

# CODE OF ETHICS

## **CHAPTER 1 | INTRODUCTION**

- 1.1 What is Ethics?
- 1.2 Brema Group's Ethics
- 1.3 Brema Group Style
- 1.4 Code of Ethics Purpose
- 1.5 Addressees and disciplinary application field
- 1.6 Code of Ethics approval and distribution

## **CHAPTER 2 | GENERAL PRINCIPLES**

- 2.1 Current regulation compliance
- 2.2 Equity and equality
- 2.3 Human Rights safeguard
- 2.4 Environmental safeguard
- 2.5 Transparency and reliability
  - 2.5.1 Accounting and corporate transparency
  - 2.5.2 Communication transparency
- 2.6 Information and personal data protection and treatment
- 2.7 Regulation respect under competition field
- 2.8 Conflict of interests' absence
- 2.9 Free gifts, presents and benefits

## **CHAPTER 3 | THE RELATIONSHIPS WITH BREMA GROUP PEOPLE**

- 3.1 Recruiting and management
- 3.2 Harassment and mobbing
- 3.3 Inclusivity, parity and diversity
- 3.4 Safe and healthy workplace
- 3.5 Corporate instrument usage
- 3.6 Production of photos, videos and other multimedia contents
- 3.7 Personal use of social network

## **CHAPTER 4 | RELATIONSHIPS WITH BUSINESS PARTNERS**

- 4.1 Establishment and maintenance of commercial relationships
- 4.2 Relationships with clients
- 4.3 Relationships with suppliers

# INDEX

## CHAPTER 5 | RELATIONSHIPS WITH PUBLIC ADMINISTRATION

## CHAPTER 6 | RELATIONSHIPS WITH COMMUNITY AND INSTITUTIONS

- 6.1 Relationships with political parties and union organizations
- 6.2 Institutional relationships

## CHAPTER 7 | ACTIVITIES OF ACCOUNTING, ADMINISTRATIVE AND FINANCIAL NATURE

## CHAPTER 8 | IMPLEMENTATION, CONTROL AND VIOLATIONS OF THE CODE OF ETHICS

- 8.1 Supervisory body: duties and tasks
- 8.2 Reports
- 8.3 Sanctions



It is an honor for me to join this team and embark together on a new journey. I firmly believe that a company's success stems from open communication, mutual listening, and the ability to work side by side with trust and collaboration.

One motto that inspires me every day is “**Ubuntu**”, an ancient African word meaning “I am because we are.”

This powerful concept embodies the values of community, collaboration, and shared success.

These are the principles I want to bring to Brema Group, where we work together to build the future with a vision that goes beyond individual growth and embraces the growth of the entire team.

Teamwork is our strength: each of us has a crucial role, and only together can we achieve great goals. I want everyone to feel free to share ideas, exchange experiences, and contribute to our collective growth. I am here to listen, engage, and support each of you.

Let's build a successful future together, with energy and passion!

At the same time, I want our workplace to be a welcoming and inspiring environment, where everyone feels valued and motivated to give their best. Let's create a positive culture together, based on respect, support, and a shared drive to grow.

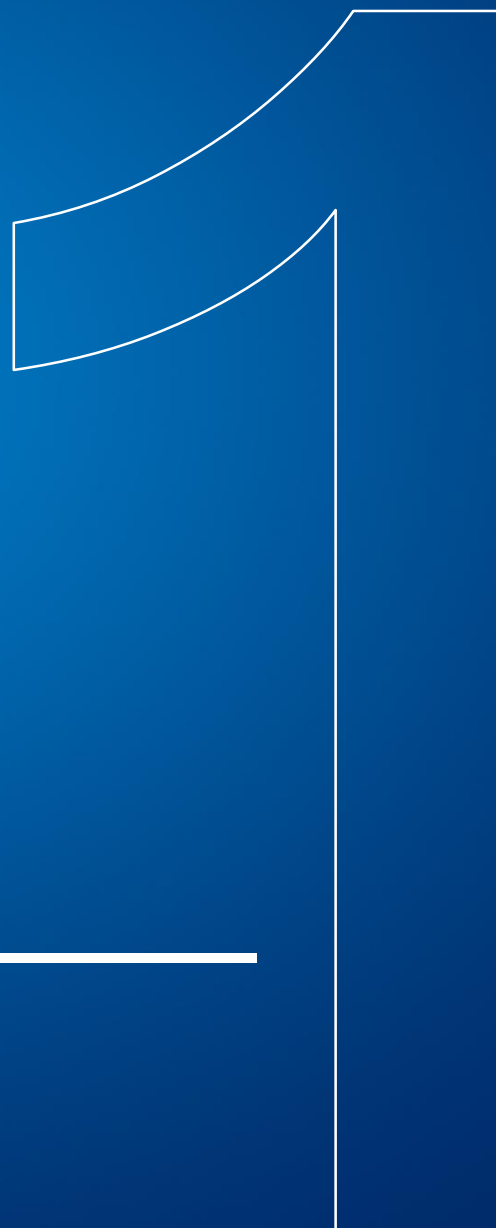
# ANDREA BERTONE

Managing Director

*“I am here to listen, to engage and support each of you.*

*Let's build a successful future together!  
**Forward, with energy and passion!**”*





## INTRODUCTION

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# 1. Introduction

## 1.1 What is Ethics?

The «**Ethics**» expresses the whole of conduct rules – both public and private – followed by a person or by a group of people. It is a word widely used in different contexts, and it indicates a reflection of rules and principles that should be followed in the day-by-day life.



