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*Fasteners* | *Safety Division* | *B-Lean Factory Systems* | *Industrial Components*

Società soggetta all'attività di direzione e coordinamento di FASTENING SOLUTIONS SRL

# THE ORGANIZATION, MANAGEMENT AND CONTROL MODEL

**BERARDI BULLONERIE Srl**

## Code of Ethics

Adopted by Resolution of the Board of Directors dated November 27th, 2023

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## 01 | PREMISE

Ethical action constitutes a value and a condition for success.

Respect, passion and determination, honesty, reliability and a sense of responsibility have always constituted our modus operandi and represent the fundamental prerequisite for achieving company objectives and the reference for the everyday work of administrators, employees, collaborators and other they operate, permanently or temporarily, on behalf of our company.

The principles and rules of conduct enshrined in this Code of Ethics contribute to affirming the credibility of our company.

All of us, at all levels, must demonstrate that we know and share the values and principles set out in this Code.

The creation of value for the company and for the society in which we live depends on the ability of each of us to contribute to supporting these principles in our daily actions.

The Code of Ethics therefore constitutes an essential behavioral reference model, which identifies the values we believe in both as people and as a company, guiding the future behavior of all of us in the complexity in which we live.

### 1.1 | Adoption

The corporate culture of **Berardi Bullonerie Srl** has always been shaped by integrity and ethical and legal conduct. Considering that our behavior defines the way we work, the Company has adopted a Code of Ethics that serves as a guideline for responsible business conduct.

This document clearly defines and encloses the set of principles and values that inspire the Company's activities, the observance of which is required by all those who maintain relations and relationships with it in any capacity.

With this Code of Ethics, in particular, we mean:

- give relevance to the ethical principles and behavioral standards described, also with a view to preventing sanctionable conduct in business management, which could compromise the relationship of trust between **Berardi Bullonerie Srl** and its stakeholders<sup>1</sup>, and expose the Company to the risk of "corporate administrative liability" pursuant to Legislative Decree

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231/01;

- define and explain the values and principles that underlie all internal and external relationships **Berardi Bullonerie Srl**;
- indicate the behavioral principles which all recipients of this Code are required to observe;
- empower those who in various capacities have relationships with **Berardi Bullonerie Srl** in relation to the observance of said principles, also informing about the possibility of sanctions where there is non-compliance with the same;
- increase the good reputation and image of the company, true essential intangible resources that favor:
  - outwards, the investments of members, the loyalty of customers, the attraction of the best human resources, the serenity of suppliers and the reliability of creditors;
  - inwards, the implementation of a harmonious and planned work organization.

Consistently with the prefigured purposes, the Code of Ethics of **Berardi Bullonerie Srl** represents a preliminary element to the implementation of the Organisation, Management and Control Model pursuant to Legislative Decree 231/01.

## 02 | RECIPIENTS OF THE CODE OF ETHICS

The provisions of this Code are aimed, without any exception, at all those who directly or indirectly, permanently or temporarily, establish collaborative relationships or relationships or operate in the name or on behalf or in the interest of **Berardi Bullonerie Srl**.

These subjects will be defined below as "Recipients", in particular by way of example they are represented by:

- those who hold representation, administration or management functions, or who exercise, even de facto, the management and control of the Company, therefore those who give substance to the values and principles contained in the Code by taking on responsibilities internally and towards the external and strengthening trust, cohesion and team spirit;
- employees, in compliance with current regulations, adapt their actions and behaviors to the principles, objectives and commitments set out in the Code;
- consultants, collaborators, suppliers, business partners and anyone who cooperates in any capacity with **Berardi Bullonerie Srl**, who align their conduct and professional practices with the principles contained in the Code.

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**Berardi Bullonerie Srl** undertakes to promote the dissemination and respect of the principles contained in this Code of Ethics, through the use of adequate cognitive, training and awareness-raising tools, so that it can be applied by everyone in their daily actions and transformed by everyone into concrete actions of success.

