

A close-up photograph of a person's hand holding a rectangular wooden sign. The sign has the words "CODE OF ETHICS" printed in a bold, black, sans-serif font. The person holding the sign is wearing a dark suit jacket and a white shirt. The background is a plain, light-colored wall.

**CODE OF
ETHICS**

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Generalities

The **CODE OF ETHICS** adopted by **BOEMA** is a set of principles and rules, that the observance is of fundamental importance for compliance with the principles of ethics, sustainability, respect for the environment and the proper functioning and improvement of the company itself.

It represents the "Charter of Fundamental Rights and Duties" through which the Company:

- clarifies one's responsibilities;
- communicate and share the intentions with all stakeholders.

This **Code of Ethics** is binding for Boema directors and employees, as well as for all those who operate and collaborate, permanently or occasionally, on behalf of the Company.

Compliance with the provisions of this Code is entrusted to the cautious and careful supervision of each of the recipients, within the context of their respective roles and functions within the company.

The internal control system is oriented towards the adoption of tools and methodologies aimed at countering potential company risks, in order to guarantee compliance not only with the law, but also with internal provisions and procedures.

The key principles on which it is founded are the following:

Compliance with laws

- comply with the laws of the legal systems applicable every time.

Prohibition of bribery

- not to admit or engage in any form of corruption, including payments or other forms of benefits conferred on public officials in order to influence decisions contra legem (against law).

Respect for the basic human rights of employees

- promote equal opportunities for the employees, as well as fair treatment of them, regardless of skin color, race, nationality, social background, disability, sexual orientation, political or religious faith, gender, or age;
- respect the personal dignity, privacy, and rights of each individual;
- abstain from hiring or making someone work against their will;
- not condone any unacceptable treatment of employees, such as mental cruelty, sexual harassment, or discrimination;
- prohibit any behavior that is sexually offensive, coercing, threatening, abusive or exploitative, including gestures, language, and physical contact;
- provide adequate remuneration and guarantee the applicable national minimum wage;
- comply with the maximum number of working hours established by the applicable regulations;
- recognize, as far as legally possible, the right of free association of employees and not support or discriminate against members of employee associations or trade unions.

Prohibition of child labor

- do not hire workers under the age of 18.

Employees health and safety

- take responsibility for employee health and safety;
- keep hazards under control and take the most appropriate precautionary measures against occupational accidents and diseases;
- offer training activities and ensure that employees are informed on health and safety issues;
- set up or use an occupational health and safety management system according to the OHSAS 18001 standard or equivalent system.

Environmental protection

- act in compliance with statutory and international regulations on environmental protection;
- minimize pollution and make continuous improvements to protect the environment;
- establish or operate an environmental management system in compliance with the ISO 14001 standard or equivalent system.

Supply chain

- work to promote compliance with this Code of Ethics among its suppliers;
- comply with the principles of non-discrimination in the selection and treatment of suppliers.

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