

2. Company policy

2.1 GENERAL ASPECTS

2.1.1 Purpose and Recipients

This document outlines the general principles and behavioural rules that BBM S.P.A. recognizes as having positive ethical value. By adopting this Policy and, consequently, the Code of Ethics, the company has defined a core set of values and principles that are already inherent in its corporate conduct and serve as fundamental guidelines for daily operations. These principles apply both to internal relations with employees and to external interactions.

The purpose of this Code is to ethically guide the company's actions, and its provisions are therefore binding on the conduct of all company directors, managers, employees, consultants, and anyone who, for any reason, establishes a collaborative relationship with the company.

The Code is widely disseminated internally through Procedure 101, posted on company bulletin boards, and published and available for download on the company website, thus making it accessible to any company stakeholder.

2.1.2 The Value of Corporate Reputation and Credibility

Reputation and credibility are essential intangible assets. A strong corporate reputation and credibility support investments, relationships with local institutions, customer loyalty, human resource development, and the integrity and reliability of suppliers.

In carrying out any business activity, unethical behaviour undermines the trust between the company and its stakeholders. For this reason, behaviours and attitudes—whether by individuals or organizations, internal or external collaborators—that aim to obtain undue advantages or benefits for themselves or for BBM S.P.A. are considered unethical and, on the contrary, promote the emergence of hostile and non-transparent conduct toward BBM S.P.A.

Unethical behaviour includes not only violations of legal regulations but also any conduct that conflicts with internal rules and procedures established by the company's system.

2.1.3 Contractual Value of the Code

Compliance with the provisions of this Code must be considered an essential part of the contractual obligations of the company's employees, pursuant to Articles 2104, 2105, and 2106 of the Italian Civil Code.

Serious and repeated violations of the rules set out in this Code undermine the relationship of trust established with the company and may lead to disciplinary actions and claims for damages, without prejudice, for employees, to the observance of procedures established by applicable laws and collective labour agreements.

2.1.4 Updates to the Code

The Code may be amended and supplemented based on initiatives and suggestions from the Supervisory Body and all recipients of the Code, and requires the approval of the Board of Directors.

2.1.5 General principles

The Code of Ethics represents a set of principles and guidelines whose observance is fundamentally important for achieving the company's objectives, ensuring the proper conduct of activities, maintaining reliable management, and preserving the image of BBM S.P.A. The company's activities, behaviours, and relationships—both internal and external—are guided by these principles and guidelines.

2.1.6 Responsibility

In carrying out the company's mission, the behaviour of all recipients of this Code must be guided by an ethic of responsibility.

The company's fundamental principle is strict compliance with laws and regulations, both in Italy and internationally.

Recipients of the Code are required to adhere to applicable laws; under no circumstances is it permissible to pursue or achieve the company's interests in violation of the law.

2.1.7 Transparency

The principle of transparency is based on the truthfulness, accuracy, completeness, and sharing of information, both externally and internally within the company. When drafting contracts with its Clients and Suppliers, the company formulates clauses in a clear and understandable manner.

2.1.8 Fairness

The principle of fairness entails respecting the rights of all individuals involved in the company's work and professional activities, including privacy and equal opportunities. This also requires the elimination of any discrimination and potential

conflicts of interest between employees and the company. Relationships with external parties, interactions with collaborators, and relationships among employees must be conducted with utmost loyalty, a sense of responsibility, the protection and enhancement of the company's assets, and an attitude of good faith in every activity or decision.

BBM S.P.A. therefore commits to acting fairly and impartially, adopting the same conduct toward all stakeholders it interacts with, while respecting the different forms of relationships and communication required by the nature and institutional roles of the various stakeholders.

2.1.9 Efficiency

The principle of efficiency requires that every work activity ensures the cost-effectiveness of the resources used in carrying out business processes and commits to providing products and services that meet customer needs according to the highest standards. BBM S.P.A. is dedicated to consistently guaranteeing the effectiveness and efficiency of its business processes by establishing and adhering to programs for the continuous improvement of the quality of services and products. This is achieved through the adoption of technological and organizational solutions aimed at combining customer satisfaction with efficient and economical management.

