



# CODE OF ETHICS

The ethical vision of B.ForB. Srl

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## 1. WHY THE CODE OF ETHICS

The Code of Ethics defines the acceptability or unacceptability of behaviours and proposes a set of corporate ethical rules. The Code of Ethics also aims to be a source of motivation so as to stimulate ways of behaviour that help to guide one's own conduct, to increase internal cohesion and to improve relations between companies. The objective of the Code is to improve internal relations and to create a harmonious and irreproachable external image, in order to encourage the construction of a climate of trust within the company and towards its customers by supporting B.ForB.'s reputation in the eyes of its stakeholders. The Code of Ethics is intended to be a point of reference and a guide for those who work at B.ForB. It sets out the commitments that each collaborator of B.ForB. assumes in conducting business activities.

This Code is an integral part of the organisation and management model laid down in Legislative Decree no. 231 of 08/06/2001.

## 2. RECIPIENTS OF THE CODE

The addressees of the Code are all those who, in various capacities and with different responsibilities, constitute the organisation and/or directly and indirectly achieve its objectives.

They are defined as follows:

- *Collaborators*: those who, beyond the legal qualification of the relationship, have a working relationship with B.ForB. aimed at achieving the goals of the company.
- *Customers*: these are the organisations that, in the various markets in which B.ForB. operates, make use of the company's consulting services;
- *Shareholders*: they are the owners of the company, those who hold a share of shares in B.ForB.;
- *Suppliers*: are all those subjects (natural and/or legal persons) who, for various reasons, exchange with B.ForB. goods, services, services and resources necessary to carry out its activities;
- *Institutions*: these are the public entities with which B.ForB. deals.

## 3. MISSION OF B.ForB.

To be partners of our customers for the development of a sustainable and innovative entrepreneurship, defining and implementing projects of enhancement and optimization, measurable and durable. To propose a corporate culture of continuous improvement and attention to the customer, inclined to qualitative and technological excellence.

## 4. VALUES OF B.ForB.

These are the principles to which B.ForB. refers in carrying out its daily activities and on which guidelines are formulated in order to achieve the strategic objectives of the company:

- **Relationship**

Establishing constructive relationships between people is the basis on which B.ForB. sets its success. Building trustworthy and synergistic relationships with customers is the first step to work effectively, to create a proactive working environment and to achieve challenging goals.

- **Responsibility, Coherence and Transparency**

Transparency of behaviour and consistency in respecting the rules. B.ForB. is responsible for its work, individually and collectively and undertakes to operate in accordance with the principles of honesty of which it acts as spokesperson.

- **Sustainable Innovation and Quality**

B.ForB. is aware that developing innovative and sustainable solutions is the winning strategy to achieve the most demanding goals. B.ForB. is committed to providing solutions capable of ensuring continuous growth with high competitive impact.

- **Respect**

Respect for colleagues and customers, the environment and working rules. To guarantee a fair balance between work and private life for all employees.

- **Legitimacy and Integrity**

B.ForB. respects the current regulations of the country in which it operates, taking care to verify the non-infringement of the same by all its collaborators, customers, shareholders and suppliers.

## 5. CONDUCT BEHAVIOURS AND RELATIONS WITH EXTERNAL PARTIES

These are the rules, responsibilities and values that B.ForB. assumes towards its direct stakeholders.

### 5.1 Responsibility towards collaborators

- **Respect, fairness and enhancement of professionalism**

B.ForB. acknowledges that the staff who work together to achieve the company's objectives are the most important assets. For this reason B.ForB. guarantees a working environment in which each collaborator can work accordingly to his or her professional profile. To this end, B.ForB. undertakes to:

- Invest in the development of skills, preparing updating and training programmes aimed at valorising the professionalism of the individual;
- Provide fair compensation and benefits in accordance with applicable law;
- Communicate and share professional and career paths, improvement objectives for each professional profile;
- Respect the principle that all people must have equal access to work, facilities, services and programs, regardless of personal characteristics and conditions;
- Prohibit discrimination and harassment against anyone on the basis of gender, race, religion, creed, age, ethnic origin, nationality, marital status, maternity or paternity, pregnancy, disability, sexual orientation or any other personal characteristic and/or condition.

- **Motivation and engagement:**

B.ForB. is committed to creating optimal working conditions to maintain high motivation and commitment of employees, listening to their expectations, taking charge where possible and proposing the most appropriate organizational solutions.

Especially, B.ForB. is committed to:

- Enhance the work time of employees, requiring only performances consistent with the exercise of their role and with the needs of the company;
- Develop a positive and proactive working climate, encouraging a culture of knowledge sharing within society;
- Organising periodic meetings to share company objectives;
- Pay attention to the needs of collaborators, especially in situations of difficulty that may prevent the normal performance of work.

