part of the contractual obligations of all the above-mentioned recipients of this document.

Each Bomi Group company, in the course of its business, intends to comply with the laws and regulations in force by directing its actions and behaviour towards the principles, objectives and commitments referred to in the Code of Ethics and, under no circumstances, may the pursuit of an interest or advantage for the company justify improper behaviour.

Any behaviour contrary to the letter and spirit of the Code of Ethics will be sanctioned in a manner proportionate to the seriousness of any infringements committed.

Infringements by third parties will be sanctioned in accordance with the criteria set out in the specific contractual clauses.



GENERAL PRINCIPLES AND CRITERIA OF CONDUCT

2.1 Honesty, moral integrity, fairness, transparency and impartiality

In the performance of activities and in relationships of any kind and nature, all those who work with and for the companies of the Bomi Group are required to diligently comply with the applicable laws and regulations of the countries in which the company's business is conducted, as well as the Code of Ethics and internal regulations. They must behave in accordance with the fundamental principles of honesty, moral integrity, fairness, transparency, objectivity and respect for individual personality in the pursuit of the corporate objectives and in all relationships with persons and entities inside and outside the company. All those who work with and for the companies of the Bomi Group are also expected to respect the principles of sobriety and transparency in their relationships with healthcare professionals and healthcare organisations.

Each Bomi Group company undertakes to comply with applicable export control laws as well as regulations restricting trade with certain countries.

Under no circumstances may the pursuit of the company's interest justify conduct that does not conform to an honest line of conduct. Therefore, each Bomi Group company will neither enter into nor continue any type of relationship with anyone who engages in conduct inconsistent with this specific point of the Code of Ethics.

2.2 Non-discrimination

All forms of discrimination, and in particular any discrimination based on race, nationality, gender, age, disability, state of health, sexual orientation, political or trade union opinions, philosophical views or religious beliefs towards any person inside or outside the company shall be avoided.

2.3 Value of human resources

The Bomi Group safeguards and promotes the value and development of human resources as an important success factor for the company, with the aim of maximising their degree of satisfaction and enhancing their skills.

In the management of relationships involving the establishment of hierarchical relations, each Bomi Group company requires that authority be exercised with fairness and propriety, prohibiting any behaviour that may be deemed detrimental to the employee's dignity and autonomy.

In order to guarantee full respect for the individual, each company requires compliance with the legal obligations concerning labour protection, health and safety conditions, trade union rights or, in any case, rights of association and representation required by the legislation of the country in which they operate.

2.4 Correctness and transparency of corporate information

Every operation and transaction must be properly executed, recorded, authorised, verifiable, legitimate, consistent and appropriate. This means that each action and transaction shall be properly recorded in the accounting system, according to the criteria specified by law and the applicable accounting principles.

In order for the accounts to meet the requirements of truthfulness, completeness and transparency of the data recorded, each operation must also be supported by appropriate documentation, so as to enable checks to be carried out at any time to certify its characteristics and motives and to identify who authorised, performed, recorded and verified the operation.

The circulation of information within the company, for the purpose of preparing the financial statements and in order to ensure a clear and truthful representation of the economic, asset and financial situation, shall take place in accordance with the principles of truthfulness, completeness and transparency.

2.5 Internal control system

Each company of the Bomi Group recognises the importance of an efficient and effective internal control system as an indispensable condition and prerequisite for the performance of its business activities in accordance with and consistent with the principles of this Code of Ethics.

To this end, each Bomi Group company ensures the creation of the best organisational and environmental prerequisites, so that such a culture is promoted and disseminated at every corporate level, sensitising its employees to the importance of the internal control system and compliance, in the performance of work activities, with current regulations and corporate procedures, also with the aim of effectively managing activities and providing accurate and complete accounting data.

A prerequisite for the creation of an effective internal control system is an adequate and complete determination and assignment of tasks and responsibilities to those acting on behalf of the company, with the consequent adoption of a coherent allocation of operating powers.

2.6 External communications

The communication of every Bomi Group company must be characterised by respect for the right to correct information; under no circumstances may false or tendentious news or comments or information be disseminated.

All communication activities shall comply with the laws, rules and practices of professional conduct and shall be carried out with clarity, transparency and timeliness.