In order to ensure correct understanding of the Code of Ethics, the latter is disseminated through publication on the company intranet, in addition to any other action aimed at promoting awareness of it. Communication and training on the Code ensure our employees' awareness and understanding of the principles included in the policies.

This Code of Ethics can be consulted on the website (<https://www.gberardi.com/codice-etico>). Violation of the aforementioned rules will constitute failure to fulfill the obligations deriving from the employment or collaboration relationship, with all legal or contractual consequences, also pursuant to and for the purposes provided for by the articles. 2104 et seq. Of the cc

Compliance with the principles and rules set out in the Code of Ethics also constitutes an express contractual obligation in the relationships between **Berardi Bullonerie Srl** and its suppliers. Therefore, the procurement and supply contracts between the Company and the aforementioned subjects are equipped with a specific clause which binds compliance with the contents of the Code of Ethics, the transgression of which determines ipso jure the termination of the stipulated contract.

The principles of the Code of Ethics must inspire the Board of Directors and the Corporate Bodies of **Berardi Bullonerie Srl** in any decision or action relating to business management; Likewise, the Managers, in concretely implementing the management activity, must be inspired by the same principles, also in order to represent a reference model for employees and collaborators.

Each company manager in a top position:

- represents an example for his collaborators with his behavior;
- promotes compliance with the rules of the Code by the "Recipients";
- works so that the "Recipients" understand that compliance with the rules of the Code constitutes an essential part of the quality of the work performance and of their activity;
- takes immediate corrective measures when required by the situation;
- endeavors to prevent, within the limits of its competences and responsibilities, possible behavior that does not comply with current legislation, this Code or internal rules.

### 03 | GENERAL ETHICAL PRINCIPLES

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**Berardi Bullonerie Srl**, considers its image and reputation as fundamental values that must be protected and developed also through the full dissemination, sharing and observance of the ethical and behavioral principles contained in this code. In carrying out its activities, the Company is inspired by the ethical principles set out below, which it requires compliance with by the subjects involved in the various tasks.

## HONESTY and RESPECT, LEGALITY, LOYALTY AND CORRECTNESS

Honesty and respect represent the fundamental principles for all activities of **Berardi Bullonerie Srl**, necessarily inspiring its initiatives and communications: it constitutes an essential element of management.

Legality, loyalty and correctness are key elements on which **Berardi Bullonerie Srl** bases interactions with all Stakeholders, therefore undertakes to:

- act in compliance with current laws and regulations;
- act by adopting a responsible, correct and honest attitude to protect the interests of customers and the community;
- establish loyal and collaborative relationships with all counterparties;
- do not make misleading communications;
- do not adopt behaviors that take undue advantage of others' positions of weakness or lack of knowledge.

## TRANSPARENCY, COMPLETENESS AND TRUTH OF INFORMATION

**Berardi Bullonerie Srl** recognizes the fundamental value of correct information to Shareholders, to the corporate management and control bodies and to the competent functions, regarding significant facts concerning corporate and accounting management. The Managers and Employees of **Berardi Bullonerie Srl** are required to provide complete, transparent, truthful, understandable and accurate information, so that, in establishing relationships with the company, stakeholders and anyone else who comes into contact with the company are able to make decisions autonomous and aware of the interests involved, the possible alternatives and the relevant implications.

## PROFESSIONALISM

**Berardi Bullonerie Srl** carries out its activities with diligence and professionalism, using the utmost commitment and assuming the responsibilities required by its duties.

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The quality and efficiency of the company organization and reputation are determined to a significant extent by the conduct of each recipient who is therefore required to contribute with their conduct to the protection of these values; mutual collaboration between the subjects involved, in any capacity, in the same project or process represents an essential principle.

## PROCESSING OF CONFIDENTIAL INFORMATION

Documents, information and data which are not in the public domain and which, if made public, could cause harm to the Company are considered confidential.

