



Company subjected to management and coordination activities by
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CODE OF ETHICS

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Introduction

..... *Within the scope of an organization, intended as a social phenomenon of aggregation, a first phase dedicated to the creation of operational procedures should be supported in a second phase by the formalizing of the rules and regulations to achieve such an organized environment.*

The latter becomes necessary when the organization is involved in a progressive growth of human resources and related individual behavioral dynamics.

It becomes even more critical if the organization identifies its structural objective at a level of utmost excellence, be it referring to the products supplied, the human resources involved or the operational setup of the Group in general.

General Manager

General principles

1.1 SCOPE OF APPLICATION, RECIPIENTS AND IMPLEMENTATION

The provisions contained in this document represent the set of principles and conducts identified by the Company as mandatory and correct code of conduct for Company business.

The Recipients of this Code - and therefore those required to comply with the requirements contained therein - are all those working inside the Company, without exception, as well as all subjects who, permanently or temporarily, establish relationships or dealings with Brawo and work to achieve its objectives.

Those who work in positions of responsibility (the so-called Senior Management) are expected to provide an example for their collaborators and steer them towards observance of the Code of Ethics and supporting such compliance.

Brawo requires all suppliers and customers to behave according to the general principles of this Code, hence preferring counterparties that conduct their business based on the values, principles and standards of behavior expressed herein.

In particular, each employee is required to acknowledge and apply the principles contained herein within the context of their job tasks and duties, contributing to their application at all levels of the Company.

Finally, although aware of the cultural, social and economic diversity of the different Countries in which the Company operates, the latter undertakes to apply its own Code of Ethics both in Italy and abroad.

1.2 CONTRACTUAL VALUE OF THE CODE

This Code contains the ethical values that characterize the organization and activity of Brawo steering towards a management model that respects and safeguards human rights, the environment and the welfare of the Community and condemns all forms of corruption.

Upon classifying compliance with the "Standards of Business Conduct" as an essential part of the contractual obligations of the

employees, pursuant to art.2104 of the Italian Civil Code, the Company shall consider any conduct which fails to comply with the same as a breach of the undertaken obligations and subject to the provisions of the laws and contracts in force.

1.3. INTERPRETATION RESPONSIBILITY

The interpretation and responsibility of an adequate distribution of the following provisions shall be assigned to the General Manager and/or HR Management, who shall remain available to provide any clarification on interpretative doubts concerning the content, the applicability and the consequences of breaches of the Standards of Business Conduct. The General Manager shall ensure a fair and thoughtful application of such standards in order to prevent punishable conduct and to avoid unequal treatment.

1.4 IMPLEMENTATION METHODS

Supervisory Body

Brawo has set up its own Supervisory Body, with the purpose of monitoring the implementation and respect of this Code of Ethics and the Organization, Management and Control Model, put in place according to the provisions of Legislative Decree 231/01.

These tasks imply, among others:

- overseeing the distribution and compliance with the Organization, Management and Control Model and the Code of Ethics.
- handling the update of the Organization, Management and Control Model.
- periodically reporting to the Council on its activities and any problems that have emerged.
- handling the reports of both breaches of the Code of Ethics and the Organization, Management and Control Model sent to odv@brawo.it or breaches included in what foreseen by Legislative Decree 24/23 and received through the internal whistleblowing section at the link <https://Brawo.go-tell.it> and in the dedicated area on the Company website.

The Supervisory Body may avail itself of the support of independent experts to perform the aforementioned tasks.

The Supervisory Body protects whistleblowers from any form of retaliation they may encounter after reporting any inappropriate conduct, keeping their identity strictly confidential, except for their legal obligations.

Any violation of the Code of Ethics also represents a breach of the employee or functional or consultant contract obligations and consequently is subject to what foreseen by the contract or the laws in force in such cases.

Distribution

The Code of Ethics is available to all stakeholders requesting it at the Company headquarters. It is also published on its website and on the Employee Portal at <https://saas.hrzucchetti.it/>.

