



Code of Business Conduct and Ethics

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I. Definitions

In order to facilitate a better understanding of the Code of Business Conduct and Ethics (hereinafter “Code”), the following definitions have been identified:

- ❖ **Board of Directors:** the board of Brembo SGL Carbon Ceramic Brakes S.p.A.
- ❖ **BSCCB/Company/Group:** Brembo SGL Carbon Ceramic Brakes S.p.A. and its subsidiary Brembo SGL Carbon Ceramic Brakes GmbH
- ❖ **Close family member:** family members of a person and include: that person’s children, and spouse or domestic partner; children of that person’s spouse or domestic partner; spouse or domestic partner; and that person’s other relatives by blood or by marriage up to the second degree
- ❖ **Code:** The present edition of the Code of Business Conduct and Ethics
- ❖ **Employees/Coworkers:** All subordinate workers performing duties on behalf of BSCCB
- ❖ **Direct Manager:** Person/people holding a supervisory position, directly responsible for the management of one or more Coworkers
- ❖ **Directors:** BSCCB General Managers/Managing Directors and people holding positions directly reporting to the BSCCB General Managers/Managing Directors
- ❖ **Stakeholders:** Coworkers, investors, shareholders, customers, suppliers, communities, etc. who are involved in and/or have an interest in BSCCB
- ❖ **Third Parties:** Agents, brokers, partners, consultants (both natural and corporate), contractors, direct and indirect suppliers and other representatives performing work on behalf of and/or for the benefit of BSCCB
- ❖ **You/your/yourself:** Coworkers and members of the Board of Directors, Directors, Direct Managers and Third Parties.

II. Purpose and Scope

1. Why a Code?

Brembo SGL Carbon Ceramic Brakes S.p.A. and its subsidiary Brembo SGL Carbon Ceramic Brakes GmbH (jointly the “BSCCB”) has grown extensively in recent years, becoming an industrial force that competes and does business on a global playing field. This transformation, that has been clear for all to see and a source of pride for us all, has confirmed BSCCB’s commitment in creating value for its customers by offering best solutions through its innovative, high-quality products and services. Such commitment, which involves a great deal of complexity at a geographical, legislative and cultural level, includes more stringent standards, responsible and lawful conduct in all of our businesses, that more effectively responds to new and diverse statutory requirements.

This Code of Business Conduct and Ethics (the “Code”) is an expression of the respect of people, the legal and ethical standards embodied in the excellence we strive for throughout all of our businesses, and which we expect in return from our business partners, fostering in us all the capacity to share and spread behaviors to support the sustainable growth of BSCCB, while encouraging understanding and respect for diversity and building a culture of integrity.

A key element for the sustainable business success of BSCCB is the respect for people. BSCCB is determined to ensure the same dignity and treatment for all the people with who, in different countries, create and promote our products and services, and upon whom our success most depends – employees, customers, shareholders, suppliers and the public. Compliance with the *Code* is fundamental to creating and maintaining trust and confidence with our stakeholders.

Thus, BSCCB invite you all to adopt the standards identified in this *Code* as your own, and doing so, contribute to continuously strengthening our stakeholders’ trust in BSCCB, with the belief that it is only by showing respect that respect is gained.

“Today, transparent, ethical and compliant behaviors are essential for conducting business. For this reason, BSCCB Code of Business Conduct and Ethics emphasizes not only our commitment to compliance with laws and regulations, but also describes standards of conduct aimed at supporting sustainable growth and preserving BSCCB’s reputation, in accordance with our principles and values.”

2. Application of the Code

This *Code* should be read and construed in conjunction with BSCCB Antibribery Code of Conduct, BSCCB Basic Working Conditions and other policies, procedures, guidelines and/or organizational announcements existing as of today and that may be issued in future. This Second Edition of the *Code* supersedes all previous releases.

This *Code* will be available in English, Italian and German according to BSCCB's presence in Europe. The original version is in English; the Italian and German versions are provided for convenience.

All Coworkers have to receive – upon hiring in BSCCB – a digital or hard copy of this *Code* (and all future updates) and to respectively acknowledge or sign a receipt attesting delivery. In addition, the *Code* is posted on the BSCCB's Bulletin Boards and made accessible to all the Coworkers¹ and it is available on, and may be freely downloaded from, the BSCCB's Intranet.

The *Code* is also available for consultation to all Third Parties, and may be freely downloaded from the BSCCB's website. Particularly, through these principles, BSCCB reinforces its commitment to building a resilient, responsible, and forward-looking supply chain that aligns with its long-term sustainability vision. This *Code* applies to all Third Parties delivering goods and services to all companies within the BSCCB Group.

BSCCB expects all its Stakeholders' behaviors to be aligned with the contents of the *Code*.

3. Personal Responsibility and Accountability

This *Code* shall apply to all members of the Board of Directors, General Managers, Directors and Coworkers, both management and non-management, and Third Party performing duties for or on behalf of BSCCB, whether or not directly employed by BSCCB, in the countries where BSCCB operates.

Each Coworker has the personal responsibility to create and sustain a work environment in which all Coworkers know what the right behaviors are to adopt and to comply with the *Code* and the laws that apply to her/his work.

