

CODE OF ETHICS AND CONDUCT

1. Purpose of the Code of Ethics

Bellino srl is a company operating in the mechanical industry sector specializing in the manufacturing of valves and precision machining.

The Company, with the firm intention of ensuring maximum correctness and transparency in the management of its activities and to protect its image and reputation, has drawn up this Code of Ethics which clearly defines the set of shared values and rules and principles of conduct which shape the Company's relationships with its staff and third parties and which characterise the performance of the Company's activities.

The Code of Ethics is a useful tool for preserving the values and integrity of the Company over time. It is a set of positive principles and rules of conduct that the Company has chosen to adopt in the management and execution of its activities and to protect its image and reputation, as well as to increase the sense of social responsibility in its corporate bodies, its employees, its collaborators and consultants in relations with third parties. All those who work in and for the Company must comply with the principles and rules of conduct set out in the Code, taking into account the importance of the roles, the complexity of the functions and the responsibilities entrusted to them for the pursuit of the Company's purposes.

Knowing the Code of Ethics is, therefore, a duty, just as it is a duty to apply it.

The reputation, good functioning and reliability of the Company are the result of the attention of each and every one, together.

This Code, an essential element in the prevention of the crimes provided for by Legislative Decree no. 231 of 8 June 2001, while providing a wide range of guidelines in reference to the standards of integrity and conduct of activities, is not to be considered a substitute for the responsibility and commitment of each individual to operate in compliance with the law, with diligence, correctness, loyalty and good faith, in the context of work activities carried out on behalf of and in the interest of the Company.

The Code represents, in fact, a guide and support to pursue the Company's *mission in the most effective manner*.

The Company's human resources, at every level of functional responsibility, as well as third-party collaborators (where contractually required to do so), are therefore required to scrupulously respect and enforce the norms and rules of conduct contained in this Code.

The Code of Ethics and Conduct, also prepared pursuant to and for the purposes of Legislative Decree 231/2001, forms an integral part of the Company's Organization and Management Model, and aims to characterize operations, behaviors and the way of working with correctness, fairness, integrity, loyalty and rigour both in internal relations within the Company and in relations with external parties, placing compliance with company procedures at the center of attention.

The Company carefully monitors compliance with the Code of Ethics, providing adequate information, prevention and control tools and ensuring the transparency of operations and behaviors implemented, intervening, if necessary, with corrective actions and adequate sanctions.

ART. 2 Recipients of the Code of Ethics

The provisions of this Code apply, without exception, to the corporate bodies, the Sole Director, the General Manager, employees, collaborators and consultants, as well as to all those who, directly or indirectly, permanently or temporarily, establish with the same, in any capacity, relationships and relations of collaboration, however named, or operate in its interest. These subjects will be defined below as the "Recipients".

ART. 3 Functions assigned

The Sole Director, in order to give concrete implementation to the application of this Code, has delegated to the General Manager the task of supervising compliance with the Code by all parties involved and allows all personnel to elect their own representative within the social responsibility system.

ART. 4 General principles of conduct

Compliance with the law, regulations and corporate provisions, ethical integrity and correctness are a constant commitment and duty of all those who operate within the organizational structure of the Company. All actions, operations and negotiations carried out and, in general, the behaviors exhibited in the performance of work activities, are inspired by the utmost correctness, completeness and transparency of information, legitimacy in terms of form and substance and clarity and truthfulness of accounting documents in accordance with current regulations and internal procedures. All activities of the Company must be carried out with commitment and professional rigor, with the duty to provide professional contributions adequate to the functions and responsibilities assigned and to act in a way that protects the image, prestige and reputation of the Company. Anyone who operates within the organizational structure of the Company, without distinctions or exceptions, must conform their actions and behaviors to the principles and contents of the Code of Ethics within the scope of their functions and responsibilities, in the awareness that compliance with the Code is an essential part of the quality of work and professional performance. Relationships between all those who operate at every level in the Company must be based on criteria and behaviors of honesty, fairness, collaboration, loyalty and mutual respect. In no way can the belief of acting to the advantage or in the interest of the Company justify, even in part, the adoption of behaviors that conflict with the principles and contents of the Code. Corrupt practices, illegitimate favors, collusive behaviors, solicitations, directly and/or through third parties, of personal and career advantages for oneself or for others, are prohibited without exception. The Company takes care to adequately inform third parties about the commitments and obligations imposed by the Code, requiring them to comply with the principles that directly concern their activity and adopts appropriate internal and, if within its jurisdiction, external initiatives in the event of non-compliance by third parties.