Pursuing the goal of achieving maximum possible awareness of the contents of the Code among administrators, employees and collaborators, Brawo shall schedule regular training and updating meetings, structured according to the different functions and roles of the participants.

Human Resource Policies

2.1. COMPANY CLIMATE

“Given priority to the professional handling of all relations within the work environment, improves the performances of individuals and, consequently, that of the Company”.

Certain that only through individual excellence and teamwork the Company can be guaranteed a position of leadership, it is necessary to encourage a workplace climate that facilitates the fairness and honesty of interpersonal contacts between employees and individual growth. Every employee should be aware of his or her role within the organization, classifying any party as a Customer, whether external or internal.

For this reason, all relationships should be managed with fairness and honesty; for example, avoiding quarrels, discussions and lack of respect among colleagues and third parties who generally come into contact with the Company, while respecting the diversity of opinion, gender, religious and political beliefs, and reporting the incorrect use of the instruments provided, whilst not abusing any benefits granted

by the Company in order to perform the assigned job descriptions. It is not admissible, in fact, for any form of lack of respect or irrational behavior to affect the teamwork and, as a direct result, the objectives of the Company.

2.2. INDIVIDUAL BEHAVIOUR

The Company considers compliance with national and international standards and regulations as binding and essential conditions in terms of its own actions. Appropriate sanctions will be therefore imposed on those responsible of breaches of such regulations.

Illicit behavior, even if aimed at pursuing the interest or benefits of the Company, is never justified under any circumstances.

Each employee must carry out the assigned tasks in a responsible, diligent and honest manner, and propose favorable solutions to the Company, in compliance with the established regulatory laws and corporate policies. The behavior must be based on good moral values and common sense, avoiding attitudes that may appear improper or that voluntarily create situations that may affect, not only one's work performance, but also the personal integrity of the individual.

2.3. RECRUITING AND TRAINING MANAGEMENT

The Managers of each Area, either directly or through the Head of Personnel and/or the Human Resources Department, shall forward a request to the General Manager whenever necessary, highlighting the characteristics that the resource requires to be recruited and the related company requirements.

Before appointing the search for potential candidates to a specialized agency, it is verified if someone already employed in the Company can meet the expressed requirements. When appointing a specialized external agency, as well as in every request for documents to potential candidates, it is made clear that all the information requested is strictly necessary to check the requirements for the job position or to complete the employment procedures complying to the law. No request for information, even through specialized agencies, can refer to sexual, political or religious orientation and race. The evaluation and ranking of candidates shall be carried out based on objective elements, with particular preference assigned to merit,

without distinction of race, gender, religious and/or political beliefs, explaining the reasons for the recruitment of a specific candidate.

The Company ensures equal opportunities concerning career conditions and growth.

The Human Resources Area plans appropriate training activities for new recruits and prepares a training plan, including mandatory and optional training, for those already employed by the Company on a regular basis and within the competence of each individual. An attendance certificate is issued at the end of each training course.

2.4. CHILD LABOUR AND FORCED LABOUR

The Company:

- Disavows and contrasts child labour. In particular, the Society complies to what foreseen in the United Nations Convention on Child Rights and all applicable national laws referring to the prohibition of employees exploitation and to minors employment, taking care of checking the documents attesting that the candidate is an age equal or older than 18 years.
- Does not make use of forced, restricted or non-voluntary labour.
- Does not start or keep any business relationship with companies using forced labour or child labour resources violating the norms of the place they work in.

2.5. WORK CONDITIONS

The Company complies with all the information of the legislation in force concerning the prohibition of exploitation of workers and the recruitment of children, taking care of checking the documents attesting that the candidate is an age equal or older than 18 years.

Remuneration, working hours, rest periods, weekly rest days, mandatory leave and holidays shall be proportionate to the quantity and quality of the work performed and regulated by the applicable National Collective Bargaining Agreement (CCNL) and/or by any Territorial Contracts concluded with the most representative Trade Unions at a national level.