A high level of social and ethical competence is expected from the executive staff or from those who manage and coordinate people, whose conduct should serve as an example of legal and ethical compliance.

Third Parties shall also comply with the regulations and standards in force in the countries where they operate. Where local regulations are less stringent than the principles contained in this *Code*, Third Parties are invited to adopt, within a reasonable period of time, the necessary measures to comply with the principles and conduct defined in this *Code* and detailed below.

4. Information

If you have any doubt about the requirements and principles stated in this *Code*, you should contact your Direct Manager.

If you don't understand a policy or procedure, you are responsible for obtaining an explanation and you should contact your Direct Manager.

¹ To this extend in accordance with the provision by the applicable laws.

On the last page you can find all reference and links to the BSCCB's website and intranet, where you can have access to all documents such as codes of conduct, policies or procedures mentioned in the *Code*.

III. Basic Principles

The following principles support legal and ethical behavior and promote personal integrity in our Coworker and a strong corporate culture for BSCCB. They are the basis for operating business and achieving long-term success:

- **Behaving with integrity, honesty and respect, placing common interest before individual ones:** that means fair, polite and respectful conduct towards all coworkers; honest dealings with customers and other business partners, shareholders, and authorities, and general lawful and ethical conduct in the countries where BSCCB operates, while maintaining sensitiveness to and respect for the diverse social and cultural settings;
- **Passion for success and Commitment:** that means pursuing excellence through high quality and timely performance and professionalism and good business practice.
- **Appreciation and Loyalty:** feeling part of BSCCB and proud to be recognized as such;
- **Trust and Responsibility:** that means responsible and transparent conduct in dealing with risks, and appropriate consideration of the interests of the environment, doing the best to maximize people contribution (in terms of performance, competencies, potential and motivation) to Company goals.

This *Code* summarizes the main areas of conduct and ethics, most of them described in more detail in the underlying specific policies and procedures and which form an integral part of its Governance Principles.

1. GENERAL STANDARD OF CONDUCT

1.1. Lawfulness and Integrity

BSCCB believes that a lawful and honest conduct provides the basis for its long-term sustainable success, for the achieving of which the trust of the customers, shareholders, colleagues and communities is essential.

BSCCB is committed, and all its Coworkers have a fundamental role in that, to managing its business and operations in compliance with all existing laws in force in any jurisdiction where it operates, also in terms of prevention and/or mitigation of the corporate criminal and administrative liability.

You are highly encouraged to remember that, in many cases, the mere appearance of violation of the law can be sufficient to negatively influence the general public attitude, including customers and business partners. BSCCB requires Third Parties to uphold the principles of this *Code* when working with or on behalf of BSCCB, ensuring that all activities are carried out in an ethical, fair, and lawful manner.

Should local rules be more demanding than principles stated in this *Code*, then the local rules shall prevail.

“You must act according to all the applicable regulation and laws in the country where you operate. You must observe legal obligations at any time, even if does not appear convenient. You cannot use – as an excuse for law breaches – ignorance of the applicable laws and regulations.”

1.2. Transparency

BSCCB ensures its communications are truthful, as well as accurate and grant to its Stakeholders a full transparency on its activity, subject to any confidentiality obligations required by the business' activities and/or management.

“You do not say or imply that you represent BSCCB unless you are actually authorized to do so, or it is required by your specific role in BSCCB, and in such cases you must provide accurate and truthful information, state the facts clearly to ensure that the content of communication is not misunderstood and avoid speculating. Do not exaggerate or include unsupported assumptions in your communication.”

1.3. Loyalty and Conflict of Interests

Business decisions must be conducted with the best interests of, and loyalty to BSCCB in mind, and must not be motivated or influenced by private interest and/or relationships. A conflict of interest might arise when a personal interest or activity interferes or appears to interfere with your duties and responsibilities to BSCCB objectively and effectively based on independent and sound judgment.

Any situation that could result in an actual or potential conflict of interests or appearance of conflict of interests, has to be disclosed and must be reported to the immediate hierarchical supervisor in order to determine what actions need to be taken to eliminate the conflict of interests.

“Business arrangements must always be entered into, or continued, on the basis of objective criteria e.g. quality, price and reliability of the business partner concerned. You must refrain from illegitimate favors and solicitation of personal advantage for yourself or others. You avoid situations that may result in a conflict of interest. As long as a decision has not been made about the conflict of interest, you are to avoid participating in or influencing the decision-making process or other activity which generate the conflict. You, as Third Parties, shall promptly report any actual, potential or perceived circumstances that could give rise to a conflict between personal interests and the professional obligations to BSCCB.”

1.4. Anti-Bribery

BSCCB does not tolerate any forms of corruption and bribery and is committed to conducting business in a transparent manner and in compliance with applicable anti-corruption laws in all countries in which it conducts business and requires every Stakeholders to act honestly and with integrity at all times.

Business entertainment and gifts as well as any other benefits granted to, or received by, a business partner must be in compliance with BSCCB's Antibribery Code of Conduct, adopted by BSCCB to prevent breaches of anti-bribery and anti-corruption legislation.

