

BiesSse Group



CODE of ETHICS

Code of Ethics

BiesSse Tape Solutions S.p.A., in accordance with and pursuant to the Organization, Management and Control Model adopted under Legislative Decree No. 231 of 8 June 2001, has resolved to adopt this Code of Ethics.

This Code of Ethics, approved by the Company's Board of Directors on November 11, 2024, constitutes an integral and substantial part of the Organization, Management, and Control Model adopted pursuant to Legislative Decree No. 231 of June 8, 2001, and contains a series of principles and rules of conduct that its recipients must adhere to in carrying out their activities.

1. Introduction

1.1. The Mission of BiesSse Tape Solutions S.p.A.

BiesSse Tape Solutions S.p.A. (the “**Company**” or “**BiesSse**”), which has been operating in the global market for over 40 years, specializes in the production and processing of high-performance technical adhesive tapes.

BiesSse’s corporate mission is founded on technological innovation, with the primary objective of designing, developing and manufacturing advanced industrial solutions that ensure high performance, maximum safety and efficiency throughout every production process.

BiesSse is also committed to maintaining a constant and attentive focus on the protection of the environment and the surrounding ecosystem and, consequently, to identifying production processes aimed at achieving zero environmental impact. In this regard, through its ongoing commitment to research and development, BiesSse implements sustainable technical solutions designed to reduce its environmental impact and to pursue and ensure the continuous improvement of its corporate *performance*.

1.2. Ethical Approach to Business Activities

Through this Code of Ethics, the Company intends to define and set forth the values and principles of conduct that underpin its activities and govern its relations with all parties with whom it interacts in the pursuit of its corporate purpose.

The Company is committed to ensuring that all those who have relationships with it, be they employees, collaborators, customers, suppliers, commercial partners, the Public Administration, supervisory bodies, supervisory authorities or information bodies, that BiesSse's activities will be carried out in full compliance with the Law, the Statute and in compliance with the principles identified in this Code of Ethics.

All recipients of this Code of Ethics, as further identified in Section 1.4 below (the “**Recipients**”), are required to conduct themselves in accordance with the highest standards of fairness and integrity and to refrain from engaging in any conduct that is incompatible with their roles and responsibilities within the Company or that may adversely affect the Company’s reputation or image.

Compliance by all Recipients with the provisions of the Code of Ethics contributes to the pursuit of BiesSse's mission and is necessary from a reputational, well-functioning and reliable perspective of the Company.

1.3. Unethical conduct and the value of reputation

Behaviors that violate the rules of civil coexistence and proper social and commercial relationships are unethical. Such conduct evidently compromises the relationship of trust between the parties and can foster hostile attitudes towards society.

On the other hand, ethical behavior, good reputation, and transparency foster relationships with institutional, commercial, entrepreneurial, and financial stakeholders, attract the best human resources, and consolidate existing relationships between the Company and third parties.

1.4. The Recipients

The Recipients of this Code of Ethics shall include all persons who hold positions involving the representation, administration or management of the Company, or who, whether de jure or de facto, exercise management or control over the Company; all persons who, in any capacity, cooperate or collaborate with the Company in the pursuit of its objectives; all employees, without exception; and any person or entity having business dealings or commercial relationships with the Company.

The Recipients are required to comply with the principles set forth in this Code of Ethics, which shall also apply to any activities carried out by BiesSse outside Italy.

Compliance with the provisions of the Code of Ethics must be considered an essential part of the contractual obligations towards the Company, also pursuant to and for the purposes set forth

in Article 2104 of the Civil Code. The principles and contents of this document are, therefore, intended to be exemplary specifications of the obligations of diligence, loyalty, impartiality imposed by law on employees and which qualify the correct fulfillment of the work performance and the behaviors in general towards the Company.

Therefore, violation of the provisions of the Code of Ethics may constitute, as explained in § 4.5., failure to fulfill the primary obligations of the employment relationship or disciplinary offense, with any legal consequences, including with regard to the preservation of the employment relationship and may lead to actions for compensation for damages caused by the same violation.

2. BiesSse's principles and reference values

As previously stated, through this Code of Ethics, BiesSse intends to formally set forth the values and general principles of conduct to which it is committed and with which it identifies.

