



Anti-Bribery Code of Conduct

BSCCB - ANTI-BRIBERY CODE OF CONDUCT

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1. Code Statements

BSCCB requires its employees and workers at all times to act honestly and with integrity. This Anti-Bribery Code of Conduct (hereinafter “Code”) is designed to protect you and BSCCB from breaches of anti-bribery and anti-corruption legislation and applies to all employees and other individuals or companies performing duties on behalf of BSCCB whether or not directly employed by it.

BSCCB does not tolerate any form of corruption and is committed to complying with applicable anti-corruption laws in all countries in which it conducts business or plans to conduct business in the future.

The purpose of this Code is to ensure transparency, provide clarity on acceptable behavior and comply with relevant anti-corruption legislation wherever in the world you are conducting business for BSCCB. The aim of the Code is to ensure that the highest standards of integrity are maintained.

This Code also sets out BSCCB’s policy on the giving and receiving of gifts, hospitality and entertainment, and your responsibilities under this Code.

BSCCB recognizes that the giving and accepting of gifts, entertainment and hospitality can be part of building normal business relationships. This practice can vary significantly between the various geographical locations in which BSCCB does business or will do business in the future. However, regardless of local laws and customs some gifts and hospitality can lead to the suggestion that an improper influence has been asserted either on or by BSCCB, or that a conflict of interest has arisen. In some instances, the giving and/or receiving of gifts and entertainment can be interpreted as a bribe, which is unlawful and which damages the reputation of BSCCB and can lead to criminal prosecution for those individuals involved as well as the company.

Neither BSCCB nor any of its Employees and/or Third Parties may make, promise, offer, request or receive any gift, donation, gratuity or hospitality whatsoever if its nature or value may even potentially be deemed excessive or extravagant. This is to ensure that any legitimate gift and hospitality may not be construed as an inducement for securing BSCCB an undue commercial advantage.

This Code sets out guidelines to ensure that the above code statements can be adhered to. The aim of the Code is to ensure that the highest standards of integrity are maintained and that it can never be suggested that there was an improper motive behind the offer or acceptance of the gift or hospitality, of unduly influencing the recipient, or on the part of the recipient in accepting it.

This Code should be read in conjunction with BSCCB’s Code of Business Conduct and Ethics.

2. Definitions used in this Code

BSCCB: Brembo SGL Carbon Ceramic Brakes S.p.A. and/or BSCCB GmbH

Bribe/Bribery: Either:

- The offering, promising or giving anything of value to improperly influence another in order to obtain business for BSCCB; or
- The requesting or accepting anything of value as a reward for or as an inducement to act improperly in relation to the awarding of business by BSCCB.
- Bribes can include money, gifts, hospitality, expenses, reciprocal favors, political or charitable contributions, or any direct or indirect benefit or consideration.

Corruption/Corrupt: A generic term used to describe any corrupt conduct. This may include the giving or receiving of Bribes, any fraudulent act, or acting in a way that puts your own interests in conflict with those of BSCCB, whilst in the course of your employment. Corruption also means abuse of power or abuse of position in return for money or political gain.

Direct Manager: A person holding a managerial position with executive rank, directly responsible for the management of 1 or more Employees.

Employees: All workers performing duties on behalf of BSCCB, whether or not employed directly by BSCCB.

Facilitation Payments: Payments that are requested by Government Officials to speed up routine official processes such as processing licenses, permits, or other official documents and processing government paperwork such as visas and work orders.

Government Officials: Officials of any national, local or foreign government department or agency; officials of any public international organization (e.g. the United Nations, International Patent Bureau, European Bank of Investment, European Commission, Customs Agency, Revenue Agency, Municipality etc.); political parties and party leaders; candidates for public office; executives and employees of state-owned or state-run companies; anyone acting on behalf of any of these officials; any individual holding a legislative, administrative or judicial position.

Third Party/Parties: Include agents, brokers, partners, consultants (both individuals and companies) and other representatives performing work on behalf of or for the benefit of BSCCB.