2.1.10 Competition

The company aims to promote the value of competition by adopting principles of fairness, fair competition, and transparency towards all market participants.

2.1.11 Relations with the Community and Environmental Protection, Proper use of Energy Sources

BBM S.P.A., in carrying out its activities, is committed to protecting the surrounding environment and contributing to the sustainable development of the territory. Sensitive to issues of sustainable development and environmental protection, BBM S.P.A. considers as one of its primary objectives the commitment to research and continuous improvement of production processes in compliance with current regulations, environmental needs, and the common interest. The company applies the best economically feasible available technologies to minimize both direct and indirect environmental impact.

To implement a concrete environmental policy, BBM S.P.A. raises awareness among management and collaborators and promotes initiatives, actions, and improvement programs for widespread environmental protection. It also ensures personnel training and updates through specific procedures within its management system, aiming at the strategic objective of pollution prevention.

To achieve these goals, BBM S.P.A. is also committed to the conscious consumption of energy sources through targeted purchasing and dedicates efforts to designing machines that minimize energy consumption throughout their life cycle.

2.1.12 Enhancement of Human Resources

Human resources represent a fundamental factor for the company's development. Therefore, BBM S.P.A. protects and promotes their professional growth, also with the aim of enhancing the company's overall skills and expertise.

2.1.13 Corporate Governance System

The governance system adopted by the company complies with current legislation and aligns with the most authoritative guidelines and best practices in the field. It aims to ensure maximum and balanced collaboration among its components through a harmonious balancing of the different roles of management, direction, and control as represented in the organizational chart.

This system is designed to guarantee responsible management of the company and transparency toward the market, with the goal of creating value for shareholders and achieving the company's objectives.

Members of the company's governing bodies must align their activities with principles of fairness and integrity, refraining from acting in situations of conflict of interest in the course of their work within the company. They are also required to participate actively and knowledgeably in company affairs; they must keep confidential any information acquired in the course of their duties and must not exploit their position to obtain gifts or personal advantages, whether direct or indirect. All communication activities must comply with laws and codes of proper conduct and be aimed at protecting confidential information.

In addition to its responsibilities, management is committed to rigorously enforcing the values set forth in the Code of Ethics, promoting its adoption and dissemination even among third parties.

Members of the company's governing bodies are required to comply with applicable laws. The obligations of loyalty and confidentiality continue to bind them even after their relationship with the company has ended.

Given the company's activities and organizational complexity, BBM S.P.A. adopts a system of delegation of powers and functions (see organizational chart), which explicitly and specifically assigns responsibilities to individuals with appropriate skills and competence.

2.1.14 Internal Control System

In compliance with current regulations and with a focus on planning and managing business activities aimed at efficiency, fairness, transparency, and quality, BBM S.P.A. has adopted an organizational and management model pursuant to Legislative Decree 231/2001, integrated into its management system.

To support the adoption of this Organizational and Management Model, a dedicated Supervisory Body has been established. This body continuously monitors the model's functioning and application and ensures compliance with this Code.

The Supervisory Body assists the Board of Directors in setting and updating the guidelines for the internal control system, evaluating its adequacy and effective operation in analyzing business risks, and performs additional tasks as outlined in the system.

2.2 RELATIONSHIP WITH SHAREHOLDERS

BBM S.P.A., aware of the important role played by its shareholders, is committed to providing accurate, truthful, and timely information, as well as improving the conditions for their participation in corporate decisions within their prerogatives.

The company is dedicated to protecting and enhancing the value of its activities in return for the shareholders' investments, through effective management, the pursuit of high standards in productive investments, and maintaining the solidity of its assets. Additionally, the company commits to safeguarding and preserving its resources and assets.

In particular, the company ensures the regular participation of directors in shareholders' meetings and guarantees the orderly and efficient conduct of these meetings, respecting the fundamental right of each shareholder to request clarifications on various topics under discussion and to express their opinions.

2.3 RELATION WITH PERSONNEL

BBM S.P.A. recognizes the value of human resources, respects the individuality of its workers, and acknowledges the importance of their contributions to the company's activities.

