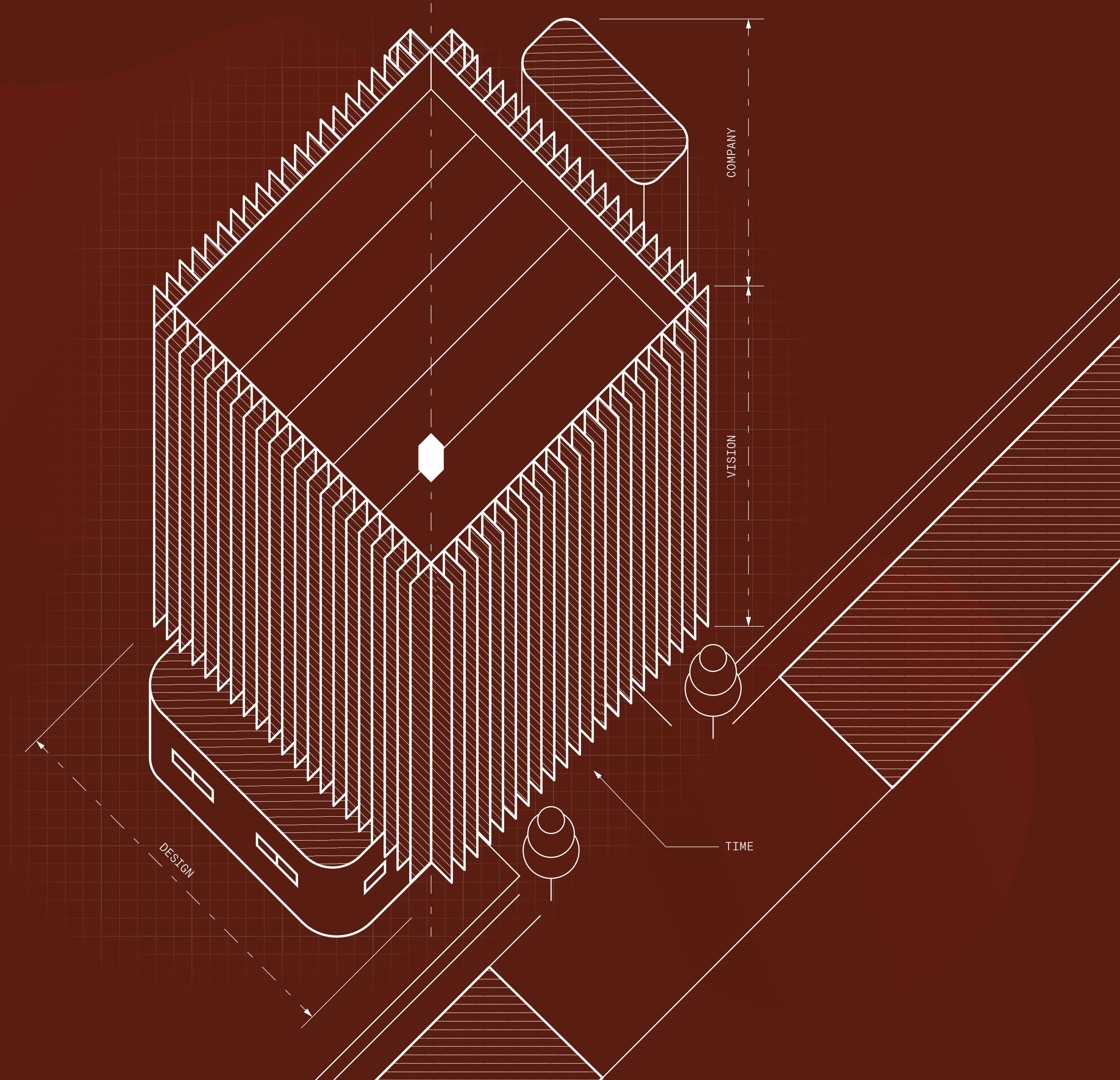


Management, Transparency and Business Ethics Policy



Scope

This policy applies to RBM S.p.A. in its entirety, including all its Italian offices, representative offices, and other permanent establishments located abroad, as well as to all employees who work permanently in Italy and abroad at such offices and facilities, in countries such as France, Belgium, and Romania.