ODV: it means the external Supervisory Committee existing in Italy according to Italian Legislative Decree no. 231/2001 (“Organismo di Vigilanza”).

3. Application of this Code

This Code applies to all Employees of BSCCB and Third Parties performing duties for or on behalf of BSCCB whether or not directly employed by BSCCB.

Employees and Third Parties are required to familiarize themselves with the applicable laws in each jurisdiction in which they conduct business on behalf of BSCCB.

4. Bribery and Corruption

It is illegal and a breach of this Code to offer, pay, request or receive a Bribe whether directly or indirectly. **There is no set monetary threshold that defines a payment as a Bribe.** A Bribe can include money or anything of value where there is an intention to improperly influence the actions of another person. It also covers payments or gifts as a reward for the improper actions of another person. There is no need for the Bribe to be successful to be viewed as Corrupt, the offering or requesting of it is enough to amount to a criminal offence.

These principles apply equally in any jurisdiction in which BSCCB operates or will operate in the future or carries on business.

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. It is also forbidden to give or receive a Bribe to or from anyone in the private sector.

5. Facilitation Payments

Facilitation Payments are a type of Bribe. It is illegal to make any sort of payment or give anything of value to a Government Official where this is to obtain or retain business or some other commercial advantage for BSCCB.

In some countries, it may be customary for Government Officials to request Facilitation Payments. However, Facilitation Payments made anywhere in the world are prohibited by BSCCB and it will be a breach of this Code to make such payments regardless of local custom.

If you are asked to make a payment on behalf of BSCCB, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment.

Where a Facilitation Payment is demanded and there is a risk to the personal safety of employees of, or other individuals performing duties on behalf of BSCCB, a risk to the property of BSCCB or in any situation where you have suspicions, concerns or queries regarding a payment, you should speak to your Direct Manager immediately.

6. Gifts, Hospitality, Entertainment and Travel Expenses

This section of the Code sets out BSCCB's policy on the giving and receiving of gifts, hospitality and entertainment. The following guidelines are intended to reduce the risk that a gift or hospitality could be construed as a bribe to the lowest practicable level.

All business gifts, hospitality, business entertainment and travel expenses must comply with the guidelines stated in the following paragraphs:

6.1 Government Official

Provision of all business gifts, hospitality and business entertainment to a Government Official is prohibited under this Code.

6.2 Gifts to Private Parties

For the purposes of this Code, a gift can be anything with a cash or face value, such as a bottle of wine or tickets to an event where the host is not present.

You are permitted to give or accept gifts of negligible value. For the purposes of this Code **a gift will be treated as having negligible value if it has a face value (including taxes) of not more than €50 (1) or equivalent amount in foreign currency** and it is customary to give or receive such a gift in the ordinary course of business. Examples of acceptable gifts might be calendars, diaries, or a bottle of wine or spirits at Christmas. You may not attempt to split a gift in order to reduce its face value (e.g. a case of wine) in order to bring it within this exception.

If you are offered a gift that falls outside of this definition you must, politely but firmly refuse it. If you reasonably consider that it is considered that acceptance would be in the best interest of BSCCB (for example, because return of a gift might cause offence) you should seek the prior written consent of your Direct Manager before accepting the gift, by filing the Gifts and Hospitality Received Form or the Gifts and Hospitality Dispensed Form attached to this Code in Annexes 2 and 3.

Such consent is requested also in case you want to give a gift over the above-mentioned limit amount.

The consent will only be given where the Direct Manager considers that the gift could not be mistaken for an inducement. In such circumstances the gift must be acknowledged on behalf of BSCCB and noted on the Register of Gifts and Hospitality.

Upon giving consent/approval to a gift which falls within the exception above, the authorizing Direct Manager shall send the relevant forms to the keeper of the relevant register (as set out in clause 6.4 below).

You may never give or accept (and a Direct Manager may not authorize) a gift of cash or cash equivalent (such as gift vouchers), regardless of the value.

(1) Or any other value provided by the written law of the countries in which BSCCB operates or will operate in the future.