This section sets out the fundamental principles and values shared by the Company which, in addition to guiding its activities and conduct, shall also govern the conduct of the Recipients, with a view to ensuring the Company's sound and proper functioning, reliability and good reputation in the market.

2.1. Legal Compliance

Compliance with national and EU laws, as well as the provisions of the Statute, is an essential principle for the Company.

The Company shall not enter into or maintain business relationships with any party that is unwilling to adopt and comply with this principle.

No violation of applicable national or EU laws, or of the provisions of the Company's Articles of Association, may under any circumstances be justified on the grounds that it serves the Company's interests or is intended to secure any benefit or advantage for the Company.

In the performance of their duties, employees are required to comply with applicable national and EU laws and with the provisions set forth in BiesSse's Articles of Association. Employees shall also observe the general duties of diligence and loyalty, as well as the standards of conduct set forth in the collective bargaining agreements applicable to them.

In the course of their professional activities, collaborators, suppliers, business partners, members of the Company's governing bodies, and all persons acting in the name and on behalf of BiesSse are required to comply with applicable national and EU laws, the provisions set forth in the Company's Articles of Association and, where applicable, the relevant professional codes of conduct and ethical standards.

2.2. Integrity, fair dealing and professionalism

The pursuit of BiesSse's interests shall never justify any conduct that is contrary to the principles of fairness, integrity and professionalism.

Accordingly, any form of benefit, whether offered or received, that could be construed as intended to influence the independent judgment or conduct of any party involved shall be strictly prohibited and rejected.

Practices of corruption, illegitimate favors, collusive behavior, solicitation, direct and/or through third parties, of personal advantages for oneself or others, are prohibited.

As a limited exception to the foregoing prohibition, customary business courtesies, including gifts and hospitality, may be offered or accepted solely where they are of modest and reasonable value, are appropriate in the circumstances, and do not compromise, or appear to compromise, the integrity or reputation of either party. In no event may such courtesies be offered or accepted where, from the perspective of an impartial observer, they could reasonably be construed as being intended to obtain or confer an improper advantage.

2.3. Conflicts of Interest

In the conduct of all its activities, BiesSse shall avoid any situation involving an actual or potential conflict of interest that may impair or interfere with the ability to make impartial decisions in the best interests of the Company and in full compliance with the provisions of this Code of Ethics. By way of example and without limitation, the following situations shall constitute conflicts of interest:

- financial or economic interests held by an employee and/or members of their family in the business activities of the Company's suppliers, customers or competitors;
- using one's position within the Company or information acquired in the course of one's employment in a manner that may give rise to a conflict between personal interests and the interests of the Company;

- performing any type of work or professional activity for customers, suppliers or competitors of the Company;
- accepting money, favours or any other benefits or advantages from persons or companies that have, or intend to establish, business relationships with BiesSse.

If a Recipient finds itself in a situation potentially capable of generating a conflict of interest or in any case such as to prejudice the ability of the same to make decisions in the best interests of the Company, it must provide immediate information to the Supervisory Body (“OdV”). This communication will determine the onset of the simultaneous obligation of the Recipient to abstain.

2.4. Free and fair competition

BiesSse recognizes free and fair competition as a fundamental driver of the Company's growth and continuous improvement.

2.5. Fairness and Equal Treatment

In its dealings with all counterparties, BiesSse shall not engage in any form of discrimination on the basis of age, racial or ethnic origin, nationality, political opinions, religious beliefs, sex, sexual orientation or health status. The Company promotes inclusive practices and initiatives aimed at recognizing and valuing diversity, with the objective of fostering fairness, unity and constructive dialogue.

Ensuring the principle of equal opportunities for access to activities and projects represents one of the foundations of the Company's actions. Recipients are required to conform their professional conduct, among other things, to the principles of solidarity, assistance, and benefit towards the most vulnerable social groups.

2.6. Health, safety and the value of human resources

Respect for the physical integrity of every individual is a core ethical value of the Company. Collaborators of any level are an indispensable resource for the success of BiesSse's mission. The Company protects and promotes the value of human resources, with the aim of improving and enhancing the experience and wealth of skills possessed by each employee and collaborator. With this in mind, it guarantees working conditions that respect individual dignity and safe and healthy work environments.