**Berardi Bullonerie Srl** undertakes to ensure the protection and confidentiality of the personal data of recipients and stakeholders, in compliance with any applicable legislation regarding the protection of personal data.

The recipients are required not to use confidential information, learned as a result of their work activity, for purposes unrelated to the exercise of that activity, except in the case of express authorization and in any case always in the most rigorous compliance with current legislation on privacy and the internal company rules.

## RESPECT AND ENHANCEMENT OF HUMAN RESOURCES

The peculiarities of the employees and their abilities are one of the strengths of Berardi Bullonerie. The professional development of staff is based on the principle of equal opportunities; the recognition of the results achieved, the professional potential and the skills expressed by people are considered essential judgment criteria.

**Berardi Bullonerie Srl** respects the fundamental rights of people: discriminatory behavior with reference to political opinions, religion, race, nationality, age, sex, sexual orientation, state of health is not permitted.

## PROTECTION OF INTELLECTUAL AND INDUSTRIAL PROPERTY

**Berardi Bullonerie Srl** acts in full compliance with the intellectual property rights legitimately held by third parties, as well as with the laws, regulations and conventions, including at Community and international level, to protect such rights.

In particular, the Company refrains from importing, marketing or otherwise using or otherwise putting into circulation industrial products with counterfeit or altered distinctive signs or made by usurping industrial property rights.

## ENVIRONMENTAL PROTECTION



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**Berardi Bullonerie Srl** considers the protection of the environment and the sustainable development of the territory in which it operates to be of primary importance, in consideration of the rights of the community and future generations.

It orients its environmental protection action based on the awareness that the environment is a common good to be safeguarded, promotes awareness-raising activities on this issue and undertakes to train its collaborators so that they are aware of the environmental aspects and impacts connected to its activities .

All company activities are implemented aiming to control the consumption of natural resources and minimize negative impacts on the environment.

## HEALTH AND SAFETY IN THE WORKPLACE

**Berardi Bullonerie Srl** guarantees working conditions that respect individual dignity and ensures safe and healthy working environments, in compliance with current accident prevention and health and hygiene at work regulations.

The Company firmly promotes the dissemination of a culture of safety and awareness of the risks connected to the work activities carried out, requiring everyone - at every level - to behave responsibly and respectfully of the safety system in place and of all the company procedures that form an integral part of it. .

From this perspective, every employee, collaborator and anyone who in various capacities carries out work activities at the Berardi Bullonerie offices is called upon to personally contribute to maintaining the safety and quality of the work environment in which they operate.

In this regard, the consumption of alcoholic beverages, drugs or similar substances is prohibited during work. It is also recommended that employees avoid taking it even immediately before working hours, as the resulting effects may persist during the subsequent work performance.

The Company is aware that the abuse of alcohol, drugs and other similar substances by employees can negatively affect the effectiveness of their work performance and can have serious harmful consequences for themselves and for the safety of colleagues. Those who believe they are dependent on the aforementioned substances are invited to seek medical advice to undertake appropriate therapeutic treatment without delay, before their condition can negatively affect their ability to work and pose a risk to their own safety and that of their work colleagues. or third parties as well as the safety of systems, machines and work environments.

The Human Resources Office, through the Competent Doctor, is available to interested parties who, on a voluntary and strictly confidential basis, wish to consult it for any information and collaboration.



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## CONFLICT OF INTEREST

**Berardi Bullonerie Srl** in relations with suppliers, customers and institutions it is inspired by the principles of loyalty, correctness and transparency.

Relationships with counterparties are governed by precise rules and objective criteria that always exclude personal interests. In pursuing the objectives and general interests of the Company we avoid that any personal interest can prevail over that of the company by influencing internal choices.

## TAX RISK MANAGEMENT

**Berardi Bullonerie Srl** undertakes to implement correct management of the tax variable and tax obligations, in order to contribute to the creation and maximization of value for all its stakeholders.

