



## **CODE OF ETHICS**

Date of issue: 11/01/2006  
REV.1 ON 16/12/2020

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# Introduction

..... Within the scope of an Organisation, 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 formalising of the rules and regulations to achieve such an organised environment.

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

*It becomes even more critical if the organisation 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.*

*Senior Management*

# 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 occupy 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 facilitate such compliance.

BRAWO requires all suppliers and customers to behave in line with the general principles of this Code, hence showing preference for counterparties that conduct their business based on the values, principles and standards of behaviour 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 various 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 characterise the organisation 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

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 in force and the contract.

### 1.3. INTERPRETATION RESPONSIBILITY

The interpretation and the responsibility of an adequate dissemination of the following provisions shall be assigned to Senior Management 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 same Management shall ensure an equitable and weighted 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 enforcement of this Code of Conduct and on the organisation, management and control model put in place according to the provisions of Legislative Decree 231/01.

These tasks imply, among other:

- oversee the dissemination and compliance with the Code;
- coordinate the Company procedures that implement the indications foreseen by the Code;
- propose amendments to the Code and the implementation mechanisms;
- report periodically to the Board on its activities and any problems that have emerged.

The SB may avail itself of the support of independent experts in order to perform the aforementioned tasks.

Any breach of this Code, however detected, must be brought to the attention of the Supervisory Body. The Supervisory Body protects

whistleblowers from any form of retaliation they may encounter after reporting any inappropriate conduct and shall keep their identity strictly confidential. notwithstanding their legal obligations.

Any violation of the Code of Conduct shall be interpreted as 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.

***Dissemination***

The Code of Ethics is made available to all stakeholders at the Company headquarters. It is also available on the corporate website.

In 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 Policy

"Giving priority, at a daily working level, to achieving correct professional relations improves the work of individual resources, and through them, those of the Company."

## 2.1. COMPANY CLIMATE

Based on our conviction that it is only through individual excellence and cohesive teamwork that we can guarantee a position of leadership for the Company, we believe it is necessary to protect a workplace climate that facilitates the fairness and honesty of interpersonal contacts between employees along with individual growth. Every employee should be aware of his or her role within the organisation, classifying any party as a Customer, whether it be internal or external.

For this reason, all relations should be managed with fairness and honesty; for example, avoiding disputes, discussions and lack of respect among colleagues and third parties that typically come into contact with the Company, while respecting the diversity of opinions and different requirements, 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 for any form of lack of respect or irrational behaviour 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. Breaches of such regulations shall therefore cause for due sanctions to be imposed on those responsible.

Illicit behaviour, 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 advantageous solutions to the Company, in compliance with the established regulatory laws and Corporate policies. All behaviour must be based on good moral values and common sense, avoiding attitudes that may appear uncalled for or voluntarily create situations that may affect, not only one's work performance, but also the personal integrity of the individual.

### 2.3. TEAM WORK

The Company views team work 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 organisation whereby, apart from the observance of the foreseen rules and regulations, the existence of mutual respect and common courtesy are of fundamental importance.

### 2.4. NO DISCRIMINATION

Based on the spirit of maximum cooperation and honesty, a fundamental pillar for all internal and external relations, the Company feels it has a duty to ensure 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 recognised 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.

### 2.5. 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 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 and/or Senior Management, whereby the Company ensures maximum availability to verify, with

confidentiality and discretion, the alleged harassment and to adopt all the appropriate measures.

## 2.6. 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. In the case where employees encounter situations of conflict of interest, they shall promptly report it to their Superior or the HR Department, whose task is to assess the most suitable action to put in place.

# Customer relations

“Customer satisfaction is key to understanding a Company.”

## 3.1. CUSTOMER RELATIONS

As we mainly work in joint activities and projects with our Customers, it is our responsibility to understand their every need and do everything that is reasonable and feasible to satisfy the same.

Given the complex organisation at the service of the Customer, the Company will ensure maximum effort and technical knowledge to deliver superior quality products that are safe, competitive and comply with the demands of the Customers.