Relations with the media are reserved exclusively for the corporate functions and responsibilities delegated to them.

2.7 Transparency and completeness of information

All those who work with and for the companies of the Bomi Group are required to provide complete, transparent, comprehensible and accurate information, so that, in the development of the relationships that are established, all interested parties can reach autonomous and informed decisions.

In particular, in the formulation of any form of agreement, each company of the Bomi Group shall take care to specify to the contracting party, in a clear and comprehensible manner, the conduct to be adopted in the performance of the established relationship.

2.8 Confidentiality and information processing

Each company of the Bomi Group ensures the confidentiality of the information in its possession and refrains from seeking confidential data, unless expressly and knowingly authorised and in accordance with the applicable legal regulations.

All persons working with and for Bomi Group companies are required not to use confidential information constituting the company's assets for purposes unconnected with the performance of their duties, and not to handle the same information in a manner contrary to the authorisations received and the corporate procedures adopted.

All information from interested parties is to be processed by the Bomi Group in full compliance with the applicable data protection laws.

2.9 Fair competition

Each Bomi Group company observes the applicable competition regulations in the Countries in which it operates, and intends to protect the value of fair competition by refraining from collusive and predatory behaviour that may constitute unfair competition.

In particular, all those who work with and for Bomi Group companies must refrain from practices (such as, but not limited to, creating cartels, dividing up markets, restricting production or sales, conditioning agreements, etc.) that represent a violation of competition regulations, and from being involved, either personally or through third parties, in initiatives or contacts between competitors (such as, but not limited to, discussions of prices or quantities, sharing markets, limiting production or sales, conditioning agreements, etc.) that may appear as violations of competition and market protection regulations.

2.10 Prevention of conflict of interest

In the conduct of any activity, by employees, members of corporate bodies and, in general, by all those who operate in the name and on behalf of the companies of the Bomi Group, situations must be avoided in which the persons involved in operations and transactions are, or may even only appear to be, in conflict of interest. Any situation in which a conflict of interest may arise that may influence the impartiality and ethical behaviour of the above-mentioned persons must be avoided.

Persons who find themselves in a situation of conflict of interest, even if only potential, must immediately inform their Head of Department and the Director/Head of Personnel, who will assess the next steps to be taken.

2.11 Gifts and benefits

Each Bomi Group company prohibits all corrupt practices, the giving of money or other unlawful benefits/benefits, collusive behaviour, direct and/or indirect solicitation of personal advantages. No form of offer, donation or promise of money or goods or future benefits or other utilities (e.g. objects, services, favours) of any nature to/from third parties (with particular reference to Italian and foreign public officials, their relatives and relatives-in-law) aimed at obtaining favourable treatment in the conduct of business or which, in any case, may be, even only indirectly, interpreted as exceeding the normal manifestations of courtesy allowed in normal business practice and within the limits of the laws and regulations of each country in which the companies of the Bomi Group operate, is permitted. The only permitted forms of courtesy must be of modest value and aimed solely at promoting the Bomi Group's image or initiatives promoted by the Bomi Group: they must in any case be authorised by the management and supported by appropriate documentation.

2.12 Responsibility towards the community

The Bomi Group is aware of the influence that its activities can have on conditions, economic and social development and the general well-being of the community, as well as the importance of social acceptance in the communities in which it operates. For this reason, each Bomi Group company intends to conduct its activities aimed at achieving the corporate purpose in accordance with social appreciation, respecting the local, national and international communities with which it interacts.

CRITERIA OF CONDUCT IN THE RELATIONSHIPS WITH THE PERSONNEL

The addressees of this Code of Ethics must comply with the procedures and instructions as well as the following criteria of conduct regarding relations with personnel.

● 3.1 Personnel selection

Applications must be assessed on the basis of whether the candidates' profiles correspond to the company's needs and requirements, while respecting equal opportunities for all concerned.

The information requested from candidates must be strictly related to the verification of the professional and psycho-aptitude profile of the individual, as well as to the verification of compliance with national and international legal requirements, always in accordance with the principles of non-discrimination and protection of personal data, as defined in this Code of Ethics and provided for by law.



● 3.2 Establishment of the employment relationship

The staff is employed under a regular employment contract; no irregular work or 'moonlighting' is tolerated.

