



CODE OF ETHICS
Of
B.M.P. Srl

(This document along with the full Model 231 to which it is attached and in compliance with the precepts set forth in the Legislative Decree No. 231/2001 has been approved by the Chief Executive Officer on 1 December 2019)

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CODE OF ETHICS AND CODE OF CONDUCT

1. Preface (history of B.M.P. S.r.l.)

B.M.P. S.r.l. was **founded** in 1992 by Edio Marangoni as a firm specialized in sub-contracting slitting of single and double-sided adhesive tapes.

Since its establishment – as predefined in the instruments of incorporation of the investment company – B.M.P. S.r.l. has always pursued the same **objectives**: Production and marketing of single and double-sided adhesive tapes.

In order to pursue the above-mentioned commercial objective, B.M.P. S.r.l. has adopted a company investment policy focused not purely on profit but also on the protection of individual persons as center of interests, whether they are employees/co-workers or they are customers or suppliers.

B.M.P. S.r.l. bases its internal and external activity on respect for the principles established by this Code, in the belief that ethics in business management is to be pursued along with Company success: Ethics is a fundamental value.

Actually, B.M.P. S.r.l. intends to contribute to the collective well-being of the community where it operates, achieving both quantitative and qualitative improvements.

On December 1st 2019, it is with this aim in view that, with the support and approval of the Company Shareholders' meeting, the Chief Executive Officer of B.M.P. S.r.l. – along with Model 231 of which it is an integral part – has approved this Code of Ethics as a Company "Constitutional Charter" meeting the requirements of Legislative Decree 231/2001 on the administrative responsibility of entities.

Therefore, the purpose of this Code of Ethics is to give evidence and shape to the standard of conduct which had been already adopted by B.M.P. S.r.l. and which has to be followed by Corporate bodies, employees, co-workers and suppliers.

2. Scope and recipients

This Code of Ethics, adopted by B.M.P. S.r.l., is an official document laying down the principles, the rights, the duties and the responsibilities of the Company towards the "interestcarriers" (Managing bodies, employees, co-workers, suppliers, Public Service as well as partners).

Thus, it establishes and settles the rules and principles of conduct and the ethical-social values that are intended to regulate the company's conduct when carrying out its objectives. Partners, managing bodies and their members, employees, consultants and collaborators for any reason, as well as third parties that are engaged by B.M.P. S.r.l. or that entertain stable or temporary relations with it, should comply with such rules and principles.

The principles of the Code have to inspire the activity of all those who serve in B.M.P. S.r.l. while bearing in mind the importance of their roles and the complexity of functions and responsibilities vested in them for



the fulfilment of the Company purpose; Therefore they have to lead and characterize the issuing and understanding of the policies, the guidelines, the standards and the procedures adopted by the institution in question.

This Code of Ethics is a different instrument to the Organizational, Management and Control Model as per Legislative Decree 231/2001 in nature, function and content; It also constitutes an essential basis of the Organizational Model as well as an integral part of it.

In relation to the nature and function of this Code of Ethics, B.M.P. S.r.l. considers as recipients of this Code and of Model 231 as a whole: the members of the Managing body, the Chief executive officer, the staff (employed and non-employed) and all those who, directly or indirectly, permanently or temporarily, operate for B.M.P. S.r.l. or those who work toward the Company objectives, namely, the Consultants, the Agents, the Suppliers and the third parties in general.

More specifically:

- In the working relationship between B.M.P. S.r.l. and the corporate bodies or the staff:
The above-mentioned principles represent the common vision of values of B.M.P. S.r.l. staff itself and they are also the lowest common denominator, unavoidable, which has to lead the conduct of everyone.
In fact, this document is an integral part of the labour relationship.
Any infringement of a provision of this Code of Ethics shall be subjected to disciplinary sanction and, in the most serious cases, up to including termination of employment.
- In the relationship between B.M.P. S.r.l. and the other recipients (such suppliers, stakeholders, etc.):
This document forms an essential premise for establishing and continuing the professional/work relationship with B.M.P. S.r.l.