In this regard, BiesSse specifically:

- considers compliance with all applicable legislation and agreements relating to occupational health and safety to be a top priority;
- recognises the effective management of occupational health and safety as an integral and fundamental component of the organisation's overall management framework;
- promotes and encourages the active involvement, cooperation and collaboration of all Company personnel in matters relating to occupational health and safety;
- guarantees the resources necessary for the correct management of occupational safety and health issues.

2.7. Environmental protection

BiesSse is firmly committed to protecting and preserving the environment. In conducting its business activities, the Company makes informed and responsible decisions aimed at ensuring that its economic activities are consistent with environmental protection requirements, in full compliance with all applicable laws and regulations.

2.8. Management of the company's assets

Safeguarding the integrity of BiesSse's assets and, more generally, those of third parties is an integral part of the Company's ethical tradition. The Company manages its assets in accordance with the principles of sound and cost-effective management, applying prudent risk management criteria.

2.9. Transparency and accuracy of Information

All transactions carried out by the Company must be adequately supported by appropriate documentation. The characteristics and rationale of each transaction must be clear, and the individuals who authorized, carried out, recorded, and verified the transaction must be identified or identifiable.

The Recipients shall ensure the highest standards of truthfulness, transparency, and completeness in all informations, whether verbal or documentary, provided in the course of their activities.

Individuals involved in the preparation of the information contained in the financial statements, reports, and all corporate communications shall conduct themselves in accordance with the

highest standards of integrity, transparency, and compliance with applicable laws and regulations.

2.10. Confidentiality of information

All informations that is not in the public domain relating to the Company or to any third party, of which a Recipient becomes aware by reason of their functions or otherwise in connection with their relationship with BiesSse, shall be deemed confidential and may be used solely for the performance of their work-related activities.

Recipients are also required not to disclose to third parties any information acquired, or otherwise obtained knowledge of, in the course of their activities, except where such disclosure is authorized by the Company or required by applicable laws or regulations.

Recipients shall not use inside information or confidential information to carry out personal transactions, whether directly or indirectly, including through an intermediary, whether for their own account or on behalf of third parties.

2.11. Protection of privacy

BiesSse guarantees, in compliance with applicable laws and European regulations, the confidentiality of the personal data and information in its possession.

All employees and collaborators of the Company are authorized to process personal data and may process only those personal data that are necessary for the performance of their assigned duties.

3. Implementation of the code of conduct

3.1. Relations with Customers

BiesSse conducts its business with the aim of satisfying and protecting its customers, paying close attention to their requests in order to promote continuous improvement in the quality of the products and services offered.

The information and documentation provided to BiesSse's current or prospective customers concerning the products and services offered, as well as BiesSse's experience and references, shall be truthful, accurate, and comprehensive.

Negotiations conducted directly by BiesSse personnel or through its sales network, contractual relationships, and communications of the Company shall be guided by the principles of ethics,

honesty, professionalism, and transparency, and shall in all cases be conducted in a spirit of the utmost cooperation.

Compliance with these principles is required of all those who provide and/or sell goods and/or services on behalf of BiesSse and, more generally, of anyone acting on behalf of or representing BiesSse.

3.2. Relations with the market

BiesSse believes in free and fair competition and conducts its activities with the aim of achieving competitive results that reward competence, experience, and efficiency.

Any action aimed at distorting fair competition is contrary to BiesSse's policy and is prohibited to anyone acting on its behalf.

Under no circumstances may the pursuit of the Company's interests justify any conduct by its management or employees that fails to comply with applicable laws, BiesSse's Articles of Association, or the principles and rules set forth in this Code of Ethics.

3.3. Relations with Employees and Collaborators

BiesSse recognizes the importance of its employees and collaborators as one of the fundamental factors in achieving the Company's objectives and adopts selection, development, performance evaluation, and training procedures and practices based on the principles of fairness and equal opportunities, without discrimination on the grounds of gender, race, age, sexual orientation, religious beliefs, or any other factor.

People are recruited on the basis of their experience, aptitude, and skills. In other words, recruitment is based exclusively on the match between the profiles sought and the qualifications and characteristics of the candidates.