Employees shall comply with the working hours in force at the facility they are assigned to. The working hours are determined by Senior Management and subject to change in accordance with the

contractual and statutory rules and regulations in force.

The Company reserves the right to require employees to work overtime in accordance with the terms and economic conditions set out in the CCNL.

The Company not only guarantees the registration of all its employees to an additional health care fund dedicated to workers in the Mechanical Engineering Industry, but also with an annual welfare plan, and also enters into agreements with institutes to obtain benefits for employees.

2.6. TEAMWORK

The Company views teamwork as the core instrument in achieving competitiveness and business success; this means stimulating the growth of work groups which combine the skills and expertise of the individuals so as to accomplish a common business objective. Each employee must therefore pursue his or her own development and professional growth objectives, with the awareness of being an integral part of a complex organization where besides observing the foreseen rules and regulations, mutual respect and common kindness are of fundamental importance.

In addition, to encourage and boost team spirit, the Company sponsors and organizes events and leisure activities throughout the year for employees and family members.

2.7. NO DISCRIMINATION

Being the spirit of maximum cooperation and honesty a fundamental pillar for all internal and external relations, the Company correctly ensures equal employment and career opportunities to each of its employees and all future candidates. Working capabilities shall therefore be assessed based solely on appropriate and recognized criteria, and all employee-related choices based on race, religion, gender, political or trade union affiliation, invalidity, family status, nationality or origin shall be deemed illicit.

2.8 RELATIONSHIP WITH THE UNIONS

As regards Union Representatives, the Society:

- Grants the employees the possibility to be represented by the same for their right's safeguard;
- Does not distinguish between different Union Representatives and/or employees who are part of the same;
- Creates and maintains a constant collaboration, based on principles of fairness and transparency, according to law regulations and to regulations in Collective Agreements;
- Ensures the quick and efficient implementation of the acquired agreements.

2.9 HARASSMENT AND MOBBING

Compliance with the requirements included in the points above should be sufficient to avoid the occurrence of unpleasant situations between employees. We consider it appropriate, however, to underline that, regardless of the civil or criminal laws put in place to protect those who are victims of harassment, the Company will not tolerate any behaviour that may be harmful to the morality and the integrity of the person. There will be no justification admissible regarding harassment, precluding the right of the employee to carry out his or her work tasks free from unjustified constraints, threatening conduct, or collective hostile and humiliating situations.

If an employee falls victim to any of the aforementioned situations, they can contact the HR Director, Senior Management or the Supervisory Body, that ensures maximum availability to verify, with confidentiality and discretion, the alleged harassment and to adopt all the appropriate measures.

2.10 CONFLICT OF INTEREST

Employees must always give priority to the interests of the Company and avoid engaging in, or simply facilitating, situations that would prevent the Company from taking full advantage of their performance and the achievement of business objectives.

To this end, employees must avoid finding themselves in situations in which conflicting interests with those of the Company could prevail,

regardless of whether or not they are induced by external subjects or their own positions in other enterprises or business entities; they shall also refrain from using their position in the Company, and the information they become aware of pursuant to the same, to facilitate, directly or indirectly, interests outside the

Company. Should employees find themselves in situations of conflict of interest, they shall promptly report it to their Responsible or the HR Department or the Supervisory Body, whose task is to assess the most suitable action to put in place.

2.11 WHISTLEBLOWING

Brawo adopted a Whistleblowing system that provides employees – or any other stakeholder involved in business activities – who wish to report any breaches or anomalies, with clear operational instructions concerning the subject, content, recipients, transmission mode of a notification and information on the kind of protection offered. The reporting procedure to adopt is provided in the “Breaches Reporting Procedure” available on the employee portal and published on the company’s website www.brawo.it. In order to manage such breaches, Brawo has established an internal channel via an IT platform to deal with such reports and the related investigations. Notifications can therefore be submitted using this link:

<https://Brawo.go-tell.it>

Brawo appointed the Supervisory Body (hereafter, mentioned as SB) as the *whistleblowing* reporting recipient.

