



CODE OF ETHICS

APPROVED BY THE BOARD OF DIRECTORS
ON 21 DECEMBER 2023

BICASA S.R.L.
REGISTERED OFFICE:
VIALE DELLE INDUSTRIE, 33
20881 BERNAREGGIO MB

CODE OF ETHICS

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1. FOREWORD

1.1 Purpose and Structure

The Code of Ethics (hereinafter also: "Code") is the official document adopted by BICASA S.R.L (hereinafter the "Company") containing the set of principles it undertakes to respect and enforce. The Code of Ethics is, therefore, the company's deontological instrument for formalising the principles and standards of conduct in the Company, creating the conditions for the correct application of specific policies and procedures.

The Code is also one of the elements prepared by the Company to ensure the effective prevention, detection and contrast of infringements of the laws and regulations applicable to its activities.

This further confirms the Company's commitment to constantly update its management, organisation and control model, so as to adequately and effectively prevent conduct which is unlawful or not in good faith, that could adversely affect its image. The Code of Ethics, therefore, sets out to prevent, forestall or ban any acts or behaviour which, although not yet criminally relevant, is manifestly at variance with the company's ethical guidelines.

The Code consists of a series of rules of conduct and principles which the intended recipients must abide by in their dealings with a series of (public and private) interlocutors.

The Code has been approved by the Board of Directors and is an official Company document.

The Code of Ethics is divided into three sections:

1. **Values:** sets out the principles guiding company behaviour and decisions
2. **Principles:** defines the conduct to be adopted in relation to significant areas of activity and areas of responsibility, with reference to the Company's main stakeholders
3. **Methods of implementation, control and sanctions:** identifies the persons responsible for the Code of Ethics; defines the application of the principles and rules; identifies the control body; defines the system of sanctions; defines the communication of the Code itself.

1.2 Scope

The rules of the Code of Ethics constitute an integral and essential part of employees' contractual obligations.

The Company assesses any conduct contrary to the principles enshrined in the Code of Ethics from a disciplinary point of view, pursuant to the laws in force, applying, in the exercise of its entrepreneurial power, the sanctions that the seriousness of the facts in question may justify.

1.3 Intended Recipients

Company business is inspired, in addition to mandatory compliance with the law, by the principles contained in this Code and it shall be free not to undertake or continue any relationship with persons who prove not to comply with its contents or infringe the principles and rules herein.

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The Company therefore intends to share its principles with all its interlocutors, with whom it pursues relations so as to achieve its mission. These include Collaborators in the broad sense, the Public Administration, Customers, Suppliers of Goods and Services, the Market, Political and Trade Union Organisations, and Information Bodies.

In particular, Collaborators in the broad sense, as defined below, must act to best represent the Company's style of conduct. They must therefore set an example in implementing the contents of the Code and are responsible for ensuring that the ethical-behavioural provisions and company operating procedures are adopted with reference to these principles.

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2. VALUES

The Company's "mission" is to be a leader on the Italian and international market in the design, production and sale of technical furnishings for laboratories. Particular attention is dedicated not only to the economic result, but also to aspects of safety, quality, image, reliability and fairness and, more generally, to the satisfaction of its customers and ethical, social and environmental aspects.

In order to establish and maintain a relationship of trust between the Company and its stakeholders, both internal (shareholders, management, employees) and external (current and potential customers and suppliers, lenders, creditors, public institutions and the community), ethics is of the utmost importance as a means and value to guide the behaviour of company bodies, management, employees and external collaborators, above and beyond the company rules and procedures.

The Company, as an active and responsible member of the community in which it operates:

- complies with and enforces the laws in force in the countries where it operates as well as the commonly accepted ethical principles according to international standards, in the conduct of its business: transparency, fairness and loyalty;
- eschews and stigmatises illegitimate or otherwise improper conduct (towards the community, public authorities, customers, workers, investors, suppliers and competitors) to achieve its economic objectives, which are pursued exclusively through excellence of performance in terms of quality and value for money of its products and services, based on experience, customer care and continuous innovation;
- adopts organisational tools designed to prevent the violation of legal provisions and implements principles of transparency, fairness and loyalty by its employees and collaborators, monitoring compliance with the same and the practical implementation thereof;
- ensures total transparency of its actions towards the market, investors and the community in general, while safeguarding competitiveness;
- undertakes to promote fair competition, which it considers functional to its own interest as well as to that of all market operators;
- pursues excellence and competitiveness in the market, offering its customers quality products and services that efficiently meet their needs;
- is aware of the strategic nature of the products and services provided for the well-being and growth of the communities where it operates;
- protects and valorises the human resources it avails of;
- employs resources responsibly, aiming at sustainable development, respecting the environment and the rights of future generations.