## 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 toward third parties must be drawn up in accordance with the rules laid down by General Management or, if no such instructions are available, according to the best practices foreseen for the service in question.

To facilitate uniformity of image, the Company has created advertising material, illustrative documentation for current and prospective Customers; a corporate web site and Company presentation documents in electronic and paper formats.

Apart from these predefined media, the preparation and updating of which are supervised directly by Senior Management, reference shall be made to the internal procedure when drawing up any other type of Company document.

Each employee shall give priority to the use of these media to promote the Company toward third parties, remembering to use them correctly and in a manner consistent with its business interests and not to make amendments or integrations, without the prior consent of Senior Management.

### 3.3. CONTRACT TERMS AND CONDITIONS

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

Given the joint design activities the Company is often involved in, it is possible that confidential information is exchanged - even during an initial business contact - or information that is part of the so-called Company know-how. For this reason, it would be appropriate for the Company to demonstrate its fairness and honesty by proposing the Customer to sign a confidentiality agreement restricting the use of information exchanged during the

course of the negotiations. This request, in fact, demonstrates the attention the Company pays to the problems of confidentiality, and any refusal by the recipient in this regard shall be used when assessing the good faith of the latter.

### 3.4. PARTICULAR CASES

In dealing with its Customers, situations may arise which expose the Company to negative consequences due to any particular constraints 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 has the duty to avoid assuming any form of extraordinary responsibility toward Customers or third parties, and trade conditions that do not guarantee compliance with the minimum profit margin required by corporate standards. Therefore, employees may only continue negotiations which are not in line with the standards of profit and corporate responsibility after receiving favourable endorsement by the CEO. Please contact Senior Management for any request and information relating to the liability regime and regulations in force.

## Company value

“Consistently protecting the value of the Company and the interests of Stakeholders means investing in our future”

### 4.1. PROFIT TARGETS

Since stock companies are a profit-making enterprise, every employee should be aware of the main business purpose of the Company, which consists in making a profit from its business practices. In carrying out their assigned duties, employees must therefore pursue this objective with diligence, remembering to respect the code of conduct and applicable regulations in force.

Attaining the level of profit that is identified by Management as optimal is, firstly, a form of guarantee to those who apply their skills and their talent to the Company; this creates concrete possibilities for technological development, expansion and advanced research, professional growth and employment, in

addition to the implementation of employee incentive policy measures.

#### 4.2. CORPORATE VALUES

The value of our Company is mainly represented by the human resources that work for us 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.

Within the scope of their duties, every employee shall undertake to contribute to safeguarding this heritage, rationalising the needs of consumer goods that are instrumental to their work (e.g., paper, stationery, electricity, water, gas, tools, instruments, etc.) and to avoid 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, a behaviour which, considered individually would be irrelevant, 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 behaviour 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, behaviours 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 the 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 undertake to handle all information received in a confidential manner, whether they be of a technical, commercial, financial or economic nature, and disclose the same for strictly work-related requirements.

Often the confidentiality of information and documents is reiterated by special stamps or endorsements; however, even in the case where 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 relating 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.

On this same note, 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.

If any employee has doubts as to the possibility of handling and disclosing certain corporate information, they can contact Senior Management to obtain relative clarification.

#### 4.4. WORK EQUIPMENT AND TOOLS

All Company assets, movable and immovable, made available to employees are provided solely to allow them to carry out the tasks and duties assigned by the Company and each individual shall be responsible for protecting the same against misuse or personal use, deterioration and loss.

Company assets include, by way of example, but not limited to: plants systems, premises, equipment, tools, voice communication, electronic and IT systems, data banks, supplies, hardware and software, stationery, vehicles, mobile phones, occupational PPE and accident prevention materials.