Gifts offered to your relatives or friends by a Third Party must always be refused, regardless of their value. You should never offer a gift to the friends or relatives of any Third Party during the course of your employment or carrying out your duties for BSCCB.

6.3 Hospitality and Entertainment

For the purposes of this Code, hospitality or entertainment involves attendance at an event where the host is present. The Code applies whether BSCCB is the host or the guest. If the host is not present, attendance at an event must be considered a gift.

You are permitted to give or accept corporate hospitality of negligible value. For the purposes of this Code **entertainment or hospitality will be treated as having negligible value if it has a real or apparently face value (including taxes) of not more than €75 or equivalent amount in foreign currency per person** and it is customary to give or receive such hospitality in the ordinary course of business. Examples of acceptable hospitality and entertainment might be dining out or tickets to a sporting event, theatre or music concert of not more than €75 (2) or equivalent amount in foreign currency per person.

You may give or accept entertainment that exceeds the value of €75 per person (or its equivalent in local currency) only if it is in BSCCB's interests to do so, you have obtained the prior written approval of your Direct Manager (by filing the Gifts and Hospitality Received Form or the Gifts and Hospitality Dispensed Form attached to this Code in Annexes 2 and 3) and the entertainment is then recorded in the Gifts and Hospitality Register. Such consent will only be given where the Direct Manager considers that the entertainment or hospitality could not be mistaken for an inducement.

Upon giving consent/approval to a hospitality/entertainment which falls within the exception above, the authorizing Direct Manager shall send the relevant forms to the keeper of the relevant register (as set out in clause 6.4 below).

Hospitality or entertainment offered to relatives or friends by a Third Party must always be refused, regardless of their value and you should never offer a gift to the friends or relatives of any Third Party during the course of your employment or carrying out your duties for BSCCB.

6.4 Register of Gifts and Hospitality

All gifts and/or hospitality which are not automatically acceptable under this Code should be recorded in the following registers:

- **BSCCB Register of Received and Dispensed Gifts and Hospitality**, kept and duly updated by BSCCB S.p.A. General Manager Assistant.

- For BSCCB GmbH in Meitingen the General Managers will also keep and duly update a **Register of Received and Dispensed Gifts and Hospitality** and will forward it to the General Manager Assistant of BSCCB S.p.A.

The abovementioned function is required to review the register on a quarterly basis and to report to the ODV of BSCCB Group about the contents of the registers at least twice a year (or more frequently upon request).

The ODV of BSCCB S.p.A. reports to the Board of Directors of BSCCB S.p.A. on anti-bribery and corruption issues that may arise from the execution of the Code once a year, within the periodical ODV Report to the Shareholder Committee or when they occur.

6.5 Business Travel

All business travel for Employees and Third Parties must comply with Interoffice Memorandum – Travel Policy, valid for both companies, which can be found in **Annex 4**.

Furthermore Italian Employees are required to comply with “Brembo’s Corporate Guidelines for Foreign Companies Referring to Business Travels” which can be found at BREMBO DOCS > Direzione Risorse Umane e Organizzazione / Human Resources and Organization Dept. > ENG > PROCEDURES and the “Brembo Travel Policy” which can be found at BREMBO DOCS > Direzione Risorse Umane e Organizzazione / Human Resources and Organization Dept. > ITA > PROCEDURE.

As well as German Employees are required to comply with the local “SGL Business Travel Management” ((GP-P-GLO-001Version 1.0-2014-09-22), “SGL globale Richtlinie Group Purchasing – Dienstreisen Management/Anhang Deutschland“ (GP-P-1002 Üb. 01-11.06.2015).

6.6 Further Guidance on Gifts and Hospitality

Further guidance in relation to gifts and hospitality is contained in BSCCB’s Do’s and Don’ts Gifts and Hospitality Checklist which can be found in **Annex 1**.

7. Contributions to Political Parties

Any and all forms of payments to political parties or organizations or representatives of the same are not admitted.

