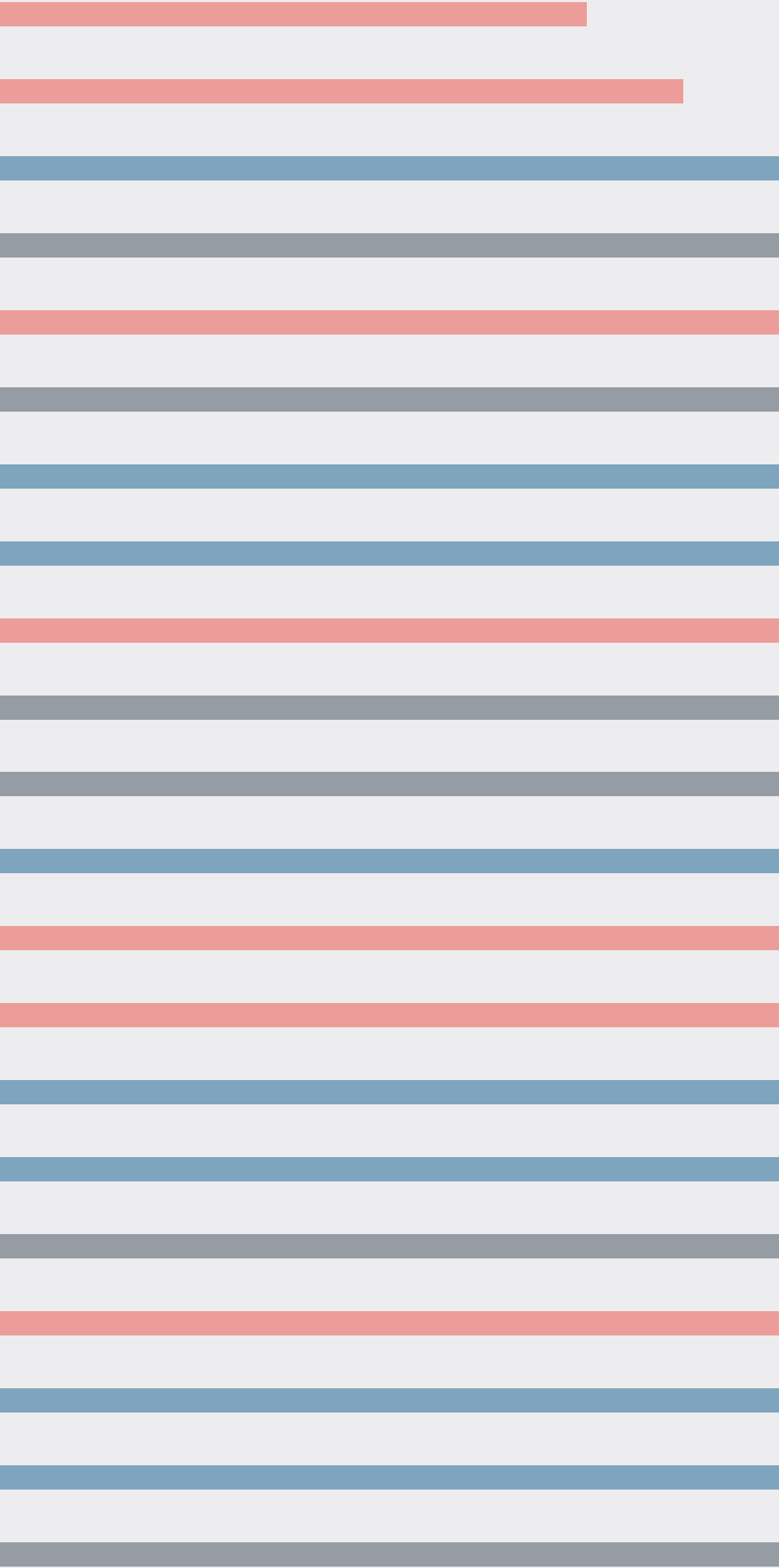




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# • Code of Ethics

# 1. Glossary



# 1. Glossary

The following expressions in this Code have the following meaning:

**Government Official**

Any officer, director or employee of a public body or a body subject to public scrutiny or a public international organisation, or a non-governmental organisation or a public body or a public company, whose employees, as a result of the said status or other reasons, are treated as public officials or public service employees, or civil servants in accordance with the legislation applicable from time to time, and any person acting in an official capacity for or on behalf of the above bodies, or whether a representative or officer of any political party or candidate for public office. The term “body subject to public scrutiny” includes, by way of an example but not limited to, any body governed by public or private law in which one or more public bodies and/or public bodies are holders of sufficient shares and/or powers and/or interest to be granted control. The aforesaid definition also includes an entity that holds at least 50%, or in fact controlled by any public body and/or public organisation.

**Collaborators**

People who maintain commercial agency or consultancy or other collaborative relationships that are fulfilled in coordinated and continued provision of work, mainly staff, albeit not employed, or any other relationship provided for by Art. 409 of the Code of Civil Procedure<sup>1</sup>, as well as any other person under the direction or

supervision of any person in a senior position.

**Employees**

People who maintain an employed work relationship with RBM Group (including fixed-term and part-time employees), internship or apprenticeship, as well as temporary workers provided by third parties for RBM Group in accordance with local regulations.

**Company Representatives**

Board members, members of the board of auditors and managing directors, if any, of RBM Group, who are from time to time in office, as well as any other person in a senior position, which means any other person who covers agency, administration or management activities of RBM Group or one of its departments with financial and functional autonomy, or any person who exercises, even de facto, management and control of RBM Group.

**Responsible**

Means every person in charge of one or more business divisions or functions of RBM Group, in accordance with the organisation chart of RBM Group from time to time in force.

<sup>1</sup>Art. 409. Individual employment disputes. The provisions in this Chapter shall be observed in cases relating to: 1) private employment relationships, even if not related to the management of a company; 2) sharecropping, sharing of agricultural ventures, renting to a direct farmer, as well as relationships arising from other agricultural leases, except for the competence of specialised agricultural sections; 3) agency contracts, commercial representation and other relationships that are fulfilled in the provision of continuous and coordinated work, mainly staff, albeit not employed; 4) work relationships of employees of public bodies that only or mainly carry out economic activities; 5) work relationships of employees of public bodies and other public law relationships, provided that they are not devolved by law to another court.