In carrying out all its activities, the Company promotes and implements tax management aimed at minimizing the risk of operating in violation of tax regulations or in conflict with the principles and/or purposes of tax regulations, also for the purpose of prevent disputes in tax matters, maintaining an attitude of transparency and dialogue towards the tax authorities of the countries in which it operates.

## FIGHTING Smuggling

**Berardi Bullonerie Srl** strongly condemns all forms of smuggling and prohibits conducting business with individuals who do not comply with the regulatory provisions regarding customs law: it therefore requires that all suppliers and collaborators rigorously apply customs legislation in the context of import activities and export. Relations with the Customs Agency are based on the principles of maximum collaboration and transparency.

## 04 | RULES OF CONDUCT

**Berardi Bullonerie Srl** requires recipients to refrain from promoting, facilitating and/or engaging in any behavior - active or passive - from which an illegitimate or illicit economic or other benefit arises or may arise in their own favor or that of third parties; or which has the purpose of promoting and/or favoring illegitimate or illicit interests of oneself or third parties.

With this in mind, the Company has dictated specific rules of conduct with reference to:

- rules of conduct towards stakeholders;
- rules of conduct towards collaborators and employees;
- rules of conduct towards the social and professional community.

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#### 4.1 RULES OF CONDUCT TOWARDS STAKEHOLDERS

In conducting business, Berardi Bullonerie ensures compliance with the ethical principles and rules of conduct identified in this Code, towards all Stakeholders and without any distinction depending on the importance of the business.

#### 4.2 RELATIONSHIPS WITH CUSTOMER

**Berardi Bullonerie Srl** bases the company activity and the conduct of business on quality, understood not only as the value of the product but also as attention to the particular needs of customers and their stakeholders and is committed to establishing professional relationships of trust, providing transparent, complete and accurate information, detailed, truthful and understandable so that customers are able to make autonomous decisions and are aware of the interests involved, alternatives and relevant consequences.

The Company also guarantees maximum confidentiality of the data and information received from customers which are collected and processed in accordance with the provisions of current Privacy legislation.

The Company undertakes maximum compliance with the laws regarding the marketing of products; no employee may be involved in the marketing of products intended for sale, which mislead the consumer regarding the origin, quality and characteristics of the good. The Company abstains from behavior aimed at putting into circulation products that violate industrial property rights or that present counterfeit trademarks or falsely marked goods.

In managing customer relations, the Company undertakes to:

- formalize, in a transparent and clear way, the main aspects relating to commercial negotiations;
- operate with diligence and care in the client's interests;
- faithfully and diligently respect the fulfillment of the obligations agreed upon in commercial negotiations and contractual obligations;
- provide, efficiently and courteously, high quality services that meet or exceed the customer's reasonable expectations and needs;
- provide complete, accurate and comprehensive information in a clear and simple way, so

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that the customer can make informed decisions;

- not treat its customers arbitrarily and unequally, differentiating them on the basis of economic importance or the size of the order;
- stick to the truth in advertising or other communications;
- do not discriminate against customers on the basis of religious, political, ethnic beliefs and sexual preferences;
- adopt behavior marked by availability, respect and courtesy, with a view to a collaborative and highly professional relationship;
- do not accept gifts, gifts, money or any other benefit from the customer, which could be interpreted as aimed at obtaining favours: specifically, they must not be accepted, either by the customer or by people belonging to the company with which one has come into contact during the consultancy, gifts and/or donations which could even merely induce the appearance of a limitation of his independence and impartiality;
- avoid any situation of conflict of interest.