So, the application field of Ethics, even if it refers to an abstract universe (made of principles and values), is anything but theoretical: refers to the everyday and traduces into behavioural rules.

Using the German philosopher Immanuel Kant words, can be defined as «ethical» the behaviour of someone who operates, not followed by fear for punishments or hope for opportunistic rewarding, but by his intellect.

*«In order to treat the humanity, in the own person as in someone else's, always together as a purpose, never as a simply mean of reaching a purpose».*

Making ice with care and passion is our mission since 1985. We think about the ice as water's evolution, drawing it in ideal shapes in order to satisfy any type of need: from the gourmet one to the most classic and appreciated by Bartender Manager (Full Ice Cube) to the most squared one, trendy and highly requested by Mixology artists (Full Square Cube), from the one shaped like a pyramid's trunk preferred by fast food (Flat Cube) to the elegantly shaped long finger that well embraces fruit juices and soft drinks (Hollow Cube), from the extremely versatile drawn small log (Nugget Ice) to the exhibitions' granular ice perfect for fresh products' presentations (Granular Ice), until arriving to under-refrigerated ice scales that last over time (Flat Scales).

## 1.2 Brema Group's Ethic

When ethics' consideration shifts from the individual's actions to a wider organizational and business field, the concept of individual responsibility and awareness inevitably bonds to the «Corporate Social Responsibility» or «Society's citizenship».

This means threatening with accuracy and respect all key interlocutors characterized by passion, energy, enthusiasm: is the spirit that is implied «in teams» and the courage of doing an extra effort in order to guarantee every day to all clients and consumers a positive experience and full of satisfaction.

## 1.3 Brema Group style

The style is awareness, it measures.

A well-balanced cocktail with good taste and precise choices, with substance's care and meticulous attention for every single detail.

Together with all of this, there is the passion of representing the Bremakers' distinctive elements.

Ours is an authentic and contagious passion, because ice evokes a multitude of emotions and memories.

A driver in our history, that creates connections and favours bonds.







## 1.4 Code of Ethics purpose

Brema Group S.p.A. (hereinafter also "Brema Group" or "Society") has contributed to the definition and adoption of the current Code of Ethics, that constitutes essential and significant part of the Organizational, Managing and Control Model pursuant to the Legislative Decree of 8th June 2001 n. 231 (hereinafter also "Decree").

The Code of Ethics resumes, without any exhaustiveness demand, the whole of values, principles and behavioural rules, that should drive the behaviour of those who, under any title, directly or indirectly, permanently or temporarily, operate in the Society's interest.

The Code of Ethics constitutes the fundamental of our action and it is an essential part of a wider vision of responsibility and commitments that we have adopted in order to actively contribute to the promotion and development of an economic, social and environmentally sustainable system.

Brema Group focuses to ethical principles included in this Code of Ethics, all actions, operations, relationships and transactions brought about in the social activities' management. It refers to basic and undeniable principles for the Society itself, that ensures – together with the respect of current regulations and useful indications aimed to prevent the commission of crimes as explained by the Decree – a behavioural code strictly oriented to promote the accuracy in all fields and with internal and external corporate relationships.



## 1.5 Addressees and disciplinary application field

Code of Ethics's addressees are:

- the administration and control social authorities' components, the employees, the partners and, however, all those who under any title acts for and under the name of Brema Group (hereinafter "**Brema Group People**");
- the suppliers, clients, contractors, consultants and, anyway, all commercial partners (hereinafter "**Business Partner**");

collectively referred to hereinafter as the "**Addressees**."

So, the addressees are requested without exception to apply and respect the Code of Ethics in all its topics.

In no circumstance the claim of acting in the Society's interest can justify the adoption of behaviours that are against the ones cited.

The adoption and application of behavioural values, principles and rules expected by the Code of Ethics are a "*condicio sine qua non*" for all mentioned subjects, to whom this document refers to.