It applies to all Coworker and other Third Parties performing duties with or on behalf of BSCCB whether or not directly employed. It focuses on the following matters:

- giving and receiving gift and hospitality;
- contribution to political parties;
- charitable donations;
- due diligence of third parties cooperating with BSCCB;
- books, records and internal control requirements.

"With reference to the following matters:

- ***giving and receiving gift and hospitality;***
- ***contribution to political parties;***
- ***charitable donations;***
- ***due diligence of third parties cooperating with BSCCB;***
- ***books, records and internal control requirements.***

you must act according to the principles and the directives stated in BSCCB's Antibribery Code of Conduct available on the BSCCB's website and intranet."

1.5. Fair Competition and Antitrust Compliance

BSCCB is fully committed to fair competition and respects the dynamics of the market, as fundamental prerequisites for generating success through good performance. It is the policy of the Company to conduct business in accordance with all applicable antitrust laws.

BSCCB unreservedly acknowledges the principles of the market economy and fair competition, antitrust and international trade laws including applicable economic sanctions, and operates in compliance with them in each country where it operates.

Agreements which impair fair competition, are strictly prohibited such as business practices which may represent an antitrust laws violation.

Although this *Code* cannot describe all the activities or situations, which might constitute a violation of an antitrust or competition law, the main practices, which are prohibited are related to any understanding, agreement, plan or scheme, expressed or implied, formal or informal, with any competitor regarding prices or pricing strategies, market strategies, or , terms or conditions of sale or service, production, distribution, territories or customers.

"You must refrain from discussing prices, pricing strategies, market strategies, or terms of sale with competitors.

You do not enter into agreements with our competitors concerning prices, production volumes, customers or sales areas.

If a prohibited subject (as specified above) comes up during a discussion or meeting where competitors are attending, you should excuse yourself from the discussion. Afterwards, you should inform your Direct Manager.

You must refrain from inducing customers to terminate unlawfully contracts with competitors.

You must collect competitive information only through proper public or other lawful channels. You, as Third Parties, shall comply with all applicable competition, antitrust, and trade regulations in every jurisdiction where you operate."

1.6. International Trade and Export Control

As a global manufacturing Company, BSCCB operates across international markets for both internal and external purposes. The international movement of goods, services, technology and information across borders contributes to a positive global economy but must be conducted in a lawful, ethical and responsible manner that also promotes the safety of people worldwide.

As such, BSCCB is committed to compliance with all applicable national and international global trade laws and regulations regarding the controls on **international commercial and financial transactions**, including export controls, customs and import/export compliance, and economic sanctions and other trade restrictions.

Through internal policies, procedures and controls BSCCB is committed to implement compliance effort for all internal and external commercial business dealings, financial transactions, technology transfer, and selection of business partners.

Where compliance with applicable trade laws and regulations cannot be reasonably assured, BSCCB will choose not to engage in a questionable business transaction.

Third Parties shall also operate in compliance with international trade laws including applicable economic sanctions.

1.7. Sustainability

Sustainability is an integral part of how BSCCB conducts business. We understand sustainability as the balanced consideration of environmental, social and governance (ESG) aspects in our decisions, processes and relationships throughout the supply chain.

We are convinced that responsible business conduct contributes to the long-term success and resilience of our company. Sustainability supports our efforts to create value for our customers, provide a safe and respectful workplace for our employees, act as a reliable business partner, maintain trust with our stakeholders and being a responsible member of the communities in which we operate.

We seek to continuously improve our environmental performance, promote responsible and fair working conditions, strengthen ethical business conduct and integrate sustainability considerations into our daily operations and long-term planning.

To support these objectives, BSCCB establishes measurable targets and monitors relevant performance indicators. Our sustainability activities are developed in consideration of regulatory requirements, stakeholder expectations and the company's business context.

Every Coworker contributes to achieving these objectives through responsible behavior, integrity and a commitment to continuous improvement.

BSCCB recognizes that responsible business conduct includes addressing adverse environmental and social impacts where they occur. Where such impacts are identified in connection with our activities

or business relationships, we seek to implement appropriate corrective and preventive measures and support remediation processes in accordance with applicable laws, regulations and company procedures.

IV. Specific Areas

BSCCB is fully committed to providing a safe, healthy and positive environment for its employees, protecting the assets, reputation and goodwill of BSCCB, safeguarding confidential and proprietary information, defining reasonable and appropriate security standards for manufacturing and IT processes, and complying with all regulatory requirements regarding Health, Safety and protection of the Environment.

For this purpose, the relevant key areas are:

- People;
- Health, Safety and Environment;
- Company Information and Assets Protection;
- External Relations.

1. PEOPLE

1.1. Human Rights and Working Conditions

BSCCB acknowledges that the Company's employees are its most important resource and asset.

The principles set out below are aligned with internationally recognized frameworks, including the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labour Organization (ILO) Fundamental Principles and Rights at Work.