This Code of Ethics, therefore, is part of a more general project aimed at strengthening the ethical identity of the Company, clarifying the values it wants all its people to comply with in their conduct.

The Company therefore intends to ensure that its employees, persons in top positions and all those acting on behalf of the Company do not commit offences that may not only discredit its

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image, but also lead to the application of pecuniary sanctions and bans, in the event that such offences are committed to the advantage of or in the interest of the Company.

It is with this proposition that the Company today intends to reaffirm with great force that **fairness** and **lawfulness** in work and business constitute and will always constitute an essential **value** of this Company.

3. PRINCIPLES OF CONDUCT

This section sets out the main rules of conduct, broken down for each category of intended recipient.

3.1 Collaborators in the broad sense

Collaborators in the broad sense are:

- those who perform, even de facto, management, administration or control functions within the Company (Directors, Executives, etc.);
- employees, classified according to the regulations and/or provisions of the relevant National Collective Labour Agreements;
- anyone who, by virtue of a mandate, other contractual collaboration, assignment of tasks or powers and/or other agreements, acts in the name of and/or on behalf of and/or in the interests of the Company.

3.1.1 Fair and Transparent Conduct

The Company requires all its Collaborators to behave correctly and transparently in the performance of their duties, respecting the principles set out in this Code so as to promote communication and cooperation to the utmost. Specifically, this conduct must be adopted with regard to any request made by shareholders, any other company bodies in charge of the legal control of accounts and internal control, as well as the auditing firm, in the exercise of their respective official functions.

In compliance with their specific remits, during audits and inspections by the competent public authorities, Collaborators must adopt an attitude of maximum helpfulness and cooperation without obstructing in any way the functions of the inspection and control bodies.

3.1.2 Compliance with Laws and Protection of Resources

The Company's core principle is to comply with the *laws and regulations* in force in all the countries in which it operates.

The Company safeguards health and safety in the workplace and considers respect for the rights of its Collaborators to be fundamental in carrying out its business. Employment relations are managed so as to guarantee equal opportunities and promote the professional growth of each individual.

Each Collaborator shall do his/her utmost to always be fully aware, for the area within his/her remit, of the rights and obligations of the Company arising from laws, contracts or relations

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with the Public Administration and shall not engage in any behaviour that may harm, in any way, the Company's interests.

To this end, each Collaborator shall be responsible for safeguarding, preserving and defending the Company's assets and resources entrusted to him/her within the scope of his/her activity and shall use them correctly and in compliance with the Company's interest, preventing any improper use thereof.

3.1.3 Finance, Administration and Control

In preparing accounting documents and data, in reports or in other company communications required by law and addressed to shareholders and the public or to the auditing firm performing the audit, as well as in any record pertaining to administration, Collaborators shall comply with the strictest principles of transparency, fairness and truthfulness.

In particular, all Collaborators called on to draft the above documents shall be required to verify, each for the part within his/her remit, the correctness of the data and information to be used subsequently to draw up the aforesaid documents.

The procurement and disbursement of financial resources, as well as administration and control thereof, must always comply with the Company's approval and authorisation procedures.

Each accounting entry must reflect exactly what is described in the supporting documentation and this must be complete and open to verification.

3.1.4 Conflict of Interest

The Company respects the private sphere of its Collaborators, including with regard to their personal activities in the economic and commercial world, provided that these activities do not conflict with the interests of the Company and with the obligations undertaken and arising from the type of collaboration in place. Situations of potential incompatibility and prejudice must be duly communicated for appropriate assessment.

3.1.5 Gifts and Benefits

Acts of commercial courtesy, such as gifts or forms of hospitality may be offered and received, if and when they are of modest value, and in any case such that they cannot be interpreted, by an impartial observer, as aimed at obtaining an advantage, even non-economic, contrary to mandatory provisions of the law, regulations and the principles of this Code.

Gifts and benefits (money, objects, services, favours or other utilities) not directly attributable to normal courteous relations may not be offered (or received), directly or indirectly, from third parties, private individuals or representatives of the Public Administration.

In particular, Collaborators are required not to make, i.e. to refuse payments that may lead to unlawful conduct in violation of laws, regulations and the principles of this Code.