# 1.

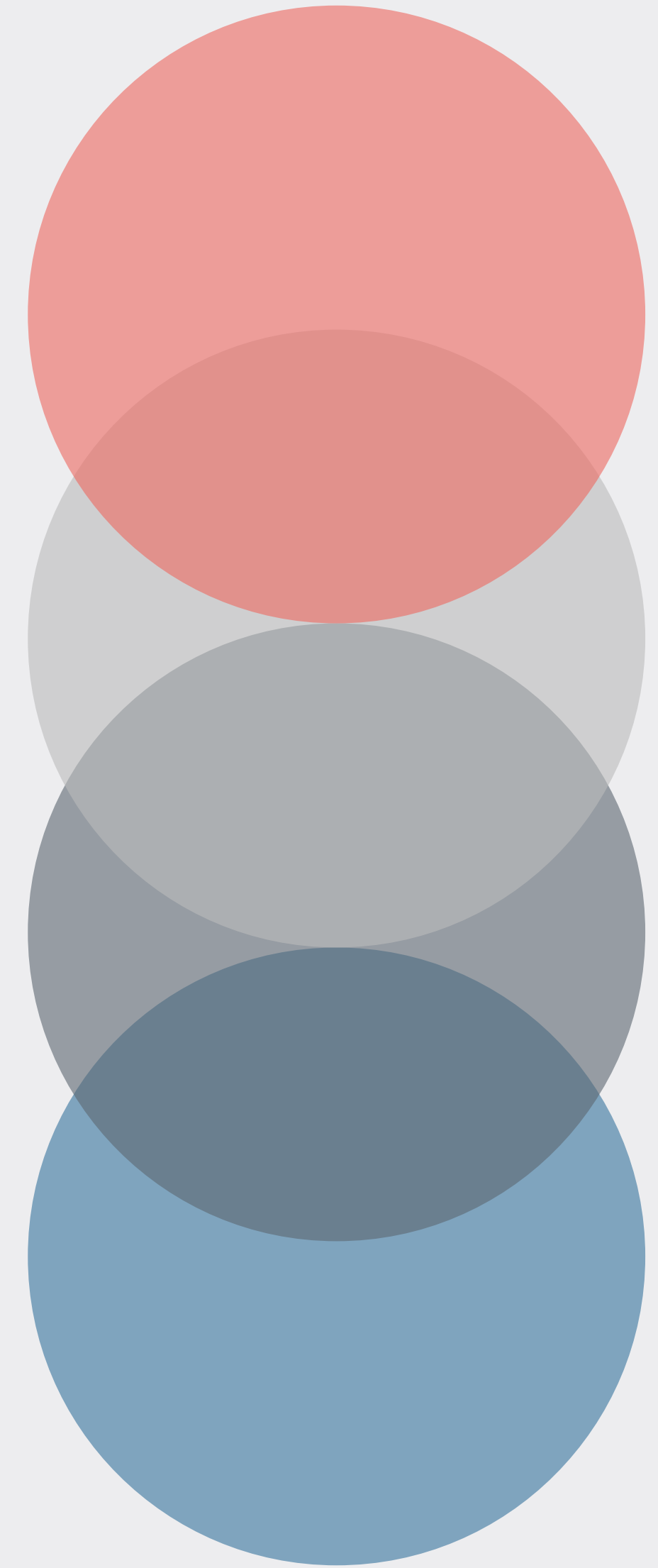
**Stakeholders**

All entities and individuals who can reasonably be expected to be significantly affected by the RBM Group’s activities, products or services or whose actions can reasonably be expected to affect the RBM Group’s ability to successfully implement its strategies and achieve its objectives.

**RBM Group or RBM**

This document applies to all Group companies, also alongside any additional Code of Ethics already present at the subsidiaries.

## 2. Introduction



## 2. Introduction

### A. Inspiring principles

The RBM Group places among its primary values and objectives those of innovation, cutting-edge and sustainability, in the awareness that only by spreading the culture of climatic well-being and working concretely to make it possible and concrete with respect to individual needs, can we design a future in which cutting-edge technology and sustainability support each other, increasing mutual value and shared benefits.

With this in mind, the guiding principles of this Code are:

- **Internationalisation;**
- **Sustainability;**
- **Research and development;**
- **Partnership.**

#### Internationalisation

Internationalisation as geographic business diversification, making it possible to split risk and investments on European and non-European markets, opening up to the reality of different cultural contexts in order to grow the skills needed in a global environment.

### Sustainability

Sustainability understood in its broad ESG sense, as a responsible way of doing business, developing and maintaining full harmony with the environmental and social context that we operate in.

For the RBM Group, being sustainable means:

- contributing to the fight against climate change and the transition to a circular economy model through the development of alternative construction systems, including through dialogue and the involvement of key suppliers;
- ensuring governance that is characterised by integrity, transparency and respect, aimed at disseminating essential good business practices and capable of inspiring new standards of sustainability;
- better management of corporate human capital, promoting fairness and inclusion, in a safe and stimulating working environment that allows the best expression of individual potential.

### Research and development

Research and development, through an approach of continuous innovation and investment, aimed at responding to new market needs and improving production processes, products and services, making them more efficient, effective and environmentally friendly.



## 2.

### Partnership

Partnership as the key to developing our business in an open, dynamic, adaptive and synergetic manner, selecting and activating relevant partnerships, with the aim of implementing continuous innovations, expanding markets and making new investments possible.

As a completion to a corporate vision that never loses sight of the context it operates in, the RBM Group stands alongside the local territory and its communities with concrete support activities and through participation in and promotion of numerous social, cultural and sporting initiatives.

The RBM Group adopts the most advanced principles on ESG criteria - Environmental, Social and Governance - adopting behaviour consistent with international standards on human rights, gender equality, transparency and fairness in the performance of its activities and in the management of the company, through methods and practices of continuous improvement.

### B. Gender equality

This Code of Ethics also embraces the commitment of the RBM Group to promote gender equality in every area of its activities. We believe that respect for rights, dignity, and equal opportunities is fundamental to a fair, inclusive, and productive environment.

### C. Addressees of this Code

Compliance with the contents of this Code of Ethics is to be considered an integral part of the contractual obligations undertaken by all Employees, Collaborators and Company Representatives.

This Code expresses the RBM Group's ethical commitments and responsibilities within the framework of the activities carried out towards customers, within the company's internal activities and in relations with all parties that come into contact with the RBM Group.

The Code of Ethics constitutes a set of principles and rules that supplement the regulations and policies adopted by the company and whose observance by all addressees - Directors, Employees, Collaborators and Company Representatives, as well as other Stakeholders - is of fundamental importance for the smooth operation, reliability of management and image of the Group.

Each addressee is therefore obliged, to the extent compatible with the law or contract (including national, local and company collective bargaining), to:

- Diligently observe the rules of this Code and all regulations and company policies in their most up-to-date version, refraining from conduct contrary to them;
- Periodically check and consult the company's information tools for the rules, regulations and procedures contained in the regulations, company policy and this Code.

## 2.

RBM Group shall promote application of this Code to Employees, Collaborators, and Company Representatives, as well as other Stakeholders, as necessary, also by inserting specific clauses that lay down the obligation to comply with provisions of this Code in their respective contracts with RBM Group.

RBM Group shall ensure that selection of candidates as Employees, Collaborators and Company Representatives is also conducted in order to assess the adequacy of personal and professional qualities of the candidates selected with the provisions of this Code. Employees, Collaborators and Company Representatives are required, limited to their personal competences, to inform third parties with whom they have business relations when carrying out their work, of the existence and content of the Code of Conduct.

In the limits of the foregoing, any reference to Employees in this Code shall also be deemed referred to Collaborators and Company Representatives of RBM Group.

### **D. Efficacy of this Code**

This Code represents the maximum expression of the principle guidelines of RBM Group. Consequently, any non-compliant conduct, even if, hypothetically, intended by those who put them into practice, are aimed at helping RBM Group, are neither permitted nor tolerated, and are intended as activities committed against RBM Group.

Therefore, compliance with this Code is an integral part of contractual obligations of RBM Group employees, also pursuant to and for the purposes of Art. 2104 of the Civil Code and its violation may constitute a breach of contract and/or disciplinary offense and, where appropriate, may lead to compensation for any damages arising from such breach to RBM Group, in accordance with current laws and collective agreements that are from time to time applicable.



Contents

## **3.A** General principles of conduct



## 3.A General principles of conduct

### A.1 Lawfulness

Complying with the law and legal system regulations of each country where RBM Group operates, represents a basic principle that each Employee must observe, together with RBM's policy, when carrying out their activities.

Violation of the law is not permitted for any reason whatsoever.

Regardless of the penalties provided by law, the Employee responsible for a violation will incur disciplinary actions resulting from failure to meet their obligations of office.

### A.2 Respect, honesty

Each Employee acknowledges and respects personal dignity, privacy and the personal rights of any person. Each Employee also works with people of different nationalities, cultures, religions, age, disability, race, sexual identity. In line with our company principles and in compliance with the labour laws in force in the different countries where RBM Group operates, discrimination against anyone according to any of the aforesaid characteristics, or harassment or sexual, personal or other offenses are not tolerated. These principles shall also apply in collaborative relationships within RBM Group and in relations with third parties. Decisions made with regard to collaborators - whether they are colleagues, employees, suppliers, customers and business counterparts - are only based on unbiased considerations

and not dictated by considerations of undue discrimination or coercion. When carrying out individual functions, each Employee shall act with transparency and honesty, undertaking responsibilities of their competence according to their duties.

### A.3 Safeguarding the reputation of rbm

RBM's reputation is mainly determined by the actions and conduct of each Employee. Therefore, illicit or inappropriate conduct of even one individual Employee can, in itself, cause significant damage to RBM Group. Each employee is obliged, with their conduct, to safeguard and promote RBM Group's good reputation in the country in which they operate.