Therefore BSCCB, in all countries where it operates:

- shall prohibit child labour and protect young workers;
- shall prohibit forced labour, modern slavery, human trafficking and any form of exploitation, including practices affecting migrant workers;
- shall respect employees' right to work, freedom of association and collective bargaining in accordance with applicable laws and welfare systems;
- shall promote diversity, equity and inclusion and shall not tolerate discrimination, harassment, bullying, intimidation or retaliation of any kind;
- shall recognize the dignity of the individual, the right to physical integrity and freedom of opinion;
- shall provide and maintain a safe and healthy working environment and strive to prevent work-related injuries and occupational diseases;
- shall comply with applicable laws and regulations governing working hours, overtime, rest periods, breaks and leave entitlements, while taking into consideration internationally recognized labour standards

- shall provide fair compensation and benefits in accordance with applicable laws, collective agreements and equal pay principles;
- shall respect the privacy of employees, business partners and other stakeholders in accordance with applicable laws and ensure the protection of personal data;
- shall promote the responsible and ethical use of Artificial Intelligence, ensuring appropriate human oversight and compliance with applicable laws and internal requirements;
- shall conduct business with integrity and shall not tolerate any form of corruption or bribery;
- shall conduct business in an environmentally responsible manner, seeking to minimize adverse impacts on the environment, biodiversity and natural resources;
- shall consider and respect the interests of local communities and other stakeholders potentially affected by its activities.

***“You, as Coworker, are expected to actively contribute to an environment compliant with the Code of Basic Working Conditions and provide full cooperation to ensure it is upheld.
 You, as Direct Manager, are expected to act as role model for all Coworkers.
 You, as Third Parties, shall maintain and ensure a work environment based on the free choice of employment and of association by joining or forming trade unions; adhering to all applicable local laws regulating work hours, compensation and benefits; prohibiting and not endorsing any forms of servitude or forced labour, and opposing to all kinds of human trafficking and modern slavery; monitoring also the prohibition of child labour, and overseeing learner programs in accordance with applicable laws and regulations.”***

1.2. Diversity, Equity and Inclusion

Consistent with the Code of Basic Working Conditions BSCCB is committed to the principle that all involved persons shall have equal access to any recruiting process, employment, facilities, services and programs based solely on their knowledge, qualifications, competencies, skills, performance and potential and not with regard to other personal conditions and/or characteristics. BSCCB acknowledges and promotes the **positive value of diversity**.

BSCCB does not tolerate any form of discrimination, harassment, bullying or intimidation based on gender or gender reassignment, sexual orientation, ethnicity (including ethnic origin and nationality), age, political opinions, religious beliefs, social origin, civil or family status, disability, pregnancy or any other personal characteristic or condition.

BSCCB is committed to the principles of equal opportunity and promoting a working environment in which diversity, open feedback and communication, continuous learning and knowledge sharing is encouraged and valued. BSCCB will recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed, respecting the ethical principles of diversity, equity and inclusion.

In order to avoid potential conflicts of interest at work, BSCCB seeks to identify all situations during the recruiting process, determining whether a relationship with close family member exists and whether such relationship is compatible with the duties and responsibilities associated to the open position to be filled.

“You must treat all your colleagues with respect at all times.”

You must not engage in or tolerate conduct that could be considered offensive, discriminatory, intimidating, harassing, bullying or retaliatory toward others.

You, as Director, Direct Manager or Coworker, are expected to conduct BSCCB business and participate in any BSCCB project, process, event or activity by establishing and maintaining an environment free of discrimination (e.g., harassment, bullying or retaliation).

You, as Director or Direct Manager, are expected to promote equal opportunities, inclusion and fair access to development opportunities for all employees.

You, as Third Parties, shall maintain a work environment that promotes equal opportunities, diversity, inclusion and respect for all individuals and shall not tolerate any form of discrimination, harassment, bullying or retaliation."

2. HEALTH, SAFETY AND ENVIRONMENT

2.1. Health and workplace safety

Respect for individual and collective health and safety is one of the imperative principles underlying all BSCCB's activities: as a result, this principle may not be breached in any corporate decision or by any Coworker.

BSCCB pursues these primary objectives both by implementing state-of-the-art technology in all its facilities and through training and initiatives, aimed at sensitizing all BSCCB Coworkers to the issues involved.

The safety vision of **zero-injuries** is paramount for BSCCB at all its facilities. BSCCB pursues this goal being committed as top priority to grant that its offices and manufacturing facilities are safe and in line with the highest safety standards and promoting the awareness of all its Coworkers of such important goal.

"Help BSCCB protect your health and safety while working, by behaving as active and diligent people.

Never disregard any situation related to your workplace or to the products that potentially represents a reasonable risk in terms of health and safety.

You must inform your Direct Manager, or the person in charge according to the ways defined at your workplace, about any unsafe or risk condition.

If you are a Direct Manager, assure that the information about any risk or unsafe condition is suitably managed by the people in charge.

You, as Third Parties, are required to implement the principles of Management Systems which, inspired by ISO 45001 (or equivalent), promote continuous performance improvement; and in particular, when you carry out activities at BSCCB sites, are required to adopt BSCCB's Health and Safety Standards."