3.1.6 Training and Professional Growth

The Company shall contribute to the training and professional growth of its Collaborators by offering them, periodically, opportunities for sharing and discussing their respective work

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experiences, and other training interventions, so as to promote their growth and allow them to develop their professional skills.

Each employee must aim to create a working environment that is always stimulating and gratifying and that therefore promotes the application of the principles of this Code.

3.1.7 Company Objectives

The Company undertakes to ensure that, in its organisation, any annual pre-set objectives, both general and individual, of Collaborators are focused on a possible, specific, concrete, measurable result and related to the time foreseen for its achievement.

3.1.8 Impartiality

The Company condemns any discriminatory behaviour by its Collaborators.

Selection, hiring, placement, training, remuneration and professional growth activities are exclusively based on objective considerations of the professional and personal characteristics needed to perform the job to be done and the skills demonstrated in the performance thereof, so as to exclude any form of discrimination on the basis of race, religion, country of origin, physical handicap, age or gender.

Information requested at the selection stage is strictly related to verification of the aspects envisaged by the professional and psycho-aptitude profile, while respecting the candidate's privacy and opinions.

3.2 Public Administration

3.2.1 Legality, Fairness and Transparency in relations with the Public Administration

The Company's conduct is inspired by compliance with the principles of legality, fairness and transparency, so as not to induce the Public Administration to violate the principles of impartiality and sound performance to which it is bound.

3.2.2 Gifts and Benefits

The Company condemns any conduct, by anyone, consisting of promising or offering, directly or indirectly, gifts and benefits (money, objects, services, favours or other utilities) to Italian or foreign public officials and/or persons in charge of public services, or their relatives, from which an undue or illicit interest and/or advantage may be gained. Such conduct is considered an act of corruption, by whomsoever put in place.

Specifically, it is prohibited to promise and/or offer any gratuity and/or benefit so as to:

- obtain more favourable treatment in any relationship with the Italian or foreign Public Administration;
- induce public officials/public service employees, whether Italian or foreign, to use their influence on other persons belonging to the Italian or foreign Public Administration.

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3.2.3 Business Negotiations

During a business negotiation, request or commercial relation with public officials and/or persons in charge of a public service, whether Italian or foreign, the following actions are prohibited, both directly and indirectly:

- engaging in conduct aimed at unlawfully influencing the decisions of public officials or persons in charge of a public service, in order to obtain an undue or unlawful profit or advantage for the Company;
- proposing, in any way whatsoever, employment and/or business opportunities that may benefit public officials and/or public service appointees or their relatives and the like;
- offering gifts, unless of modest value;
- soliciting or obtaining confidential information that may compromise the integrity or reputation of either party;
- performing any other act aimed at inducing public officials, whether Italian or foreign, to do or omit to do something in violation of the laws governing them;
- abusing a position or power to induce or force someone to unduly promise money or other benefits to the person in question or others.

3.2.4 Collaboration and Business Relations

It is permitted to engage in or entertain business relations (economic and/or financial) with employees or former employees of the Italian or foreign Public Administration, or their relatives and the like, who in recent years have personally and actively participated in business negotiations or endorsed requests made by the Company to the Italian or foreign Public Administration, only if such relations are explicitly brought to the attention of the Company's Board of Directors and assessed by it both in the recruitment phase and in the definition of business relations.

3.2.5 Financing, Contributions and Subsidies

It is forbidden to allocate for purposes other than those for which they may have been granted, contributions, subsidies or financing obtained from States or other public bodies or from the European Community or other supranational bodies, even of modest value and/or amount.

The Company condemns any conduct aimed at obtaining, from the State, the European Community or any other national or foreign public body, any type of contribution, financing, subsidised loan or other disbursement of the same type, by means of declarations and/or documents altered or falsified to such purpose, or by means of omitted information or, more generally, by means of artifices or deception, including those carried out by means of a computer or telematic system, aimed at misleading the disbursing body.

The persons entrusted with functions or tasks shall pay greater attention to any confidential information they may become acquainted with, as well as to the scrupulous filing and reporting of any document or process they execute and/or transmit to the Public Administration and to public bodies in general.

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3.2.6 Conflict of Interest

The Company may not be represented in relations with the Public Administration, whether Italian or foreign, by persons who may be in any situation of conflict of interest.

3.2.7 Computer System

The Company condemns any conduct consisting in altering the operation of a computer or telematic system or in gaining unauthorised access to the data, information or programmes contained therein, aimed at procuring the Company an unfair profit to the detriment of the State or Italian or foreign public body.

3.3 Customers

The Company's Customers are all the subjects, public and private, who purchase the services and goods offered by the same.