Therefore, B.M.P. S.r.l. undertakes that it will adopt procedures, rules or instructions for specifically ensuring that the values affirmed herein are reflected in the effective conduct of the company, its employees, and its co-workers, providing for specific systems of sanctions for any violations.

Moreover, given the impact of the possible consequences derivable from an infringement of the provisions, B.M.P. S.r.l. undertakes to make this Code of Ethics known to all the internal and external addressees through the activation of the appropriate communication channels.

3. Objectives, principles and values

Ethical behaviours is an essential value for B.M.P. S.r.l.

Honesty, moral integrity, transparency, reliability and responsibility are the fundamental principles of the activities run by the organization itself.

For this purpose, partners, employees, temporary workers, consultants, collaborators in any capacity, prosecutors and any other subject that deals with or acts for the Company are obliged to respect and promote the following principles:

- HONESTY;
- RELIABILITY AND INTEGRITY;
- OBJECTIVITY AND IMPARTIALITY;

- FAIRNESS AND GOOD FAITH;
- TRANSPARENCY;
- CONFIDENTIALITY.

Notably:

3.1 Honesty

Daily acting honestly, fairly, with rectitude, sincerely, according to moral principles considered universally valid, abstaining from any reprehensible action for the near future and operating in free conscience not affected from ulterior motives.

Acting in B.M.P. S.r.l. and on B.M.P. S.r.l. behalf means respecting the dignified and decorous life of every human person.

3.2 Reliability and integrity

The fairness of the functioning of the Company's corporate bodies, of the administration and decision-making bodies, of the manifestation of the members', collaborators' and employees' will, is equivalent to reliability and credibility of B.M.P. S.r.l. as a legal entity deserving credit and, at the same time, as an organization which is more effective in achieving concrete and positive results as well as social objectives.

3.3 Objectivity and impartiality

B.M.P. S.r.l. adapts its activities to the principles of objectivity and impartiality considering the fairness of the conduct as an unavoidable life principle and as an administrative and management behaviour. The company maintains a realistic approach always free of prejudice and personal understanding which may affect an objective and dispassionate appraisal of facts. It is forbidden to implement any discrimination which could affect the principles of impartiality of the company's activity. To this purpose, B.M.P. S.r.l. puts in place actions tending to implement policies to remove any situation which could be a source of discrimination.

3.4 Fairness and good faith

Internal B.M.P. S.r.l. relations, among its partners but also among its employees, its collaborators, its suppliers and stakeholders must be based on loyalty and fairness principles. The company will always act in good faith and fairness acknowledging errors in order to make amends with the maximum dedication and promptness.

B.M.P. S.r.l. commits to achieve the company's interest without causing damage to third party and, if it is the case, taking all steps necessary to avoid unpleasant consequences.

3.5 Transparency

The transparency and the publication of the data together with the company activity results are additional guarantees for proven reliability of the company regarding the pursued objectives.

3.6 Individual and company confidentiality

Each person, both as an individual and as part of a company group, has his own ethical and legal right to privacy based on the primary principle of the respect of the human beings.

For this purpose, B.M.P. S.r.l. guarantees the dignity, the fundamental rights and the freedoms of the persons in accordance with the rules set out in Legislative Decree 193/2006.



In relation to company confidentiality: the disclosure of confidential information outside the Company hampers the competitive position of the Company itself.

The recipients of this Code cannot use confidential information for purpose not related to business activities. Information and/or any other kind of news, documents or data of confidential nature, which are related to the activities and operations proper to each task or responsibility, are forbidden to be disclosed, used and communicated for other purposes without any specific authorization.