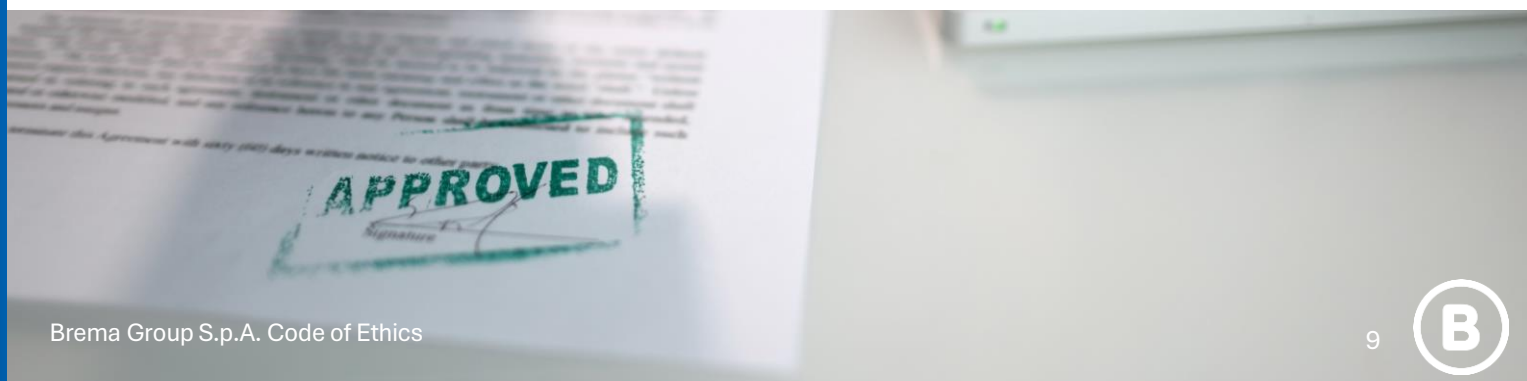
The Code of Ethics does not have a time limit validity. However, it will be object of revision and periodical updates in relation to the regulation's development and the Society's organizational changes.

So, the active contribution is fundamental, particularly to Brema Group People, who can report to the Society potential improvements or attention points.

## 1.6 Code of Ethics approval and distribution

The present document is approved by the Society's Board of Directors, expert also in the adoption of potential revisions and updates.

The Society actively operates in order to guarantee Code of Ethics acknowledgment and distribution, through the publication on the website, the distribution to all Brema Group People and to significant and ongoing Business Partner, the promotion and the planning of periodical training initiatives.



It is also forecasted:

- for what concerns Brema Group People, at the Code of Ethics delivery, they undersign a specific integrated declaration of acknowledgement and commitment, in the development of their tasks, values' respect, behavioural principles and rules in it included, with the hypothetic prevision on the consequences that the violation of this commitment can constitute;
- for what concerns Business Partner, the sending of a communication about the adoption of the Code of Ethics, indicating in the text its availability on the corporate website. In the contracts are included clauses and/or the subscription of finalized declarations aimed to obtain the Code of Ethics respect, with the hypothetic prevision on the consequences that the violation of this commitment can constitute.





## GENERAL PRINCIPLES

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## 2. General principles

### 2.1 Current regulation compliance

In Brema Group the compliance of the law is not only a requirement, but also an undeniable principle.

We operate in the complete respect of local, national and international regulations, both in Italy and in every country in which we are present.

We have adopted with belief the Organizational, Management and Control Model expected by the D.Lgs. nr. 231/2001 and we use efficient instruments aimed to prevent any type of regulations' violation.

Any behaviour in contrast with the current regulation is not only unacceptable, but it is also considered as damaging for Brema Group's reputation and integrity.

Nobody is authorized to act in violation of the law with the justification of favouring the Society. On the contrary, the legality is and will be always our first competitive advantage.

### 2.2 Equity and equality

We commit with determination to operate in the full respect of equity, equality, inclusion and parity principles.

We believe in an environment open to dialogue, where every person can feel heard, valued and respected. Our objective is to guarantee an aware balance between interests and legitimate expectations of all addressees, promoting relationships based on transparency, trust and mutual respect.

We refuse firmly any form of discrimination, in any context and under any condition. We do not tolerate differences of treatment based on ethnic or social origin, skin colour, genre, nationality, language, mental or physic disability, health status, age, marital status, pregnancy or parenthood, religious belief, political opinions or economic, social or personal conditions.

According to us, diversity is a value. Respect is a must. Inclusion is an aware and daily choice.



## 2.3 Human Rights safeguard

A person's value is in the centre of Brema Group vision.

We acknowledge human contribution, safeguard individual dignity and defend man's inviolable rights under every context and circumstance. We actively promote an environment founded on respect, on everyone's physical and moral integrity, and we commit in guaranteeing the full respect of all subjects' fundamental rights with which we build relationship.

We disapprove firmly any type of harassment, oppression or behaviour that can damage the person's freedom, serenity or dignity.

We build everyday a healthy, inclusive and collaborative workplace environment freed from discriminations and harassments, where the open dialogue, mutual respect and diversity appreciation represent our corporate culture pillars.

We are certain that only through dedication, trust and team spirit can be reached the operational excellence.

We reject firmly forced, mandatory or under-age labour and refuse any type of direct or indirect work relationship with Business Partner that carries out exploitation activities.

Our responsibility does not limit itself to our corporate area but extends to all the supply chain.

## 2.4 Environmental safeguard

Brema Group considers the environmental safeguard as a key factor that should be promoted in the generic approach of corporate activities.

We actively commit in reducing the environmental impact of our activities: valuing natural resources and promoting initiatives aimed to guarantee environmental safeguard, waste restraint and production and resources' consumption.

Our environmental sustainability strategy is under an ongoing evolution.