The Company is committed to providing all its employees and collaborators with equal opportunities, ensuring that everyone receives fair treatment based on strictly professional merit in all decisions concerning their professional life, without any form of discrimination.

BiesSse conducts its activities in compliance with all applicable laws and regulations concerning workplace conditions and is committed to fostering a dignified and respectful working environment.

The Company is committed to promoting and strengthening a culture of safety by raising awareness of risks and fostering knowledge of and compliance with applicable laws and

regulations on prevention and protection, while encouraging responsible behavior on the part of all employees.

All employees are required to conduct themselves in a manner that contributes to maintaining a workplace environment based on respect for the individual dignity, honor, and reputation of each person, and shall take action to prevent any insulting or defamatory behavior in interpersonal relations.

3.4. Relations with Suppliers and Business Partners

BiesSse's business *partners* and suppliers, through their cooperation, contribute to the effective and successful conduct of the Company's business activities. Therefore, in contractual relationships involving the provision of goods and/or services, as well as in cooperation agreements, persons acting on behalf of the Company shall:

- develop relationships of fairness and cooperation with business *partners* and suppliers based on communication aimed at enabling the mutual exchange of skills and information and which fosters the creation of common value;
- ensure that every company in possession of the required requirements has the opportunity to compete for a supply, adopting objective evaluation criteria during the selection process, according to declared and transparent methods;
- comply with and require compliance with the contractually agreed terms and conditions, maintaining a dialogue consistent with sound business practices;
- report any significant issues arising with a supplier or external collaborator to the relevant management bodies, so that the appropriate consequences can be assessed.

Fees paid to individuals or entities entrusted with professional assignments shall be commensurate with the services performed, taking into account prevailing market conditions, and payments may not be made to any party other than the contractual counterparty.

3.5. Relations with Public Authorities

All activities and negotiations with the Public Administration are conducted according to the criteria of maximum honesty, collaboration, non-interference, and transparency, and exclusively by those delegated or appointed to do so.

In general, in dealings with Public Authorities:

- No offer of any monetary benefit, goods, or services may be made to managers, officials, or employees of Public Authorities, or to their relatives;

- it is prohibited to accept any object, service, or benefit in order to obtain more favorable treatment;
- anyone acting in the name and/or on behalf of the Company is required to comply with the provisions and principles set forth in this Code of Ethics;
- the Company shall not be represented by persons who are currently, or may in the future be, in a conflict of interest.

BiesSse does not support events or initiatives that have an exclusively or predominantly political purpose and refrains from exerting any direct or indirect pressure on political representatives.

3.6. Relations with supervisory and regulatory authorities

Communications, reports, and responses submitted to supervisory bodies and public regulatory authorities shall comply with the principles of completeness, objectivity, transparency, and timeliness.

It is prohibited to present false information, to conceal, in whole or in part and by fraudulent means, facts that must be reported to supervisory bodies and public regulatory authorities, and/or to obstruct, in any way, the activities of such bodies and authorities.

3.7. Relations with the media

Relations with the press, television, and, more generally, with the mass media, both national and international, shall be managed by the corporate functions specifically designated for this purpose and shall be conducted in accordance with the communication policy established by the Board of Directors.

The information disclosed by the Company shall be complete, transparent, and clear.

Recipients who participate in meetings, conferences, or public events shall do so in a personal capacity and, unless expressly authorized and delegated by the Company, may neither disclose information nor use the name or trademark of BiesSse.

3.8. Relations with the other Companies of the BiesSse Group

The Company conducts its relations with the other companies of the Group in accordance with the principles of transparency, reliability, accountability, and quality.

All Group companies that maintain relationships with state, government authorities and public institutions, including European Union and foreign ones, as well as with other entities representing collective interests, and with the individuals representing them, shall operate in s

constant and rigorous compliance with the regulations in force in Italy and the country where the relationship takes place, focusing their activities on fairness and transparency.

4. Implementation and Monitoring

4.1. Dissemination of the Code of Ethics

The Recipients shall be familiar with all the provisions and principles contained in this Code of Ethics and, having reviewed it, shall expressly accept its contents.

The Company undertakes to inform the Recipients of the Code of Ethics through appropriate communication, training, and awareness-raising activities, using the means and procedures deemed most appropriate.