Moreover, as already mentioned in paragraph 1.4, Brawo appointed the SB as reporting recipient as regards the breaches to the Code of Ethics that are not included in the topics that can be notified through the *whistleblowing* channel. In this case, the notifications can be sent via email to the following address:

odv@brawo.it

This notification channel, despite not having the requirements requested by Legislative Decree 24/23, is completely independent from the Company. The SB is obliged to keep the identity of the reporting individuals strictly confidential and not to use the

information received for any purpose other than those assigned to the same.

For a better understanding of the reporting activity, the Whistleblowing Procedure is available to the public on Brawo website in the dedicated Brawo S.p.A. download area.

Customer relationships

“Customer satisfaction is the best key to understand how the Company is perceived

3.1. CUSTOMER RELATIONSHIPS

As Brawo mainly works in joint activities and projects with its Customers, it is its responsibility to understand every need, doing whatever is reasonably possible to satisfy the same.

Being the Company a complex customer-orientated organization, it will ensure maximum effort and technical knowledge to supply superior quality products that are safe, competitive and compliant with the Customer requirements.

3.2. CORPORATE IMAGE

Every single action, declaration or commitment, undertaken by any of us towards a Customer, promotes the external image of the Company.

Therefore, during all formal meetings, correspondence and telephone conversations, it is recommended to respect the basic principles of good manners.

When meeting Customers, it is good working practice to be on time, dressed in a formal and tidy manner and well prepared on the subject matter of the meeting.

Each declaration and document sent outside the Company and to third parties must be drawn up in accordance with the rules laid down by the General Manager or, if no such instructions are available, according to the best practices foreseen for the service in question.

To support the uniformity of the corporate image, the Company has created illustrative advertising material and gadgets for current and prospect customers, a corporate web site and Company presentation documents in electronic and paper formats.

Beyond these predefined media, whose creation and update are directly supervised by the General Manager, the internal procedure must be followed when drawing up any other kind of Company document.

Each employee should give priority to the use of these media to promote the Company towards third parties, using them correctly and complying with the corporate interests and not making amendments or integrations without the prior consent of the General Manager.

3.3. CONTRACT TERMS AND CONDITIONS

To reach further uniformity, the Company has created a series of standard contractual documents concerning the negotiating processes with Customers and third parties in general. It is good practice to give priority to the same if any written amendments to the business relationship are required.

Considering the joint design activities the Company is often involved in, it is possible that confidential information or information that is part of the so-called Company know-how is exchanged even during a first business contact. For this reason, it would be appropriate for the Company to prove its fairness and honesty by proposing the customer to sign a Non-Disclosure Agreement (NDA) restricting the use of information exchanged during the negotiations. This request, in fact, proves the attention the Company pays to confidentiality obligations, and any refusal by the recipient shall be valued to assess the good faith of the latter.

3.4. EXCEPTIONS

While dealing with Customers, the Company may be involved in situations that expose it to negative consequences, both due to particular commitments and obligations, sometimes excessively burdensome, or any difficulties in adapting to the new regulations.

In order to avoid sanctions and economic losses for the Company, every employee must avoid assuming any form of extraordinary responsibility towards Customers or third parties, and trade conditions that do not guarantee compliance with the minimum profit margin required by corporate standards. Therefore, employees may continue negotiations which are not in line with the standards of profit and corporate responsibility only after receiving a favorable

opinion by the CEO. The General Manager has to be involved for any request and information related to the liability regime and regulations in force.

Company Value

“Protecting the value of the Company and the interests of its Shareholders in the long- term means investing in our future”

4.1. PROFIT TARGETS

Since joint stock companies are lucrative organizations, every employee should be aware of the main business purpose of the Company, which consists in earning a profit from its business practices. Carrying out their assigned duties, employees must therefore pursue this objective with due diligence, also respecting the rules of conduct and the regulations in force.

Reaching the best profit level identified by the General Manager encourages those who apply their skills and their talent to the Company, creating concrete possibilities of technological development, expansion and advanced research, professional growth and employment, in addition to the implementation of employee incentive policies.