2.2. Environment

BSCCB recognizes environmental protection as an important element of responsible business conduct and sustainable business success. We are committed to conducting our operations in compliance with applicable environmental laws, regulations and permit requirements, while continuously seeking opportunities to improve our environmental performance.

We strive to use natural resources responsibly, prevent pollution, reduce environmental impacts associated with our activities and products, and integrate environmental considerations into our 12 - BSCCB Code of Business Conduct and Ethics _ Second Edition - July 2026

decision-making processes. To support these objectives, BSCCB maintains environmental management practices and defines targets, measures and performance indicators appropriate to its business activities and regulatory obligations. This approach extends to our supply chain, where we encourage suppliers and business partners to support responsible environmental practices and transparency.

Particular attention is given to the following environmental topics:

❖ **Climate Change and Energy**

BSCCB works to improve energy efficiency, increase the use of lower-emission energy sources where feasible and reduce greenhouse gas emissions associated with its operations. Suppliers are encouraged to provide transparency regarding relevant emissions data and to support measures that contribute to the reduction of environmental impacts throughout the value chain.

❖ **Water Management**

BSCCB promotes the responsible use of water resources through efficient water management, pollution prevention and compliance with applicable discharge requirements. We strive to reduce unnecessary water consumption and support appropriate treatment and reuse practices where technically and economically reasonable.

❖ **Air Emissions**

BSCCB aims to monitor, control and reduce air emissions from its operations in accordance with applicable legal requirements and operating conditions. Particular attention is given to emissions associated with manufacturing processes and energy consumption.

❖ **Chemicals Management**

BSCCB seeks to manage chemical substances responsibly throughout their lifecycle. We comply with applicable chemical regulations, monitor substances of concern where relevant to our operations and products, and support the evaluation of safer alternatives where appropriate. Suppliers are expected to provide transparent information regarding regulated substances and to comply with applicable legal requirements.

❖ **Waste and Circularity**

BSCCB promotes the efficient use of resources by reducing waste generation and supporting recycling, recovery and reuse wherever practicable. We consider circular economy principles in our operations, products and packaging solutions where technically and economically feasible and we work towards increasing the recovery of materials from our processes.

❖ **Biodiversity, Land Use and Deforestation**

BSCCB recognizes the importance of protecting ecosystems and natural resources. We seek to consider biodiversity, land use and deforestation-related aspects where relevant to our business activities and sourcing decisions. Suppliers are expected to comply with applicable legal requirements and to avoid contributing to illegal deforestation.

❖ **Responsible Sourcing of Minerals and Raw Materials**

BSCCB supports responsible sourcing practices and expects transparency regarding the origin of specified minerals and raw materials where required by applicable regulations, customer requirements or industry standards. Suppliers are expected to support relevant due diligence and reporting processes.

❖ **Local Environmental Impacts**

Where relevant, BSCCB seeks to monitor and manage impacts related to soil quality and industrial noise and odorous emissions, with the objective of preventing or minimizing adverse environmental effects on employees, local communities and the surrounding environment.

“You, as Coworker, are expected to actively contribute to reducing waste and pollutants, conserving resources and recycling materials. In particular, do your best to:

- separate waste in accordance with the procedures in force in your facility;***
- minimize water consumption;***
- reduce energy and paper consumption as much as possible.***

You, as Direct Manager, are required to promote environmental awareness, sensitizing all Coworkers to environmental sustainability issues and ensuring that Coworkers adopt responsible behaviors to reduce environmental impacts in the workplace.

You, as Third Parties, shall also promote these commitments throughout your own supply chains, in line with BSCCB’s environmental values.”

3. COMPANY INFORMATION AND ASSET PROTECTION

Good business practice dictates the careful use and protection of Company information and business assets, including equipment, inventory, products, office supplies and information systems, intangible property such as software, patents, trademarks, copyrights and other proprietary and confidential information and know-how. Company information and assets may only be used for business purposes, and not for personal interests or gain.

BSCCB, adheres to industry security standards (e.g., ISO 27001, TISAX), considers information security an indispensable factor for the protection of its own information and assets and those of its stakeholders, as well as a factor of strategic value that can be translated into competitive advantage.

3.1. Information Security

“Information” means any kind of data, documents, knowledge and processing result, of any nature or kind howsoever stored, pertaining or referring to BSCCB, its customers, suppliers and Coworkers, or any kind of activities.

BSCCB considers information as a valuable asset for the Company, considering both its economic and strategic value and the increasing new threats. All the people that are informed of or process any BSCCB data must be aware of its importance, complying with the BSCCB data classification. Thus, it is essential that everybody contributes to ensuring the security of information, also complying with internal policies, legal requirements and procedures.

As a general rule, any and all Information must be accessible solely to Coworkers or other persons specifically authorized to access them, in compliance with applicable laws and BSCCB procedures/policies.

“You, as Coworker, must take appropriate measures to protect the confidentiality of BSCCB’s Information. For example, do not share information with unauthorized persons, even if they are colleagues.

If you need to share Confidential Company Information with a supplier or other business partner, you have to be sure to have an appropriate written confidentiality agreement/clause that has been approved by the Legal, Compliance and Corporate Affairs Function.