Designated Officers

This policy was **drafted** by the following members of the HUB ESG of RBM S.p.A.:

CLO

CIO

CHRO

ESG MANAGER

It was subsequently **approved** by:

EXECUTIVE MANAGEMENT

**CHAIRMAN OF THE
BOARD OF DIRECTORS**

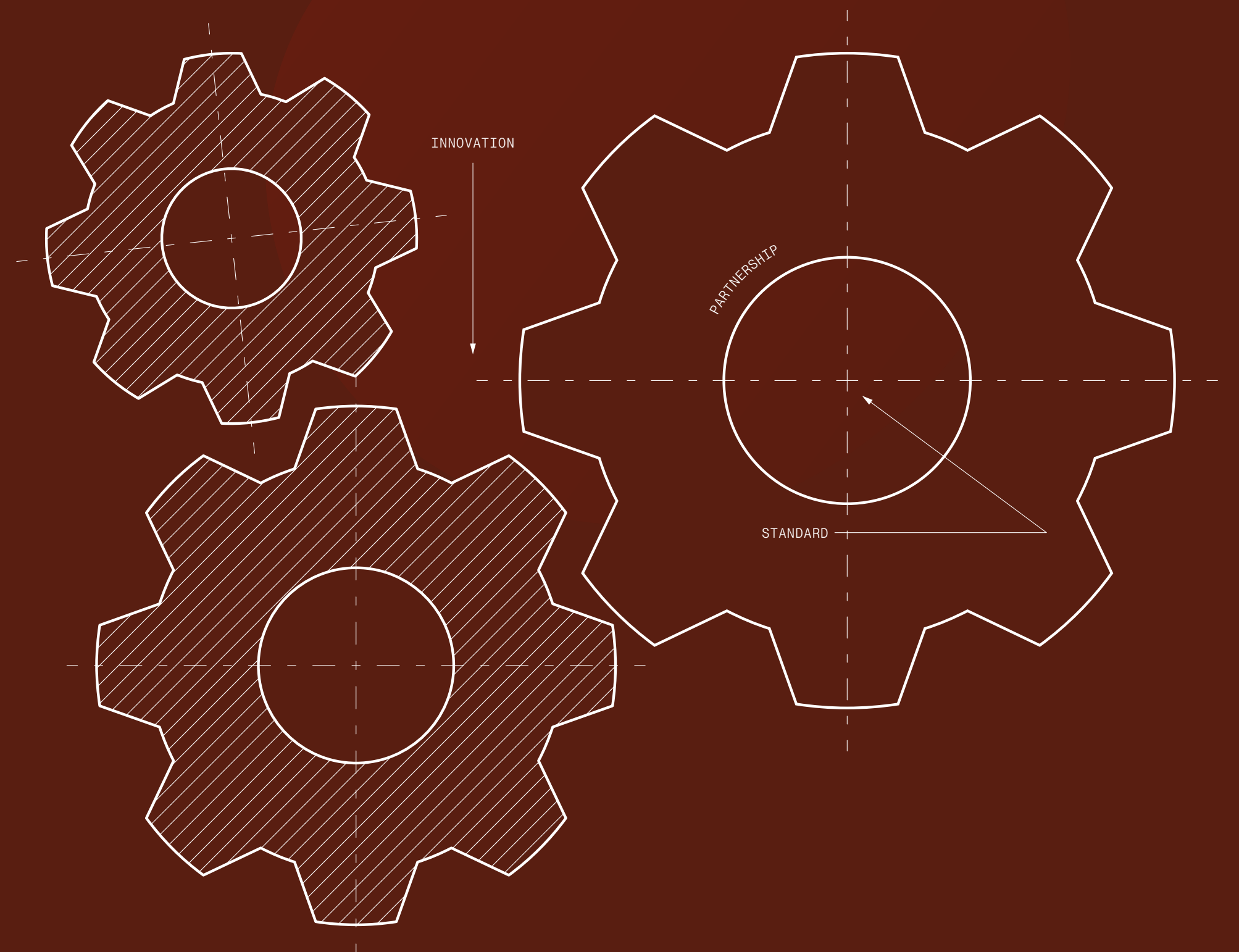
Update

This document must be **updated every two years.**

Corporate Governance

RBM is committed to adhering to the best governance practices, with particular attention to independence, transparency, and ethics. Our policy is based on clear, open management oriented towards responsibility to all stakeholders. In particular, we ensure that all decisions concerning our employees are communicated clearly to Top Management, in order to foster a healthy and cooperative working environment, inspired by **ethical leadership** and **compliance with local and international regulations**.

RBM guarantees its employees the right to express themselves freely, recognizing that freedom of expression is a fundamental value for the company. This allows not only the reporting of improper conduct, but also the proposal of ideas and actions for the continuous improvement of the work environment and company practices.



Corporate Governance

OBJECTIVES

- Ensure that all **company decisions** are **communicated clearly** to Top Management.
- **Maintain integrity and transparency in decision-making practices**, including in the communication the employees involved in strategic company choices.
- RBM is committed to **fostering an environment in which employees can safely and confidently report improper conduct**, ethical or regulatory violations, without fear of retaliation, ensuring that 100% of reports are processed and reported within a maximum of 3 months.

ACTIONS

- Implement by 12/31/2024 **an internal whistleblowing channel via an IT feedback platform for reporting violations committed in breach** of EU Regulation listed in Annex 1 to Legislative Decree no. 24/2023 in the corporate context.
- Implement by 12/31/2024 management and reporting procedures for 100% of reports received through the Whistleblower channel.
- **Implement** by 12/31/2024 **a dedicated, anonymous "anti-harassment" reporting channel** via an IT feedback platform for reporting inappropriate workplace conduct.