3.3.1 Quality, Performance and Reliability

The Company's success is based above all on its ability to satisfy the needs of its Customers, maintaining high levels of quality, performance and reliability. To this end, it is a priority for the Company to accurately identify Customers' needs.

3.3.2 Confidentiality of Information

The Company provides accurate and exhaustive information about the products and services offered, so that the Customer can make informed decisions.

The Company keeps confidential information concerning its Customers, both with regard to their strategic information and personal data, strictly reserved, and uses such information only for strictly professional reasons, requesting explicit authorisation.

Customers are also required to ensure confidentiality with regard to information, documents and personal data concerning the Company and its Collaborators.

3.3.3 Gifts and Benefits

It is absolutely forbidden to offer (or receive) from Customers, directly or indirectly, gifts and/or benefits (money, objects, services, favours or other utilities) such as to be interpreted by an impartial observer as aimed at obtaining an advantage, even non-economic, contrary to mandatory law, regulations and the principles of this Code.

Acts of commercial courtesy, such as gifts or forms of hospitality, are permitted if and when they are of modest value and in any case such as not to compromise the integrity or reputation of one of the parties.

3.4 Suppliers of Goods and Services

The Company's Suppliers are the companies supplying goods and providing services.

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3.4.1 Evaluation Criteria

Considering the fundamental role played by Suppliers, the Company's selection process is carried out according to principles of fairness, cost-effectiveness, quality and legality, based on objective assessments aimed at protecting the Company's commercial and industrial interests and, in any case, at creating greater value for it.

The Supplier's adherence to this Code, as well as its compliance with the regulations in force, including as regards the management of relations with the Public Administration, is a necessary condition for initiating or continuing the negotiation relationship.

3.4.2 Lawfulness and Fairness in Negotiations

The Company establishes contracts with its Suppliers in a legal, correct, complete and transparent manner, trying to foresee the circumstances that could significantly affect the relationship established.

3.4.3 Confidentiality of Information

The Company undertakes to keep information concerning its Suppliers entirely confidential and to use such information only for strictly professional reasons and in any case following written authorisation.

Suppliers are also required to ensure confidentiality with regard to information, documents and personal data concerning the Company.

3.4.4 Gifts and Benefits

The Company forbids the receipt (or offer) of gifts and/or benefits (money, objects, services, favours or other utilities) from potential or actual Suppliers, such as to determine unlawful conduct or, in any case, such as to be interpreted by an impartial observer, as aimed at obtaining an advantage, including non-economic, contrary to mandatory law, regulations and the principles of this Code.

Acts of commercial courtesy are permitted if and when they are of modest value and in any case such as not to compromise the integrity or reputation of one of the parties.

The remuneration to be paid to Suppliers shall be exclusively commensurate with the service specified in the contract and payments may not be made to a party other than the contracting party, nor in a country other than that of the contracting parties.

3.5 Other Interlocutors

In addition to the interlocutors already considered, the Company has relations with other parties or entities for which it has defined rules of conduct.

3.5.1 Market

The Company is in favour of guaranteeing maximum competitiveness on the market and, therefore, its commercial policy is developed in full compliance with all competition laws and regulations in force at the time.

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3.5.2 Political and Trade Union Organisations

Relations with political organisations and trade unions are normally restricted to the company departments authorised to establish and manage such relations based on the assigned corporate tasks and the provisions of the service orders and procedures in force at the time.

3.5.3 Information Bodies

Information pertaining to the Company and addressed to the mass media may only be disclosed by the company departments authorised to such purpose, in compliance with the procedures in force. Collaborators, if requested to provide information or to give interviews, shall notify the competent department and receive a specific and prior authorisation. In any case, the external communication of data or information shall be truthful, transparent and such as to homogeneously reflect the image and strategies adopted by the Company, favouring consensus on company policies.

4. PRINCIPLES OF THE ORGANISATION

4.1 Clarity and Truth in every Operation and Transaction

Every operation and/or transaction, understood in the broadest sense of the term, must be legitimate, authorised, consistent, congruous, documented, recorded and verifiable at any time.

Collaborators are required to comply with the company operating procedures and protocols envisaged to safeguard the formation and implementation of company decisions.

The procedures that regulate operations must allow for the possibility of carrying out controls on the characteristics of the transaction, on the reasons for allowing its execution, on the authorisations to carry it out and on its execution.

Any person carrying out operations and/or transactions involving sums of money, goods or other economically assessable utilities belonging to the Company, must act upon specific authorisation and provide, on request, valid evidence for verification thereof at any time.