You, as Third Parties, shall implement both technical and organizational measures to safeguard the integrity, confidentiality and availability of its information assets, as well as those of your customers, partners, suppliers and employees.

3.2. Protection of Information and Personal Data

BSCCB ensures the protection of **information and personal data** concerning its Coworkers, Third Parties or Stakeholders and avoids improper uses of them applying suitable technical and organizational measures, e.g. by limiting data access to Coworkers who need it for business or organization purposes according to applicable laws and best practice privacy protection requirements.

BSCCB adopts adequate regulations for processing of information and personal data at its locations and for storing and keeping them according to established safety measures to avoid risks of unlawful use, destruction and losses or unauthorized access or processing.

“Unless you have authorization, do not access any system or database containing information and personal data of, including but not limited, Coworkers, Third Parties, suppliers, customers and other Stakeholders.

By accessing or sending personal data, you make sure you do not disclose them to unauthorized persons.

Act complying with BSCCB policies and guidelines in force on personal data protection.

You, as Third Parties, shall safeguard personal data, take appropriate steps to protect it from misuse, and comply with all applicable personal data protection laws”

3.3. Intellectual Property Rights

Proprietary rights over any knowledge developed in BSCCB’s workplace belong to BSCCB, which upholds its right to use such knowledge in accordance with applicable laws. BSCCB actively prevents and fights the counterfeiting and pirating of its brands and products to the fullest extent of the laws of the countries in which it operates and/or wherein the fakes are produced or sold. BSCCB also is committed to prevent counterfeiting, diverted or unauthorized parts and material from its supply chain.

All Coworkers shall actively contribute, within their functions and responsibilities, to managing and safeguarding intellectual property in order to allow its developments, protection and enhancement. In doing so, they are also required to refrain from using or allowing others to use BSCCB intellectual property for personal purposes, with a view to preventing behavior that could prove prejudicial to BSCCB’s industrial property or trade secrets and protecting the Company’s rights against infringement.

Moreover, all Coworkers are required to refrain from altering or counterfeiting patents, drawings, and/or industrial designs, by any means whatsoever, and from using altered or counterfeit patents, drawings, and/or industrial designs.

Any possible violation to BSCCB intellectual property rights or Third Parties intellectual property rights shall be communicated to the competent area (BSCCB Intellectual Property Rights Function and/or Legal, Compliance and Corporate Affairs Function).

“When using the Company trademark, you must follow the Company’s guidelines and make sure that there is a specific written license agreement in place when you allow outsiders to use the Company trademark or place it on promotional items.

If you need to use a copyrighted work by reason of your position within BSCCB, for example, by adding music to presentations or by circulating articles or images in magazines, journals, or other publications, check if a copyright license is necessary.

If you need to disclose Confidential Information to Third Parties by reason of your position within BSCCB in connection with a transaction, contact BSCCB Intellectual Property Rights Function and/or Legal, Compliance and Corporate Affairs Function to assure that appropriate protections are in place.

In case of development of new product feature or process internal to BSCCB, you are expected to promptly consult BSCCB Intellectual Property Rights Function and/or Legal, Compliance and Corporate Affairs Function and verify whether they infringe other’s intellectual property rights. You, as Third Parties, shall respect the intellectual property rights of third parties and ensure that all customer information and personal data is handled securely, responsibly and in full compliance with applicable legal requirements”

3.4. Company Assets

BSCCB defends and protects the Company’s assets, also by using tools aimed at preventing misappropriation, theft and fraud against BSCCB. You are directly and personally liable for protecting and caring of the Company’s assets assigned to you.

Such assets shall be used in a careful and responsible way, avoiding different uses from those allowed by the Company and that might damage their efficiency or that might not be in compliance with BSCCB’s interest.

BSCCB computers and email accounts, and the information they contain, are BSCCB property and shall be used for work and Company purposes and limited personal use consistent with the relevant specific procedures, available on BSCCB’s Intranet.

Because BSCCB owns these assets, in specific cases as provided by IT procedures, the contents of your computers and work email accounts may be inspected and disclosed, subject to local laws, e.g. to detect potential criminal conduct and protect BSCCB rights and property.

“You may have to use a Company’s asset only if you are expressly authorized to do so.

You must use assets such as Company vehicles properly and legally, for Company purposes, and for authorized personal use.

You have to properly use and store the Company’s assets after use, in order to avoid theft, losses, damage arising from negligence, carelessness or lack of due skill, etc. In case of defects, breakdowns, destruction, you must promptly report them to the proper function.

Do not take for yourself any business opportunities that arise through the use of corporate property, information or position.

Do not use Company property, information or position for personal gain or to compete with the Company.

Do not use Company resources to offend, harass or threaten others or to access, send or store illegal or generally offensive material.

While you are at work or using a Company computer or mobile device, do not visit Internet sites with offensive content related to sex, race, religion or other personal characteristics and/or conditions.

Do not use Company resources to reproduce, display, distribute, or store materials that violate any party's trademark, copyright, licensing or other intellectual property rights.

Do not copy authorized software onto another device.

Do not share software written by Company, outside the Company without prior proper authorization."