In particular, all Recipients of this Code must comply with the following basic rules of conduct.

- **Legality:**

Each Recipient of this Code, within the scope of his/her role and activities, operates in compliance with the law, as well as in compliance with internal rules, guaranteeing the confidentiality and correctness of his/her actions. The Company prohibits the use of any means contrary to the law to achieve corporate objectives and

bases its activity on strict compliance with the law, both in relations with its own employees and with third parties, such as collaborators, consultants, agents, partners, customers and suppliers, and in relations with public bodies.

▪ **Transparency**

The Company is committed to providing interested parties with complete, transparent, comprehensible and accurate information. Transparency is the basis of fair relationships, so that anyone is able to make informed decisions, knowing the facts and interests involved. In bilateral relationships, transparency is pursued by stipulating clear and comprehensible contracts between the parties.

▪ **Responsibility and collaboration**

Each employee and collaborator carries out their work activity and duties with diligence, efficiency and correctness, assuming all responsibilities connected to them and using the work tools and time at their disposal in the best and coherent way. All Recipients of the Code are obliged not to carry out activities, even occasional ones, that may generate, even potentially, conflicts with the interests of the Company. In particular, all Recipients are required to:

- Avoid situations in which personal interests may generate conflicts of interest with those of Bellino srl;
- Not to pursue, in the performance of one's work activities, personal interests in conflict with those of Bellino srl;
- Not to use, for your own benefit or for the benefit of third parties, directly or indirectly, business opportunities intended for Bellino srl;
- Do not deal with business in competition with Bellino srl;
- Operate in relations with third parties in compliance with the law, the rules of conduct of this Code, and internal rules and procedures;
- Do not accept donations, favors or benefits of any kind, with the exception of gifts and acts of commercial courtesy of modest value provided they are not aimed at improperly acquiring advantages;
- Do not make donations of money or goods, with the exception of gifts and acts of commercial courtesy of modest value;
- Operate in relations with third parties in compliance with the law, the rules of conduct of this Code, the regulations and internal company procedures;
- Do not use information obtained during the performance of your business functions to directly or indirectly acquire advantages and avoid any improper or unauthorized use;
- Do not engage in behaviors that could benefit competing companies.

In case of doubts about the conduct to adopt, each recipient is required to contact his/her facility manager.

▪ **Confidentiality**

Each employee and collaborator undertakes to ensure maximum confidentiality regarding news and information constituting the company assets and inherent to the activity of Bellino srl, including orders, investments, projects, customers and suppliers, in compliance with the provisions of the law, current regulations and internal procedures. Furthermore, also in compliance with the legislation protecting privacy, the Recipients of the Code of Ethics must undertake to protect the information generated or acquired and to avoid any improper or unauthorized use.

▪ **Respect for the person**

Bellino srl ensures and guarantees respect for the physical and cultural integrity of the person, not tolerating requests or threats aimed at inducing people to act against the Law and/or company regulations and procedures, or to adopt behaviors that are harmful to the moral and personal beliefs and preferences of each individual. Bellino srl undertakes to avoid any discrimination based on age, sex, sexuality, health status, race, nationality, political opinions, religious beliefs.

Bellino srl ensures full gender equality in the performance of company activities. To this end, the acquisition of gender equality certification is underway.

Bellino srl pays particular attention to the inclusion of people with disabilities. Any form of discrimination against employees with disabilities will be severely punished by the Company.

Relationships between employees, regardless of levels of responsibility, are conducted with loyalty, fairness and respect, without prejudice to the roles and different corporate functions. Each organizational unit manager is required to exercise the functions and activities related to his or her corporate position with objectivity and balance, taking care of the professional growth of his or her collaborators and the improvement of working conditions.

Each employee is required to be collaborative, carrying out their duties with responsibility, efficiency and diligence.

▪ **Environmental protection**

Aware that the production activity conducted could have environmental relevance, Bellino srl works to guarantee maximum respect for the external and internal environment, to protect all interested parties and to reduce the environmental impact of its activities.

To this end, Bellino srl is committed to the continuous improvement of technologies and production practices, also adopting the necessary measures to prevent accidents that could cause harm to the community and the environment.

Bellino srl also works to reduce the environmental impact of its business as much as possible, implementing the use of eco-sustainable materials where possible, and also implementing the internal system of separate waste collection.