### A.4 Management, responsibility and control

The culture of integrity and Compliance start from the top of an organisation. Each Manager is required to meet their obligations of control and organisation, are responsible for their employees and must earn their respect by adopting exemplary conduct, demonstrating efficiency, loyalty and competence. However, this means that each Manager must emphasise the importance of ethical conduct and comply with the principles of Compliance, discussing them when carrying out daily activities and promoting their implementation through personal leadership and training. Every Manager must set clear, ambitious but realistic objectives and perfect his role of leader through the concept of "management by example". The Manager should give their employees as much responsibility and liberty as possible, while stressing

# 3.A

that compliance with the rules of Compliance is required in all circumstances and at all times. They must also prove helpful to their employees who wish to bring concerns regarding Compliance to their attention, ask questions or discuss professional or personal matters.

The duties of Managers do not waive Employees of their said responsibilities. Everyone must collaborate in order to comply with applicable laws and RBM's policy.

The specific responsibilities of Managers are listed herein for the sole purpose of providing Employees with an idea of the leadership and support they should expect from their superiors.

Managers, within their area of competence, are duty bound to ensure that no violations of law will occur that could have been prevented or at least avoided through proper control. The Manager is responsible for the fulfilment of functions delegated by him to his employees.

In particular, each Manager within his area of competence, must:

1. carefully select his employees based on their personal and professional skills, also for the purpose of compliance with this Code. The importance of carefully selecting employees increases in proportion to the importance of the tasks that the said employee must perform (duty of selection);
2. inform their employees in a precise, complete and binding way of the

obligations to be fulfilled, and specifically with regard to compliance with the law and this Code (duty of instruction);

3. constantly monitor that their employees comply with the law and this Code (duty of control);

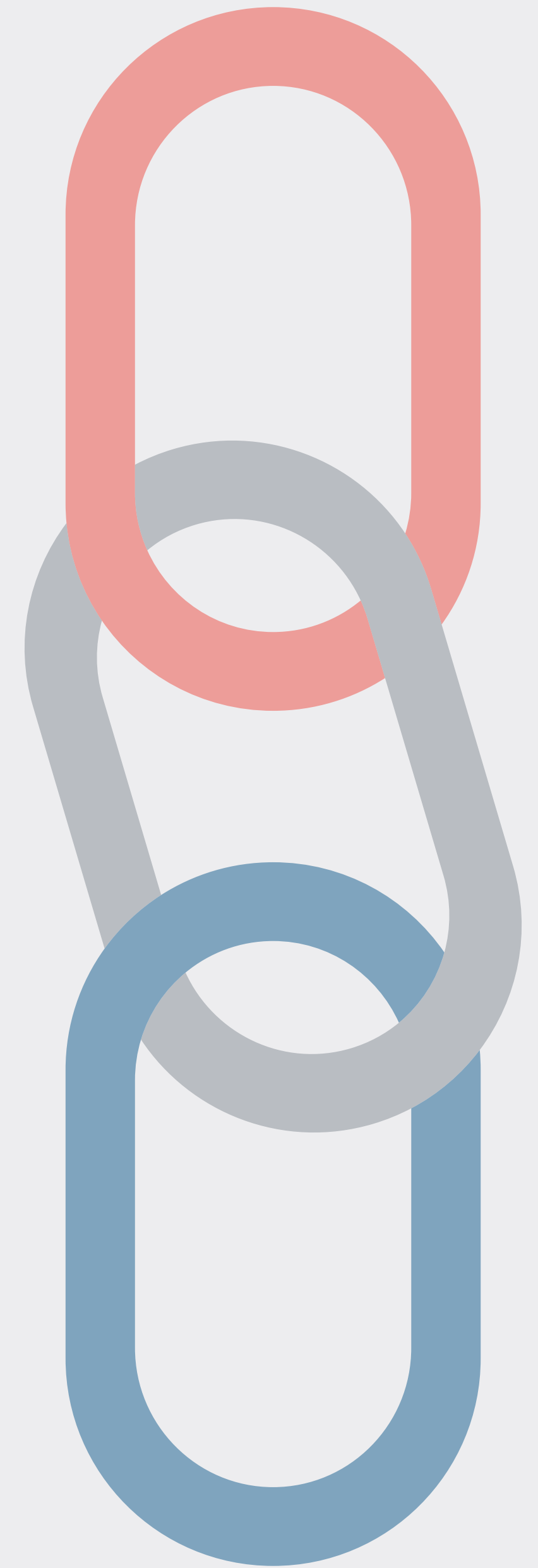
4. clearly communicate the importance of an honest conduct to their employees and the principles of Compliance when carrying out their daily activities, also indicating that violations of the law and this Code are not permitted and may constitute a breach of contract and/or disciplinary offense in accordance with current regulations and as such be punished (duty of communication).

## A.5. Gender Equality

- Equal treatment: every person must be treated with respect and dignity, without discrimination based on gender, gender identity, or sexual orientation.
- Equal opportunities: access to roles, assignments, training, and career progression must be based on merit, ensuring equal conditions for all.
- Prevention of discrimination: acts, behaviors, or policies that may constitute direct or indirect discrimination against any gender are prohibited.

Contents

## **3.B** Relations with business counterparts and third parties





## 3.B Relations with business counterparts and third parties

Employees are required to implement all the tools and precautions required to ensure transparency and fairness of business transactions. In particular, it is compulsory that:

- tasks given to any service companies and/or physical people who take care of the economic/financial interests of RBM Group must be drawn up in writing, indicating the content and economic conditions agreed upon and the contract termination clause in the event of violation of the principles set forth in this Code of Conduct;
- the minimum established and required requisites are scrupulously complied with in order to select those tendering goods and/or services that RBM Group intends to acquire;
- the criteria of assessment of the tenders is applied in a clear and transparent manner;
- that all the necessary information regarding the commercial/professional reliability of suppliers, consultants and collaborators is obtained;
- that maximum transparency is ensured in the case of agreements and/or contracts aimed at making investments.

### B.1 Fair competition and antitrust law

Fair competition helps the market to evolve freely, together with its social benefits. Every Employee is duty bound to comply with the regulations regarding fair

competition. Conformity assessment of conduct with regard to antitrust laws can be difficult, especially due to the diversity of legal requirements in different countries and in individual cases. For example, in many jurisdictions, it is common practice to apply special antitrust regulations to large companies.

Hereunder are a few examples of conduct that can determine a violation of antitrust laws. By way of example and not limited to, each Employee must not:

- discuss prices, marketing policies and tenders, profits, profit margins, costs, methods of distribution or any other criterion with competitors that can determine or influence the competitive conduct of RBM Group in order to force the competitor to align itself to such conduct;
- enter into non-competition agreements, agreements to limit negotiations with suppliers, participation in tenders and the allocation of customers, markets, territories or production programs;
- implement actions aimed at influencing the sale prices applied by dealers/distributors of RBM Group.

Also, Employees must not obtain competitive information using industrial espionage, corruption, theft or electronic wiretapping, or deliberately disseminate false information about a competitor or its products or services.



## 3.B

### B.2 Anti-corruption: offering and granting benefits

RBM competes fairly on the market to acquire orders, relying on quality, price and innovation of its products and services, not offering unfair advantages to third parties.

As a result, each Employee must not offer, promise, grant or authorise - directly or indirectly - donations of money or any other benefit to a Government Official to influence an official act or obtain an undue advantage. Any offer, promise, grant or donation must be made in accordance with applicable laws and with the policies of RBM, and must not in any way give the impression of bad faith or misconduct. This means that no offer, promise, grant or donation can be made if it can be reasonably understood as an attempt to illicitly influence a Government Official or as an act of corruption made against a counterparty to grant business advantages to RBM.

In addition, Employees should not lavish sums of money or any other benefit indirectly (for example, to a consultant, agent, intermediary, partner or other third parties), if circumstances suggest that they may, in whole or in part, directly or indirectly, be addressed to a Government Official to influence an official act or to obtain undue advantage.