Now, in the pursuit of its objective, B.M.P. S.r.l. intends to contribute to the prosperity and growth of the communities it operates in and to this purpose:

- It acts as an active player in the community in which it participates, committing to complying and ensuring compliance in its internal and external relationships with the legal provisions of the workplaces in which it is active and with the ethical principles commonly accepted in business management: transparency, fairness and loyalty;
- It condemns the use of illegal or inappropriate conduct (towards the community, public authorities, customers, employees, investors, suppliers, competitors and stakeholders) to achieve its financial objectives, which are accomplished exclusively through excellence in terms of; quality and economic advantage of products and services, based on experience, professionalism and care.
- It creates organizational mechanisms to prevent breaches by its employees and non-employee workers of the rules and principles of transparency, propriety, and fairness, and it checks that these rules are adhered to and put into effect.
- It guarantees to the market and to the community in general a complete transparency in carrying out its activities;
- It safeguards and develops its human resources;
- It uses resources in a responsible manner, with the aim of achieving sustainable development, while respecting the environment and the rights of the future generations.

4. Conduct of business rules

This document defines the framework of how the company is doing business to prevent the creation of an environment that is favourable to committing offences generally and the offences identified by Legislative Decree 231/2001 in particular.

4.1 Conduct of business rules for “internal” relations

4.1.1 Management and development of human resources: Company bodies and employees

B.M.P. S.r.l. bases the excellence of its activities paying attention to the production and marketing of single and double-sided adhesive tapes to meet market and end-users needs. The aim is to offer an immediate response to the demands and the needs of the market in keeping with the value of fairness, courtesy and cooperation.

As previously indicated, B.M.P. S.r.l. recognizes the crucial **importance of human resources**, in the belief that the key to success in any business is the professional input of the people that work for it in a climate of fairness and mutual trust.



The activity of all staff - both as a part of the corporate body or as employee/collaborator – must be based on ethics in objectives.

In keeping with its mission and its corporate growth strategy, B.M.P. S.r.l. shall be directed towards continuous improvement of the human capital available, adopting a strengthening knowledge program addressed to the achievement of the company objectives.

4.1.2 Company bodies' duties

Chief executive officer, partners, various function/areas heads namely all the top officers must lead by example for all the employees and/or collaborators.

They have to ensure the knowledge of the laws and the resulting behaviour their employees have to adopt. Moreover, they have also to guarantee a constant and continuous awareness and a training program on general themes related to the Code of Ethics.

They have to drive all the staff to comply the Code of Ethics rules doing their utmost to promote the dissemination of its contents as well as the full understanding of its principles. The Board of Directors sets the corporate objectives according to the principles of the Code of Ethics and, in carrying out its function with due diligence and fairness, gives substance to the above-mentioned principles and values by assuming all responsibilities towards both internal and external counterparts and reinforcing trust, cohesion and group spirit. Exercising their power to control, partners ensure the respect and observance of Code of Ethics content as well as the observance of the guidelines in the exercise of their functions. Furthermore, top level subjects and subordinates should be aware of the laws and regulations set out in the Code of Ethics and in the Model 231/2001 in force in all the places and in all the fields in which B.M.P. S.r.l. operates and, of course, they have to commit themselves to respect these rules. At the same time, they must respect the general procedures adopted by the company and follow the principles of the Code of Ethics in any decision or action pertaining to the Company's management.

All business shall be carried out with care and professional precision.

Therefore, working relationships are managed with a view to:

- a) Guarantee equality of opportunities and equality of treatment both during recruiting and during work performance.

Personnel recruiting doesn't take into account racial/ethnic origin, religion, political and union opinion of the individual. Each Head of Function may examine the need for recruiting new staff and propose to his immediate superior a research aimed at selecting qualified and professional figures. This selection will take place through interview processes where the applicant's Curriculum Vitae and his/her previous work experience will be taken into consideration. For this purpose, the administrator may designate an officer who will carry on the selection process and, when identified the successful candidate, will inform the Chief Executive officer who will evaluate the proposal and will take the appropriate steps to formalize the recruitment.

- b) Promote the personal development of each employee through an adequate training program for employees and collaborators.

Implementing and ensuring that, B.M.P. S.r.l. provides his staff with continuous training and, at the same time, carries out audits and monitoring of the objectives set and achieved by the company.

4.1.3 Employees' duties

All B.M.P. S.r.l. employees must respect the laws and regulations in force in the countries in which they work and they must know, disseminate and respect the rules set out in this Code of Ethics.