In view of the current context, particular importance is given to the use of the Internet/Intranet resources and management software available on the corporate network; in fact it should be noted that, in addition to the civil and criminal laws that penalise illicit behaviour concerning the use of the Internet and copyright violations arising from the unauthorised duplication of software, cd-rom and texts in general, the Company shall consider such behaviour as a breach of the diligence and loyalty obligations undertaken by all employees and which characterise the entire working relationship.

These regulations therefore aim to reconcile a two-fold set of requirements:

- on the one hand, the right of the worker to freely use the technologies made available by Brawo (also as a tool for professional growth) and the right to full respect of one's privacy and
- on the other, the right and duty of Brawo itself to ensure that there is no misuse of the corporate tools provided during working hours.

Personal computers with relative programs, printers, scanners, phones, fax machines and any other Company asset constitute a work tool, the use of which is the responsibility of Brawo who places them at the disposal of its employees under the following conditions:

- that they will only be used for professional purposes relating exclusively to the assigned tasks and duties, avoiding therefore uses for personal purposes, which do not fall within the scope of those permitted and expressly authorised by their Superiors;
- that they are kept by the employee to whom they are assigned with due care and attention, preventing tampering, damage or use, also by other individuals, for purposes which are not permitted and expressly authorised.

Therefore, all employees are obliged to comply with the following instructions and recommendations:

- 1.** Company phones and fax machines can not be used to receive or make private communications; therefore, it is recommended to limit the use of the office phone and fax to work related communications only, except in exceptional cases; employees are required to restrict the receipt of personal calls on the office phone lines and limit the duration of conversations to a minimum;
- 2.** only programs provided by the Company<sup>1</sup> can be used in order to avoid the risk of viruses accessing Company IT systems; in particular, it is prohibited to use software that is not officially authorised by the Systems Administrator or download files and software, including free versions, websites without the express

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<sup>1</sup> In full compliance with the obligations imposed by Leg. Decree no. 518 of 29 December 1992 on legal software protection and Law no. 248 of 18 August 2000 on copyright protection.

authorisation of Senior Management and only via the Systems Administrator;

**3.** it is prohibited to use programmes potentially suitable to intercept, forge, amend or delete for illicit purposes the contents of electronic messages and/or documents,

**4.** it is prohibited to change the configurations on the PC, without the express authorisation of Senior Management and only via the Systems Administrator;

**5.** it is prohibited to copy files of uncertain or external origin on magnetic/optical media for non work-related purposes; if in doubt, employees must contact the Systems Administrator;

**6.** it is prohibited to override or try to override any of the safety systems;

**7.** employees must not attempt to obtain unauthorised access, nor encourage similar activities by other Users, internal or external; employees must not deliberately and in an unauthorised manner, modify or attempt to modify the data contained in the systems on the network. It is prohibited for employees to intercept, attempt to intercept or access data in transit on the Brawo network, of which they are not the due recipients;

**8.** it is prohibited for employees to conceal their identity when using the Brawo network systems. It is prohibited for employees to impersonate other individuals;

**9.** employees are responsible for maintaining the security of any login or passwords assigned to them. Logins and passwords are normally assigned to individual users, consequently they shall not be shared with other individuals without due authorisation by Management. Employees are responsible for any activity linked to the use of the login and passwords assigned to them;

**10.** the network units are areas designated to the sharing of strictly work-related information and may not, under any circumstances, be used for different purposes. Therefore, employees should not store, even temporarily, any files in these areas which are not work-related;