- Implement by 12/31/2024 management and follow-up procedures to ensure 100% of reports received through the dedicated "anti-harassment" channel are processed and reported.
- **Implement** by 12/31/2025 **platforms and other IT tools for receiving suggestions** from employees.
- Implement management and follow-up procedures covering at least 30% of suggestions received by 12/31/2025 and 60% by 12/31/2026.
- **Increase the transparency of company decisions** through monthly meetings with Top Management, starting by 06/30/2024.

Human Rights and Inclusivity

RBM is firmly committed to respecting human rights and opposes any form of discrimination.

We strive to ensure equal opportunities for all employees, regardless of gender, ethnicity, religion, sexual orientation, disability, or political opinion.

We promote an inclusive work environment that allows each employee to fully express their professional potential, respecting workers' health and safety, gender equality, and human rights.

RBM firmly rejects any form of forced or child labor, both within its own offices and branches, and at our suppliers.

We expect, in fact, that this principle is fully shared by our business partners, considering the countries in which they operate, where such fundamental rights are guaranteed by law, and taking into account RBM's Ethical Supply Chain Management.

Human Rights and Inclusivity

Our **recruitment policy is fair and inclusive**: the selection process is open, transparent, and based exclusively on skills and merit, in full compliance with current regulations on equal opportunities and non-discrimination.

OBJECTIVES

- **Promote an inclusive corporate culture**, ensuring that every employee is treated fairly.
- **Promote the occupational inclusion** of people with disabilities at suppliers.

ACTIONS

- Ensure the **maintenance** and annual **renewal** of the **partnership contract already signed with suppliers employing personnel with disabilities**, guaranteeing the continuity of this collaboration over time.
- Start by 12/31/2023 the **process for obtaining UNIPDR125 certification**.