4.2. CORPORATE VALUES

The value of the Company is mainly represented by the human resources that work for Brawo and the knowledge developed over time; this also includes any acquired information and know-how, instruments, tools, infrastructures, trademarks and, last but not least, the image of the Company itself.

Carrying out their work duties, all employees should contribute to safeguarding this heritage, rationalizing the needs of consumer goods linked to the working activity (e.g., paper, stationery, electricity, water, gas, tools, instruments, etc.) and avoiding engaging in any activities or omissions which could compromise the value of the Company. Employees should bear in mind that, if every employee were to forget these principles, behaviors that would be irrelevant if considered individually could multiply to become a significant problem. For example, if just one employee leaves his PC turned on during the night, this does not affect the economy of the Company; but if the same behavior is replicated by all employees using

Company PCs, it is obvious that in addition to an increase in the consumption of energy, there would also be an unnecessary deterioration of equipment.

In view of the same, behaviors that negatively impact resources and assets of the Company shall not be tolerated.

4.3. CORPORATE INFORMATION AND KNOW HOW

Within the context of their job description, every employee manages a considerable volume of information, owned by the Company or other third parties.

This wealth of knowledge, although already protected by competition and intellectual property rights and regulations, must receive particular attention by the individuals who manage it on a daily basis. Therefore, every employee shall handle carefully all confidential information received, whether they be of a technical, commercial, financial or economic nature, disclosing the same strictly for work-related reasons.

The confidentiality of information and documents is often reiterated by special stamps or captions; however, even when the latter are not provided, it is good practice to avoid communicating to third parties, not bound by the Company's confidentiality obligations, any information related to the business, as the same may be the subject of confidentiality between the end customer and the Company or could be considered confidential by Management itself.

To this end, all employees shall refrain from reproducing documents that are the property of the Company for purposes which do not fall within those indicated in their job descriptions. Should any employee have doubts as to the possibility of handling and disclosing certain corporate information, they can contact the General Manager or the Chief Information Security Officer to obtain the related explanations.

4.4. CORPORATE IMAGE

The image that the Company has gained among third parties in general, during its long-lasting business activity, is an immeasurable heritage to which all employees, voluntarily or not, make their own contribution. If the relationship with external Customers is

considered in a privileged manner, it should not be forgotten that any behavior with colleagues, collaborators and any other subject, be it a public or private entity, supplier, contractor or consultant, shall be based on integrity and good manners, and always with mutual respect of the working roles.

4.5. DATA CONFIDENTIALITY AND PRIVACY

Brawo pays particular attention to the implementation of the requirements regarding the protection and safeguarding of personal data processed using IT and non-IT systems, as established in the General Data Protection Regulation (GDPR), in Legislative Decree no. 196/2003 and amended by Legislative Decree no. 101/2018 and by Reg. EU 679/2016, as well as the measures provided by the National Data Protection Supervisory Authority and the European Data Protection Board (ex. WP art.29). The Company guarantees the confidentiality of the information in its possession and shall refrain from searching for other confidential data, except when expressly and specifically authorized by the laws in force, both national and EU based. All Brawo employees should not use any confidential information for purposes unrelated to their working tasks. The Company respects the subjective right of the concerned individuals to the protection of their personal data, providing them with a preventive, complete and updated information notice on the processing of both ordinary and sensitive data already acquired by the Company or which may be acquired and processed during its business, requesting their consent, if necessary, exclusively for the purposes for which they are intended.

The personal data related to natural persons and legal persons (companies and entities) must be processed by the Company in a confidential manner in order to avoid misuse or use that differs from what stated at the time the data was collected from the individual concerned.

All employees should be aware of the legal obligation, in addition to the moral obligation, to guarantee the confidentiality of any data relating to people who interact with the Company. In this perspective, Mr. Gabriele Gnutti has been appointed the Chief Data

Processor of different types of databases, according to the Law no. 675/96 and Leg. Decree no. 196/03 and is the designated contact person for all external subjects and collaborators regarding such matters.