Particularly, they are obliged:

- To maintain – against the company – a responsible conduct based on principles of diligence and professionalism;
- To refrain from any prohibited conduct set out in this Code: with due compliance with the law and regulations in force, they shall conform their actions and conduct to the principles, objectives and commitments provided for by this Code;
- According to their duties and functions, to inform the third parties they may come in contact with about the principles and commitments contained in this Code, requiring compliance;
- To promptly report every notice related to possible violation of the rules of this Code to their Managers.

(Diligence and good faith) Each Partner, the Chief Executive Officer, as well as each B.M.P. S.r.l. employee and collaborator shall act loyally and in good faith: meeting the obligations prescribed in the Certificate of incorporation and in his or her employment contract; performing the provisions of the current Code of Ethics; ensuring performance, functions and required tasks and bringing good ideas, activities and enthusiasm, as indispensable contribution to the harmonic and lasting development of the company.

Moreover, they must base their conduct on respect, cooperation and mutual collaboration independently of their assigned jobs and/or level of responsibility. They must be aware of and implement B.M.P. S.r.l. dispositions with regards to protection of the environment, safety and health in the workplace and safeguarding of privacy, in relation to the role covered and the level of responsibility attributed. Personnel are required to report to their Managers any violation of the rules of conduct established.

4.1.4. Safety and Health (Health – Safety – Environment)

As mentioned above, B.M.P. S.r.l. places the individual at the heart of its activities and, for this reason, no compromise on the integrity of human life can be accepted: Even if this means costs increase or new constrains for the company. The worker's safety, the protection of health and safety in the workplace and the protection of environment are principles of great cultural significance to B.M.P. S.r.l. These principles guide all the choices and decisions of the company. Prevention and removal of all the situations which may create a risk both within and outside the company are an ethical and professional duty.

Therefore, within the company, B.M.P. S.r.l. promotes the culture of safety, developing the awareness of the risks, promoting responsible conduct on the part of all collaborators and preserving, especially through preventive actions, the health and safety of workers.

In accordance with Legislative Decree 81/2008, B.M.P. S.r.l. has already completed an assessment of its workplace health and safety management system, achieving on December 19th 2014 the OHSAS Certification and, on December 2015, updating the Risk Assessment Document realized according to the standard provisions pursuant to Articles 17, 28 and 29 of Legislative Decree 81/2008 and to the preparation and update of the so-called "General procedures" which are carefully conserved and available at B.M.P. S.r.l. premises and which are an integral part of the Organizational, Management and Control Model 231/2001.



The workers' health is monitored on a constant basis through a health surveillance program carried on by the Doctor in charge.

All the workers are asked to: a) respect the provisions in force and the single dispositions taken by B.M.P. S.r.l. concerning occupational safety and hygiene in regard to the use of the collective means of protection as well as the individual protective devices with which they have been provided; b) report to the Management any relevant issue registered during the activity or any other possible dangerous circumstances of which they become aware.

In fact, with regards to the most critical individual risk areas, B.M.P. S.r.l. undertakes to:

- Stick to the mandatory rules and applicable laws related to the protection of workplace health and safety and to the protection of the environment;
- Involve actively the workers about health and safety issues in the workplace sharing with them prevention targets and organizing annual training and updating sections;
- Maintain a high level of protection of health and safety even through regular monitoring in the workplace with the aim to prevent hazardous behaviours;
- Contribute in a concrete way to respect the protection of the health, safety and environment through an ongoing improvement of processes/steps;
- Ensure compliance with the Model and current Code of Ethics rules, even through the application of sanctions to the persons involved.

4.1.5. Environmental protection

B.M.P. S.r.l. is committed to carry out its activities in full respect of the environment in which it operates. Already in 2007, in order to use clean energy produced from renewable sources with no environmental impact, B.M.P. S.r.l. signed a contract with Lifegate Energy S.p.A. Thus, the company is committed to protect the environment through the introduction of new energy-saving technologies. This is a clear expression of a real commitment to make its activities less impacting on the ecological system.

Currently, for its facility, B.M.P. S.r.l. is using 100% renewable energy.