In order to increasingly reduce the use of energy from fossil fuels and/or fuels, the Company is equipped with a photovoltaic system.

The Company is working to draw up the environmental sustainability report and obtain the Carbon Footprint Certification .

ART. 5 Protection of health and safety in the workplace

The Company, aware of the importance of ensuring the best health and safety conditions in the workplace, is committed to spreading and consolidating the culture of safety by developing risk awareness, promoting and requiring responsible behavior among its employees, resorting to appropriate preventive actions, in order to preserve the safety, health and security not only of the staff, but of all those who go to its premises.

Bellino srl systematically reiterates the importance of health and safety, through training and communication sessions, as well as through constant updating of methodologies and systems, implementing a specific assessment of risks, processes, critical issues and resources to be safeguarded.

All employees are required to strictly comply with company rules, regulations and procedures regarding safety. In particular, production workers are required to use Personal Protective Equipment (PPE) provided by the Company. The Internal Manager in charge of compliance with the application of safety regulations will periodically conduct specific inspections.

ART. 6 Protection of company assets

Each Recipient is responsible for the protection and conservation of the company assets, both tangible and intangible, entrusted to them for the performance of their duties, as well as for their use in a manner appropriate and compliant with the company's purposes.

Employees and collaborators have the obligation to protect the company assets assigned to them and to work diligently to safeguard them, prohibiting their use by unauthorised persons,

Company assets also include IT tools, IT systems and software. With reference to the responsible use of such assets, Bellino srl condemns all illicit conduct in relation to the use of IT systems, the use of unauthorised or unlicensed software, falsifying public or private IT documents, unauthorised access to a computer or telematic system, the unauthorised dissemination or possession of access codes to computer or telematic systems, the unlawful interception or interruption of computer or telematic communications, etc.

The tangible and intangible corporate assets of Bellino srl also include documents and information relating to the company's business: these assets must also be treated with due diligence and ensuring maximum confidentiality.

The information included in periodic reports and accounting must be represented in compliance with the principles of transparency, correctness, completeness and accuracy. In this regard, each recipient is required to collaborate in the correct representation of company activities.

Recipients who become aware of omissions, falsifications or negligence of information and documentation are required to report such situations to the Director General. Information, documents, data and knowledge may be acquired, used or communicated only by authorised or specifically authorised persons.

In the event of violation by employees of the provisions set out in this article, the most appropriate measures will be applied, in accordance with the provisions of the relevant CCNL.

Violation by employees, collaborators and suppliers of the provisions contained in this article may constitute a breach of contractual obligations, with all legal consequences, including with regard to termination of the contract or assignment and any compensation for damages.

Anyone among the employees who becomes aware of a violation of this Code by another employee or by collaborators, consultants, suppliers or other company partners is required to immediately notify the General Manager, or proceed according to the procedures established and regulated by the Regulation on *whistleblowing*.

ART. 7 Rules of conduct in relations with interested parties: employees, customers and partners external to the Company.

In managing relationships with the Recipients of the Code, Bellino srl guarantees compliance with and application of the following rules of conduct.

With particular reference to the relationship with employees, Bellino srl ensures:

- valorization of human resources, respecting gender equality, defining clear roles and precise levels of responsibility;
- flexibility of working hours (possibility of part time, etc.);
- use of holidays and permits within the limits set by the sector collective bargaining agreement;
- acceptance of certain requests for financial assistance (e.g. TFR advances or personal loans);
- incentive plan, in compliance with gender equality, for all company levels;
- corporate welfare;
- constant meetings with all staff to share objectives, programs and results achieved by the Company;
- involvement and professional development of employees, supporting their continuous training and also recognising the performances rendered with bonuses and financial incentives;
- adoption of tools to promote corporate communication (internet, newsletter, etc.);
- hiring disabled people in compliance with legal limits;
- compliance with what is foreseen and declared in the "Risk Assessment Document", in compliance with Legislative Decree 81/08 and subsequent amendments ;

Furthermore, Bellino srl declares:

- not to make use of child labour, where child labour means that of persons under the age of 16 or still subject to compulsory education;
- not to make use of or exploit any form of forced labour, which means "any work or service obtained from any person under the menace of any penalty and for which the said person has not offered himself voluntarily";
- to have prepared work environments, equipment, machines and systems in compliance with the mandatory legislation in force, in order to protect the health and safety of both workers and any third parties involved;
- to respect the right of all staff to join trade unions and/or engage in collective bargaining, where applicable;
- not to implement or encourage any form of discrimination based on different religion, race or political or spiritual beliefs;
- not to make use of disciplinary practices other than those provided for by the CCNL;
- to comply with what is expressly provided for by the sector collective bargaining agreement, regarding working hours;

▪ to comply with the provisions expressly set out in the CCNL and company bargaining in terms of remuneration.