When starting contractual relationships with new parties and managing existing ones, it is prohibited to:

- maintain relationships with subjects involved in illicit activities, criminal organizations, in particular connected to the trafficking of weapons and narcotics, money laundering, smuggling and terrorism and, in any case, with subjects lacking the necessary requirements of seriousness and commercial reliability;
- maintain financial relationships with subjects who, even indirectly, hinder human development and contribute to violating fundamental human rights (e.g. exploiting child labor, encouraging sex tourism, etc.);
- maintain relationships with individuals who do not comply with the provisions on health and safety in the workplace;
- use confidential customer information for purposes not connected to the exercise of its consultancy activity and/or outside the limits established by current legislation;
- request and/or accept, directly or indirectly, forms of gift (money, gifts, favors) that can be interpreted as exceeding the normal displays of courtesy permitted in commercial practice, or in any case aimed at obtaining favorable treatment.

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#### 4.3 RELATIONSHIPS WITH SUPPLIERS, DISTRIBUTORS AND COMMERCIAL PARTNERS

With suppliers, distributors and commercial partners, the Company adopts transparent behavior that respects internal procedures, establishing lasting relationships that ensure the satisfaction of mutual needs without ever losing sight of the professional nature of the relationship.

Employees must not abuse their position, role or powers within the Company to exert pressure of any nature on third parties and to influence, for improper purposes, the performance of assigned activities. The abuse of one's professional position represents an offense for which not only the person who commits the offense can be prosecuted, but also anyone who encourages the continuation of such behavior.

**Berardi Bullonerie Srl** establishes relationships with suppliers, distributors and commercial partners who enjoy a respectable reputation, who are engaged only in lawful activities and whose corporate ethical culture is comparable to that of the Company.

The choice of suppliers is made based on objective criteria of cost-effectiveness, opportunity and efficiency; the choice of suppliers on a purely subjective and personal basis or, in any case, by virtue of interests conflicting with those of the Company is precluded.

From this perspective, the Company, in managing relationships with suppliers, distributors and commercial partners, undertakes to:

- assign tasks/orders according to objective criteria, in compliance with the principles of impartiality, transparency and independence;
- establish transparent, correct and collaborative relationships in order to create a solid foundation for mutually convenient and long-lasting relationships;
- regulate and explain mutual commitments through comprehensive contracts;
- verify that suppliers, distributors and commercial partners enjoy a respectable reputation and possess the characteristics of ability, professionalism, honesty and moral integrity;
- verify that third parties are engaged only in lawful activities and are inspired by ethical principles that do not conflict with those of the Company;
- guarantee maximum transparency of the agreements, avoiding the signing of pacts or secret agreements contrary to the law;
- not take undue advantage of contractual dependence relationships in which suppliers,

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distributors and commercial partners may find themselves due to their insufficient information on the Company's activities, especially with reference to long-term relationships or to services in advance of payments and investments by the supplier;

- do not accept freebies, gifts, money or any other benefit which could be interpreted as aimed at obtaining favours.

#### 4.4 RELATIONSHIPS WITH COLLABORATORS AND EMPLOYEES

**Berardi Bullonerie Srl** recognizes that human resources constitute a factor of fundamental importance for its existence and development: interpersonal relationships within the Company are based on the principles of respect, loyalty and transparency and remuneration and career opportunities are defined equally for everyone the employees.

Forms of exploitation, isolation, harassment or induction of stress are not tolerated and the protection of collaborators and employees against any possible mobbing action is foreseen.

#### 4.5 STAFF SELECTION AND ENHANCEMENT

The selection of personnel is carried out by the competent functions, in compliance with company values, ethical principles and all applicable legal regulations and is based exclusively on criteria of competence and merit.

**Berardi Bullonerie Srl** pays the utmost and constant attention to the valorisation of human resources, condemning any form of discrimination of ethnic, cultural, religious origin, age, disability, race, gender or sexual orientation and incitement to racism, xenophobia or apology for the Shoah and any form of exploitation of personnel.

The Company does not establish any employment relationship, nor any form of collaboration with individuals without a regular residence permit, and in any case in violation of the working standards generally applied or foreseen by national regulations.