The company ensures compliance with collective labour agreements as well as social security, insurance, and welfare regulations relevant to the sector. Employment management is aimed at fostering the professional growth and skill development of each employee.

Any form of discrimination based on race, gender, nationality, religion, language, union membership, or political beliefs is strictly prohibited in hiring, compensation, promotions, or dismissals, as well as any form of favouritisms.

The exploitation of minors is strictly forbidden.

2.3.1 Workplace Safety and Protection of the Individual

The company is committed to protecting the moral and physical integrity of its employees, consultants, and clients. To this end, it promotes responsible and safe behavior and adopts all safety measures required by technological advancements to ensure a safe and healthy work environment, fully compliant with current prevention and protection regulations and in accordance with the international ISO 45001 standard, certified by the third-party body Det Norske Veritas.

BBM S.P.A. strives to ensure the necessary conditions for a collaborative, non-hostile workplace free from any discriminatory behavior based on race, religion, gender, political and union opinions, sexual orientation, age, origin, disability, or other factors unrelated to employee job performance.

The company requires everyone's cooperation to maintain a climate of respect for each person's dignity, honor, and reputation.

Any form of harassment in the workplace, including but not limited to sexual harassment, is strictly prohibited.

Other prohibited behaviors include, by way of example and not limited to, the following:

- Threats
- Violent behaviour
- Possession of weapons of any kind
- Use of recording devices, including video phones or cameras, for purposes other than those approved by the responsible managers.
- Use, distribution, sale, or possession of drugs or other narcotic substances; possession of pornographic material in any capacity.

Furthermore, employees must not remain on BBM S.P.A. premises or in any BBM S.P.A. work environment while under the influence of alcoholic beverages, drugs, or other narcotic substances.

BBM S.P.A. does not tolerate any intimidating or discriminatory behavior and will take appropriate disciplinary measures against anyone who engages in such conduct or abuses their position of authority within the company.

Employees who believe they have experienced discrimination may report the incident to the Supervisory Body.

2.3.2 Selection and Hiring of Personnel

Without prejudice to the obligations arising from current regulations, personnel selection is subject to verifying that candidates fully meet the professional profiles required by the company, while respecting equal opportunities for all applicants.

Hiring is conducted based on regular employment contracts, with no allowance for any form of employment relationship that does not comply with or circumvents applicable laws and regulations.

2.3.3 Duties of Personnel

Personnel are required to commit to respecting the obligations set forth in this Code, adhere to legal requirements in the performance of their duties, and conduct themselves according to principles of integrity, fairness, loyalty, and good faith, as also outlined in the relevant procedures of the system that are periodically distributed.

Any employee who becomes aware of or suspects a violation of this Code or of procedures established within the management system must report it to the Supervisory Body.

Managers are responsible for ensuring that no retaliation occurs against anyone who provides information about breaches of ethical standards and/or internal procedures or cooperates in related investigations.

2.3.4 Right of Personnel to Disconnect from Work

To ensure respect for rest periods and the right to disconnect, employees have the right to disconnect from technological tools used for work performance and are not required to perform any work-related activities from Monday to Friday during a continuous period of 11 hours, which includes the night-time hours between 10:00 PM and 6:00 AM the following day, as well as on Saturdays and Sundays.

2.3.5 Conflict of Interest

Personnel must maintain a position of autonomy and integrity to avoid making decisions or carrying out activities in situations, even if only apparent, that represent a conflict of interest with the company's activities.

Any activity that conflicts with the proper fulfilment of one's duties and that could harm the interests or reputation of the company must be avoided.

Any real or potential conflict of interest must be promptly reported to the Supervisory Body.

2.3.6 Company Assets and IT System

Employees must carefully use and safeguard the assets entrusted to them for work purposes. Any improper use of company-owned assets and resources is prohibited, including as specified in the company's procedures for the use of the IT system.

Each employee is directly and personally responsible for the protection and legitimate use of the assets and resources assigned to them to carry out their duties.

BBM S.P.A., in compliance with applicable laws, adopts necessary measures to prevent misuse of such assets.

Furthermore, every employee is required to make every effort to prevent the possible commission of offenses through the use of IT tools.