For this reason, Employees appointed to select consultants, agents, partners in joint ventures or other business counterparties must implement appropriate measures in order to:

- make sure that third parties involved know and respect this code of conduct of RBM;
- evaluate the qualifications and reputation of third party companies;
- include appropriate clauses in agreements and contracts to protect RBM.

The aforesaid applies in particular, but not limited to, if the said third parties have dealings with Government Officials on behalf of RBM.

This does not only apply in the case of lunches or forms of entertainment of moderate value. In any case, Employees are forbidden to offer the above if the said offer can be reasonably understood as an attempt to illicitly influence a Government Official or as an act of corruption made against a counterparty to grant business advantages to RBM. Lastly, each investment decision made by RBM Group - whether acquiring majority shareholding in a company, of a minority interest, or a joint venture arrangement - must always be based on a prior control of compliance with the principles of Compliance.

### B.3 Anti-corruption: benefit demands and acceptance

Employees must not exploit their professional position to demand, accept, obtain or be promised benefits of any kind. This principle does not apply in case of unsolicited acceptance of occasional gifts of a purely symbolic value or lunches or forms of entertainment of reasonable value, in line with local customs and practices,

## 3.B

as well as with the policies of RBM.

Any other gift, lunch or entertainment that does not comply with the above must be refused or returned, and the Employee must immediately inform their direct Manager.

### **B.4 Political contributions, donations and sponsorships**

The RBM Group refrains from making any contribution, direct or indirect, in any form whatsoever, to political and trade union parties, movements, committees and organisations, their representatives and candidates, except for those due and/or permitted under specific provisions of law.

In any case, donations are prohibited:

- to organisations whose objectives are not compatible with the company's principles of RBM;
- that damage the reputation of RBM.

Transparency of each donation must be guaranteed. Therefore, the recipient of the donation must be known together with its actual use; it is always important to account for the reason for the donation and its use for a particular purpose.

Sponsorship is understood as a contribution in cash or in kind by RBM in favour of an event organised by a third party in exchange for the opportunity to give RBM

Group brands visibility through, for example, exposure of the RBM logo, quoting RBM in opening and closing speeches, participation of a speaker at a round table and tickets for the event itself. All contributions made in the form of sponsorship must be given in a transparent manner and regulated by a written agreement, must pursue a legitimate business purpose and be appropriate to the return offered by the organiser of the event. Moreover, these contributions must not be promised, offered or granted to organisations whose goals are incompatible with the company's principles of RBM or that would damage the reputation of RBM Group.

### **B.5 Public tenders**

RBM Group shall operate in full transparency, honesty and fairness in all negotiations and contacts entertained by RBM with public/government bodies. RBM Group shall comply with all laws and regulations applicable with regard to public tenders, including laws prohibiting any attempt to illegally influence Government Officials.

### **B.6 Anti-money laundering**

Money laundering is the act of placing "dirty money" in circulation in an ordinary business cycle, disguising its nature and criminal origin - linked to activities such as terrorism, drug trafficking or corruption - making it appear legitimate or preventing identification of its actual origin or ownership. RBM's objective is to only conduct business with customers, business consultants and counterparties of proven good



## 3.B

reputation, engaged in legal activities and whose financial capabilities are of legal origin. RBM Group opposes facilitation of money laundering.

Each Employee must comply with the laws against money laundering and RBM's procedures to identify customers, forms of payment or other suspicious transactions that may involve money laundering. To avoid any problems in this regard, Employees must pay the utmost attention and report any suspicious conduct of customers, consultants and business counterparts.

Employees must also strictly comply with all provisions on accounting, recording and financial reporting applicable to cash flows and payments associated with transactions and contracts.

### B.7 Trading principles

RBM complies with all the regulations on export control and customs laws applicable in the countries in which it operates. Export controls generally apply to the transfer of goods, services or technologies outside certain national borders, including electronic means.

The laws on the control of exports shall apply in relation to exports or imports, direct or indirect, respectively to or from countries or sanctioned parts reported, for example, for reasons of national security or involvement in criminal activities. Violations of these laws and regulations can result in severe penalties, including fines

or the revocation by the government to import and export simplified procedures (interruption of the continuous supply chain).

Employees who are involved in import and export of goods, services or technologies in the manner indicated above must comply with the applicable laws and regulations on the control of exports and imports, as well as comply with every policy and procedure in matters established by the industry in which they work.

### B.8 Relations with suppliers

RBM demands that its suppliers comply with all applicable laws and share its values and principles, assuming their responsibility to the people involved and the environment and is committed to:

- comply with applicable laws;
- enforce corruption prohibition;
- respect the basic human rights of employees;
- observe laws prohibiting child labour;
- undertake the responsibility of the health and safety of employees;
- safeguard the environment in compliance with applicable laws;
- comply with this Code, as well as with the Code of Conduct for Suppliers of the RBM Group.

## 3.B

### B.9 Special rules for the conferral of orders

RBM Group pursues fair and impartial verification of offers from its suppliers.

The Employee shall comply with supplier selection and award procedures established by RBM Group. In any case, in the contract relations, administration, procurement or supply of goods or services to RBM Group, Employees must comply in particular with the following regulations as part of their duties:

1. the Manager or the responsible authorities in charge for this purpose by RBM Group must be informed by each Employee of any personal interest in carrying out their work, which could lead to the onset of a conflict of interest;
2. in case of competing offers, suppliers must not be unfairly favoured or hindered. Consequently, the Employee shall not preclude candidate suppliers who meet qualification requirements from time to time required by RBM Group, from the chance to win the supply in question, adopting, should the need arise, assessment and objective selection criteria and in a transparent manner;
3. it is permitted to accept invitations by counterparties only if the reason and scope of those rights are adequate and a refusal would infringe the duty of courtesy;
4. no Employee is permitted to give people engaged in professional relationships personal orders that could obtain undue advantages. This is particularly true when the Employee may directly or indirectly influence the award of an appointment to the said supplier by RBM Group.

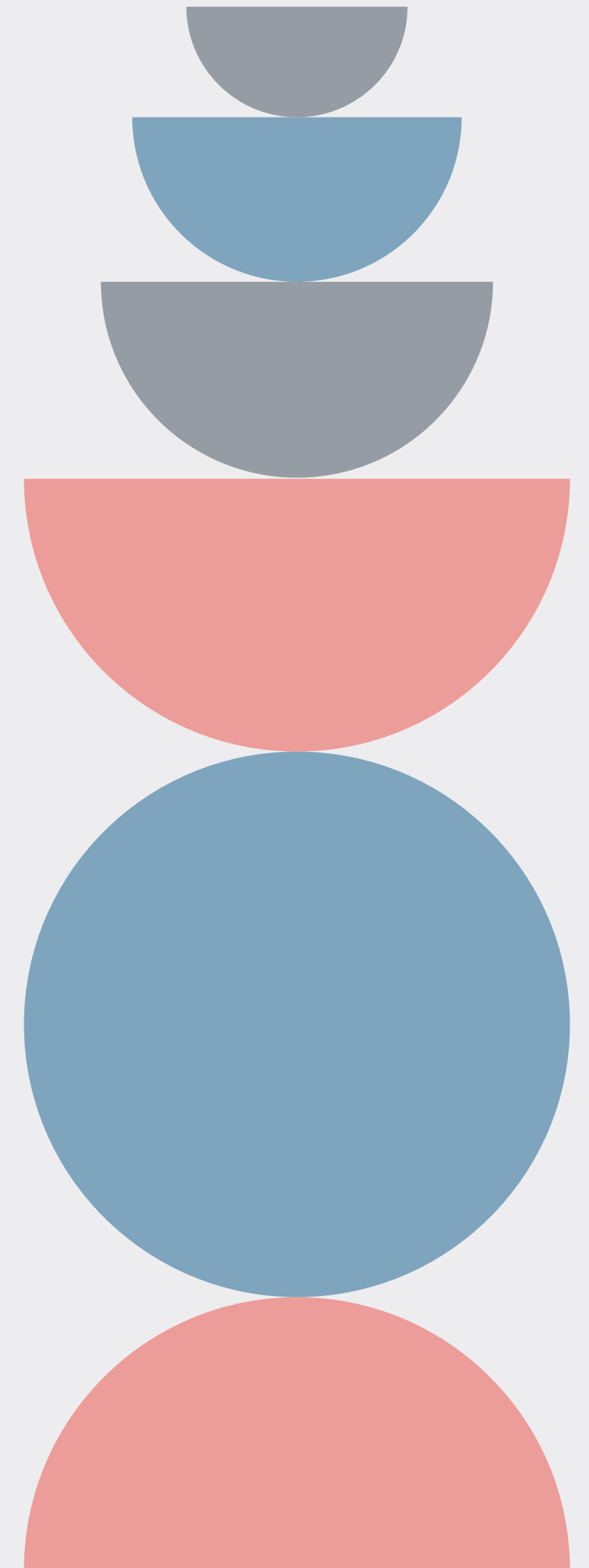
### B.10 Customer relations

Customer satisfaction is the primary objective of RBM Group through reliable and correct conduct aimed at ensuring high quality products and services. In this context, the conduct of Employees and Collaborators towards customers should be helpful, courteous and professional. Employees and Collaborators are thus duty bound to:

- provide in an efficient and timely manner, in the limits of contractual provisions, high-quality products and services that meet the reasonable expectations and needs of the customer;
- always adhere scrupulously to contract terms;
- observe all in-house rules to manage customer relationships, in addition to the instructions given by superiors, and provide accurate and complete information about RBM products, in compliance with company's guidelines for customers to make informed decisions.

Contents

## **3.C** Conflicts of interest





## 3.C Conflicts of interest

RBM Employees shall, when carrying out their work, be obliged to make decisions in the best interests of RBM Group and not based on their own personal interest.

Conflicts of interest can arise in cases where employees carry out activities or place their economic and professional interests at the expense of the interests of RBM. Employees who have any personal interest in the exercise of their duties must immediately inform their Manager.

Employees are prohibited from using companies with which they have business relations in order to perform their work for RBM for their own personal contracts or orders, if they can obtain personal benefit in relation to these contracts or personal orders. In particular, this provision applies if the employee exercises or is able to exercise direct or indirect influence on whether or not RBM awards an order or tender to the company in question. A conflict of interest can be generated by a business relationship with a competitor or customer of RBM, by an interest in its activities or from involvement in activities that jeopardise the employee's ability to fulfil his duties in RBM. Therefore, it is important that each individual Employee identifies and avoids any conflict of interest, even apparent in the performance of their professional activities.

### C.1 Competition against rbm

Employees are not permitted to conduct or carry out activities in favour of competitors of RBM or engage in competitive activities.

### C.2 Secondary activities

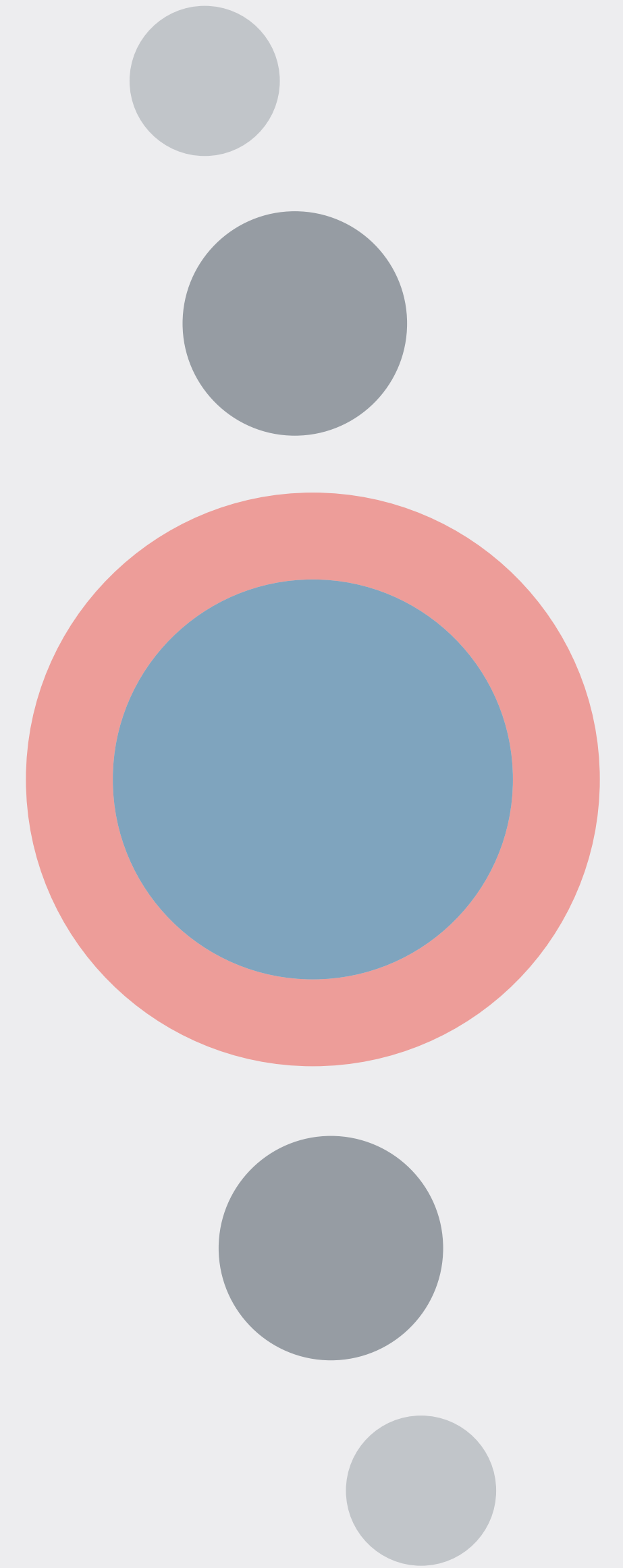
Employees are not permitted to perform secondary activities in competition with RBM. An Employee who intends to undertake paid secondary activities that may interfere with the work carried out at RBM must immediately inform RBM in writing and obtain written authorisation for this purpose. Casual office work, teaching and similar sporadic commitments are not considered secondary activities. The aforesaid authorisation can be denied if it damages the interest of RBM. For the same reasons, a previously released authorisation can be revoked.

### C.3 Participation in the share capital of third party companies

Unless further regulated by internal regulations, Employees who hold or take on shareholdings, direct or indirect, in the share capital of a competing company, or of a supplier or customer of RBM Group, must inform their Personnel Manager. Employees who hold or take on shareholdings, direct or indirect, in the share capital of an RBM trading counterparty - supplier, customer, contractor or other business counterparty - must inform their Personnel Manager, should they have relations with the said counterparty or company in the performance of their professional duties or vested with a position in that company. For shareholdings in listed companies, the above provision shall apply only if the investment is more than 5% of total share capital. Following disclosure of share capital participation of a third party company, RBM shall have the right to implement appropriate measures to eliminate any potential conflict of interest.

Contents

## **3.D** Use of company assets



## 3.D Use of company assets

Each Employee and Collaborator is duty bound to act with due care and diligence to protect the assets of RBM Group, through responsible conduct and in line with the operating procedures established to govern use, documenting their use as appropriate and/or required.

In particular, use of company cars is provided with a specific regulation aimed at defining the upkeep of the company's vehicle, which must be signed by the Employee and Collaborator on handing over the vehicle.

The devices and equipment in offices and other areas of RBM, such as phones, copiers, PCs, software, Internet, machines and other tools, including e-mail and voice mail systems, must only be used for work-related reasons and not for personal use.