The hiring of spouses, relatives or companions of the employee is permitted in Berardi Bullonerie, however, the employee is obliged to inform the Function Manager in this regard, as well as the Human Resources Management.

Employees and collaborators are required to:

- maintain respectful behavior towards the Company and towards the client for whom they work, in order to protect the image and contribute to the enhancement of the Company;
- base their actions on respect for the person, the good name of the Company and its working context;

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- guarantee order and respect in the use of company spaces, also ensuring the safekeeping of company assets entrusted to them;
- maintain a conduct that respects the rights and personality of colleagues, collaborators and third parties, regardless of their corporate role and the operational circumstances in which they find themselves;
- not use names, brands, creations and intellectual achievements owned by the Company and/or its customers, for personal purposes;
- do not disclose methodologies, processes and working documents externally;
- refrain from taking personal advantage from acts or information of which they become aware during the performance of their duties;
- avoid situations of conflict of interest deriving from one's activities;
- carry out business trips for purely work-related purposes;
- do not consider rewards or incentives of any kind: travel expenses must be expressly authorized and always accompanied by an expense report;
- request the approval of the function manager for representative lunches and dinners, provided that it is a business meeting in the interests of the Company and provided that there is no form of undue or irregular influence;
- request the authorization of the function manager for the acceptance and sending of promotional material;
- request the authorization of the department manager for participation in training and demonstration actions, which must be weighted based on the topics covered, the expenditure of time and travel expenses;
- if a collaborator receives free products, show tickets (sporting events, concerts, etc.), trips or other forms of reward from current or potential suppliers as a reward or motivational lever, he or she is required to immediately notify his/her Function Manager; small gifts or products omitted from the aforementioned category may be accepted as acts of commercial courtesy, provided that, in terms of value, they do not compromise the integrity and reputation of the Company.

#### 4.6 USE OF COMPANY GOODS AND RESOURCES

The use of company assets and resources must be functional to the performance of company activities or the purposes authorized by the function manager and must take place efficiently and with methods suitable for protecting their value in compliance with current legislation, avoiding alterations or damage.



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Under no circumstances is it permitted to use company assets and resources for personal purposes, in conflict with the interests of the Company and for purposes contrary to the law, public order or morality, as well as to commit or induce the commission of crimes. .

Each employee is responsible for the custody of the entrusted resources, for maintaining their safety, avoiding fraudulent or improper use that could cause damage or reduction in efficiency, or in any case in conflict with the interests of Berardi Bullonerie.

#### 4.7 USE OF COMPANY ACCESS TO THE INTERNET

**Berardi Bullonerie Srl** undertakes to avoid the use of company access to the Internet for reasons not strictly related to work reasons and, in particular, prohibits its use to come into possession of, or distribute, illicit material or which exposes the Company to the risk of administrative responsibility.

#### 4.8 COMPLIANCE WITH THE RULES CONTAINED IN THE CODE OF ETHICS

The Company ensures the widest dissemination of the Code of Ethics among its employees. To this end, it requires that its employees know and observe the provisions and that, compatibly with individual possibilities, they promote awareness of it among newly hired employees as well as third parties interested in its application with whom they come into contact for reasons of their office.

In particular, employees have the obligation to:

- refrain from behavior contrary to the rules of the Code of Ethics and demand compliance with it;
- contact your superiors or the functions assigned to this if you need clarification on the methods of application of the same;
- promptly report to superiors and company representatives any news, directly discovered or reported by others, regarding possible violations and any request made to him to violate them;
- collaborate to verify possible violations with the structures responsible for this.

#### 4.9 RULES OF CONDUCT TOWARDS THE SOCIAL AND PROFESSIONAL COMMUNITY

##### **RELATIONSHIP WITH THE PUBLIC ADMINISTRATION**

No behavior contrary to current legislation and this Code of Ethics, which could constitute corruption, extortion and undue inducement to give or promise benefits, carried out by directors, managers, employees and collaborators in the execution of the tasks or tasks entrusted , even if motivated by the pursuit of a generic "interest" of the Company, can be



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considered justified and will therefore lead to the adoption of sanctioning measures.