8. Charitable Donations

(2) Or any other value provided by the written law of the countries in which BSCCB operates or will operate in the future.

Charitable donations are permissible provided the donation is not made for the personal, financial, or political benefit of any Government Official, or any customer/supplier/Third Party (or their

families). Donations must not be made to improperly influence the recipient or in exchange for any business advantage and shall be made consistently with the following principles:

- Donations must be subject to an indication of whether or not they are in line with the approved annual budget.
- Beneficiaries may only include charitable bodies and “no profit” organizations that are established and registered according to applicable law. No charitable donations may be made to individuals.
- All charitable donations must be strictly traceable and appropriately and accurately documented in writing.
- The beneficiary (body/association/organization that is to receive the donation) must be a bona fide charity with good standing and reputation.

Specific donations (> € 5.000) may only be authorized by the Chairman of BSCCB’s Board of Directors.

9. Third Parties

BSCCB may be liable for “indirect” payments made or offered to any entity or person on its behalf by a Third Party. When working with a Third Party it is essential that appropriate due diligence is carried out on the Third Party’s background and reputation and to understand any bribery and corruption risks that may exist.

BSCCB considers that the following areas in particular require due diligence and risk assessment before entering into any business relationship, transaction or project (which for the avoidance of doubt include Third Parties, some joint ventures or acquiring a company):

- assessing the fraud, Bribery and Corruption risk associated with the country in which the business is to be conducted;
- reviewing the Third Party’s potential business partners; and
- reviewing the proposed project or business transaction in order to identify as far as possible the risk of Corruption or Bribery.

When dealing with Third Parties, some Red Flags to watch out for as indicators of potential violations of anti-corruption laws include:

- A Government Official recommends that BSCCB hires a specific Third Party;
- A Third-Party request that BSCCB hires someone avoiding the internal recruiting policies;
- The proposed compensation of a Third Party retained by BSCCB is unreasonably high compared to the market rate without a reasonable explanation;
- A Third Party retained by BSCCB requests that payments shall be made to a country or geographic location different from where the Third Party resides or conducts business or to an off-shore; to an unknown Third Party; be split among multiple accounts; be made to an account in a country other than where the Third Party is located or business is to be performed; or any other unusual financial arrangements;

- A Third Party which BSCCB seeks to retain lacks qualifications or staff to perform the expected services;
- A Third Party relies heavily on political or government contacts instead of technical skills or time invested;
- Upon checking references, you find that the Third Party has a bad reputation or is not well known in the industry;
- A Third Party that BSCCB seeks to retain will not agree to terms requiring compliance with Anti-Corruption laws;
- A country in which BSCCB is conducting or seeks to conduct business is a country with a reputation as a high-risk location for Corruption; or
- The same Third Party is repeatedly used for business without any reasonable justification for their repeated appointment;
- A Third Party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- A Third-Party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- A Third Party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- A Third-Party request that a payment is made to "overlook" potential legal violations;
- A Third-Party request that you provide employment or some other advantage to their friend or relative;
- You receive an invoice from a Third Party that appears to be non-standard or customized;
- A Third Party insists on the use of side letters or refuses to put terms agreed in writing;
- You notice that we have been invoiced for a commission or fee payment that appears large or disproportionate given the service stated to have been provided;
- A Third-Party request or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
- You are offered an unusually generous gift or offered lavish hospitality by a Third Party.

Please note that this is a non-exhaustive list and other instances exist which may flag potential violations of Anti-Bribery or Anti-Corruption laws.

If you are in any doubt whatsoever about the legitimacy of a proposed Third-Party you should discuss your concerns with the Direct Manager prior to entering into any arrangements with the Third Party.

10. Books, Records, and Internal Control Requirements

BSCCB's business records must, by law, be accurate 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.

All payments and other activities must be supported by an invoice and a contract or an order containing sufficient detail to reflect the services that were performed and according to BSCCB's internal procedures.

In addition, all payments must be accurately recorded in BSCCB's corporate books, records and accounts in a timely manner and in reasonable detail. False, misleading, incomplete, inaccurate or artificial entries in the books, records and accounts of BSCCB are strictly prohibited.

