



Code of Ethics and Business Conduct

The Code of Ethics and Business Conduct (hereafter "coc") is intended to engage the company Bellandi S.p.A. (hereinafter "the Organization"), its managers, and all its employees and collaborators to act with honesty and integrity, by this CoC.

Field of application of the CoC

The CoC applies to all employees and collaborators who perform functions for or on behalf of the Organization, whether or not they are direct employees of the Organization.

Anti-bribery and anti-corruption policy

It is illegal to offer, promise, pay, claim, or receive a bribe or other debt benefit, directly or indirectly. A bribe can include donating money or anything of value to influence another person's actions. It also covers payments or regulates them as a reward for the improper actions of another person.

It is prohibited to pay or receive any sum of money and/or any valuables from a Government Official or anyone in the private sector where this is to obtain or maintain business or other commercial advantage for the Organization.

Facilitation payments are a type of bribe. It is illegal to pay or receive any amount of money and/or any valuables to/from a government official where this is to obtain or maintain business or other business benefits for the Organization.

Books, registers, accounting, and internal control

The Organization's business records must be accurate and reliable. All business documents, including cost statements, financial statements, operational and production reports, auditor reports, and reports to government agencies, must be prepared with diligence and honesty.

No false or misleading entries shall be entered into the records of the Organization for any reason. Compliance with generally accepted accounting principles and established internal controls is always required.

All payments must be supported by an invoice and a contract or order containing sufficient details to reflect the services that have been performed and must be recorded accurately, in a timely manner, and with reasonable details. False, misleading, incomplete, inaccurate, or artificial entries in the books, records, and accounts of the Company are strictly prohibited.





Politics for the whistle-blowing

The Organization is committed to the highest standards of transparency, probity, and accountability. An important aspect of accountability and transparency is a mechanism that allows staff and other members of the organization to express their concerns / reports / complaints / suggestions in a responsible and effective manner.

Based on this, this "Whistleblowing Policy" sets out how to report an unlawful act or omission that constitutes, or may constitute, a violation of laws and regulations, the values and principles set out in the Company's CoC, and/or that could cause any type of damage (e.g. economic, environmental, worker or third party safety, or merely reputational) to the Organization, its customers, partners, third parties.

This Policy is the reference document for the Company, subject to any specific local laws on the matter that conflict with it.

This Policy is addressed to members of corporate bodies, employees, and collaborators.

The Addressees who discover or otherwise become aware of possible unlawful behavior or irregularities, must immediately report the acts, events, and circumstances they consider, in good faith and on reasonable grounds, have led to the abovementioned infringements.

This policy encourages people to put their name in any disclosure they make, but reports can be made anonymously. In any case, the reports shall be detailed and documented in order to provide useful and appropriate information to effectively verify the validity of the reported events.

Reports should be reported to Roberto Oliva who is responsible for the reception and analysis of the reports.

The Organization guarantees the confidentiality of the report and the information contained therein, as well as the anonymity of the reporting agent or sender, even if the report subsequently proves incorrect or unfounded. No threat, retaliation, sanction, or discrimination against the signaller shall be tolerated.

The Organization ensures that the personal data of whistleblowers and any other parties involved in the management of reports (including any sensitive data) will be processed in full compliance with current legislation on the protection of personal data. Only data strictly necessary for the verification of the validity of the report and its management will be processed.

Management of personal data

The Organization undertakes to process personal data in such a way as to fulfil its obligations regarding the guarantee and protection of the fundamental rights and freedoms of natural persons, in particular the right to privacy, family life, and private life, with regard to the processing of personal data.





The Organization has taken appropriate technical and organizational measures to protect personal data against destruction, loss, alteration, disclosure, unauthorized access, or any other form of unlawful processing.

Sanction system

Any behaviour that does not comply with the provisions of this CoC entails, independently and regardless of any legal action against the offender, the application of disciplinary sanctions under current legislation and/ or employment contract.

Date	Stamp and signature of the authorized representative
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31/03/2022	A handwritten signature in black ink is written over a horizontal line. Below the signature is a stamp that includes the Bellandi logo and the word "Bellandi" in a bold, sans-serif font.