Locally, it is possible to establish exceptions and possibly agree on paid use, provided that use of company assets:

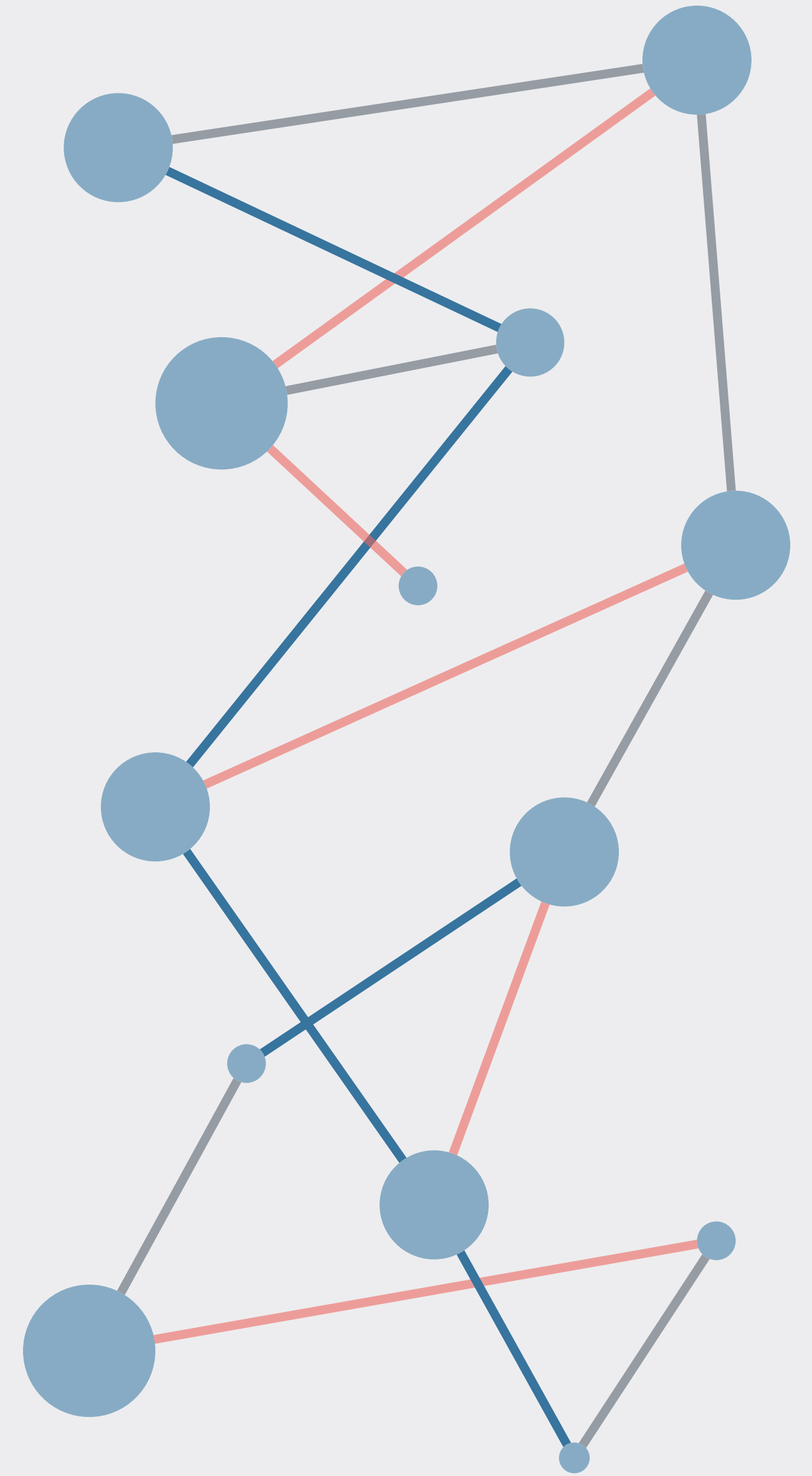
- are not connected to any illicit operations;
- do not create an effective or potential conflict of interest;
- does not entail significant additional costs, does not interfere with the business activities of RBM Group or involves other negative effects for RBM Group, for example by interfering with the tasks assigned to the Employee or other employees.

It is strictly forbidden to collect or divulge information that incites racial hatred, distortion of violence or other criminal acts, or that contain material considered offensive from a sexual point of view in relation to their cultural environment.

No employee is permitted, without prior authorisation from their Manager, to create archives, databases, video and audio recordings or reproductions using RBM's equipment or structures, unless directly related to the company's activities.

Contents

## **3.E** Information management





## 3.E Information management

### E.1 Accounting records and separation of duties

To ensure transparent and efficient communication, accurate and truthful reporting is essential. This indiscriminately applies to relations with suppliers, collaborators, customers and business partners as well as institutional ones addressed to the public or public authorities.

Also, RBM has the duty to implement processes and controls that are effective and that guarantee execution of transactions according to what is authorised by management. RBM must also prevent and detect any unauthorised use of RBM Group assets. All Employees must ensure that the accounting records of RBM drawn up by them, or requests for which they are responsible:

- are complete;
- are accurate;
- accurately reflect every operation/activity;
- are immediately drawn up and in compliance with applicable accounting regulations and principles;
- that all transactions carried out will be used for income, capital and financial reporting purposes, both internally and externally.

These principles also apply to the preparation of expense reports by Employees, and their relative procedures for authorisation. With regard to financial transactions,

there is a strict separation of duties between those who keep a record of financial reports, verifying correspondence with purchase orders, the person making the payments, the person who authorises them and materially signs payment orders and who, at the end, checks the bank transactions via Banking.

### E.2 Confidentiality

Internal information reserved to or property of RBM that has not be divulged to the public must be kept confidential. Non-public information obtained from or concerning suppliers, customers, employees, agents, consultants and other third parties must also be kept confidential in accordance with legal and contractual requirements.

The expression “confidential information or property of RBM” are identified in particular, but not limited to::

- data regarding the company and company assets, prices, sales, profits, markets, customers and other matters pertinent to RBM Group;
- information regarding production activities or research and development;
- in-house financial data.

The obligation of confidentiality shall also remain in force after termination of employment and/or contractual relationship, since the disclosure of confidential information, at any time it occurs, could damage the activities of the company,



## 3.E

customers or counterparties of RBM .

### **E.3 Personal data protection and security**

Access to in-house company networks and the Internet, exchange of information through electronic tools, as well as electronically distributed business negotiations, are fundamental prerequisites for the effective execution of employment of each Employee and for the success of the business as a whole. However, the advantages provided by electronic communication systems involve risks to protect privacy and data security. Effective prevention of these risks is an important element of IT management, tasks of management and also the conduct of each Employee.

Processing of personal data is only permitted to the extent in which collection, processing or use of the said data are necessary for predetermined, defined and legitimate purposes. In addition, personal data must be kept safely and necessary precautions must be implemented with regard to their transmission. The highest standards of data and protection quality must be guaranteed against unauthorised access. Use of personal data must occur in complete transparency to the persons concerned, who have the right to verify its use and accuracy of information and, where appropriate, challenge them, block their use and provide for their cancellation. In certain jurisdictions (such as Italy and the European Union), there are strict laws and regulations in force with regard to processing of personal data, including data relating to third parties, whether they are customers or commercial