At the establishment of the employment relationship, each employee must receive accurate information on

- characteristics of their function, responsibilities of their role and tasks to be performed;
- normative and salary elements, as regulated by the national collective labour agreement;
- rules and procedures to be adopted in order to avoid conduct contrary to the law and corporate policies.

This information is presented to the employee in such a way that the establishment of the relationship is based on an effective understanding of it.

● 3.3 Managing the employee

Each manager is required to value the working time of employees by requiring performance consistent with the exercise of their duties and work organisation plans.

It constitutes an abuse of authority to request, as a due act from a hierarchical superior, services, personal favours or any behaviour that constitutes a violation of this Code of Ethics.

The involvement of employees in the performance of work is ensured, also by providing for participation in discussions and decisions functional to the realisation of corporate objectives.

The employee must participate in these moments in a spirit of cooperation and independent judgement.

Employee management must be carried out in accordance with the systems and through the use of the tools provided by the Human Resources Department.

● 3.4 Enhancement and training of resources

Each company manager must fully utilise and enhance all the professional skills present in the structure by activating the available levers to foster the development and growth of its employees.

Of particular importance here is the communication by managers of the employee's strengths and weaknesses, so that the employee can strive to improve his or her skills also through targeted training.

Each Bomi Group company makes information and training tools available to all employees with the aim of enhancing specific skills and implementing the professional value of personnel.

Institutional training is provided at certain times in the employee's corporate life (e.g., for new recruits, training on safety at work, introduction to the company and its business) and recurrent training for operational staff.

● 3.5 Workers' rights: health and safety at work

Each Bomi Group company is committed to providing and maintaining a safe and healthy working environment in compliance with the accident prevention regulations in force in the countries in which it operates and to disseminating and consolidating a culture of safety and health at work by developing risk awareness and promoting responsible behaviour by all employees.

To this end, it implements interventions of a technical and organisational nature, through the introduction of:

- a management analysis of risks, security, resources to be protected;
- control and updating of the system to guard against security risks;
- training and communication interventions.

● 3.6 Workers' rights: protection of privacy

The employee's privacy is protected by adopting standards specifying the type of information to be requested from the employee and how it is to be processed and stored.

Any investigation into the ideas, preferences, personal tastes and, in general, information of collaborators not related to the purposes of personnel selection and management of the employment relationship in accordance with the criteria set out in this Code of Ethics is excluded.

These standards also provide that, except in cases provided for by law, personal data may not be disclosed or disseminated without the prior consent of the person concerned.

● 3.7 Workers' rights: protection of the person

Each Bomi Group company is committed to protecting the moral integrity of its employees and collaborators by guaranteeing the right to working conditions that respect personal dignity.

For this reason, acts of physical or psychological violence, sexual harassment, and any attitude or behaviour that is discriminatory or harmful to the individual, his or her beliefs and preferences are not tolerated.

Any employee who believes he or she has been harassed or discriminated against on the grounds of age, sex, race, state of health, nationality, political opinions and religious beliefs, etc., may report the incident to the relevant Case Manager, who will assess the violation of the Code of Ethics.

● 3.8 Duties of the worker: general criteria of conduct

The employee must act loyally, in compliance with the obligations entered into in the employment contract, the provisions of the Code of Ethics and corporate regulations, ensuring high standards of performance.

He/she must absolutely avoid conduct that damages the company's assets, the company's management, the relationship with stakeholders and the Bomi Group's image.

Decisions made by each individual must be based on the principles of sound and prudent management, assessing potential risks wisely, in the knowledge that personal choices contribute to the achievement of positive business results.

All operations and transactions must be inspired by the utmost fairness from the point of view of management, completeness and transparency of information, legitimacy in form and substance, and clarity and truthfulness in accounting, in accordance with current regulations and corporate procedures, and must be subject to audit.

It is forbidden to solicit or accept, for oneself or for others, recommendations, favourable treatment, gifts or other benefits from the persons with whom one enters into relations, and to avoid receiving benefits of any kind that may be or appear to influence one's independence of judgement or impartiality.

● 3.9 Employee's duties: conflict of interest

All employees of every Bomi Group company are required to avoid situations from which conflicts of interest may arise (e.g. co-interest with suppliers or clients) and to refrain from taking personal advantage of business opportunities of which they have become aware in the course of performing their duties.

