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**BREMBO CODE OF
CONDUCT FOR THE
DEVELOPMENT AND
USE OF A.I.**

(REV. 00 – 06/11/2025)

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BREMBO CODE OF CONDUCT FOR THE DEVELOPMENT AND USE OF A.I.

INTRODUCTION: TECHNOLOGICAL EVOLUTION AND RESPECT FOR VALUES

Brembo and all its subsidiaries ("Brembo" or the "Company") have always been oriented towards innovation, digitalization, and the use of new technologies, including various artificial intelligence ("AI") applications in its products, processes, and solutions.

In this context, characterized by increasing complexity and the continuous evolution of new features attributable to so-called generative AI, Brembo intends to implement all measures aimed at mitigating any negative and/or unpredictable effects. This applies above all to any potential impacts on "Fundamental Human Rights" as enshrined in the Charter of Fundamental Rights of the European Union ("EU Charter of Fundamental Rights")¹, as well as on the security and accuracy of data and the integrity and fairness of results.

The Brembo Code of Conduct for the Development and Use of AI ("Code"), shared and approved by the Board of Directors of Brembo N.V. on 6 November 2025, embraces and adheres to, among other things, the ethical values of honesty, fairness, legality and transparency also defined in the Company's Code of Ethics. It therefore sets out the principles and guidelines that all Brembo activities must follow when using AI systems, whether third-party or proprietary, either directly or indirectly.

This Code applies to any type of AI, present or future, without claiming to be exhaustive and with a commitment to continuous adaptation and improvement in line with the overall evolution of AI.

1. LEGALITY AND RESPECT FOR FUNDAMENTAL RIGHTS

Brembo undertakes to ensure that any decision relating to the use and the development and sale of AI is made in full compliance with and in accordance with "Fundamental Human Rights," as set off in the EU Charter of Fundamental Rights. This applies in particular to the rights of freedom, human dignity, equality, non-discrimination, inclusion, accessibility and justice. Full compliance with current and future national, European (including EU Regulation 2024/1689 on artificial intelligence) and international regulations on AI, labour, personal data protection, intellectual property and copyright must also be ensured in all countries where Brembo operates.

¹ [Charter of Fundamental Rights of the European Union](#)

2. HUMAN-CENTRIC APPROACH ("HUMAN-IN-THE-LOOP")

Brembo evaluates the opportunities offered by AI as a service and as a tool that can improve and/or facilitate the work of all employees, placing people at the centre of all activities and safeguarding their physical and psychological integrity. Human supervision of AI – at every stage of the development, production, sale and use process, as well as in all its forms (the so-called 'human-in-the-loop' principle) – is a fundamental pillar for ensuring that people retain their autonomy of judgement and decision-making with regard to what is generated by AI, especially in relation to maintaining critical skills.

3. DATA ACCURACY AND RELIABILITY

Brembo undertakes to ensure that data used to input AI systems are accurate, complete, up-to-date, and sourced from proprietary, reliable, and verified sources, in accordance with principles of verifiability and transparency and without infringing any third-party rights. Brembo also commits to periodically reviewing the data processed by AI systems to ensure its relevance, accuracy, and timeliness.

4. INCLUSIVITY AND FAIRNESS

Brembo is committed to ensuring that the development and use of AI in its activities is based on solutions that are ethical and socially responsible, promoting inclusivity and respect for personal data processing while avoiding any form of discrimination. Regarding AI systems involving employees, collaborators, customers, suppliers, or other stakeholders, Brembo is committed to ensuring the constant review of algorithms and datasets. This is also intended to prevent bias or distortion, and to avoid the risk of unfair or discriminatory results.

5. TRANSPARENCY OF INFORMATION

Brembo promotes clear and transparent communication on the use of AI both internally and externally, allowing all stakeholders to use it in compliance with applicable regulations and Fundamental Rights.

6. TECHNICAL ROBUSTNESS AND SECURITY

Brembo promotes the development and adoption of AI systems designed according to criteria of technical robustness and security to ensure operational integrity throughout the application's lifecycle, including

through testing activities, monitoring of operations and the adoption of preventive measures against operational risks, in line with regulatory and industry standards.

7. SUSTAINABLE DEVELOPMENT

Brembo promotes energy-efficient AI that is consistent with the ESG objectives at the core of its strategic vision, assessing the environmental, social, and governance impact of the solutions adopted: energy consumption efficiency and waste reduction are just some examples of objectives that Brembo pursues through AI use.

8. ACCOUNTABILITY

Improper use of AI can cause not only economic damage but also have a reputational impact. Every coworker is responsible for the use and verification of AI and the results it generates. Responsible implementation of AI involves mapping the digital systems used and developed to classify Brembo's level of risk exposure and their potential impact on the activities carried out and on stakeholders.

One of the objectives of this mapping is to ensure a system of continuous monitoring and updating (considering technological and regulatory developments) throughout the life cycle of AI-based systems, so as to ensure full application of the provisions of this Code and compliance with the "Fundamental Human Rights" as enshrined in the EU Charter of Fundamental Rights².

To this end:

- Transformation GCF must be consulted for any adoption and/or creation of new products and/or services that use AI.
- an internal committee has been identified to monitor and continuously update the aforementioned mapping.

9. TRAINING

Brembo has long been committed to spreading the culture and knowledge of AI among all its employees, aware that training is essential both for the best use and for the widest mitigation of the possible risks associated with the use of AI in all its application, both in professional and personal life. For this reason, Brembo promotes training programs, accessible to all, on the ability to understand and adopt AI in the performance of one's work duties, as well as on the ethical, legal and social implications of its use.

² [Charter of Fundamental Rights of the European Union](#)

10. FOR USERS

To report any violations of the EU Charter of Fundamental Rights, you can use the internal reporting channel – legality whistleblowing. To exercise your rights regarding the processing of personal data through AI applications, you can send a request to privacy@brembo.com.