In its relations with customers, the Company, in carrying out business relations with customers, is inspired by the principles of legality, loyalty and correctness.

The Company only markets products that protect customers as they comply with industry directives regarding safety, are subjected to rigorous quality controls to ensure their correct functioning and use and comply with environmental directives regarding environmental impact (product recovery, product end-of-life cycle). In this regard, Bellino srl guarantees the provision of all information and certificates relating to the products marketed.

The Company refrains from giving or promising freebies, gifts or other benefits that go beyond normal customs.

Customers are prohibited from giving gifts or offering benefits of any kind to Company employees or their families, which may induce Company personnel to behave in conflict with the interests, including moral, of the Company. Customers are also encouraged to report any improper behavior involving personnel of both parties.

With reference to the relationships to be maintained with subjects external to the Company, Bellino srl undertakes to require its suppliers and external collaborators to respect the behavioral principles expressly reported in this Code, considering this aspect of fundamental importance for the creation or maintenance of a business relationship.

Each supplier, business partner or external collaborator must therefore be informed of the existence of the Code of Ethics and the related commitments.

The selection of suppliers and the determination of purchasing conditions are based on an objective assessment of quality, price and the ability to supply and guarantee goods and services of an adequate level.

For the Company, the following are therefore reference requirements:

- definition of commercial relationships inspired by the logic of transparency and commercial correctness;
- request for quality, environmental and safety certifications;
- request for compliance with the standards required by the legislation regarding respect for human rights and workers employed in production units.

In its comparative choice of suppliers, Bellino srl prefers those that guarantee, through specific certifications and attestations recognized *by law*, an adequate legality rating, environmental protection and gender equality. (so-called supply chain responsibility).

Employees and collaborators who deal with suppliers at various levels refrain from receiving gifts or benefits of any kind and value within the scope of working relationships that go beyond normal customs, except those of symbolic value.

Suppliers are required to operate in compliance with the current legislation on contracts, contributions, safety and hygiene at work and environmental protection and must not use child labor or non-consenting labor in the performance of their business. Suppliers are prohibited from giving gifts or offering benefits of any kind

to company employees or their families, which may induce the Company's personnel to behave in conflict with the interests, including moral ones, of Bellino srl

ART. 8 Relations with public bodies and subjects that perform public functions

If, in the performance of company activities, relationships are maintained with public institutions, bodies or companies and with subjects that exercise public functions or provide public services, the Company ensures absolute compliance with the principles of correctness, transparency and collaboration, as well as compliance with the laws and regulations in force. In relationships with public bodies, the Company refrains from giving or promising freebies, gifts or other benefits that go beyond normal customs. Specifically, employees and collaborators refrain from any offer, promise or giving of money or other benefits that may influence the fulfillment of the duties of the office or service by a public official or a person in charge of a public service.

Bellino srl cannot hire public administration employees, of any qualification or level, or their spouse or relatives (both ascendants and descendants), in the three years following the completion of an act within the competence of one of the aforementioned employees directly addressed to Bellino srl and from which an advantage for the Company has arisen.

The Company refrains from any fraudulent conduct aimed at obtaining contributions, financing, subsidized loans, grants or other disbursements from public bodies.

The Company allocates contributions, financing, subsidized loans, grants and other disbursements received from public bodies for the intended purposes, respecting the conditions and methods of use.

ART. 9 Commercial incentives

Any commercial incentive must be in line with common market practices, must not exceed the permitted value limits and must be approved in accordance with internal procedures. It is forbidden to promise or provide benefits or other incentives commensurate with the achievement of objectives that are clearly unattainable or not in line with company policy.

ART. 10 Sponsorships and contributions

In the context of sponsorships and contributions, Bellino srl may recognise contributions and donations in favour of entities (e.g. non-profit associations) regularly constituted in accordance with the law and which promote the ethical principles of the company (social, scientific, cultural, sporting and artistic events and initiatives).