We invest in the development and technology of innovative and sustainable solutions, we commit in ecosystem and biodiversity safeguard, in the hydro-resources and all natural resources sustainable management.

We inspire our activity to international guidelines and general principles of environmental management, committing in producing and selling products in line with the highest standards in terms of safety and environmental performance.

Moreover, we contribute to lead the industrial change in the chemical substance management under an open and collaborative way, with the purpose of protecting consumers, workers and environment.



## 2.5 Transparency and reliability

Transparency and reliability represent two of Brema Group's fundamental principles. The transparency principle imposes information communication's truthfulness, accuracy, completeness and verifiability, both outside and inside of the Society. The management of social activities and addressees' relationships are built on criteria of accuracy, coherence and loyalty.

### 2.5.1 Accounting and corporate transparency

Under the transparency principle's respect, every action relating to the Society's management must be correctly and promptly represented in the transparent, true, accurate, complete and verifiable information reported in the accounting. Consequently, every operation and transaction must be correctly carried out, registered, authorized, verifiable, legitimate, coherent and adequate. Each action and/or operation must have a specific registration that reflects exactly the supporting documentation's results and answers to regulations' criteria and applicable accounting principles.

Brema Group's financial and accounting information must not be object of incomplete, wrong or fraudulent treatment, but be redacted in an exhaustive and clear way made available for potential changes.

Brema Group actively refuses and opposes every type of money laundering, auto-money laundering and possession of stolen goods. In order to guarantee the highest level of transparency and correctness in financial transactions, the Society verifies carefully clients' and commercial partners identity, so that are built only relationship with trustworthy partners, whose activities is in line with the law, and with which means have a legitimate origin.





### **2.5.2 Communication transparency**

All communications must occur in line with transparency, truthfulness, coherence and objectiveness principles, blocking with any means and instrument the diffusion of fake and/or trendy information and comments.

Brema Group acknowledges the significant role of mass media and commits in collaborating with all information authority, without discrimination, respecting informative regulations and mutual roles. The relationships with mass media are exclusively reserved to duly authorized functions.

## **2.6 Information and personal data protection and treatment**

Personal data protection is our absolute priority.

We commit with extreme seriousness and responsibility to treat information in line with the current regulation, specifically the UE Regulation 2016/679 (GDPR) and the D. Lgs. n. 196 del 30th June 2003.

We safeguard Brema Group People and Business Partner's privacy with whom we collaborate, collecting exclusively the strictly necessary information and using them only for clear, licit and proportionated finalities.

We have implemented a structured and updated Privacy Management System, that includes strict procedures, precise controls and dedicated training courses. All of these is to guarantee the highest level of safety standards, under the regulation's respect, and to ensure the best level of privacy rights to interested people.

The commitment and information's treatment are managed under the full respect of transparency, accuracy, privacy and lawfulness principles, with the prohibition of:

- using reserved information for purposes not connected with the exercise of own activities and/or not authorized purposes;
- allow, by any means, to let have access to them by unknown or people not explicitly authorized;
- making known, by any means, reserved information.

## **2.7 Regulation respect under competition field**

Under the awareness that a healthy and correct competition system contributes to the ongoing improvement, development and creation of a loyal competitive market, we observe the regulation according to competition and we abstain from implementing or incentive illicit contracts and vexatious behaviours that can imply form of disloyal competition.

The competition with our competitors must be constantly inspired by accuracy, loyal competition and transparency principles.

In no way, the following of Brema Group's interest can justify a conduct that is not compliant with regulations in competition field.

Every action that can change the condition of correct competition is absolutely against the Society's policy.

## **2.8 Conflict of interests' absence**

Anyone who operates for or under the name of Brema Group is requested to act with integrity, transparency and sense of responsibility.

With a stricter view, it is forbidden to create situations that can generate, even if hypothetically, conflict of interests.

For conflict of interest is intended any circumstance in which an individual follows personal goals, or anyway different from the Society's ones, otherwise brings about actions that can compromise its ability of taking impartial decisions, free and under the exclusive interest of the Society itself.

## **2.9 Free gifts, presents and benefits**

We refuse bribery as an instrument for conducting affairs.

It is not permitted under any circumstance corrupt or even try to corrupt electoral public title holders, public officials or people in charge of public services, as well as privates.