The company has promptly adapted in the light of the environmental laws and regulations and, in particular, with regard to the provisions of Legislative Decree 152/2006 (so-called Environmental code) and ISO 14001:2004 international standard. It has adopted and approved an Environmental management Manual, issuing a specific company environmental policy. Under the existing legislation on environmental protection, B.M.P. S.r.l. undertakes to adopt on a continuous basis a global management approach of environmental aspects which allows to tackle them in a global, systematic, coherent and integrated way with a view to continuous improvement of its environmental performance. In particular, B.M.P. S.r.l. promotes the environmental planning, the sustainable use of natural resources besides an integrated approach to the waste management and energy conservation. All those who operate on B.M.P. S.r.l. behalf must act according to the applicable environmental laws and regulations.

4.1.6. Privacy protection

B.M.P. S.r.l. undertakes to ensure that all the personal acquired information relative to its employees and third parties will be properly protected, in accordance with the applicable regulations, avoiding



improper or not approved uses, for the protection of human dignity, of the image and privacy of each individual, both inside and outside the Company.

B.M.P. S.r.l. acts in compliance with the prevailing legislation on Privacy and processing of personal data and particularly of critical and legal ones by means of technical and organizational measures to preserve the confidentiality prearranging the programmatic document on the security of data, so-called "D.P.S." which is not legally required but which allows to monitor regularly the correct application of existing legislation.

The above-mentioned D.P.S. – containing the guidelines regarding the storage and security of data contained in paper or computer supports – was drawn up pursuant to Art. 34 of Legislative Decree 196/2003 and Art. 19 Annex B) of the Privacy Code and adopted on December 1st 2019.

Therefore, personal data are processed in a lawful and proper manner. Personal data are acquired and stored if are strictly needed for determined explicit and legitimate purposes. Data shall be stored for a period of time no longer than necessary for the purposes of collection.

4.1.7. Anti-money laundering: ban of money laundering, recycling, self-laundering and utilization of Money, Goods or Benefits of Unlawful Origin.

B.M.P. S.r.l. acts in full compliance with current legislation on the subject of Anti-money laundering and with the prescriptions of the competent authorities. Among its model principles, the company has the principles of maximum transparency in business transactions, and equips itself with the most suitable means to fight the phenomena of money laundering and receiving of stolen goods. B.M.P. S.r.l. undertakes to prevent its own economic-financial system being used to launder money or to finance terrorism or any other criminal activity by its customers, suppliers, employees and stakeholders the company deals with. Personnel must never carry out or be involved in activities that may mean the laundering (namely acceptance or handling) of proceeds from criminal activities in any form or way.

When performing their official duties, the Chief executive officer, the Partners, the employees and collaborators must:

- a) to verify beforehand the available information on commercial counterparts, consultants and suppliers in order to assess the respectability and legitimacy of their activities before establishing with them business relationships.
- b) to strictly observe laws, company policies and procedures and/or instructions and/or any operative or organizational provisions in any business they undertake, ensuring the full traceability of financial flows in and out and the full compliance of such operations to money laundering prevention rules.

Moreover, the employees – in particular, the entities involved in accounting issues – must not perform operations that may implicate the money laundering, such as the use, replacement, or investment of money or assets profited from criminal activities or offences related to the respect of fiscal legislation.

B.M.P. S.r.l. expressly refuses any relationship with counterparts which may be involved in any kind of criminal activity, in particularly regarding money laundering.

4.1.8. Conflict of interest

A conflict of interests exists where an individual, by virtue of its role, office or post held, acts pursuing its interests or those of third parties which are, however, incompatible with interests of the company. Therefore, when personal interests or activities condition the subject's ability to operate entirely in the interests of the company there exists a conflict of interest.

In the exercise of their functions, all B.M.P. S.r.l. personnel, employees, partners, collaborators or agent – as well as Governance bodies - must avoid any situation which may give rise to conflict of interests and must refrain from acts that might, even potentially, conflict with the interests of the company meaning any situation or relationship where, even potentially, personal interests are involved, or the interests of others in some way linked to them.