**Berardi Bullonerie Srl** prohibits its employees, agents and more generally all those who operate in its own interest, in its own name or on its own behalf, from accepting, promising or offering - even indirectly - money, gifts, goods, services, services or favors not owed in relation to relationships maintained with public officials, those in charge of public service or, in general, employees of the Public Administration or other Public Institutions, as well as with private entities, to influence their decisions, in view of more favorable treatments or undue or for any other purpose.

Any employee who receives - directly or indirectly - requests or offers of money or favors of any kind (including for example freebies or gifts of no small value) unduly formulated by those, or to those, who operate on behalf of Berardi Bullonerie in the context of relationships with public officials, public service representatives or employees in general of the Public Administration (Italian or other foreign countries) or other Public Institutions, or with private entities (Italian or foreign), must immediately report to the internal function responsible for the adoption of the consequent measures.

In relation to requests for public funds from the State/European Union/other public body and their use, Berardi Bullonerie undertakes to proceed with the process for obtaining the funds and using them correctly, in compliance with the law, norms of this Code of Ethics and internal procedures, also in order to avoid possible damage to the company's image.

It is therefore forbidden for the administrators, managers and employees of Berardi Bullonerie to use the funds received to promote initiatives aimed at the realization of works or the carrying out of activities of public interest with purposes other than those for which they were obtained. It is also forbidden to use/present false statements or documents attesting to untrue things or to omit due information in order to unduly obtain the funds, or to promise/give a Public Official - for him or for a third party - an undue remuneration in money or other utility in exchange for an act of one's office, necessary to obtain funds.

#### 4.10 RELATIONSHIPS WITH TRADE UNIONS, POLITICAL PARTIES AND PUBLIC ORGANIZATIONS

Relationships with political parties, trade unions and other interest-bearing associations are maintained by authorized company representatives or by persons delegated by them, in compliance with the provisions of this Code, as well as the Articles of Association and special

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laws, with particular regard to compliance with principles of correctness, collaboration, impartiality and independence.

The Company does not make contributions of any kind - directly or indirectly - to trade union organizations, nor to their representatives or candidates, refraining from any pressure on public representatives (consultancy contracts, acceptance of recommendations for hiring, etc.).

#### 4.11 RELATIONS WITH COMPETITION

**Berardi Bullonerie Srl** is committed to maximum compliance with the laws regarding the protection of competition and the market in any jurisdiction.

No collaborator may be involved in initiatives or contacts with competitors (agreement to maintain fixed prices, agreements on prices or quantities, division of markets, etc.), which may appear to be a violation of the regulations protecting competition and the market.

Any infringements can generate negative consequences, including material ones, and cause damage to one's image. For these reasons they may entail consequences in accordance with the provisions of current legislation.

Berardi Bullonerie employees are required to strictly comply with these provisions. In particular, information deemed confidential or covered by professional secrecy must not be disclosed to competitors. Likewise, sensitive data regarding competitors must not be disclosed to third parties.

#### 4.12 CORPORATE COMMUNICATIONS AND SOCIAL MEDIA

All corporate communications managed through the media are based on respect for the right to information and based on the principles of transparency, correctness and timeliness; under no circumstances is it permitted to disseminate false or biased news, information, rumors or comments.

Each communication activity is managed exclusively by the officially appointed functions; relations with the press are maintained exclusively by the Legal Representatives (except for specific authorisations), in full compliance with the laws, rules and practices of professional conduct.

BERARDI BULLONERIE undertakes to use social media, according to principles of transparency, correctness and responsibility to guarantee the protection and protection of the image and reputation of the Company and the people who work there.