2.3.7 Gifts, Presents, and Other Benefits

Employees must not request, accept, or offer, either for themselves or for others, gifts or other benefits, except those consistent with normal commercial and courtesy practices, from anyone who has commercial or working relationships with the company, as established in the company's procedures.

No illicit advantages may be granted to clients or suppliers, whether public or private.

Gifts and benefits that are offered but not accepted, and that exceed a modest value, must be reported to allow the company's Supervisory Body to conduct an appropriate evaluation.

2.3.8 Protection of Confidentiality

The company protects the privacy of its employees in accordance with applicable laws, committing not to disclose or share personal data—except where legally required—without the prior consent of the individual, as also outlined in the system's procedures.

The collection, processing, and storage of such information take place within specific procedures designed to prevent unauthorized access and to ensure full compliance with privacy protection regulations.

See also the specific procedures detailed on the following pages.

2.3.9 Duty of Confidentiality

Each employee is required to maintain the confidentiality of any information acquired in the course of their duties, in accordance with applicable laws, regulations, and circumstances.

Employees must observe this duty of confidentiality even after the termination of their employment. They are also required to handle all entrusted documents with due care. See also the specific procedures outlined on the following pages.

2.3.10 Disclosure Obligations

All employees are required to promptly and confidentially report to their direct supervisor any information they become aware of in the course of their work activities regarding violations of legal regulations, the Code of Ethics, the Management System, or any other company provisions that may, in any way, involve the company.

Supervisors are responsible for monitoring the conduct of their assigned staff and must inform the Supervisory Body of any potential violations of the aforementioned rules.

Any conduct that may be considered unlawful under the topics mentioned above, in the broadest possible interpretation, must be reported through the specific procedure available on the company website (bbm.it) on the WHISTLEBLOWING page, or by using the QR code provided here and displayed on company notice boards.



2.3.11 Obligations of Collaborators

The provisions set out in the previous sections also apply to all external collaborators, consultants, agents, and representatives of the company.

2.4 RELATIONS WITH CUSTOMERS

BBM S.P.A. establishes a relationship with its Customers characterized by high professionalism and based on availability, respect, courtesy, and a commitment to providing maximum cooperation.

Customer satisfaction represents a fundamental objective for BBM S.P.A., and to this end, the company is committed to ensuring the quality of the products sold and the services provided.

BBM S.P.A. pledges to adopt a style of conduct towards Customers that is efficient, collaborative, and courteous, providing clear and transparent information that is accurate, complete, and truthful regarding the characteristics of the services and products offered. The company uses simple and understandable language and ensures equal treatment for all Customers.

2.4.1 Contracts and Communications

Contracts and communications with Customers must be clear and simple, using language as close as possible to that of the general customer base; they must comply with current regulations (including environmental and safety matters) and with the specific requirements requested by customers. The company is committed to promptly communicating, in the most appropriate way, any information regarding changes or modifications in the service provided or in the characteristics of the products sold.

2.4.2 Quality and Customer satisfaction

The company is committed to ensuring that the required quality and safety standards are met and to periodically monitoring the quality of the products and services provided to the Customer. The company strives to promote interaction with Customers by managing and promptly resolving any complaints through its system procedures. The company protects the privacy of its Customers in accordance with applicable laws, undertaking not to disclose or share their personal, financial, or consumption data, except as required by law.

2.5 RELATIONS WITH SUPPLIERS

The selection of suppliers and the purchase of goods and services of any kind must comply with the principles of competition and equality of conditions among bidders and be based on objective evaluations regarding competitiveness, quality, usefulness, and price. The supplier selection methods must comply with the procedures established by the system.

In the selection process, BBM S.P.A. adopts objective and transparent criteria in accordance with current regulations and the specific procedures provided by the system.

When selecting suppliers, the company considers their ability to ensure the implementation of adequate corporate quality systems, where required, the availability of resources and organizational structures, the supplier's adoption of a Model pursuant to Legislative Decree 231/01, and the need to comply with confidentiality obligations, all through a specific form provided by the system procedure.

Each selection procedure must be conducted respecting the widest conditions of competition, and any exception to this principle must be authorized and justified.