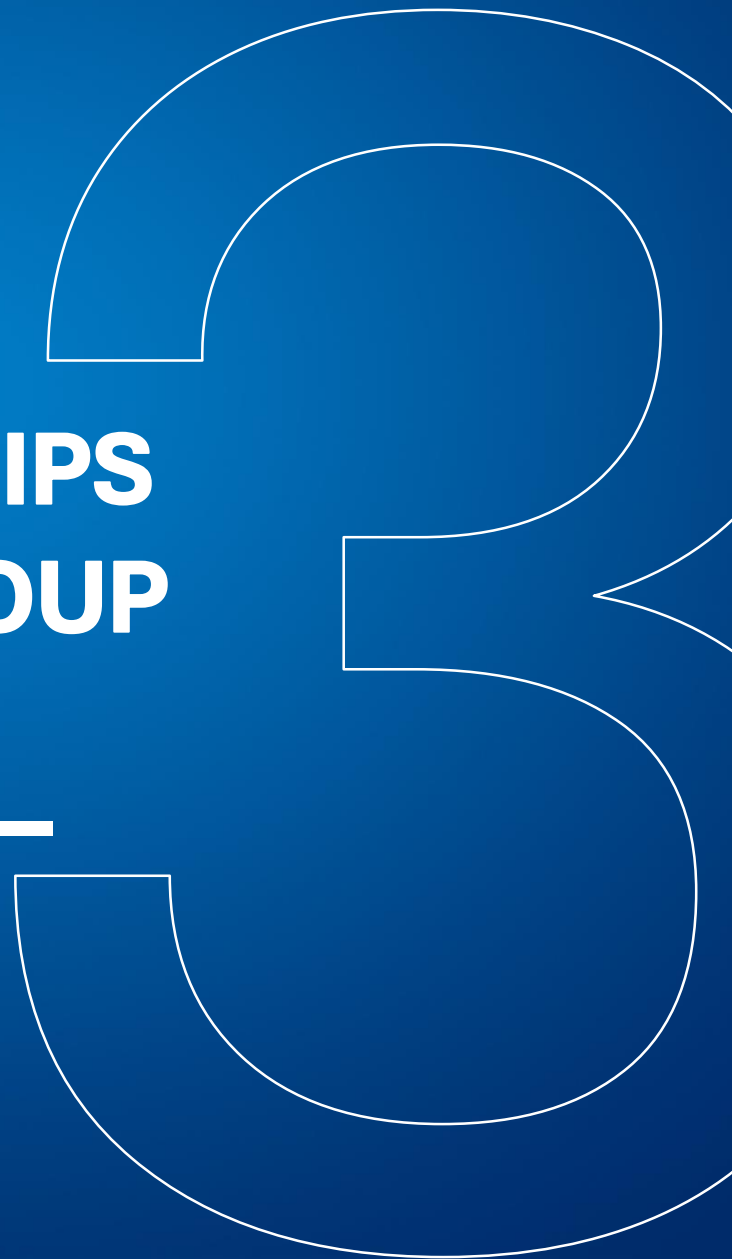
Particularly, no one can offer, promise or give money or other advantages to obtain for Brema Group or for its own, illicit performances or request money or other advantage to carry out, under other's favour, not requested performances.

It is not allowed any type of offer, promise of money or goods, or any type of future benefits to/from third parties that can be understood, even indirectly, as excess of normal manifestation of courtesy allowed in commercial practice, or however focused on obtaining favourable treatment when conducting affairs.



## THE RELATIONSHIPS WITH BREMA GROUP PEOPLE

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## **3. The relationships with Brema Group people**

### **3.1 Recruiting and management**

In Brema Group we firmly believe that people are the heart of our organization: an essential resource of the Society's existence, growth and success.

For this we value talents, competences and aspirations, creating an environment in which everyone can express fully their own potential and contribute actively to reach corporate objectives.

Thanks to our People's effort, passion and professionalism we can offer high quality services and generate a durable value. For us a strategic priority is favouring human resources' growth, development and well-being.

We promote an inclusive, welcoming and meritocratic corporate culture, where each employee feels acknowledged, valued and put in condition of having equal access and developing opportunities.

In the recruiting process, we adopt criteria based on objectiveness, competence and respect of equal opportunities, under the full respect of current regulation.

The work relationship is established exclusively through contracts that are standard and compliant with the law, excluding any type of elusive or not compliant relation. Salaries, compensations, growth path are founded on credit, on professional competences and individual effort.

At the company's entry, to every person is given clear and detailed information regarding the role, the tasks to be carried out, the compensation level provided in the applicable CCNL, as well as rules and procedures that must be followed in order to operate with safety and to safeguard its own health on the workplace.

### **3.2 Harassment and mobbing**

We believe that people are a fundamental element for Brema Group success. In fact, we guarantee a workplace free from any type of discrimination or abuse of power, in which there is mutual respect and support.

We establish work relationships characterized by accuracy, equality, no-discrimination and attention for the person's dignity. The communication occurs in an appropriate and respectful way, since we refuse any behaviour that implies physic or psychological violence, constraint, harassment, bullying or mobbing related attitude.

We consider unacceptable and forbidden any attitude or behaviour that can generate fear in the other person or even create discomfort since hypothetically can be considered as a verbal, physic or psychological harassment.



### **3.3 Inclusivity, parity and diversity**

We encourage an inclusive culture able to favour the expression of individual's potential, valuing it as strategic lever for reaching organizational objectives. We firmly refuse any type of prejudice and do not tolerate discriminatory behaviours that refers to ethnic or social origin, skin colour, genre, nationality, language, religion, mental or physic limitation, sexual orientation, health status, age, marital status, pregnancy or parenthood situation, the belonging to union or political believes, in so far as it is based on democratic principles and disagreement respect.

We respect diversity and consider it as an additional value. We promote and guarantee genre parity and equal opportunities.