Furthermore, it should be noted that recipients are required to avoid to use the information acquired while conducting business activity for direct or indirect benefits. It is strictly forbidden to take personal advantage of business opportunities which may have come to one's attention in the course of the performance of a person's duties within B.M.P. S.r.l. They shall refrain from any activity that could, even occasional, entail a conflict of interest with B.M.P. S.r.l. or interfere with their ability to make decisions which are consistent with the objectives of the company.

The Code of Ethics recipients must avoid – and they are anyway requested to notify - all situations and/or activity that may lead to any conflict of interests or might interfere with their ability to make impartial decisions, in order to safeguard the best interest of the company. More generally, with third parties, the recipients must act in a transparent and correct manner, with explicit prohibition of resorting to illicit favouritism, collusive practices, corruption or solicitation of personal advantages for themselves or others.

In the most serious case, the proven existence of a conflict of interest may lead to the termination of work relationship or paid office and it will be reported to the bodies of the company justice for the adoption of penalties.

Even the members of the company Bodies must base their activity on the principles of correctness and integrity, refraining from acting in situations of conflict of interest within the activities carried out by them within B.M.P. S.r.l.

In the event that a member faces a conflict of interests for business reasons or for any other situation may rise, he/she is required to report immediately revoking eventually his/her mandate. In the most serious case, the failure to disclose a conflict of interest may lead to the recall of the member of the company Bodies or a liability action. For a convenient management of the company life, B.M.P. S.r.l. expects employees and partners to avoid even the simple appearance of conflict of interest.

Moreover, the members of the company Bodies are required to adopt a behaviour based on the principles of autonomy, independence and observance of the guidelines provided by the company in their relations with Public Institutions and with any private subject on behalf of B.M.P. S.r.l. The obligation of loyalty and confidentiality bind such subjects also after the termination of the relation with the Company.

4.1.9. Protection of fair competition

B.M.P. S.r.l. seeks to protect the value of fair competition by refraining from activities considered collusive or predatory.



For this purpose, the company carries on its business activity in accordance with the rules on open and fair competition as a fundamental value for the development of the market and the protection of customers and community interests. The Company and its collaborators undertake not to infringe upon the rights of third parties regarding intellectual property and to comply with rules protecting the distinguishing marks of original works or industrial products (trademarks, patents) in full compliance with applicable laws on the protection of industrial property rights.

4.2 Rules of conduct with Co-workers

As already mentioned, even while selecting collaborators and/or professional, B.M.P. S.r.l. undertakes to adopt criteria inspired by the principles of competence, transparency and fairness, professional and moral integrity of the person involved in the respect of the relationship.

As laid down in paragraph 5.1.2, the evaluation of prospective employees is made based on matching of candidate profiles and company requirements, applying the equal opportunities principle in respect of all applicants. The information requested is strictly connected to verifying the aspects foreseen by the professional profile, and respects the privacy and opinions of the candidate. Collaborators must comply with the obligations under the work contract and the Ethic Code, acting faithfully and granting the performance required; they shall report any non-compliance or failure to perform the conduct rules set out in the internal procedures. The fees and / or sums paid for any reason to those who have been appointed with a professional assignment must be properly documented and must be proportionate to the activity performed.

4.3 Rules of conduct with Third parties (Ext. collaborators: suppliers and consultants)

The professionalism and commitment of B.M.P. S.r.l. characterize the choice and the definition of the actions to be developed, of the methods which should guide the plans as well as the selection of suppliers and external collaborators (agents and consultants included) identified time-by-time to establish a complementary relationships with a specific professional expertise organizing forms of cooperation and mutually exchange and delegating to them parts of its activity.

Professional and business contributions must be based on dedication and professional rigour and must always be in line with the professionalism and liability that characterize the company, with the attention and precision required to pursue its respect and reputation.

In the exercise of its discretionary power, B.M.P. S.r.l. undertakes to identify the most reliable and suitable contractor to carry out the required services under the most favourable conditions – both in economic terms and in terms of quality -.