In the event of even the appearance of a conflict of interest, the employee is required to notify his or her direct superior, who must inform the management in order to assess its actual existence.

● 3.10 Employee's duties: protection of company assets

Each employee is required to work diligently to protect the company assets assigned to him/her and to prevent their fraudulent or improper use, through responsible conduct in line with the objectives and operating rules drawn up to regulate their use, accurately documenting their use.

The use of company tools by the company's employees and/or consultants (for the latter within the contractual limits) must be functional and exclusive to the performance of work activities or the purposes authorised by the internal functions in charge.

Each Bomi Group company reserves the right to prevent improper and/or unlawful use of its assets and infrastructure through the use of appropriate control systems.

● 3.11 Employee's duties: forgery of money

It is forbidden to counterfeit, hold, spend or otherwise put into circulation counterfeit or altered banknotes, coins, public credit cards, stamps. Anyone who receives banknotes or coins or public credit cards that are suspected of being counterfeit or stolen must inform their direct supervisor, so that he or she can make the appropriate report.

● 3.12 Duties of the worker: handling information

The employee must be familiar with and implement the provisions of the company's information security policies and regulations to ensure the integrity, confidentiality and availability of information.

Information acquired in the performance of assigned activities must remain strictly confidential and appropriately protected and may not be used, communicated or disclosed, either inside or outside the company, except in compliance with current legislation and corporate procedures.

Each employee is required to process his or her documents using clear, objective and exhaustive language, allowing for any verifications by colleagues, managers or authorised external parties.

● 3.13 Respect for human rights and fundamental freedoms

Each Bomi Group company is committed to respecting human rights and fundamental freedoms, the provisions of the International Labour Organisation (ILO) and, in particular, the conventions on the elimination of child labour, the abolition of slavery and forced and compulsory labour.

Each Bomi Group company undertakes to

- Prohibit the employment of minors;
- Prohibit the use, in whatever form, of slavery, human trafficking, debt bondage and the use of forced or compulsory labour, as well as products or services created by such means;
- Pay special attention to categories of workers subject to exploitation, especially migrants, by guaranteeing them non-discriminatory recruitment and employment practices, freedom of movement and remuneration, while ensuring that they understand their rights (where 'forced or compulsory labour' is defined as any work or service imposed on an individual under threat of any punishment or without payment and for which the person has not offered of his or her own accord);
- Prohibit any type of work that, by its nature or the conditions in which it is carried out, may compromise health, safety, integrity or morality (clean and safe workplaces, access to drinking water, sanitary facilities, etc.).

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CONDUCT CRITERIA IN RELATIONS WITH CLIENTS AND SUPPLIERS

The addressees of this Code of Ethics must comply with the procedures and instructions as well as the following criteria for conduct in relations with clients and suppliers.



4.1 Setting up and maintaining business relations

In establishing and maintaining business relations with new clients and/or suppliers and in the management of existing ones, it is prohibited, on the basis of public and/or available information in compliance with the regulations in force:

- with persons involved in illegal activities and, in any case, with persons lacking the necessary requirements of seriousness and commercial reliability;
- with actors who, even indirectly, hinder human development and contribute to disrespect for human dignity and individual personality and/or violate fundamental human rights (e.g. by exploiting child labour, promoting migrant smuggling or sex tourism, etc.);
- with parties who do not formally commit themselves with the company - for example in a contractual context - to comply with the laws in force on labour - with particular attention to child labour - and workers' health and safety, as well as in general with all the principles laid down in this Code of Ethics.

Finally, it is forbidden to

- perform services in favour of partners that are not adequately justified in the context of the association relationship established with them;
- recognise fees in favour of external collaborators that are not adequately justified by the characteristics of the task to be performed or that are not justified within normal market values;
- during the negotiation and sales phase, make gifts or donations of any kind and for any reason (whether for personal benefit or for the benefit of the company) to persons occupying relevant functions with decision-making powers in the client's organisational structure as well as to external and related parties, in accordance with the relevant global policies adopted by the Bomi Group.



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4.2 Client relations

Professionalism, competence, helpfulness, respect and fairness are the guiding principles and style of conduct to be followed in dealing with clients.