- 11.** it is prohibited for employees to remove or modify any data or equipment belonging to the Bravo network without due authorisation;
- 12.** it is prohibited for employees to connect any external device which is not the property of Brawo (such as for example notebooks, hard discs, modems, printers, or in general any other personal electronic devices) to network systems without due authorisation;
- 13.** all use of the Brawo Network must comply with the Italian Civil Code or Criminal laws and regulations. Examples of breaches of these regulations include: the distribution of obscene material; receipt, recording, transmission or possession of pornographic images relating to minors; copyright infringements.
- 14.** it is recommended to restrict access to the Internet, bearing in mind that, except in exceptional cases, is not permitted to access sites which are not work related; in particular, it is prohibited to access websites whose contents are not appropriate to the level of integrity and decorum required of any workplace;
- 15.** it is prohibited to carry out any kind of financial transaction via the Internet, including remote banking transactions, on-line purchases and so on, except in those cases directly authorised by Management and in compliance with the standard purchase procedures;
- 16.** it is prohibited to use corporate accounts to register with websites whose content is not work-related;
- 17.** it is prohibited to participate, for non work-related purposes, in forums, chat lines, electronic message boards and registrations with guest books, even using pseudonyms; access to these sources of information, exclusively for professional reasons, are permitted and subject to the written authorisation of Management;
- 18.** electronic mail, both internal and external, is a means of communication that Brawo puts at the disposal of the employee exclusively for work-related purposes. Therefore, it is recommended to avoid using such instruments for reasons unrelated to the duties and tasks assigned.

**19.** all work files must be saved in the appropriate folders on the server; under no circumstances is it admissible to save files on the hard disk of the assigned PC or on removable computer storage media ( e.g. local disks, floppy disks, CD, etc.), without the prior authorisation of the Systems Administrator;

**20.** all written communications (internal and external), sent or received via electronic devices and fax machines, that concern or contain commitments for the Company, must be reviewed and authorised by the Manager of the competent corporate function.

Brawo acknowledges the right to the confidentiality of personal information of employees logged on the Company network. Nevertheless, circumstances may arise where the Systems Administrator, according to the combined regulations of Law no. 300/70 and Leg. Decree no. 196/03, shall be entitled to access personal data even without the consent of the relative person/data subject.

The Systems Administrator is authorised to access such data:

- when it is necessary to identify or diagnose problems or vulnerabilities detected on the network system in order to preserve the integrity of the same;
- at the request of judicial authorities.

Access to the personal data of employees may, in any case, only take place with the prior authorisation of the Data Controller. The Systems Administrator has, in any case, the right to track activities relating to the use of the network services without the need for any form of consent. This Administrator is authorised to disable login credentials of employees, in the case where breach of these Regulations has been confirmed or when necessary in order to preserve the integrity of the Brawo network. The person responsible/data subject shall receive, if possible, prior notification of such disabling.

The Brawo network System is capable of producing archives containing descriptive lists related to network resources used by

individual employees, the so-called log files. These log files are used to facilitate data recovery in the event of malfunction or for the purposes of System management.

Every individual employee is obliged to comply with these rules of conduct. Failure to comply with the instructions provided by Brawo in this regard shall mean that the employee assumes all civil and criminal liability arising from such conduct and shall determine, in the cases and within the limits foreseen by the legislation in force, the disciplinary contestability of such conduct by the employee in question.

#### 4.5. PATENTS AND TRADE MARKS

In compliance with the regulations in force, the Company in its capacity as the Employer and provider of the tools and instruments used by its employees, is the sole owner of the right to the protection of inventions or other intellectual property created during the course of the employment relationship or aspects related to the same.

The registered trademark, trade names and logos belonging to the Company, regardless of the protection of the same by the regulations on distinctive signs, must be used by employees in a manner which is consistent with the Corporate policy and image. Employees can contact Senior Management for clarification on any further doubts concerning the use of trademarks, logos and settings in general.

#### 4.6. CORPORATE IMAGE

The image that the Company has earned itself in respect to third parties in general, during its extensive period of business operations, 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 conduct 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 various roles.

#### 4.7. CONFIDENTIALITY OF PERSONAL DATA

The personal data relating 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 that stated at the time the data was collected from the Data Subject 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 persons who interact with the Company. In this perspective, Mr Gabriele Gnutti Gabriele has been appointed the Chief Data Processor under Law no 675/96 and Leg. Decree no. 196/03, of the different types of databases, and is the designated contact person for all external subjects and collaborators regarding such matters.