The Code of Ethics is available to all Recipients on the Company's website, www.biesseworld.com, and on the Company's Webstudio portal. A hard copy may also be requested from Jennifer Mapelli, HR Manager.

The Code of Ethics is also made available to all those who have business and commercial relationships with the Company.

4.2. Implementation of the Code of Ethics

The Company is committed to updating this Code of Ethics should new needs arise, in terms of its modification and/or integration. In compliance with applicable laws and with a view to planning and managing the Company's activities in accordance with the principles of efficiency, fairness, transparency, and quality, BiesSse adopts appropriate organizational and management measures to prevent unlawful conduct or any conduct that is otherwise contrary to the rules set forth in this Code of Ethics.

In order to make the above principles increasingly concrete and effective, BiesSse has adopted management policies and practices aimed at ensuring their implementation, including the adoption of quality management systems (ISO 9001), the obtaining of the AIA (Integrated Environmental Authorization), and compliance with the requirements of the SA 8000 standard.

4.3. Supervisory Body for the Implementation of the Code of Ethics

While each corporate function is responsible for implementing the Code of Ethics within the scope of its respective duties, the Supervisory Body (OdV) is entrusted with certain key functions in connection with the implementation of this Code, including:

- promote the dissemination of the Code of Ethics among its Recipients;
- monitor the observance and adequacy of this Code of Ethics, also in order to propose any updates and/or additions thereto; receive and review reports of violations of the Code of Ethics;
- receive and review reports of violations of the Code of Ethics;
- report periodically to the Board of Directors on the results of the activities carried out, highlighting any violations of the Code of Ethics;
- define and strengthen policies and procedures aimed at preventing unethical, unlawful, or otherwise improper conduct by the Recipients.

The Recipients shall:

- report to the Supervisory Body any information concerning suspected violations of this Code of Ethics occurring within the Company.
- provide the fullest possible cooperation in investigating any actual and/or suspected violations of the Code of Ethics.

The Company's Supervisory Body shall have unrestricted access to data, documentation, and information relevant to the performance of its monitoring activities, subject to compliance with applicable *privacy* and data protection requirements.

4.4. Reports

Without prejudice to any protections provided for by applicable laws and/or collective bargaining agreements, each Recipient may submit requests for clarification, file complaints, or report information concerning potential violations of this Code of Ethics to the external party appointed in accordance with the Whistleblowing Policy.

The Company undertakes to carry out the appropriate investigations in response to any reports of violations of the Code of Ethics, with any resulting sanctions being applied, where appropriate. Reports of violations of the Code of Ethics made in good faith shall not result in any adverse consequences for the reporting person, even if such reports subsequently prove to be unfounded.

Whatever communication channel is used by the person making the report, the Company is committed to treating any report received confidentially and confidentially, in compliance with *privacy* regulations and all applicable laws.

4.5. Sanctions

Without prejudice to any sanctions provided for by applicable laws and regulations for violations of the provisions contained therein, the Company shall establish the sanctions to be imposed on Recipients who engage in conduct contrary to the provisions and principles set forth in the Code of Ethics. Such sanctions shall be imposed in accordance with the principle of proportionality, taking into account the seriousness and intentionality of the violation committed, as well as any recurrence of such conduct.

For employees, compliance with the Code of Ethics is an integral part of the conditions governing the employment relationship, and any violation of this Code of Ethics will result in disciplinary action, proportionate to the seriousness of the conduct, taking into account any recidivism, as provided for in applicable employment contracts. These violations will also be taken into account for any career advancement and promotion.

With regard to other Recipients, violation of the provisions or principles contained in this Code of Ethics will lead to the adoption of measures proportionate to the seriousness of the conduct, taking into account any recidivism, until the termination of existing contracts with them for just cause or for non-performance.

In any case of violation of this Code of Ethics, the perpetrator of the act and any competitors in the violations themselves may be held accountable for the damages caused to the Company.

5. Approval and amendment of the Code of Ethics

This Code of Ethics is approved by the Board of Directors of BiesSse

Any amendments and additions to the Code of Ethics may be adopted, again by resolution of the Company's management body, based on regulatory developments and application experience, as well as suggestions and guidance from the Supervisory Body.