In selecting the initiatives to support, the Company operates in such a way as to avoid any possible situation of conflict of interest at a personal or corporate level.

ART. 11 Administration, accounting and finance

Compliance with the procedures aimed at planning, regulating and controlling the management of the Company's financial resources is ensured. The Company ensures the orderly, complete maintenance and conservation of documentation relating to its administrative and accounting activities. Accounting is in fact kept in compliance with the regulatory rules and principles. The Company complies with all the rules, principles and procedures functional to the correct and complete representation of the economic, patrimonial and financial situation of the Company. The Company ensures the truthfulness, correctness and completeness of the balance sheets, reports, corporate communications, prospectuses and any other documentation relating to the economic, patrimonial and financial situations of the Company.

ART. 12 Use of cash

No payments should be made in cash. Travel expenses or the purchase of goods for the performance of ordinary business activities, even if of modest value, must be supported by the use of a prepaid card by the Company.

ART. 13 The employment relationship

ART. 13.1. The individual employment contract

a) The employment relationship is constituted and regulated by an individual contract, concluded in the form established by law and whose economic and regulatory conditions are communicated in writing to the employee

b) Upon hiring, Bellino srl will activate a suitable professional accident insurance policy valid for all premises used.

ART. 13.2 Professional levels and profiles .

Professional levels are applied according to the national collective agreement. The company has the right to periodically define a description of the activities and functions that each worker will have to perform, in relation to the service needs. Bellino srl has a specific job description

ART. 13.3 Respect for working hours and absences .

Working hours must be respected on the basis of what is indicated by Bellino srl.

In the event that the working hours are not respected without notice and without justified reason, a deduction will be made in an amount equal to the amounts due for the delay or early termination, without prejudice to the application of the sanction provided for by the CCNL in force. Except in the case of legitimate impediment, for which the burden of proof always falls on the worker, and without prejudice to the obligation to immediately notify Bellino srl of the absence, absences must be justified in writing to the company within 48 hours.

ART. 13.4. Attendance and break recording

It is mandatory for all staff to be at the workplace at least 10 minutes before the start of working hours to ensure the start of work at the agreed working time. The time required for dressing operations, both when entering and leaving the plant, are not part of additional paid breaks, nor will they be considered paid periods.

ART. 13.5 . Absence documentation

All absences must be communicated and justified with specific documentation and in particular:

Illness : In case of illness, the worker must notify the company within the first day of absence and send the company the electronic transmission code of the certificate by the attending physician within two days of the beginning of the absence. Any continuation must be communicated to the company within the first day on which the worker should have resumed service and must be attested by medical certificates.

Parental leave : The use of the same will take place in accordance with the provisions of the contractual regulations and the law. It will be the employee's responsibility to provide the appropriate supporting

documentation to the company managers (for example, death certificates or self-certification of the deceased relative, medical certificates of illness of the children and declaration of non-use of the leave by the other spouse).

ART. 13.6 Holiday periods

The holiday periods will be established, taking into account the needs of Bellino srl and the interests of the employee, on the basis of specific provisions by the company itself and communicated in advance to the interested parties. The collective holiday period will be communicated by Bellino srl by 30.6.2023 for the summer holidays and by 30 November for the Christmas holidays, taking into account, as already mentioned, the requests of individuals and compatibly with company needs.

ART. 13.7 Paid leave

Permissions prevent the regular performance of the activity. Therefore, they must be requested with the same procedures provided for the request for individual holidays with at least 3 days in advance and will be granted, subject to authorization, only in the presence of particular emergencies, reasons provided for by the current category CCNL or in any case authorized at the discretion of Bellino srl. Absence from normal working hours without the authorization mentioned above will be considered a breach of the aforementioned CCNL. Any exits during working hours must be authorized by the relevant manager as well as the carrying out of overtime hours. Permission to leave the company must be requested by the worker within the first half hour of work, except in exceptional cases, and authorized by the General Manager.

ART. 13.8 Prohibitions

Staff are prohibited from returning to the company premises and remaining beyond the prescribed hours (except in the case of overtime work), except for service reasons and with the authorization of Bellino srl. Violation of this prohibition may result in the initiation of disciplinary proceedings against the offender, which may end, depending on the seriousness of the act committed, even with dismissal.

The use of cell phones and any other electronic devices for personal purposes is not permitted during the course of work, except in particular and urgent cases. Violation of this prohibition may also result in the initiation of disciplinary proceedings.