3.5. Books, Records and Internal Control Requirements

BSCCB's business records must, by law, be complete, accurate, timely, clear, comprehensive and reliable.

All business records, including expense reports, financial statements, service records, operations and manufacturing reports, reports to auditors, and reports to government agencies, must be prepared with diligence and honesty. No false or misleading entry shall be made in BSCCB's records for any reason. No undisclosed or unreported fund or asset of BSCCB shall be established for any purpose. Compliance with generally accepted accounting principles and established internal controls is required at all times.

According to BSCCB's internal procedures, all payments and other activities must be supported by an appropriate documentation proving performed services. All payments made or received by BSCCB must be accurately recorded in Company's corporate books, records and accounts in a timely manner and in reasonable detail.

Expenses must never be hidden or purposefully misclassified to be used for illegal payments. All financial transactions must be authorized by appropriate management in accordance with internal control procedures. False, misleading or artificial entries in the books, records and accounts of BSCCB are strictly prohibited.

"You should remember that cash payments and/or similar instruments in the Company transactions are not admitted."

3.6. Responsible Use of AI

BSCCB leverages Artificial Intelligence (AI) to empower its processes and workforce, shifting the focus of the people from routine tasks to higher-impact, value-added activities, facilitating the work of all Coworkers, placing people at the center of all activities and safeguarding their physical and psychological integrity.

BSCCB undertakes to ensure that any decision relating to the use and the development and sale of AI is made in full compliance to "Fundamental Human Rights," as set out 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.

Human supervision of AI – 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.

BSCCB promotes a human-centric approach to AI and ensures that AI systems are used exclusively as tools to support human judgement and decision-making. AI shall not be used to unlawfully monitor employees or to make automated decisions affecting individuals. Appropriate human oversight shall be maintained at all times, and accountability for decisions shall remain with the responsible human decision-maker.

Full compliance with current and future national, European and international regulations on AI (including EU Regulation 2024/1689 on artificial intelligence), labour, personal data protection, intellectual property and copyright must also be ensured in all countries where BSCCB operates.

BSCCB undertakes to ensure that data used to input into 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.

Aligned with this commitment, Third Parties are expected to adopt a responsible approach to the development and use of AI, ensuring its ethical application and alignment with principles of data privacy and integrity.

3.7. Social Media

BSCCB expects all Coworkers to comply with applicable laws and government guidelines ruling both social media and labour.

Therefore, when using social media (for example, any form of online publishing and discussion, including social networks, file sharing, user-generated video and audio blogs, and wikis) and referring to BSCCB, all Coworkers must act and behave according to the principles of confidentiality, integrity and loyalty.

“While using social media:

- ***be fair and transparent in every social engagement about who you are, what your current job is and what you do at work;***
- ***act in a manner that is respectful to others, their diversity and the Company;***
- ***do not disclose Confidential Information and/or untruthful information about BSCCB;***
- ***do not damage the Company’s reputation.”***

4. EXTERNAL RELATIONS

4.1. Local community and social context

BSCCB considers local population and communities among its main Stakeholders in all the countries where BSCCB operates, and the company shall promote the relationships with them in the forms contemplated under applicable local laws.

4.2. Customers

Relationships with **customers** must be aimed at achieving excellence in terms of product, service and quality, in line with the principles and values set forth in the paragraphs above.

All relationships with customers must be characterized by mutual transparency and compliance with market and antitrust regulations, through reliable and correct conducts and by ensuring complete and accurate information about the products and services offered. Commercial incentives must be in line with market practices and compliant with the rules imposed by BSCCB.

“If you are designated to carry out negotiations with customers, you must behave in accordance with the principles of mutual business propriety, good faith and the prompt and proper performance/ fulfilment of contractual obligations.”

4.3. Suppliers

BSCCB’s **suppliers** are considered valuable business partners and key contributors to the achievement of BSCCB’s objectives. Upholding the principles and values set forth in the paragraphs above, suppliers are expected to align with the values outlined in this *Code* and in all other relevant BSCCB documentation pertaining to the supply chain.

The BSCCB’s approach to supplier engagement, from the stages of selection to contract awarding and executions, prioritizes excellence in quality standards, service levels, contribution to innovation, cost competitiveness and sustainability performance, as detailed in BSCCB “General Supply Agreement for the Purchase of Direct Materials and Services”.

BSCCB is committed to fostering equal opportunity for all potential suppliers, in line with principles of transparency and fair business conduct. Through continuous communication and engagement, BSCCB aims to develop collaborative and long-term relationships with its suppliers.

Suppliers are also expected to promote and cascade principles contained in this document within their own supply chains and business relationships.

BSCCB promotes the adoption of common values and business objectives, committing to avoiding instances of dependency and abuse of dominant position to ensure a fair business relationship between the Company and its suppliers.

Supply chain compliance also includes observing the reporting and disclosure requirements for so called "conflict minerals" which means tin, tantalum, tungsten and gold sourced from conflict-affected and high-risk areas. BSCCB is committed to avoiding the use of conflict minerals in its products and production processes and expects the same from its business partners.