#### 4.8. ACCURATE CORPORATE DATA

When performing their respective duties, all employees shall ensure they process all corporate data in a correct and accurate manner. These data, for the most part of an administrative nature, shall be regularly checked and verified, aimed at presenting an accurate situation of the Company to third-parties and Shareholders.

In particular, it is necessary to consider that precise 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, also at the request of external parties, must submit the documentation to Senior Management and/or the Administration Management to obtain relative consent prior to the disclosure.

# Supplier relations

"Neglecting honesty and integrity in the management of Supplier relations, means legitimising a system that is counterproductive for the Company itself."

## 5.1. SUPPLIER RELATIONS

In an attempt to regulate Supplier management aspects, the Company introduced precise business procedures, with an aim to optimising 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 action 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 there should be privileged objective selection criteria, which pursue the satisfaction of the quality objectives of the final Customer and the establishment of relations based on courtesy and fairness, in addition to the economic soundness of the conditions offered. Compliance with these simple rules will ensure that the Company is part of exchange relationships in line with the expectations of its image and integrity desired by Management and Shareholders.

# Relations with competitors

"Knowing the rules of the game and following them with ones competitors, strengthens successes and always provides an explanation to setbacks."

## 6.1. RELATIONS WITH COMPETITORS

The Company promotes, as a mandatory principle, respect of the ordinary rules of protection of fair competition, particularly during the course of 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 gratuitous denigration of the latter.

In view of the above, the Company invites every employee to immediately report any risk situations that could integrate a breach of legislative prohibitions to Senior Management, so that the latter can evaluate the most suitable behaviour to adopt in facing the situation.

# Health, Safety and the Environment

"Considering the Company as a separate entity to the environment that surrounds it, may represent the most serious obstacle for any future development"

## 7.1. HEALTH, SAFETY AND THE ENVIRONMENT

The Company considers the Environment to which it belongs, and the safety of its Human Resources as an invaluable asset; in view of this principle, in addition to creating a role responsible for the Prevention and Safety Service, to establish procedures for regular monitoring of occupational Health and Safety of employees and the healthiness of the surrounding Environment.

In this latter sense, measure have been put in place to minimise the environmental impact of its own production activities.

On the basis of these premises, all employees have the duty to report to their Superior or directly to HR Management and/or Senior Management any situations that may pose a risk to their own Health and Safety and that of others.

# Continual improvement

"Convincing oneself that every goal reached simply represents the starting point for improvement, is the precondition of the most important successes"

## 8.1. CONTINUAL IMPROVEMENT

Our Company considers QUALITY to be the main source of business success and the primary effect of proper management.

It is also aware that QUALITY is not a noun coinciding with mere external recognition, but is the result of a common sensitivity of the resources used that knows how to transform a normative concept into a common culture.

Every employee should therefore act as the promoter of the dissemination of QUALITY within the Company, stimulating compliance with quality standards and not limit themselves to a mere compliance with the minimum requirements of the System.

It is important, in fact, 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, so as to ensure that every user, either inside or outside the Company, achieves a result, an asset, a service in accordance with the very best quality requirements.

In accordance with these principles, all employees are required to report any shortcomings, dysfunctions and suggestions aimed at optimising the QUALITY in every business process, trade exchanges and human relationship.

## Relations with the public administration

### 9.1. RELATIONS WITH THE PUBLIC ADMINISTRATION

Relationships of any kind with the Public Administration, with Public Authorities and similar bodies, are based on maximum integrity and honesty.

In particular, it is prohibited to offer any type 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 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

## 10.1 HOW TO COMMUNICATE WITH THE COMPANY?

All the guidelines or simply the comments relating 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 their own suggestions and recommendations to the HR Management deemed useful to improving manufacturing processes and the products of the Company.

Disclosure reports of breaches of the regulations or particular situations/problems arising at an employment level, must on the other hand be submitted directly by the Employee involved to the HR Management, who shall manage them with the utmost confidentiality.