In order to protect the Bomi Group's image and reputation, it is essential that client relations, including advertising messages, are characterised:

- full transparency and fairness;
- compliance with the law;
- independence from all forms of conditioning, both internal and external.

Practical Cases, Doubts and Solutions

Bomi - with the promise, by direct or indirect offer or concession, of an undue advantage (eg. Cash, promises of hiring relatives, dinners, travel gifts, bandages of value, etc.), for the benefit of the Customer's Purchasing Office Manager, or another person or entity - bribes the counterparty with the aim of obtaining the signing of a new service contract.

What to do?

Any direct or indirect promise, offer or concession, even received, of undue advantages is **FORBIDDEN!**

4.3 Contracts and client communications

Contracts and client communications must be:

- clear and simple, formulated in a language as close as possible to that normally used by interlocutors;
- compliant with applicable regulations, without resorting to elusive or otherwise unfair practices;
- comply with the company's commercial policies and the parameters defined therein;
- complete, so that no element relevant to the client's decision is overlooked.

Purposes and recipients of communications must determine, on a case-by-case basis, the choice of the most suitable contact channels for the transmission of content, undertaking not to use misleading or untruthful advertising tools.

4.4 Relationships with suppliers

Every purchase must be conducted with loyalty, integrity, confidentiality, diligence, professionalism and objectivity of judgement, by qualified personnel who take responsibility for their assessments and judgements, ensuring compliance with all relevant regulatory provisions in their purchasing activities.

The assumption of commitments and the management of relations with current and potential suppliers must be carried out in compliance with the provisions of this Code of Ethics on the prevention of conflicts of interest and specifically, the persons responsible for and involved in the purchasing process:

- are bound to respect the principles of impartiality and independence in the exercise of the tasks and functions entrusted to them, operating on the basis of the adoption of objective and documentable criteria;
- must remain free from personal obligations towards suppliers; any personal relationships of employees and/or consultants with suppliers must be reported to the relevant management prior to any negotiations;
- must maintain relations and conduct negotiations with suppliers in such a way as to create a sound basis for mutually beneficial relations of appropriate duration in the interest of the company;
- must not offer goods or services, in particular in the form of gifts, to personnel of other companies or entities in order to obtain confidential information or direct or indirect benefits relevant to themselves or the company, without prejudice to the general provisions of this Code of Ethics;
- must not accept goods or services from external or internal parties in exchange for the release of confidential information or the initiation of actions or conduct aimed at favouring such parties, even if there are no direct repercussions for the company.

4.5 Transparency of the purchasing process

In order to ensure maximum transparency and efficiency of the purchasing process, it must be ensured in corporate procedures:

- the separation of roles between the organisational unit requesting the supply and the unit concluding the contract;
- adequate reconstructability of the choices made;
- the retention of information as well as all documents relevant to the management of the relationship.

Furthermore, any contract of a significant amount must be constantly monitored and signed by persons with appropriate powers.

Practical Cases, Doubts and Solutions

As part of the process of selecting a contract for the supply of goods and/or services, for which I have to evaluate the offers, I receive a bottle of Champagne as a gift from one of the potential Supplier companies.

Can I accept the gift?

No, you must refuse the gift and follow the procedure required by internal regulations on gifts and hospitality. The bidder's conduct could be interpreted by an impartial observer as solely motivated by the desire to exercise undue influence in your evaluation of the bids.

Code of Ethics Addendum

<u>DECLARATION</u>	
I, the undersigned, _____(name and surname)	
With reference to the following Code of Ethics of Bomi Group,	
DECLARES TO:	
<ul style="list-style-type: none">- Acknowledge the content of the Code of Ethics and of the provisions included in it;- Accept the provisions included in the Code of Ethics;- Observe all the provisions included in the Code of Ethics and in the following amendments;- Assume the duties included in the Code of Ethics.	
Place and Date, _____	
_____ (Signature)	

CRITERIA OF CONDUCT IN RELATIONS WITH THE PUBLIC ADMINISTRATION

The Addressees of this Code of Ethics must comply with the procedures and instructions as well as the following criteria of conduct regarding relations with the public administration.