Each Collaborator is responsible for the truthfulness, authenticity and originality of the documentation and information rendered in the performance of the activity for which he/she is responsible.

4.2 Purchases of Goods and Services

Collaborators purchasing goods and/or services, including external consultancies, must always act in compliance with the principles of fairness, cost-effectiveness, quality and lawfulness, operating according to the principle of "good housekeeping".

4.3 Staff Selection and Evaluation

The selection and assessment of personnel to be recruited are carried out based on how the candidate profiles match specific skills, with respect to what is expected and to the company's needs, as resulting from the request made by the applicant department and always in compliance with equal opportunities for all the persons concerned.

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The information requested is strictly related to verification of the aspects envisaged by the professional and psycho-aptitude profile, while respecting the candidate's privacy and opinions.

The Personnel Manager, within the limits of the information available, adopts appropriate measures to avoid favouritism, nepotism or forms of influence peddling in the selection and recruitment stages.

As regards personnel assessment, the Company undertakes to ensure that, in its corporate organisation, annual pre-set objectives, both general and individual, are focused on a possible, specific, concrete, measurable result and related to the time foreseen for its achievement.

Possible situations of difficulty or conflict with the aforementioned principle must be promptly reported to the Board of Directors, so that it may take rapid corrective action.

4.4 Collection and Payment methods

Collections and payments must be made, where possible, preferably through bank remittances and/or bank cheques. Receipts and payments made in cash must always be documented.

4.5 Occupational Health and Safety Management

The management of health and safety at work is an integral part of the Company's general policy and is expressed in the pursuit of the following main objectives:

- progressively reduce the overall occupational health and safety risks, including those arising from accidents, injuries and work-related illnesses, minimising the dangers to which employees or third parties (customers, suppliers, visitors, etc.) may be exposed;
- increase the efficiency and performance of the Company;
- contribute to improving health and safety levels at work;
- improve the Company's internal and external image.

The Company implements a series of activities that are integrated in an ISO 45001-certified Occupational Health and Safety Management System, which ensures the fulfilment of all the legal obligations pursuant to Art. 30 of Legislative Decree no. 81 of 9 April 2008, 'Implementation of Article 1 of Law no. 123 of 3 August 2007 on the protection of health and safety in the workplace' and which can be described as follows:

- adoption of an occupational health and safety policy, defining the general commitments for risk prevention and the gradual improvement of health and safety, issued by the Employer in collaboration with the Prevention and Protection Service Manager (PPSM) and the Workers' Safety Manager;
- identification of the applicable legal requirements and regulations, by the dedicated structure, in particular with regard to the acquisition and maintenance of equipment and facilities, the cleaning and care of workplaces and the possible use of chemical, physical and biological agents;
- identification of all hazards and assessment of related risks for workers, including special cases, associated with processes, operational and organisational activities both in-house

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and at external sites, hazardous substances and preparations, etc., as per the Risk Assessment Document prepared by the PPSM;

- identification of all hazards and assessment of the relative risks for self-employed workers and contractors, as per the Single Document for the Assessment of Risks from Interference (DUVRI) prepared by the PPSM;
- identification, by the Employer and the dedicated structure, of specific objectives that are appropriate, achievable and congruent with the general commitments defined in the policy and the related programmes, procedures and resources for the achievement thereof;
- awareness-raising of the entire company organisation to achieve the set objectives, through scheduled meetings, training and information, with internal and also external personnel;
- drafting and dissemination of procedures for emergency management, fire prevention and first aid, with the organisation of related periodic drills;
- implementation of appropriate monitoring, verification and inspection activities of the procedures adopted and work instructions, and possible corrective and preventive actions;
- provision of appropriate health monitoring, by means of an appropriate contract with a duly authorised external structure and appointment of the company doctor;
- provision to workers of personal protective equipment (PPE), which may be recognised as necessary for carrying out activities.

Responsibility in the management of health and safety at work and the application of all related procedures and requirements concern the entire company organisation, from the Employer down to each individual Collaborator, each according to his or her duties and remit. All Collaborators must therefore necessarily comply with the safety procedures adopted by the Company and the required work instructions.