In order to value Brema Group's people, we work hard to promote unicity and dignity ensuring working well-being, increasing personal self-esteem, resilience ability and creation of a satisfying workplace. Under the respect of contractual regulations, we offer professional development possibilities, based on abilities, potentiality and professional qualifications without discrimination and/or favouritisms, ensuring an equal treatment founded on individual competences and abilities.

### **3.4 Safe and healthy workplace**

In Brema Group, safety and health in the workplace are essential and unnegotiable values.

We guarantee a safe workplace, compliant with highest national and international standards, applying strictly current regulation and industry's best practice. We constantly monitor the respect of the cited standards, promoting a solid culture of risks prevention and awareness and health safeguard.

We believe that safety is a shared responsibility and a daily commitment. For this reason, we actively invest in educational and informative moments, programmed to strengthen individual's safety, common well-being and the distribution of healthy and sustainable lifestyles.

Moreover, we have defined procedures relating to specific activities that are more relevant when considering safety, in order to manage them with attention and reduce any potential risk for our People.



### 3.5 Corporate instrument usage

Brema Group's People are requested to manage with sense of responsibility corporate goods, considering as fundamental resources that should be safeguarded and valued.

All goods made available must be used with diligence, in an adequate way and in line with Society's interests, avoiding any type of abuse or inappropriate use, also from third parties.

It is strictly forbidden the use of corporate instruments for personal interest or for ones outside the working activity, as well as for purposes against the law, public order and public morality.

Particularly, the use of technologic instruments (that are personal computer, laptop, corporate network, Internet connection, mailbox, removable supports and any other corporate technology) must occur in the full respect of adopted policies and procedures' rules, which define in a precise way use modality and relating responsibilities.



## 3.6 Production of photos, videos and other multimedia contents

It is forbidden to produce and share photos, videos and other multimedia contents that relates to Brema Group People or other subjects that find themselves within corporate areas.

Except for photos, videos and other multimedia contents produced during events organized by the Society and for which the Society itself gives the authorization for publishing.



## 3.7 Personal use of social network

Brema Group People when using personal social network are requested to follow a conduct in line with the Society's values and to adopt all adequate cautions so that the Society's image or reputation is in no way damaged.

It is forbidden to share, through any way including the use of personal social network, reserved information obtained in the field of the own function or related to working activity, services, projects and documents not yet made public or anyway reserved.



## **RELATIONSHIPS WITH BUSINESS PARTNERS**

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## 4. Relationship with Business Partner

### 4.1 Establishment and maintenance of commercial relationships

In line with corporate strategies and objectives, Brema Group establishes commercial relationships aimed to safeguard ethic, social and environmental responsibility, favouring durable commercial relations based on trust and transparency.

Business Partner's selection processes are founded on criteria of competence, high quality services, trustworthy, potential validations, competitiveness, but also on sustainability requirements, intended on a general level. Internal procedures provide verification systems aimed to identify potential reputation risks and/or corruption with Business Partner.

It is forbidden to start or maintain business relationships or even partnership with any subject who, based on public and/or available information, is involved in activities considered as illicit with particular interest for those related to crimes included into the D.lgs. nr. 231/2001.





## 4.2 Relationships with clients

Our clients' satisfaction is for us an undeniable value and the starting point of our actions. We operate with accuracy, transparency and respect, making us at clients' service in order to comprehend needs and offer real, timely and quality answers.

Our relationships with clients are based on the active listening, availability, courtesy and high professionalism, in the full awareness that every interaction means an opportunity to create trust and strengthen durable relations.

We constantly commit in guaranteeing excellence standards in the sold services, monitoring in a systematic way the perceived quality, bettering ourselves constantly and overcoming expectations.

We categorically refuse any type of misleading, aggressive or wrong practice, both in advertising activities and in commercial communications, ensuring that each message is clear, coherent and accurate.

We maintain our clients' trust through a transparent and ethic dialogue and oriented to mutual value creation.

## 4.3 Relationships with suppliers

Brema Group pursues a responsible supply, oriented to the best balance between quality, price and sustainability.

The objective is not only to obtain products, materials, pieces and services under the most favourable conditions, but doing it in the fully respect of the ethical values that drives us: human rights, workplace safety and environmental safeguard.

In suppliers' relationships, we inspire to undeniable principles of legality, accuracy, transparency, loyalty and equal treatment, establishing professional relationships focused on mutual trust and durable partnership.

Every purchasing process is conducted with impartiality, diligence, efficiency and competence, always ensuring the respect of current regulation and internal procedures. The acknowledged value of purchased goods and services must be coherent with market conditions, guaranteeing transparency and traceability in every negotiation phase and contract execution.





## RELATIONSHIPS WITH PUBLIC ADMINISTRATION

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## 5. Relationships with Public Administration

Relationships with subjects qualified as Public Officials or Public Service Representatives must be carried out in the full respect of laws, of current regulations and of the Code of Ethics, ensuring a behaviour inspired by correctness, integrity, legality and transparency principles.