● 5.1 Scope of reference

For the purposes of this Code of Ethics, Public Administration shall mean, in addition to any public body, also any independent administrative agency, person, natural or legal, acting as a public official or person in charge of a public service or as a member of a body of the European Communities or as an official of a foreign state.

Also under the terms of this Code of Ethics, the definition of a public body includes those private entities that, for overriding political and economic reasons, perform a public function aimed at protecting general interests, such as the managing bodies of regulated markets.



● 5.2 Rules of conduct on corruption and bribery risks

It is not permitted, neither directly nor indirectly, nor through a third party, to offer or promise money, gifts or compensation or other benefits, in any form whatsoever, nor to exert unlawful pressure, nor to promise any object, service, performance or favour to executives officials or employees of the Public Administration or to persons in charge of a public service or to their relatives or cohabitants for the purpose of inducing them to perform an official act or an act contrary to their official duties, this also being deemed to be the purpose of favouring or damaging a party in a civil, criminal or administrative trial in order to directly or indirectly benefit the company.

Furthermore, anyone who receives explicit or implicit requests for benefits of any kind from persons in the Public Administration, as defined above, shall immediately:

- suspend all relations with them;
- inform in writing the Compliance Function and its corporate officer.

The requirements set out in the preceding points must not be circumvented by resorting to various forms of aid and contributions that, in the guise of appointments, consultancy, advertising, etc., have similar purposes to those prohibited in the same points.

● 5.3 Fairness in business dealings with the public administration

In the direct supply of one's own products to the Public Administration, when establishing business relations with the Public Administration, including participation in public tenders, it is necessary to always operate in compliance with the law and proper business practice.

In particular, the following actions must not be taken, directly or indirectly:

- examining or proposing employment and/or business opportunities that may benefit employees and/or their direct superior in a personal capacity;
- offer or in any way provide gifts that are not of modest value, while ensuring their traceability through appropriate documentation;
- solicit or obtain confidential information that may compromise the integrity or reputation of either party
- hiring as employees or entrusting tasks to employees or former employees of the Public Administration, who have exercised authoritative or negotiating powers in the last three years.

● 5.4 Conduct relating to declarations and attestations to the Public Administration

It is not permitted to use or submit false declarations or documents or to certify things that are not true, or to omit information in order to obtain, to the advantage or in the interest of the company, contributions, financing or other disbursements, however denominated, granted by the State, a Public Entity or the European Union.

It is prohibited to mislead anyone by artifice or deception in order to procure the company an unfair profit to the detriment of others. The violation of this prohibition is even more serious if the State or a public body is misled.

The 'unfair profit' may be direct or indirect and includes not only contributions, financing and other disbursements granted by the State, a public body and the European Union, but also concessions, authorisations, licences or other administrative acts.

● 5.5 Use of contributions and financing received

It is forbidden to use contributions, financing, or other disbursements, however denominated, granted to the company by the State, a Public Entity or the European Union, for purposes other than those for which they were allocated.

● 5.6 Data and information systems that relate to the public administration

It is prohibited to alter in any way the operation of a computer or telecommunications system or to intervene illegally in any way on the data, information and programs contained therein or pertaining thereto, in order to obtain an unfair profit to the detriment of others. The prohibition is reinforced if the State or a public body is damaged.



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CRITERIA OF CONDUCT IN RELATIONS WITH THE COMMUNITY AND INSTITUTIONS

The addressees of this Code of Ethics must comply with the procedures and instructions as well as the following criteria of conduct regarding relations with the community and institutions.





6.1 Social policy

Each Bomi Group company pursues objectives consistent with the development of the community and the environment in which it operates.

This is based on the awareness that community satisfaction is one of the Bomi Group's aims as well as a competitive advantage.

6.2 Relations with parties, trade unions and associations

Each Bomi Group company does not finance political parties, either in Italy or abroad, their representatives or candidates, nor does it sponsor congresses or parties whose sole purpose is political propaganda. It refrains from any form of direct or indirect conditioning or pressure towards political representatives.

6.3 Institutional relationships

All relations with local, national and international public institutions that are part of normal administrative activity are oriented towards criteria of transparency and fairness, avoiding attitudes of a collusive nature.