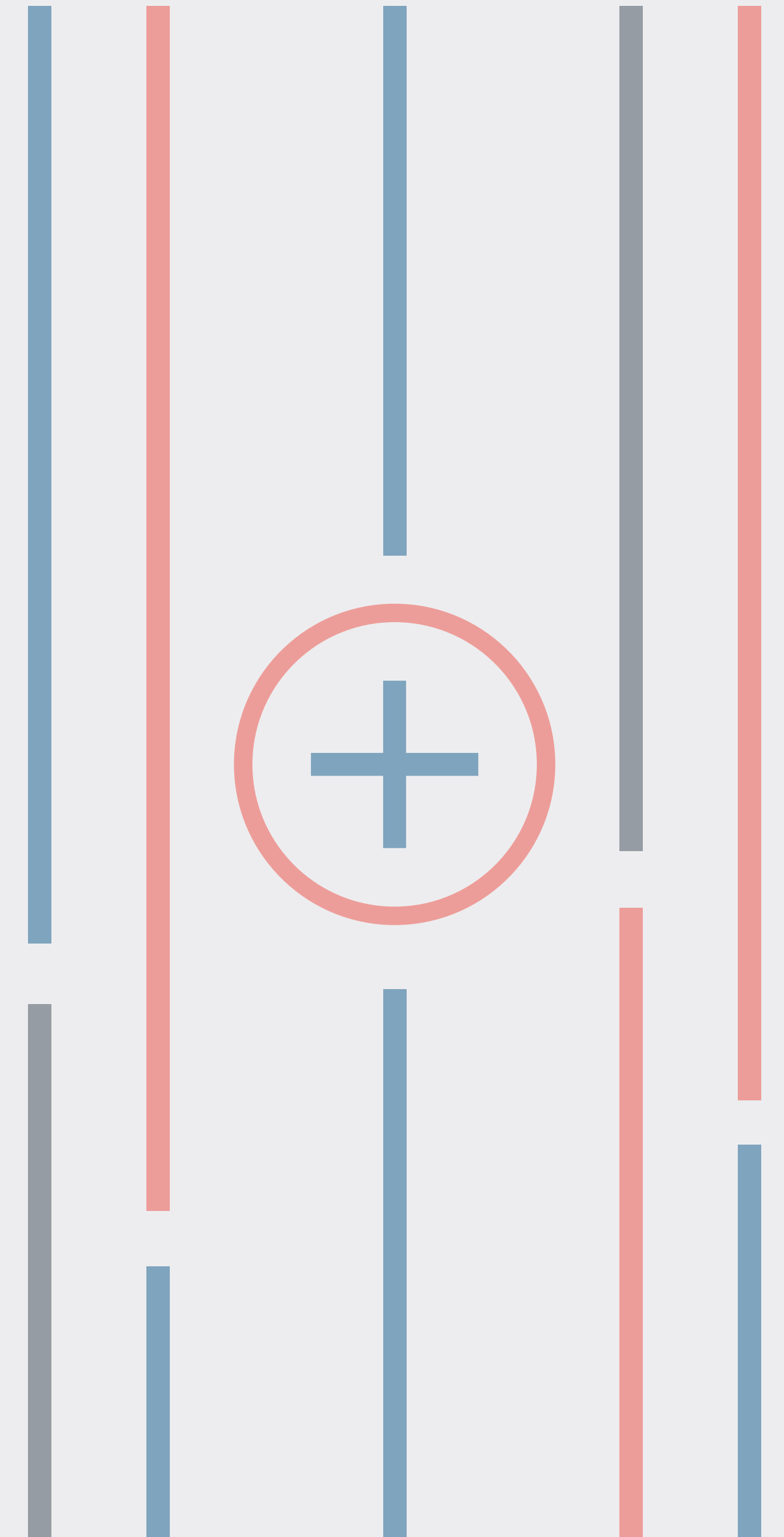
counterparties.

All employees are required to comply with such laws, as applicable, to protect the privacy of third parties. In particular, they must use tools and the computer or telecommunication services in full compliance with current laws with regard to computer crimes, information security, privacy and copyright, and the company's in-house procedures.

Employees cannot upload unauthorised software on the company's systems. It is also forbidden to make unauthorised copies of programs, license permissions, for personal or third party use. It is imperative to use computers and IT tools provided by RBM exclusively for business purposes. Consequently, RBM reserves the right to check the contents of computers as well as proper use of IT tools in compliance with the provisions set forth by the company's procedures in this regard.

Contents

## **3.F** Occupational health and safety and environmental protection



## 3.F Occupational health and safety and environmental protection

### F.1 Environment and technical safety

Environmental protection and the preservation of natural resources are the main objectives of the company.

Through the commitment of Managers and Employees, RBM strives to conduct its business in order to protect the environment and continuously improve its environmental performance.

During the product development phase, an eco-sustainable project, technical safety and health protection are primary objectives and basic points of reference. Each Employee must contribute to pursue these objections through their conduct.

### F.2 Safety at the workplace

The health and safety of employees at the workplace is a priority for RBM.

Everyone is responsible to promote the efforts of RBM Group, which are aimed at ensuring maximum safety when carrying out its company's activities. Responsibility towards employees requires implementation of the best possible measures to prevent accidents, and is carried out through

- technical planning of workplaces, equipment and processes;

- safety management;
- personal conduct at the workplace.

The work environment must comply with the requirements imposed by a safety and health-oriented design.

All employees must constantly pay the utmost attention to safety at work, in particular, must:

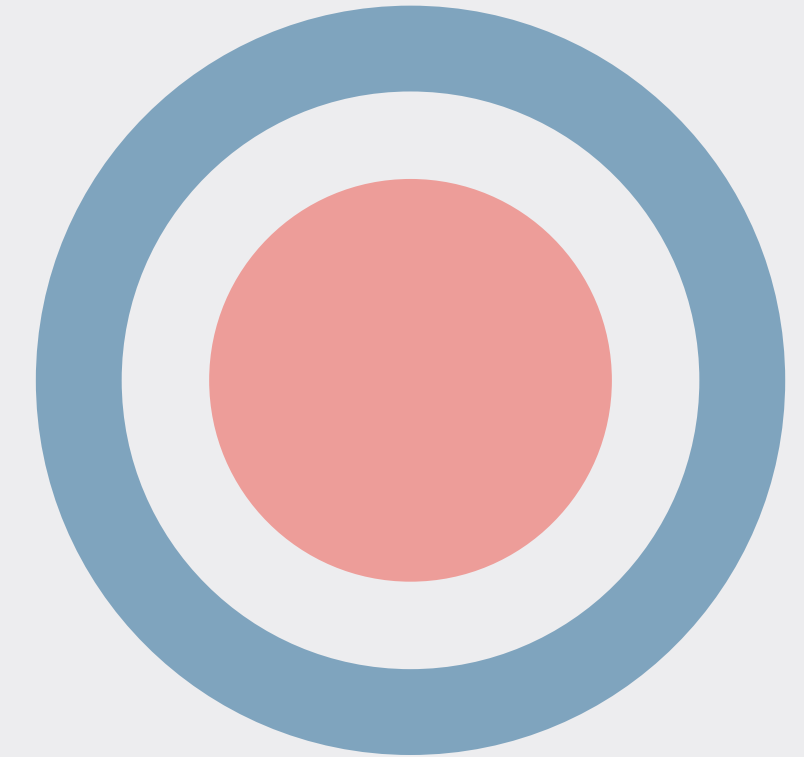
- contribute to fulfilling the obligations provided for under current laws with regard to health and safety at the workplace;
- comply with the provisions and instructions given by Management and various function Managers;
- use systems, machinery, equipment and means and company vehicles correctly;
- appropriately use protection devices made available without taking any personal initiatives to modify them, and to report any defects or problems;
- immediately report faults to systems, machinery, equipment and devices and other company vehicles, and any dangerous condition of which they become aware to their various function Managers;

## • 3.F

- participate in training programmes organised by RBM Group;
- not carry out any operations or handling on their personal initiative that can compromise their health and safety and that of other operators;
- undergo the health checks required by law or otherwise organised by the company's doctor.

Contents

## **3.G** Protection of workers





## 3.G Protection of workers

The RBM Group is committed to respecting and defending the human rights of its workers and to treating them with dignity and respect, committing to:

### **G.1. Prohibition of forced or undeclared labor**

Do not use or tolerate any forced labor (where forced labor means any work or service obtained from a person under threat of any penalty and for which that person has not offered themselves voluntarily) or undeclared labor.

### **G.2. Prohibition of child labor**

Do not use or tolerate child labor (the term “minor” refers to any person who is younger than the minimum age required for employment under the applicable law where the work is performed or who is still subject to compulsory schooling).

### **G.3. Non-discrimination**

Do not implement or tolerate any form of discrimination based on nationality, sex, race or ethnic origin, religion, political opinion, age, sexual orientation, disability, or health status, whether in hiring and pay policies, or in access to training, career paths, dismissal, or retirement of personnel.

### **G.4. Harsh or inhuman treatment**

Do not tolerate any harsh or inhuman treatment of employees such as psychological harassment, sexual harassment, corporal punishment, physical or mental coercion, or verbal abuse.