B.ForB. also defines the procedures relating to the conduct that must be adopted by collaborators in order to safeguard the working environment.

- **Knowledge management and sharing**

Every collaborator shall:

- Prevent conduct that could be prejudicial to B.ForB.'s trade secrets;
- Not manipulate or use information and knowledge owned by B.ForB. to increase their personal power to the detriment of the company itself.
- Not disclose confidential Information and/or false information about B.ForB.;
- Not damage the company's reputation.

- **Conflict of interest**

Each collaborator must avoid situations in which conflicts of interest may arise with B.ForB. and must refrain from taking personal advantage of possible business opportunities connected with the performance of their duties.

## 5.2 Responsibility towards customers

Customer relations shall aim to ensure excellence in service and quality, in accordance with the principles and values set out in the preceding paragraphs. These relationships should be based on:

- **Honesty and mutual transparency:**

B.ForB. undertakes to provide professional services that are in line with its capabilities and competences, never operating below the standards of what it has undertaken to do and in compliance with contractual obligations. Moreover, in all the different phases of a consultancy intervention, B.ForB. is committed to always operate with the utmost intellectual honesty, fairness and integrity.

B.ForB. guarantees that the quotations of the consultancy service are in line with the reference market practices and in any case in accordance with the internal rules of the company itself, requiring a fair remuneration for the services performed and reporting to the customer on costs and resources committed to the project.

- **Quality and sustainability of services:**

B.ForB. is committed with the aim of providing companies with quality services and solutions that are sustainable over time, explaining to the customer the characteristics, potential, risks and limits of each project and promoting the sharing of information at every stage of the project.

- **Confidentiality:**

B.ForB. assumes responsibility for protecting the confidentiality of information and sensitive data of companies with which it signs a consulting contract. In addition, all collaborators of B.ForB. will be prevented from using confidential information for personal purposes and will be required to be careful when working with a potential competitor of the customer.

### 5.3 Responsabilità verso gli azionisti

B.ForB. guarantees an ongoing dialogue with its shareholders in accordance with the principles of:

- **Consistency and accuracy:**

B.ForB. assumes the duty to report to shareholders on the results achieved, ensuring the accuracy and timeliness of financial information.

- **Valorisation of the company:**

For all consultancy services requested, B.ForB. protects the reputation of the company, refraining from taking any action that could discredit its image. Furthermore, it undertakes to act correctly in all institutional relations.

- **Value Creation**

B.ForB. is committed to the creation of value in the medium to long term for its shareholders, through a sustainable management of its activities.

### 5.4 Responsibility towards suppliers

B.ForB. suppliers are considered as valuable partners and key contributors to the achievement of business objectives. B.ForB. manages and establishes relationships with suppliers according to the following principles:

- **Collaboration Relationship**

B.ForB. works to create, especially with partners in consultancy services, collaborative relationships aimed at exchanging information and expertise for the creation of value for the customer. These relationships are based on transparency, mutual honesty and correctness of information. Suppliers are also required to observe and respect the values and principles expressed in this Code. Failure to comply with the provisions contained in this Code may lead to the end of the supply relationship, relieving B.ForB. of any commitment provided for in the contractual conditions initially agreed.

- **Selection Criteria:**

The selection of suppliers shall be based on the evaluation of the quality of services, on the congruence of professional and technical performance, as well as on social and environmental responsibility.

During the selection and qualification phases, and for the entire duration of the service provision, B.ForB. pursues excellent quality and service levels, together with the cost-effectiveness of the offer. These evaluations shall be based on objective and impartial evaluation and qualification criteria. B.ForB. guarantees equal opportunities to any potential supplier.

- **Fairness in partnership**

B.ForB. promotes the creation of common and shared business values and objectives, avoiding possible situations of dependency and abuse of position. B.ForB. bases its partnership relationships with suppliers on fairness and undertakes to respect the terms and methods of payment agreed with them, unless there are unforeseen events that could lead to a review of the initial contractual conditions.

In addition, B.ForB. avoids any form of illegal payment to suppliers or their representatives and does not give gifts intended to obtain special conditions of favor. Likewise, B.ForB. rejects benefits and/or gifts from suppliers aimed at obtaining special favourable conditions.

#### 5.5 Responsibility towards Institutions

All relations with the Public Administration must be characterised by transparency and strict compliance with the principles of legality. Furthermore, any form of illegal payment, offering or receiving gifts for the purpose of obtaining an assignment or any other advantage is prohibited