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## 05 | RULES FOR IMPLEMENTING THE CODE

In implementation of the provisions of Legislative Decree 231/01, an internal body has been established, called the Supervisory Body (acronym ODV), which is entrusted with the task of continuously supervising the effective functioning and observance of the Organizational Model, as well as to take care of its updating.

The Body constantly monitors the effective implementation of the Model, and to this end:

- carries out inspection activities with methods predetermined and approved by the Body itself;
- monitors compliance with the rules of conduct by employees, including those with managerial functions, and by each recipient of the Model;
- has access to all documents relating to the Model;
- can request information from anyone operating on behalf of the Company in the areas at risk and sensitive processes identified in the Model;
- receives the information specifically indicated as mandatory by the Model;
- proposes the activation of sanctioning procedures following the violation of the rules of conduct identified in the Model;
- subjects the Model to periodic checks, regarding its real effectiveness and actual ability to prevent the commission of crimes, and ensures its updating, proposing appropriate changes to the management body;
- expresses an opinion regarding the adequacy and suitability of the changes to the Model developed on the initiative of the Board of Directors, before their adoption;
- receives any reports of irregularities or legal violations (so-called "ethical alert") and manages the evaluation and decision-making process.

### 5.1 REPORTS OF VIOLATIONS OF LEGALITY AND THE CODE OF ETHICS

It is the duty of each employee, manager, manager with management and control duties, member of corporate bodies or collaborator, to verify - within the scope of their knowledge and skills - the correctness of the processes in which they are called upon to participate, giving immediate communication (so-called Policy Whistleblowing according to Law 179 of 30 November 2017) to the hierarchical superior, to the Management or directly to the Supervisory Body, of any irregularity classifiable as a "significant irregularity" and therefore of crimes, violations of civil law (including negligence, fraudulent of a contract, violation of an administrative law), violation of protocols, judicial risks, dangers to safety, health or the

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environment and/or the cover-up of any of these.

The Company has established suitable communication channels through which interested parties will be able to make their reports regarding the Code or any violations thereof, in full compliance with the right to be heard and maximum confidentiality, without prejudice to legal obligations. Reports can be forwarded through the following methods:

- physical mail, with the sending of an envelope with the words "private and confidential" addressed directly to the Supervisory Body at the address of the Company's offices: Via San Carlo, 1. Loc. Poggio Piccolo 40023 Castel Guelfo (Bologna);
- e-mail, possibly also anonymously, addressed to the SB's e-mail address: [odv@gberardi.com](mailto:odv@gberardi.com) ;

Based on the "Whistleblowing Policy", integrated according to the protection requirements of Law 179 of 30 November 2017 and the related regulation of the SB, the report will not constitute a potential violation of the confidentiality obligations deriving from the employment relationship, and the procedure is designed in such a way as to guarantee protection from retaliatory or discriminatory conduct at every stage, as well as the confidentiality of the report. The person who made the report will in fact be protected from any punitive disciplinary measure or from retaliation by superiors, for reports or complaints made in good faith and based on reasonable belief.

## 5.2 SANCTION SYSTEM

Observance of the principles and rules of the Code of Ethics, their dissemination and operational application within the scope of the responsibilities assigned, are an integral part of the contractual obligations of each recipient pursuant to and for the purposes of the art. 2104 of the Civil Code.

Each violation will be prosecuted by the Company within the terms of the law and may constitute failure to fulfill the contractual obligations undertaken, with all legal consequences regarding the termination of the contract or assignment conferred, and compensation for resulting damages.

It is understood that violations carried out by individuals who hold representation, administrative or management positions within the Company will result in the adoption, by the competent corporate body, of the sanctioning measures deemed most appropriate in relation to the nature and seriousness of the violation committed and the qualification of the person

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responsible for the violation, in compliance with applicable legislation.

The Recipients must perceive compliance with the Code as an essential part of the quality of the work performance and therefore act and behave in line with what is indicated in the document.

Castel Guelfo,  
November 27th, 2023