It is forbidden to use the IT tools made available by the Company for private and/or personal reasons, in violation of current regulations and company procedures. Violation of this prohibition may lead to the initiation of disciplinary proceedings against the offender, which may end, depending on the seriousness of the act committed, even with dismissal.

It is forbidden to consume alcoholic beverages in any company premises. Violation of this prohibition may result in the initiation of disciplinary proceedings against the offender, which may end, depending on the seriousness of the act committed, even with dismissal.

Smoking is prohibited in any company premises, as required by law. Violating this prohibition, in addition to not respecting existing laws and regulations, causes damage and risk to people and things inside the premises themselves.

Audio, video and photographic reproductions are absolutely prohibited within the company premises, whether offices, workshops or warehouses. Violation of this prohibition may result in the initiation of disciplinary proceedings against the offender, which may end, depending on the seriousness of the act

committed, even with dismissal, as well as liability for all material and immaterial damages that the company may suffer due to the disclosure of the aforementioned reproductions.

All employees are prohibited from accessing workstations or company premises (with the exception of those intended for the canteen or toilets) that are not relevant to the assigned work task, unless expressly and priorly authorized by the Unit Manager. The continued violation of this prohibition may lead to the initiation of disciplinary proceedings against the offender, which may end, depending on the seriousness of the act committed, even with dismissal.

It is also forbidden to access cabinets, archives, drawers and other document collectors, including digital ones, for which there has not been prior written authorization by the Head of the work unit, or by the employee responsible, with reference to the duties assigned to him, for the management and custody of the aforementioned cabinets, archives, drawers and other document collectors, including digital ones. Violation of this prohibition may result in the initiation of disciplinary proceedings against the offender, which may end, depending on the seriousness of the act committed, even with dismissal, as well as with compensation for all material and immaterial damages that the company may suffer due to the disclosure of documents or information contained in documents stored in the aforementioned media.

It is absolutely forbidden to leave your workstation unattended, even for a few minutes. If you need to leave your workstation even for a few minutes, you must inform the Manager of your unit or, in his absence, another employee present in the vicinity of your workstation.

Art. 14 Digital ethics

Bellino srl promotes and sensitizes its employees to an ethical and responsible use of digital systems and tools. To this end, a specific Company Regulation has been drawn up and approved for the correct and responsible management of IT and digital tools

Art. 15 Innovation and continuous improvement.

mission is also to create new, better and more efficient products. To this end, the Company encourages its employees to research, develop, innovate technology and improve products (from design to manufacturing) also through the provision of economic incentives.

ART. 16 Methods of implementing the Code. Reports of violations of the provisions contained therein.

Responsibility for the proper functioning of the internal control system lies with all recipients of the Code, within the scope of the functions performed.

Each employee is required to promptly inform his/her direct manager of the emergence of dynamics that may interfere with the correct management of the work activity.

The effectiveness and functionality of the internal control system are guaranteed by the supervisory and control activities carried out by the competent company functions.

Violation of this Code damages the relationship of trust established with Bellino srl and may lead to the activation of legal actions and the adoption of measures against the recipients, in accordance with the provisions of the law and the expected contractual regimes.

Each employee and collaborator must accept their commitments arising from this Code, at the time of establishing the employment relationship, of the first dissemination of the Code or of any relevant amendments or additions. In particular, employees and collaborators have the obligation to:

- refrain from behaviors contrary to the rules contained in the Code;
- contact company representatives to request clarification on how to apply them;
- promptly report to company representatives any news, whether directly discovered or reported by others, regarding possible violations of theirs and any request made to violate them;
- adequately inform each individual with whom they come into contact in the context of their work activities about the existence of the Code and the commitments and obligations imposed on external individuals.

Without prejudice to the provisions relating to reporting of illicit conduct, as reported in the “ *Wistleblowing* ” Regulation, attached to the Organization and Management Model *pursuant to* Legislative Decree no. 231/2001, reports relating to violations of this Code must be addressed to the General Director, including by using emails addressed to the following address: wistleblowing@bellinosrl.com.

It is understood that when verifying the validity of the report received, anyone who made it may be contacted to request further information that may be necessary.

This Code of Ethics and Conduct was adopted on 24.4.2024. The adoption by Bellino srl and its content have been widely disclosed and disseminated within the Company.

It constitutes an integral part of the Organization and Management Model.

Modugno,

The sole director