Suppliers and collaborators are selected according to procedures in compliance with the laws in effect from time to time and which are always characterized by the principles of transparency, competitiveness and efficiency (for example, possibly specifying the relation between the company and an agent so that he cannot shift the customer base).

The selection of suppliers and the establishment of the terms of purchase of goods and services must be made on the basis of an objective and transparent evaluation which, among other things, takes account of price and ability to supply and ensure an adequate level of service. For the company, the selection of the vendors is a key factor in ensuring also innovation, excellence in production and marketing of its products. For this purpose, the administrator or the employee responsible for corporate functions that are part of these processes must:



- To recognize to the participants in possession of necessary requirements equal opportunity for participating in selection;
- To check - including through suitable documentation - that the participants in the selection process have the means, including financial, organizational structure, capacity, knowhow, quality systems and resources that are consistent with the needs and image of the company;
- To verify compliance with laws on employment, including that which concerns child and women's labour, the safety and health of workers.

B.M.P. S.r.l. commits operating to ensure to the suppliers of products and services the compliance with the commitments undertaken, the protection and confidentiality of professional know-how, requiring to the counterparts the same fairness in managing relations.

Suppliers and external collaborators – agents, consultants and, in general, any third party acting on behalf of B.M.P. S.r.l. – undertake to comply with all laws and regulations in force in all the places where the company acts and shall have to adhere to the full contractual documentation proposed by B.M.P. S.r.l. that includes an obligation to comply with Code of Ethics, Guidelines, as well as the rules of voluntary behaviour set up and notified by the company for this purpose. These rules include the provisions of Model 231 adopted by the company and what is set out in the single sections of the Special Parts.

B.M.P. S.r.l. itself makes suppliers and external collaborators aware of the content of the Code of Ethics, of the Guidelines and of the other rules of voluntary behaviour by making available.

No relationship is started or continued, with those who do not intend to be in line with these principles. Any task entrusted to third parties to act on behalf and/or in the interests of the Company is always assigned in writing, including a specific clause to comply with the ethical and behavioural principles adopted by B.M.P. S.r.l.

The realization of the activities carried on by suppliers and collaborators whether they are called to work together with company employees or they are called to carry on their work autonomously has to comply with the procedures to safeguard the health and safety in the workplaces.

Failure to comply with the foregoing may result in termination for breach of contract.

4.4 Rules of conduct with Public Institutions and Public Service

Even if largely limited and occasional, the relationships of B.M.P. S.r.l. with state institutions and public service must be guided by the principles of fairness, impartiality, independence, correctness, honesty, professionalism and transparency as well as based on maximum collaboration. Moreover, these relations should always comply with the legal provisions, the articles of association and the provisions of the Code of Ethics.

When, for any reason, dealing with public institutions and public service:

- Administrators, employees, partners, collaborators must not seek to improperly influence the decisions of the counterparty, including the decisions of the officials that are dealing with or making decisions on behalf of the public administration.
- The Recipients of this Code must refrain from offering, including through an intermediary, money or other benefits (which may also consist in job or commercial opportunities) to the public officers involved, their relatives or to subjects in any way associated with them; from illegally requesting or setting up personal relations of favour, influence and interference aimed at influencing, directly or indirectly, the outcome of the relations.

- Only the company functions assigned to such tasks are authorized to take on commitments and manage relations, of any nature whatsoever, with the Public Administration, public officials or subjects in charge of a public service.
- It is prohibited to use contributions, financing, or other disbursements (howsoever called) granted by the State, a public body or the European Union, for purposes other than those for which they were given.
- It is severely prohibited to unjustly obtain, to the detriment of the Public Administration grants, funding, soft loans or other disbursements of the same nature, however they are called, granted or disbursed through the use or presentation of false documents or through the omission of information that must be provided.
- alter the functioning of a public computer or electronic system or intervene, without authorization or by any means, on the data, information or programs contained on a public computer or electronic system or related thereto.

It is prohibited put measures in place to procure any undue profit (licenses, permissions, relief of social charges, tax breaks or non-payment of social security contribution, etc.) for partners and/or third parties or for the company to the detriment of the public administration by means of artifices or expedients (for example: transmission of documents that are false or state untruths information). Any violations of these rules (whether actual or potential) committed by the employees or by third parties must be immediately reported by those who have received notification to the Chief executive officer.