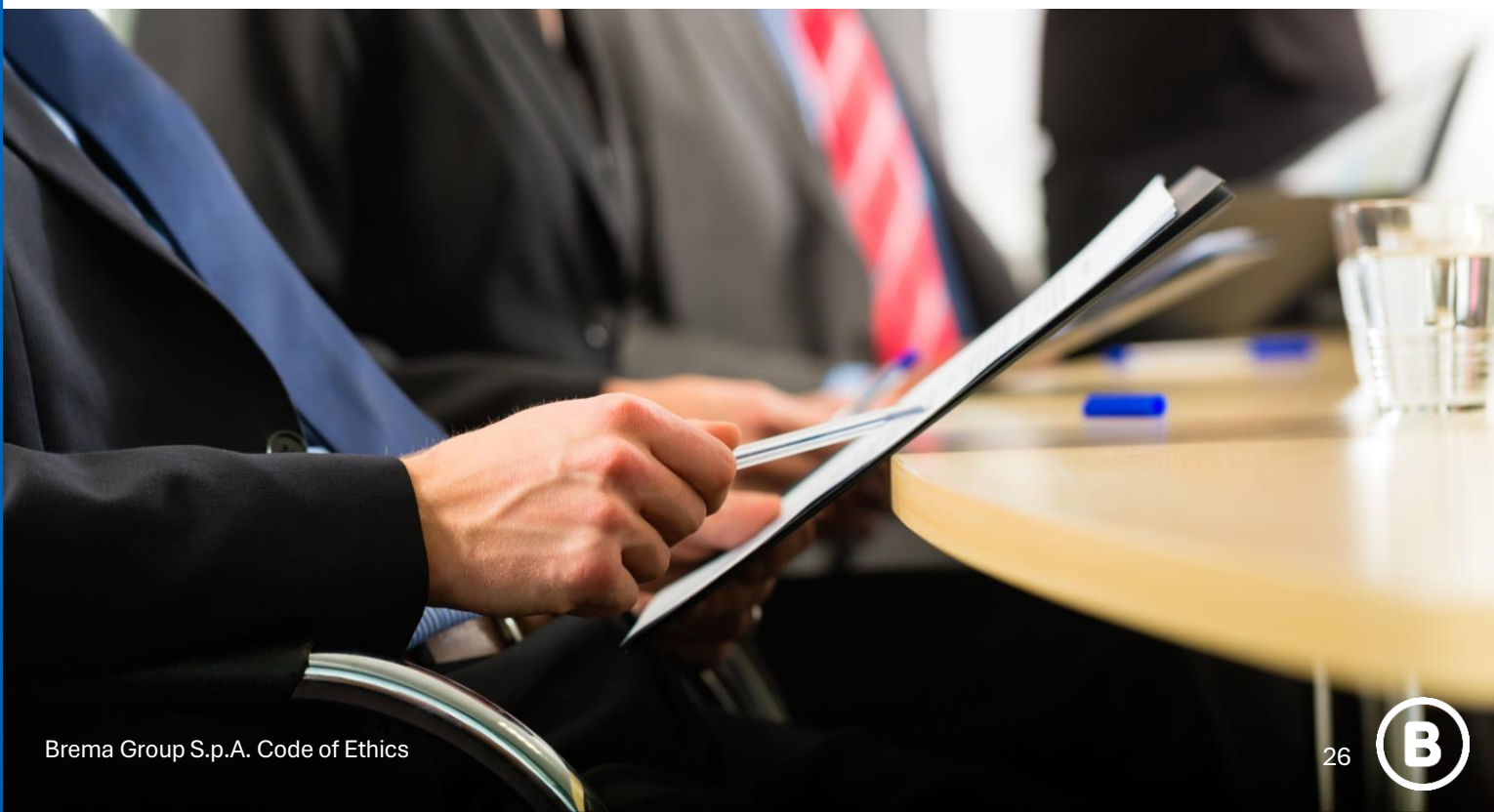
The tasks' assumption and relationship management, of any nature, with these subjects, are reserved exclusively to corporate functions for these appointed and authorized.

Particularly, it is forbidden in relationships with Public Administration, with Public Officials and Public Service Representatives as well as other subjects representing common interests and physical person who represents them, to:

- address compensations, subsidies, public loans for purposes different from the ones for which they were requested and obtained;
- provide fake information or omit communicating relevant events;
- give, offer or promise, even indirectly, any benefit (for example, money, goods, services, performances, gifts, favours, even in terms of job opportunities) in order to influence decisions, in the view of a more favourable treatment or illicit performance or for any other goal.

In the event of investigations, inspections, or requests from Public Administration, the Company commits to promptly providing the requested data and information, ensuring completeness, accuracy and full cooperation and transparency.

Statements made to individuals qualified as Public Officials or Persons in Charge of Public Services must be entirely truthful, complete and based on valid documentation, to guarantee proper evaluation by the relevant Public Administration.





## **RELATIONSHIPS WITH COMMUNITY AND INSTITUTIONS**

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## 6. Relationships with Community and Institution

### 6.1 Relationships with political parties and union organizations

Brema Group maintains a position of absolute independency in relation to any internal or external political influence.

We neither do not support or participate to any event or initiative that has exclusively, or even partially, political purposes.