Ethical Supply Chain Management

RBM is committed to influencing the behavior of its suppliers and business partners, requiring them to adhere to ethical and responsible practices through the implementation of a **Code of Conduct**. We preferentially select local suppliers, rooted in the territory, who are subject to the same regulatory framework, thus ensuring essential alignment between our company policies and those of our suppliers.

OBJECTIVES

- **Promote a responsible supply chain** by selecting **suppliers who share our corporate values** of integrity, transparency, and social responsibility.
- Implement the **Code of Conduct for suppliers**, ensuring that they comply with environmental regulations, human rights, and local laws.
- Ensure that each year the **supplier compliance rate with the Code of Conduct continues to increase**, and that by 12/31/2025 at least 50% of the total purchasing value comes from suppliers who have signed the Code of Conduct.

ACTIONS

- **Adoption and rollout of the Supplier Code of Conduct** by 12/31/2023.
- Preferred **selection criterion for suppliers located in the territory** where RBM operates.
- Implement **IT solutions that allow monitoring of suppliers** who have signed the Code of Conduct.

Anti-Corruption and Business Ethics Policy

RBM has adopted a rigorous anti-corruption policy, guided by the principles of **compliance, integrity, and transparency**.

All RBM employees and business partners are required to comply with applicable anti-corruption regulations and to adhere to our **Code of Ethics**, which promotes ethical conduct in all professional interactions.

OBJECTIVES

- **Promote ethical behavior** in every corporate decision.
- **Increase employee awareness regarding anti-corruption regulations and ethical best practices**, ensuring, for example, that 100% of employees are informed about the contents of the company Code of Ethics upon hiring.

ACTIONS

- Ongoing **drafting** and **updating** of the **company Code of Ethics**.
- Ensure that **100% of employees are informed of the contents of the company Code of Ethics** upon hiring, by 12/31/2023, and maintain this level of communication in subsequent years as well.
- Organize targeted **training sessions for employees** who may be exposed to active or passive corruption practices or fraud.
- **Conduct an assessment of corruption risks** to which the company is exposed by 12/31/2024.
- **Adopt the Organizational Model 231 for RBM's Italian offices** by 12/31/2026.

Information and Data Security

RBM is committed to protecting corporate information and the personal data of employees, clients, and partners, ensuring confidentiality, integrity, and availability. The company promotes a culture of cybersecurity and secure information management, in compliance with current regulations.

OBJECTIVES

- **Ensure the protection of all corporate data**, both digital and paper-based, from unauthorized access or incidents, maintaining over time the already achieved result of “0 data breaches”.
- **Spread awareness and safe behaviors** among employees in information management.
- **Ensure compliance with EU Regulation 2016/679 (GDPR)** for the protection and security of corporate information, a result already achieved and to be maintained over time.

ACTIONS

- **Implement and maintain secure data management procedures** in line with the “least privilege” principle, whereby each user must have access only to the resources and data strictly necessary to perform their duties.
- **Provide regular training for employees** on cybersecurity, data protection, and incident prevention.
- **Conduct periodic assessments of cybersecurity risks and update protection systems.**
- **Constantly monitor access** to data and secure backup systems for critical information.

Communication and Transparency

Transparent communication of our performance is a core value for RBM. We are committed to making information on our initiatives and the progress made towards the set objectives accessible to the public.