4.5 Relations with the judicial authority, the public security forces and with authorities having inspection and control powers

The recipients of this Code of Ethics must scrupulously comply with the regulation in force in the sectors related to the respective areas of activity. Correct operation of the civil service, particularly the judicial function, is also guaranteed through the prohibition, imposed on all persons obliged to comply with this ethical code, to directly or indirectly undertake any unlawful action that may favour or damage one of the litigants during civil or criminal lawsuits or administrative proceedings.

B.M.P. S.r.l. demands the utmost helpfulness and collaboration in relation to the representatives of judicial authorities, the force of order and any public official that has powers of inspection on behalf of INPS, the Ministry of Labour, Health and Social Policies and of any other public service.

The recipients of this Code must promptly comply with all requests arising from the Institutions or competent Authorities.

It is prohibited to adopt illegal pressure (offers or promises of money or other utilities) or unlawful coercion (violence or threats) in order to persuade the person called to give statements before the court not to give statements or to give mendacious statements that can be used in criminal proceedings, when this person has the right to remain silent.

It is prohibited to destroy or alter registrations, minutes, accounts, and any other type of document (printed or electronic materials), or to lie or make false declarations to the competent authorities.

It is prohibited trying to convince with assign of professional appointments, giving or promising gifts, money or other advantages to those who perform investigations and inspections, namely to organs of the Judiciary Authority.



5. Diffusion of the Code of Ethics

B.M.P. S.r.l. undertakes to promote and ensure a suitable knowledge of this Code of Ethics.

This Code of Ethics is widely circulated among all external and internal subjects who cooperate with B.M.P. S.r.l. using specific effective and appropriate information and communication activities.

In fact, the Chief executive officer establishes:

- Its distribution to all the Governance bodies and employees;
- Its diffusion by display in a position where it can be accessed by all (and publication on the corporate web-site) in order to generate a better understanding of this Code of Ethics and a better knowledge of the principles and rules of ethics reported in it;
- Its distribution to agents, consultants and suppliers.

6. Monitoring and update

B.M.P. S.r.l. undertakes to update the contents in the event of any modifications to the context, reference standards, environment or company organization that make it appropriate or necessary. This Code will be reviewed on an annual basis to guarantee a constant updating. The Chief executive officer, recognized as competent, shall arrange changes and additions if necessary.

7. Compliance with the Code of Ethics

All corporate bodies, management and B.M.P. S.r.l. employees as well as external collaborators such as agents, consultants, suppliers and third parties in general are obliged to respect the Code of Ethics. B.M.P. S.r.l. undertakes that it will adopt procedures, rules, or instructions for specifically ensuring that the values affirmed herein are reflected in the effective conduct of the Group, its employees, and its outside workers and providing for specific systems of sanctions for any violations. Compliance with the ethical code by third parties (suppliers, consultants, etc.) completes the obligation to fulfil the duties of diligence and good faith in negotiations and in the performance of existing contracts with the company.

8. Disciplinary system

Behaves in violation of the existing rules or this Code of Ethics or procedures are considered prejudicial to the interests of B.M.P. S.r.l. and may result in the application of the sanctions referred to the Model 231, the Code being an integral part of it. Violations of this Code are serious acts such as to cause permanent damage of the reliance relation with the Company which means may lead to disciplinary actions, admonitions, suspensions and civil actions for damages.

Therefore, Failure to comply with the present Code of Ethics entails the application of disciplinary sanctions, according to the provisions of the collective labour contract, depending on the gravity and possible civil or criminal sanctions.

The application of the disciplinary system and the relative sanctions is independent of the course and outcome of legal proceedings initiated by the judicial authorities. For suppliers, collaborators and external consultants, violation of the rules contained in this Code may entail termination of existing contracts with them, on the grounds of an explicit provision in the contracts without prejudice to the right for B.M.P. S.r.l. to seek compensation for damages incurred as a result of the acts referred to above.