### **G.5. Freedom of association**

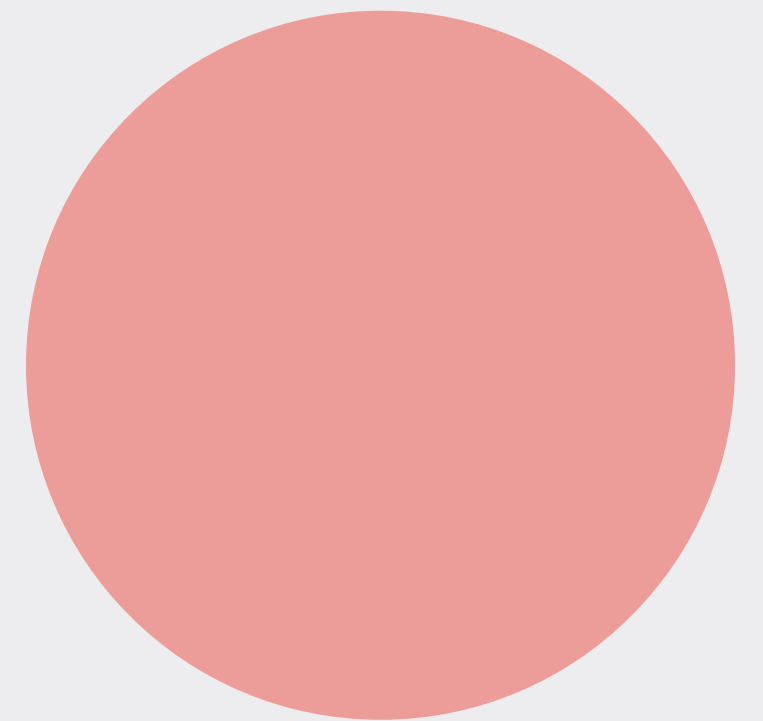
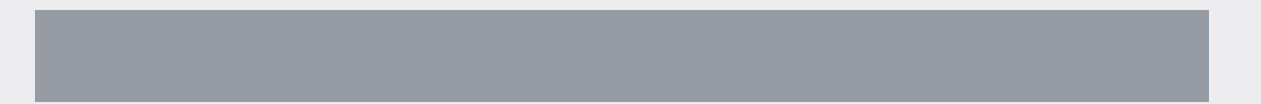
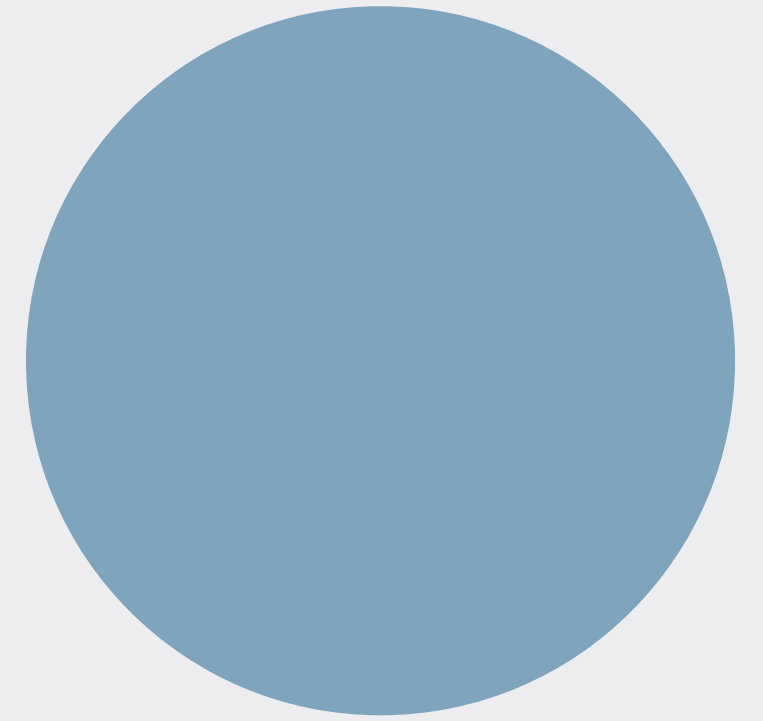
Recognize, as far as legally possible, the right of employees to free association, and do not support or discriminate against members of employee associations or unions.

### **G.6. Compensation and working hours**

Comply with all current regulations regarding salary, working hours, and legally mandated benefits; the terms and methods of compensation must be communicated to workers clearly and promptly. Comply with applicable laws and industry standards regarding public holidays.

Contents

## **3.H** Non-discrimination - gender equality



## 3.H Non-discrimination - gender equality

The RBM Group does not implement or tolerate any form of discrimination based on nationality, gender, race or ethnic origin, religion, political opinion, age, sexual orientation, disability or health status, whether in recruitment and remuneration policies, access to training, career paths, dismissal or retirement of staff:

- during selection and recruitment, is committed to preventing gender inequality and any other form of discrimination. It is also committed to selection processes that are transparent, impartial, and free from gender bias;
- it is committed to monitoring any pay inequalities between men and women in the same roles and with the same skills;
- professional development and promotions are based solely on professional skills and levels;
- is committed to a working environment that fosters diversity and protects the mental and physical well-being of employees;
- policies of flexibility and tools that facilitate the reconciliation of professional and personal life are encouraged, taking into account specific gender needs;
- offers adequate work-life balance tools;
- fully implements legal provisions and collective agreements on combating harassment in the workplace;

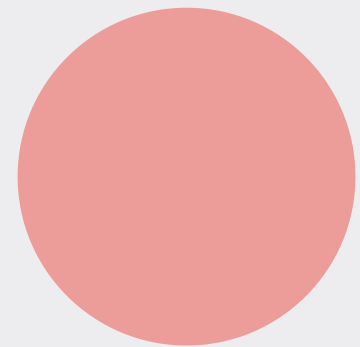
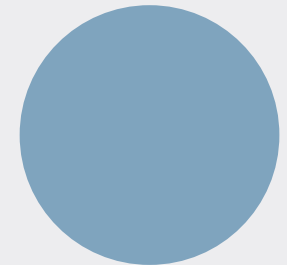
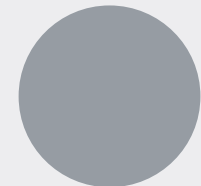
- any form of harassment, verbal or physical, is not tolerated. The RBM Group promotes a safe environment in which everyone feels protected and supported. Clear and confidential mechanisms are also provided for reporting and managing any incidents of harassment or discrimination: in particular, for this purpose, a dedicated reporting channel has been established;

1. Direct contact with the Gender Equality Management System Manager;
2. Email address – [paritadigenere@rbm.eu](mailto:paritadigenere@rbm.eu) ;
3. Teseo Portal – which allows suggestions or reports to be submitted, even anonymously, at the link <https://rbm.wb.teseoerm.com/#/> ;

- pays constant attention to the language used, sensitising communication to be as polite and neutral as possible;
- indicators and tools are defined to monitor the effectiveness of gender policies and identify possible areas for improvement;
- a Reference Steering Committee for gender equality has been established, with supervisory and continuous improvement functions.

Contents

## 3.1 Reports





## 3.1 Reports

Recent legislation on the prevention of corruption and unlawfulness (whistleblowing) has introduced a new instrument governing the protection of persons who report violations of national or European Union law that harm the public interest or the integrity of the public administration or private entity, of which they have become aware in a public or private employment context (Art. 1, Legislative Decree 10 March 2023, no. 24).

RBM Group has activated, in compliance with the whistleblowing regulation mentioned above, an internal reporting channel that, through a specific platform, makes it possible to electronically send reports in written form and guarantees the confidentiality of the identity of the reporting person, of the persons involved in the report, and of the related documentation. The reporting tool, as well as the organisation act and the privacy policy, can be downloaded from the appropriate area of the corporate website

All reports can be submitted in confidence and will be subjected to thorough investigation, resulting in the adoption of appropriate measures, where appropriate. All documentation and the identity of the informant will be kept confidential, to the extent permitted by law, and any form of retaliation will not be tolerated against those issuing the report.



**RBM S.p.A**

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