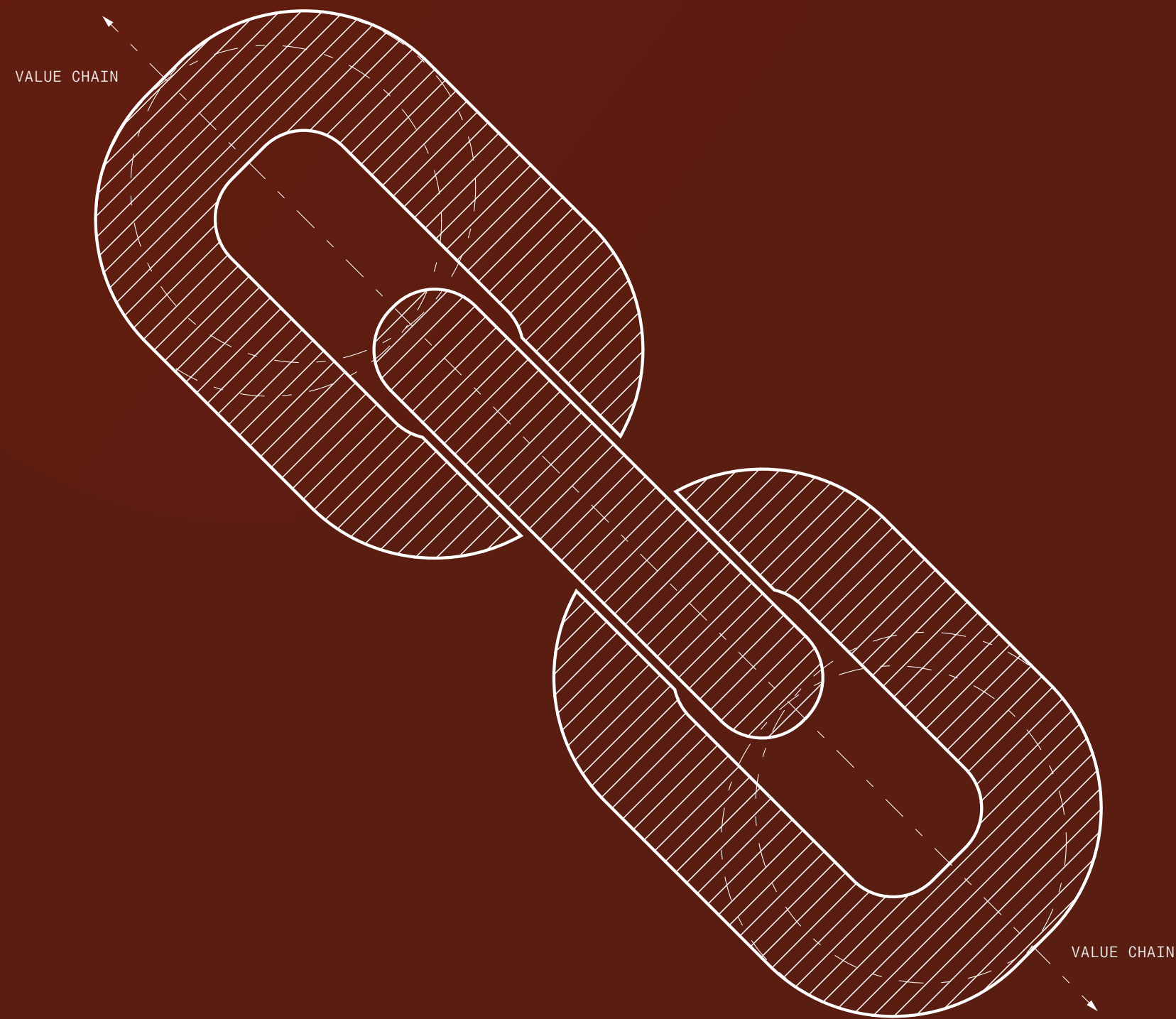
OBJECTIVE

To publish, starting from the 2023 fiscal year and subsequently every year, a **Sustainability Report** that clearly illustrates the progress achieved with respect to the established objectives.

ACTIONS

- **Collect and analyze data** annually to support the **development of corporate KPIs**.
- **Publish a transparent report on progress** achieved and future initiatives.

Conclusions



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This RBM Governance Policy is founded on fundamental ethical principles, including transparency, integrity, sustainability, respect for human rights, and the protection of corporate information and personal data.

RBM is committed to ensuring that every employee, collaborator, and business partner acts in line with these values. In particular, a strong focus on data security, both digital and paper-based, is an integral part of our business practices, ensuring the confidentiality, integrity, and availability of critical information, thereby safeguarding the company and all stakeholders.

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Guido Bossini



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