5. PRINCIPLES RELATING TO COMPANY OFFENCES

- The Company condemns any conduct aimed at altering the correctness and truthfulness of the data and information contained in financial statements, reports or other corporate communications required by law and addressed to shareholders, the public and the auditing firm.
- All persons called upon to prepare the above documents are required to verify, with due diligence, the correctness of the data and information that will subsequently be incorporated for their preparation.
- Accounting-administrative procedures must be adopted such as to ensure easy and immediate checking with regard to: compliance with the "Accounting Principles" issued by the Commissions of the National Councils of Certified Public Accountants and Bookkeepers, as well as with the international accounting standards; compliance, by the persons delegated to specific functions, with the contents of their own delegations of powers and/or powers of attorney.
- The bodies in charge of preparing the financial statements and company communications shall comply in their activities with the procedures envisaged by the model, basing their

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actions on the principles of fairness and good faith, i.e. acting with due diligence. They must also avoid situations of conflict of interest, even if only potential, in performing the functions delegated to them.

- The Company requires that the Administrative Body, executives, collaborators and employees behave correctly and transparently in the performance of their duties, especially in relation to any request made by shareholders, other company bodies and the auditing firm in the performance of their respective official functions.
- It is forbidden to engage in any conduct aimed at causing damage to the integrity of the company's assets.
- It is forbidden to perform any act, simulated or fraudulent, aimed at influencing the wishes of the members of the shareholders' meeting in order to obtain an irregular majority and/or a different resolution.
- All phases related to the shareholders' meeting, such as the convocation and filing of any document deemed suitable for the adoption of resolutions by the shareholders, must be scrupulously controlled.
- Anyone who is aware of impediments to compliance with the principles referred to herein, even if referring to extraneous third parties, must notify the competent bodies, vested with the necessary powers to carry out appropriate investigations.
- It is forbidden to spread false information both inside and outside the Company, concerning the Company itself, its employees, collaborators and third parties working for it.
- Collaborators and employees are required to keep the information and documents acquired in the performance of their duties confidential and not to use them for their own benefit.
- Persons entrusted with the transmission of documents and information, on the occasion of audits and inspections by the competent Authorities, must behave in good faith and fairly, being required to perform their duties with the diligence of an agent. They must also maintain an attitude of utmost helpfulness and cooperation towards the inspection and control bodies.
- It is forbidden to obstruct in any way the functions of the public supervisory authorities that come into contact with the Company in relation to their institutional functions.

6. PRINCIPLES RELATING TO MARKET ABUSE

It is expressly forbidden for all those who have become aware of privileged information, learnt by virtue of their position within the Company, to use it to gain a personal advantage or to have it used by third parties.

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7. METHODS OF IMPLEMENTATION, CONTROL AND SANCTIONS

7.1 The Control Body

The body appointed to supervise the application of the Code is the Board of Directors, which appropriately coordinates with the competent bodies and departments for the correct implementation and adequate control of the principles of the Code.

The company bodies and their members, employees, consultants, collaborators and third parties acting on behalf of the Company are required to provide the utmost cooperation in facilitating the performance of the functions of the Control Body.

7.2 Disciplinary System

Compliance with the rules of the Code must be considered an essential part of the Company's contractual obligations.

Failure to comply with the principles contained in this Code may result in the application of sanctions.

7.3 Awareness and Application

This Code of Ethics is brought to the attention of all the intended recipients.

Any doubts concerning the application of this Code must be promptly discussed with the Board of Directors.

All those who collaborate with the Company, without distinction or exception, in Italy or abroad, are committed to having the principles of this Code observed. In no way may acting for the benefit of the Company justify adopting behaviour in contrast with legislation and these principles.

In particular, all intended recipients are required to ensure that these rules are properly applied.

7.4 Internal Reporting

Anyone who becomes aware of violations of the principles of this Code and/or the operating procedures that make up the Model, or of other events that may alter its scope and effectiveness, shall promptly report them to the Board of Directors.

7.5 Conflict with the Code

Should even one of the provisions of this Code of Ethics conflict with provisions set forth in internal regulations or procedures, the Code shall prevail over any of these provisions, without prejudice to legal provisions and obligations.

7.6 Amendments to the Code

Any amendments and/or additions to this Code shall be made in the same manner as that adopted for its initial approval.

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8. DECLARATION OF ACKNOWLEDGEMENT

I, the undersigned, declare that I have received and read my personal copy of this Code of Ethics of BICASA S.R.L. with registered office in Viale delle Industrie, 33 - 20881 Bernareggio MB, approved by the Company's Board of Directors.

I, the undersigned, further declare that I have understood, accepted and intend to comply with the principles and ethical rules contained in this Code.

Lastly, I, the undersigned, declare that I shall comply with the principles expressed in this Code, acknowledging the responsibilities related to the violation of such rules.

Date

Signature