4.6. ACCURATE CORPORATE DATA

When performing their working duties, all employees shall ensure they process all corporate data in a correct and accurate manner. These data are mostly administrative data and shall be regularly checked and verified, to present an accurate situation of the Company to third parties and Shareholders.

In particular, it is necessary to consider that specific legislative provisions are foreseen in relation to the presentation of the economic-financial data of capital enterprises. Therefore, anyone who needs to provide a statement, even on request of external parties, must submit the documentation to the General Manager and/or the CEO to obtain related consent prior disclosure.

Sustainability

“Environmental sustainability means protecting the planet and its resources, satisfying the current needs without compromising future generations”

5.1. SUSTAINABILITY

Brawo S.p.A. is committed to support firmly and to distribute in a detailed way the ESG principles (Environment, Social and Governance) in its company culture. The sustainability is fundamental for Brawo long-term success. This reflects also on the ethical handling of the internal activities and all along the value chain.

Brawo constantly controls the impact, the risks and opportunities of its activities, striving to a sustainable and systematic improvement of the three ESG areas. Based on these principles, Brawo regularly reports its sustainability activities publishing periodically its own Sustainability Report, monitoring the progress and its transparency towards internal and external stakeholders.

Brawo aims at going beyond the regulations in force, improving the interactions with the local territory, preserving the environment and ensuring its employees' health and safety.

Supplier relationships

“Neglecting integrity and fairness when managing relationships with Suppliers means endorsing a system that is counter-productive for the Company itself”.

6.1 SUPPLIER RELATIONSHIPS

Attempting to regulate the management of Supplier, the Company introduced specific business procedures aiming to optimize the price/quality ratio of goods and acquired services.

Employees must ensure they respect these procedures but, given the margin of discretion inherent to every decision-making process, they must in any case take the necessary actions to ensure that no potential supplier in possession of the required characteristics is precluded the possibility to apply to become a qualified supplier. For this reason, objective selection criteria that pursue the satisfaction of the quality objectives of the final Customer and the establishment of business relationships based on courtesy and fairness, in addition to the affordability of the conditions offered, will have to be privileged.

Compliance with these simple rules will ensure that the Company is part of business relationships aligned with the expectations of image and integrity established by the General Manager and the Shareholders.

Relations with competitors

“Playing by the rules and respecting one’s competitors is the key to be successful and provides an explanation in moments of defeat.”

7.1 RELATIONS WITH COMPETITORS

As a fundamental principle, the Company promotes the respect of the ordinary rules of protection of fair competition, in particular during the constant analysis of competitors (*benchmarking*).

It is therefore considered appropriate to remind all employees that it is prohibited to engage in restrictive agreements of the free market put in place by secret agreements or exchanges of confidential information, as well as the servile imitation of products marketed by third parties or the unjustified denigration of the latter.

In view of the above, the Company invites every employee to immediately report any risk situations that could breach legislative prohibitions to the General Manager, who will evaluate the most suitable behavior to adopt in that specific situation.,

Health, Safety, Environment and Energy

“Viewing the Company as an element which is extrinsic to the surrounding Environment can represent the most serious obstacle for any future development”.

8.1 HEALTH, SAFETY, ENVIRONMENT AND ENERGY

The Company considers the Health and Safety of human resources, the environment to which it belongs, and its energy performance as fundamental assets. According to this principle, besides appointing a Responsible for the Prevention and Safety Service, it has also created a designated office to establish procedures to monitor regularly the occupational health and safety of employees, energy performance and the healthiness of the surrounding environment. Based on these premises, all employees have the duty to report to their Superior or directly to HR Management and/or General Manager and/or Employer and/or the PSSM, any situation that may be a risk to their own and others' Health and Safety. All people accessing the Company's premises are required to comply with the Company procedures. In order to ensure that all activities are carried out properly, it is prohibited to behave in a dangerous way to oneself or others' Health and Safety, to perform operations or maneuvers which do not fall within one's duties, to ask workers to operate in situations of serious and immediate danger, to conceal facts or events which have constituted a potential risk to the Health and Safety of workers.