In order to ensure the utmost clarity in relations, contacts with institutional stakeholders must be made exclusively through contact persons who have received an explicit mandate from the legal representatives of each Bomi Group company.

CRITERIA OF CONDUCT RELATING TO ACCOUNTING, ADMINISTRATIVE OR FINANCIAL ACTIVITIES



To all persons (employees and/or consultants) who in any capacity whatsoever, even as mere data suppliers, are involved in the preparation of financial statements and similar documents, or in any case of documents representing the company's economic, asset or financial situation, as well as in particular to directors, supervisory bodies and those holding top management positions:

- is required to provide the utmost cooperation in specific aspects; to ensure the completeness and clarity of the information provided as well as the accuracy of the data and processing;
- it is forbidden to present untrue facts, even if subject to assessment, or to omit information or conceal data in direct or indirect violation of regulatory principles and internal procedural rules, so as to mislead the addressees of the above-mentioned documents.

Any unlawful conduct will be deemed to have been committed to the detriment of the company itself.

It is forbidden to prevent or in any case obstruct the performance of control or audit activities legally assigned to the shareholders and other corporate bodies empowered to do so.

It is forbidden to determine the majority in the assembly by simulated or fraudulent acts.

It is forbidden to spread false news or engage in simulated transactions or other devices that cause a significant alteration in the price of listed or unlisted financial instruments.

All those who have dealings with public supervisory authorities, as well as directors, supervisory bodies and those in senior positions are prohibited from obstructing their functions.



It is also forbidden, in communications to the aforesaid authorities, to set forth facts that do not correspond to the truth, even if subject to assessment, concerning the company's economic, asset or financial situation, or to conceal by other fraudulent means, in whole or in part, facts concerning the same situation that should have been communicated.

Employees and consultants must avoid any conduct that may, directly or indirectly, cause insider trading even by third parties.

Employees, consultants, members of the BOMI ELT, supervisory bodies and, more generally, all persons who have access to confidential information that is not accessible to the public and that may influence the value of shares and - more generally - any other securities circulated to the public, must refrain from using such information to buy or sell the aforementioned securities, in order to ensure maximum market transparency.

Each Bomi Group company also undertakes to comply with operating procedures and instructions relating to accounting, administrative or financial activities.

08 CRITERIA FOR CONDUCT IN THE PREVENTION OF MONEY LAUNDERING

The persons to whom this Code of Ethics applies, in the context of the various relations established with the company, must not, in any way and under any circumstances, be implicated in events connected with the laundering of money from criminal activities or the receiving of goods or other utilities of illegal origin.

They are also required to check in advance the information available on business counterparts, suppliers, partners, collaborators and consultants, in order to ascertain their respectability before establishing business relations with them.

Every company of the Bomi Group is committed to complying with all national and international rules and regulations concerning the prevention of money laundering, as well as to complying with operational procedures and instructions for the prevention of money laundering.

09 ENVIRONMENTAL PROTECTION

Each company of the Bomi Group promotes production policies that contemplate the requirements of economic development and value creation, inherent in the business activity and attributable to it, with the requirements of respect for and protection of the environment.

Each Bomi Group company complies with the environmental laws and regulations in force in each country where it conducts its business and contributes to the sustainable development of the area, including through the use of the best available technologies, the constant monitoring of business processes, and the identification of industrial solutions with the lowest environmental impact in terms of the choice of materials and resources, packaging, distribution and management of its products.

Each Bomi Group company also undertakes to comply with operating procedures and instructions relating to environmental protection.

10

ENFORCEMENT MECHANISMS OF THE CODE OF ETHICS

10.1 Dissemination and communication

Each Bomi Group company undertakes to disseminate the Code of Ethics, using all available means of communication and opportunities such as, for example, the company website, information meetings and staff training.

All personnel must be in possession of the Code of Ethics, be familiar with its contents and observe what is prescribed therein.

In order to ensure the correct understanding of the code, the human resources function prepares and implements a training plan aimed at fostering awareness of the principles and ethical standards. The training initiatives are differentiated, depending on the role and responsibility of the persons; a special training programme is planned for new employees, illustrating the contents of the Code of Ethics that they are required to comply with.

The Compliance Function and the corporate management are available for any clarification and explanation of the Code of Ethics.