Every corporate decision is driven exclusively by the Society's and of its stakeholders' interests and by ethical values that differentiate us, without any political interference or influence.

Our neutrality is an impartiality, transparency and coherence warranty, principles on which are founded our credibility and our daily behaviour.

### 6.2 Institutional relationships

Every relationship with local public institutions, both national and international, can be attributed to administrative and commercial activities and are oriented to transparency, accuracy and clarity criteria.

For this purpose, contracts with institutional interlocutors must occur exclusively through the Board of Directors, so the subjects by this authority identified.





## **ACTIVITIES OF ACCOUNTING, ADMINISTRATIVE AND FINANCIAL NATURE**

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## 7. Activities of accounting, administrative and financial nature

All subject under any title, even ones that are mere services suppliers, that are involved in economic and financial activities, contributing to balance sheet's items and to all documents to it directly or indirectly related, must provide full collaboration in order to clarify specific aspects, given potential explanation in order to ensure the clarity of given information about carried out commercial or financial operations, as well as data accuracy and their processing.

So, it is forbidden to display items in accounting or administrative documents not corresponding to reality, even if it is object of subsequent activities of evaluation and control.

It is also forbidden to omit information or modify data through a direct or indirect violation of regulation principles and internal procedures' rules, in order to mislead the addressees of the above cited documents or even only not permitting a transparent, precise and clear interpretation.

Moreover, in official or public communications is forbidden to indicate or state events that do not correspond to the truth relating to economic, patrimonial or financial situation of the Society or modifying/hiding them.







## **IMPLEMENTATION, CONTROL AND VIOLATIONS OF THE CODE OF ETHICS**

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# 8. Implementation, Control and violations of the Code of Ethics

## 8.1 Supervisory body: duties and tasks

The task of supervise on the Code of Ethics's functioning and observance is entrusted to the Supervisory Body by the Board of Directors, provided by independent controlling and initiative power and adequate instruments in order to verify and supervise on the adequacy and effective implementation.

Specifically, the Supervisory Body is entitled to:

- promote at expert corporate structures an adequate educational process for employees through adequate initiatives in order to spread knowledge and comprehension of the Code of Ethics;
- monitor and evaluate over time the Code of Ethics's validity, promoting, also through a prior consultancy of the interested corporate structures, all necessary actions to ensure its effectiveness;
- supervise on the Code of Ethics's effective implementation and detect behavioural changes that potentially can arise from received reports;
- communicate potential of Code of Ethics violations to expert authorities, in order to adopt potential sanctioning measures.

The Supervisory Body is composed of individuals selected exclusively on the basis of professionalism, integrity, competence, independence and functional autonomy.

## 8.2 Reports

With the purpose if guaranteeing the Code of Ethics's effective application, Brema Group requests to anyone who learns about events or circumstances potentially against the Code of Ethics's values, principles and behavioural rules of communicate them to the Supervisory Body.

Brema Group People can report using the platform available in the "Whistleblowing" section in Brema Group's website, where is moreover available the procedure that regulates the internal reporting managing modalities and the warranties present to safeguard the whistleblower.

Even other Addressees can report events and circumstances potentially against to the Code of Ethics's values, principles and behavioural rules of which they learned about thanks to relationships with the Society using, by their own choice, one of the following ways:

- through e-mail, to the e-mail address [odv@bremaicegroup.it](mailto:odv@bremaicegroup.it), whose access is only allowed to Supervisory Body's components;
- through postal service in a closed envelope addressed to the Supervisory Body, with the address of the headquarters in Villa Cortese (VA), 20035, Via Dell'Industria n. 10.

## 8.3 Sanctions

The violation of values, principles, behavioural rules included into the Code of Ethics is incisively prosecuted by Brema Group, timely and instantly, through adequate and proportionated measures, independently from the potential legal importance of these behaviours and, in those cases that are considered as crime, the starting of a lawsuit.

The observance of Code of Ethics's values, principles and behavioural rules from:

- Board of Directors' component and Statutory Auditors constitute a fundamental duty of their task. The violation will implicate the adoption of related measures on the violation's seriousness or recidivity and to the fault's degree, up to the suspension of the mandate for just cause;
- the employed personnel constitute a fundamental part of the contractual duties assumed pursuant to the law and to the common and individual contract. The violation implicates a non-fulfilment of duties deriving from the working relationship, with consequent application of disciplinary sanctions imposed by the C.C.N.L.. Sanctions will be related to the responsibility's level, potential existence of disciplinary records on employee's charge, behaviour wilfulness, as well as its seriousness, with this is intended the Society's risk level at which it can be exposed followed by a hidden conduct;
- subjects related to the Society by a contractual relationship different from the employee work, constitutes essential part of the assumed contractual duties. The violation will determine, in hypothesis of greater seriousness, the relationship's resolution in line with the contracts' clauses;
- business Partner constitutes fundamental part of assumed contractual duties. The violation will determine, in hypothesis of greater seriousness, the relationship's resolution in line with the contracts' clauses.

In any case, the right for Brema Group to request damages' refund is not affected.







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Brema Group S.p.A. subject to the management and coordination of Hoshizaki Corporation