Moreover, the Company took care of minimizing the environmental impact (water consumption, waste production, acoustic pollution, atmospheric pollution, water pollution, soil and subsoil contamination) and energy impact of its own production activities.

8.2 TRAINING ON HEALTH, SAFETY, ENVIRONMENT AND ENERGY

All employees are informed, trained, made aware, and updated to perform the tasks assigned to them in safe conditions, to fully assume their responsibility and contribute to the efficiency of health, safety, environment and energy management systems on the working place. The responsibility of providing the information, training and instruction shall lie with the Employer, the Plant Managers and the Function Managers, according to the identified training requirements.

The Training Office archives the training on the employee's personal record.

8.3 INVESTMENTS ON HEALTH, SAFETY, ENVIRONMENT AND ENERGY

The following costs are included in the budget for health and safety, environment and energy: Personal Protective Equipment (PPE), training, improvement works, maintenance costs / mandatory checks and inspections.

As for the environmental aspects, in addition to complying with current regulations, the Company is committed to preventing all forms of pollution, reducing environmental impacts and optimizing natural resources, avoiding waste of water and energy resources.

Continuous Improvement

“Convincing oneself that each milestone achieved is just another step towards continuous improvement, is the key to accomplishing even greater goals”.

9.1 CONTINUOUS IMPROVEMENT

Our Company considers Quality as the main source of business success and the primary effect of proper management. Quality does not just coincide with mere external recognition, but it is the result of a common sensitivity of the resources used to transform a normative concept into common culture. Every employee should therefore act as the promoter of the Quality awareness within the Company, stimulating compliance with quality standards and not limiting to a mere compliance with the minimum requirements of the system. In fact, it is important that not only the service responsible for Quality Assurance, but also the individual resources, participate in the process of continuous improvement of the activities and products supplied to ensure that every user, either inside or outside the Company, achieves a result, an asset, a service compliant to the very best quality requirements.

According to these principles, all employees are required to report any deficiency, dysfunction and suggestion aimed at optimizing the Quality in every business process, trade exchange and human relationship.

Relationship with the Public Administration

10.1 RELATIONSHIP WITH THE PUBLIC ADMINISTRATION

Any kind of relationship with the Public Administration, with Public Authorities and similar bodies, is based on maximum integrity and honesty.

In particular, it is prohibited to offer any kind of gift to public officers or their relatives, that may affect their impartiality of judgement or induce them to ensure any kind of advantage to Brawo.

Brawo is also committed to providing full cooperation to the public officers it may come into contact with, by collecting, processing and providing all requested information in a timely manner; and to act with utmost transparency and clarity in order not to mislead or deceive institutional representatives.

How to communicate

11.1 HOW TO COMMUNICATE WITH THE COMPANY?

All the guidelines or simply the comments related to this document may be submitted to one's own Superior, who will submit and discuss the same with HR Management.

All employees can submit to the HR Management their own suggestions and recommendations, if deemed useful to improving manufacturing processes and the products of the Company.

On the other hand, the reports of breaches of the regulations or particular situations/problems arising at an employment level must be submitted directly by the involved employee to the Supervisory Body through the Whistleblowing platform, which shall manage them with the utmost confidentiality.

Final regulation

12.1 REFERENCES

The content of this Code shall be systematically coordinated with the provisions of the Italian Civil Code, with the ordinary and special laws in force, with the revisions of Model 231, as well as with the Company Bylaws.

Revision	Date	Description	Approval and signature
Rev. 0	11/01/2006	First issued	General Manager
Rev. 1	16/12/2020	Formatting	General Manager
Rev. 2	13/11/2023	Chapter update: 1.4; 2.1; 2.3; 2.4; 2.5; 2.7; 2.9; 4.3; 4.5; 7; 10; 11	General Manager
Rev. 3	27/02/2025	Added chapter 5, updated the table of content	General Manager