



Società soggetta ad attività di direzione e coordinamento di
HOLDING UMBERTO GNUTTI S.p.A.



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BRAWO POLICY FOR CUSTOMERS, SUPPLIERS, AGENTS, DISTRIBUTORS, CONSULTANTS AND SUB-SUPPLIERS

Subject: Adoption of the Organizational, management and control model as per Legislative Decree D.Lgs. 231/2001 and s.m.i.

In application of the Legislative Decree in the subject about the administrative liability of the legal entities, Brawo S.p.A. has implemented on December 16th 2020 the Organizational, Management, and Control Model ex D.Lgs. 231/2001 (called the "Model") including the Ethical code you may find in www.Brawo.com. The adopted Model and Ethical code intend to formalise the principles, the rules and the procedures in order to prevent any illegal conduct of employees and all who have business or other collaborative relationships with Brawo S.p.A (called "Addresses") in carrying out relevant activities. BRAWO S.p.A. requests all addresses to align their conducts with regulations in the Model and in the Ethical Code. The non-compliance with the Code of Conduct during activities carried on for and on behalf of Brawo S.p.A., and in all other circumstances potentially at risk of crime, could lead to the termination of the business and employment relationship. Brawo S.p.A. has assigned to a Supervisory Board (ODV) the function of supervising the operation and compliance of the Organisational Model and keeping it up-to-date.

ODV, in order to verify the efficiency and effectiveness of the Organisational Model adopted, must be **KEPT CLOSELY INFORMED** about any activity and other relevant matter within the company

Brawo S.p.A ODV can be always contacted in writing at the address: Brawo S.p.A via XXV Aprile, 36 Pian Camuno (BS) or by email at: ODV@Brawo.it

Dr. Francesco Musig
General Manager