It is the responsibility of everyone, especially management, to include the contents of the code in training programmes and to refer to it in all corporate procedures, policies and guidelines.



10.2 Reporting problems or suspected violations and Whistleblowing

In accordance with the procedures set out in the Group's Speak Up Policy, which is hereby fully referred to, anyone who becomes aware, or is reasonably convinced, of the existence of a breach of this code, of a particular law or of corporate procedures, has a duty to immediately inform his or her supervisor, the Case Managers and to the Compliance Function.

Whistleblowing must be in writing, even anonymously: each Bomi Group company takes the necessary measures to protect whistleblowers from any kind of retaliation, in the sense of an act that may give rise to forms of discrimination or penalisation (e.g., termination of relations with partners, suppliers, consultants, etc.; denial of promotions to employees). To this end, the confidentiality of the whistleblower's identity is ensured, without prejudice to legal obligations.

According to the provisions of the whistleblowing rules, it is possible to make a report:

- **Option 1:** contact your supervisor or direct supervisor;
- **Option 2:** contact the relevant case manager (at globalcompliancecommunication@bomigroup.com) or the People & Culture divisions;
- **Option 3:** use the online tool available at the following link: [EthicsPoint - United Parcel Service, Inc. \(UPS\)](#). The website can also be accessed using the QR Code found on the Posters available at all company locations;

- **Option 4:** call the dedicated call centre, active 24 hours a day, seven days a week. Here are the phone numbers for each country:

COUNTRY	CONTACT NUMBER
BELGIUM	0800-10010
BRAZIL	0800-8920429
CHILE	800-360312
COLOMBIA	01-800-911-0010
ECUADOR	1-800-225-528
FRANCE	800-914784
ITALY	800-790513
MEXICO	001-800-462-4240
HOLLAND	0800-3100006
UNITED KINGDOM	0808-2341195
SPAIN	900990011
TURKEY	0811-288-000
GREEN NUMBER	800-220-4126

The above telephone numbers will also be available at the following *link*: [EthicsPoint - United Parcel Service, Inc. \(UPS\)](#), as well as published in the various posters displayed in the company offices.

Options Nos. 3 and 4 allow the whistleblower to choose whether or not to disclose his or her identity.

The channels above guarantee the confidentiality of the whistleblower and reports are handled directly by the case managers.

Following the submission of the report, it will be forwarded to the UPS Corporate Compliance & Ethics department, which, following a preliminary assessment of its completeness, will forward the report (if there is enough information to do an investigation) to the Bomi Group *Case Managers*.

The case managers in charge of managing the reporting channel will diligently follow up the report, examining it and assessing its significance and completeness.

Retaliatory or discriminatory dismissal of the whistleblower is null and void. A change of job and any other retaliatory or discriminatory measure taken against the whistleblower shall also be null and void.

10.3 Disciplinary measures resulting from violations

The provisions of this Code are an integral part of the contractual obligations undertaken by personnel as well as persons having business relations with each company of the Bomi Group. Violation of the principles and conduct stated in the Code of Ethics compromises the relationship of trust between the Bomi Group and the perpetrators of the violation, whether they are directors, employees, consultants, collaborators, clients or suppliers.

Each Bomi Group company will take the necessary disciplinary measures in the event of violations of the Code of Ethics.

Should a report prove to be well-founded and adequately documented, disciplinary measures may be taken.

Similarly, disciplinary measures may be taken against those who violate the whistleblower protection measures, as well as against those who maliciously or grossly negligently make reports that turn out to be unfounded.

Use the online tool

EthicsPoint - United
Parcel Service, Inc. (UPS),



EthicsPoint - United
Parcel Service, Inc. (UPS),



FINAL PROVISIONS

Any variation and/or addition to this Code of Ethics shall be approved by the BOMI ELT and promptly disseminated to the addressees.

11.1 Local commitments

Under its own responsibility, each company of the BOMI Group may specify other and further commitments in relation to national and international regulations, provided that these commitments are in conformity and consistent with the values of the Group.

All those who work with and for the companies of the BOMI Group are encouraged to submit to the company the opportunity to include further compliance commitments, which are in line with those already part of the BOMI Group Code of Ethics, in order to cooperate in the realisation of an increasingly structured BOMI Group Compliance.