2.5.1 Transparency

The company's relationships with suppliers, including financial and consulting contracts, are governed by the rules set forth in this Code and regulated by internal procedures. They are also subject to constant and careful monitoring by the company, including with regard to the appropriateness of the services or goods provided in relation to the agreed consideration.

BBM S.P.A. establishes appropriate procedures to ensure maximum transparency in supplier selection and the purchase of goods and services.

2.5.2 Fairness and Diligence in Contract Performance

The company and the supplier must work to build a collaborative relationship based on mutual trust.

The supplier's fulfillment of contractual obligations must comply with the principles of fairness, integrity, diligence, and good faith, and must be carried out in accordance with applicable laws and regulations.

2.6 RELATIONS WITH PUBLIC AUTHORITIES

BBM S.P.A. pursues its objectives by working effectively with public bodies responsible for regulating and overseeing tax, accounting, administrative, and legal compliance.

In order to ensure maximum clarity in institutional relations, such interactions are conducted exclusively through representatives who have received explicit authorization from the company's governing bodies and who are not in situations of conflict of interest with the institutional representatives.

In all interactions with Institutions and Public Authorities, in any capacity, those representing BBM S.P.A. must act with the utmost transparency, clarity, and integrity.

2.7 METHODS OF IMPLEMENTATION AND CONTROL OF THE CODE OF ETHICS

Pursuant to Legislative Decree 231/2001, an Organization Model integrated with the management system has been adopted, and a Supervisory Body has been established, as shown in the organizational chart, for internal control tasked with overseeing the implementation and compliance with the Model as well as this Code.

In particular, the Supervisory Body:

Provides opinions regarding ethical issues that may arise within the scope of corporate decisions and alleged violations of the related Code of Ethics;

Oversees the periodic review of the Code of Ethics, including through the submission of adjustment proposals;

The Supervisory Body is a company organ endowed with independence, full autonomy of action and control, whose activities are characterized by professionalism and impartiality, and to which this role has been assigned by a specific resolution of the Board of Directors.

The Supervisory Body has adopted a Regulation to establish the rules governing its functioning.

The Supervisory Body has free access to data, documentation, and information useful for carrying out its duties.

Employees, collaborators, and all individuals acting on behalf of the company are required to actively cooperate in fulfilling the activities of the Supervisory Body. See also the previous point 2.3.10 regarding reporting.

2.8 DISCIPLINARY SYSTEM

Violation of the rules of the Code of Ethics by its recipients undermines the relationship of trust established with the company and may result in the imposition of disciplinary sanctions, graduated according to the severity of the violation; without prejudice to any claim for damages.

For employees, compliance with the rules of the Code of Ethics is an essential part of the contractual obligations pursuant to and for the purposes of Articles 2104, 2105, and 2106 of the Civil Code, the applicable National Collective Labor Agreement (CCNL), and individual contracts.

The sanctioning system complies with the provisions of Law No. 300 of May 20, 1970, sector-specific regulations, collective bargaining agreements, and current company policies.

The recipients of sanctions may include:

- The Chairman or members of the Board of Directors, auditors;
- Employees (executives, middle management, clerical staff, workers);
- Third-party recipients (external collaborators, consultants, partners, suppliers, etc.);
- Members of the Supervisory Body;

Disciplinary offenses are collected (either directly or indirectly) by the Supervisory Body, which, after conducting appropriate investigations to verify the infractions, will propose the application of any sanctions to the Board of Directors, which has the final decision on the sanction to be applied.

2.9 CONTINUOUS IMPROVMENT

In order to pursue continuous improvement, BBM S.P.A. has implemented a management system that ensures ongoing enhancement of the System. This is achieved through process-specific objectives that allow, by verifying their achievement or lack thereof, the measurement and review of the System itself, including the prevention of accidents and injuries.

Management has granted the System Manager the necessary authority and responsibility to ensure and verify that the integrated management system for Quality, Environment, Safety, Information Security, Energy Efficiency/Energy (energy performance improvement), and Nuclear is understood. The policies for the energy and nuclear sectors are reinforced through specific documents that are implemented and maintained, in accordance with the provisions of the management system.