***“BSCCB suppliers are required to respect the values and principles outlined in the Code and in all BSCCB documentation dedicated to suppliers. Failure to comply with these provisions may result in the termination of the supply relationship.
BSCCB employees are required to treat suppliers with transparency and fairness, ensuring equal opportunities for all.”***

4.4. Government Officials

“Government Officials” means officials of any local, national or foreign government department or agency; officials of any public international organisation (e.g., the United Nations, the International Patent Bureau, the European Bank of Investment, the European Commission); political parties and

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party leaders; candidates for public office; executives and employees of state-owned or state-run companies or any other similar organisation; anyone acting on behalf of any of these officials; any individual holding a legislative, administrative or judicial position.

Any and all relationships with Government Officials must be characterized by strict compliance with principles of lawfulness and transparency and managed exclusively by the corporate functions expressly invested with the delegated powers and authority required for such purpose.

It is forbidden to make any sort of payment or give or receive anything of value to or from a Government Official where the intent is to obtain or retain business or some other commercial advantage for BSCCB.

Provision of all business gifts, hospitality and business entertainment to a Government Official is prohibited under BSCCB Anti-Bribery Code of Conduct, which is available on the BSCCB's website and intranet.

Any form of payments to political parties and/or organization or representatives of the same or for political campaigns are prohibited.

"You must never provide business gifts, hospitality and business entertainment to a Government Official regardless of value.

You must never make a facilitation payment (a payment to a Government Official to speed up a routine government action such as processing a visa).

You must not pay for expenses including business related travel for a Government Official.

BSCCB does not restrict your personal political activities away from the Company using personal funds. But you cannot campaign during your work hours or use any Company resources to support such activity."

V. Whistleblowing

You are bound to comply with the provisions set forth in this *Code*, in the course of all conduct and activities, you perform for and on behalf of BSCCB. Alleged ignorance or incomplete knowledge of this *Code* and its contents shall be no excuse for breaches.

A breach of this *Code* may lead to a Coworker disciplinary action, up to and including dismissal, according to applicable laws in place in different countries where BSCCB operates and collective labour agreements where acknowledged by laws.

BSCCB will not place any further business with Third Parties who have breached this *Code*.

If you become aware of any unlawful or unethical situation, you must immediately notify it to your Direct Manager and/or through the reporting channel in accordance with the **Whistleblowing Procedure**, which can be found on the BSCCB's website and intranet.

Information that you provide to BSCCB must be accurate to the best of your knowledge, and it will be assessed and managed in a timely, impartial, and proportionate manner. BSCCB expects you to assist it with any further requests and/or investigations and cooperate in appropriate remediation actions. Reporting false and/or slanted information to BSCCB may result, if you are a Coworker, in disciplinary liability up to dismissal according to the applicable laws and collective bargaining agreements, and, if you are a Third Party, in the termination of the relationship with BSCCB.

In addition to the disciplinary measures applicable in the country of reference, any and all breaches of this *Code* may entail legal action against the persons or parties responsible

Starting from 15th July 2023 the whistleblowing channels and the related “Whistleblowing Procedure” has been updated, introducing even more protections for the whistleblower, in accordance with the European Directive (EU) 2019/1937 and its transposition in Italy with Legislative Decree No. 24/2023 and in Germany with the Whistleblower Protection Act, and in particular:

- For Italy:

The Global Central Function Internal Audit of Brembo N.V., as autonomous department with personnel specifically trained for the management of the whistleblowing channel, in the person of the *Chief Internal Audit Officer* is entrusted for the management of the internal reporting channel having the task of receiving any whistleblowing reports from everyone related to BSCCB S.p.A..

Reports can be submitted both written and oral form, including anonymously, through:

- the web platform [Legality Whistleblowing](#)
- the Legality Whistleblowing App Mobile.

This new platform is in place to even better guarantee, through IT and encryption tools, the obligation of confidentiality of the whistleblower, of the persons concerned and of the persons mentioned in the report as well as of the content of the report and of the related documents.

- For Germany

The German Interne Meldestelle (*Ombudsperson*), is entrusted for the management of the internal reporting channel having the task of receiving any whistleblowing reports from everyone related to BSCCB GmbH.

Reports related to breaches have to be addressed to the Interne Meldestelle (*Ombudsperson*)’s channel through:

- Verbal reports to the “Interne Meldestelle (*Ombudsperson*)”;
- Ordinary mail or by hand ([sealed envelope](#) “strictly confidential” to notify to Interne Meldestelle (*Ombudsperson*) “*HSK | Service*” to the attention of Rechtsanwalt Mr. Prof. Dr. Sandmann, Steingasse 13, 86150 Augsburg (Deutschland);
- E-Mail (service@hsk-arbeitsrecht.de);

VI. Reference for searching BSCCB Documents

Please find below the update references for BSCCB documents:

Code of Business Conduct and Ethics	Company's Intranet Group's website
Anti-Bribery Code of Conduct	Company's Intranet Group's website
Code of Basic Working Conditions	Company's Intranet Group's website
General Terms and Conditions of Purchase Direct Materials and Services	Company's Intranet Group's website
Whistleblowing Procedure	Company's Intranet Group's website