Expenses must never be hidden or purposefully misclassified to be used for illegal payments. All payments made or received by BSCCB must be accurately recorded in BSCCB's books and records. All financial transactions must be authorized by appropriate management in accordance with internal control procedures. Undisclosed or unrecorded funds may not be established for any purpose.

11. Obligations to Report Breaches of Anti-Bribery Laws

BSCCB requires its Employees and Third Parties at all times to act honestly and with integrity. BSCCB will not tolerate any Employee or Third Party being involved in any level of Bribery or Corruption.

Employees and Third Parties are required to report any circumstances which are in breach of this Anti-Corruption Code making use of the whistleblowing channels which has been established since 2017 to facilitate the disclosure of potential misconduct or violations.

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) 2019/193 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).

All reported incidences of actual or suspected corruption will be promptly and thoroughly investigated and dealt with appropriately. All reports will be dealt with in confidence and in a manner which protects the legitimate personal interests of the person making the report.

BSCCB will ensure that any form of sanction, retaliation or discrimination against any BSCCB Employee – who discloses compliance concerns in good faith – will not be tolerated, and the confidentiality of the identity of the whistleblower and of the people involved in the report will be protected to the maximum extent possible, including with IT security measures.

12. Consequences for Breaches of Anti-Bribery Laws

Consequences for individuals: Penalties for breaching Anti-Bribery laws may include imprisonment, disqualification from acting as a director and significant monetary fines against you as an individual. You would also be subject to disciplinary action, up to and including dismissal from your position within BSCCB, for any breach of this Code.

Consequences for BSCCB: Consequences may include the company facing unlimited fines, damage to the corporate brand and reputation of BSCCB, loss of the ability to trade in certain jurisdictions, debarment from bidding for government contracts, loss of business, legal action by competitors, litigation and substantial investigation expenses.

In addition, under certain Anti-Bribery laws, the directors and senior officers of BSCCB can be held personally liable for the breaches committed by Employees and Third Parties and face significant fines and/or imprisonment.

13. Enforcement and Discipline

BSCCB views Corruption and Bribery very seriously. BSCCB will investigate all allegations of Corruption and Bribery and take disciplinary and/or legal action in all cases where it is considered appropriate.

A breach of this Code may result in an Employee facing disciplinary action, up to and including dismissal. BSCCB will not place any further business with Third Parties who have breached this Code.

Where a case is referred to the police or other law enforcement agency, BSCCB will co-operate fully with the criminal investigation which could lead to Employees and Third Parties being prosecuted.

14. Information and Diffusion of Anti-Bribery Knowledge

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All Employees must be aware of the types of Corruption and Bribery, the risks of engaging in Corrupt activity and Bribery, this BSCCB's Anti-Bribery Code of Conduct, and how they may report suspected Corruption and Bribery.

BSCCB will promote awareness about the contents of this Code. If any Employee or Third Party requires further guidance to fully understand this Code, BSCCB will provide appropriate support upon request.

15. Responsibilities

The following roles have specific responsibility for execution of the Code as follows:

Secretary of BSCCB S.p.A.	Keeping and updating BSCCB Register of Received and Dispensed Gifts and Hospitality and reporting to the ODV of BSCCB S.p.A. at least twice a year
Secretary of BSCCB GmbH	Keeping and updating BSCCB Register of Received and Dispensed Gifts and Hospitality and forwarding it to the Secretary of BSCCB S.p.A.
Direct Manager	Considering questions received from Employees concerning the following: - Facilitation Payments; - Due Diligence of Third Parties - Gifts, Hospitality and Entertainment received or to be given which exceed the financial limits set out in clauses 6.2 and 6.3 of this Code; and - Where appropriate, providing consent to the giving or receiving of exceptional gifts and/or hospitality and filing the relevant forms and sending it to the register's keeper.
General Managers BSCCB S.p.A./ General Managers BSCCB GmbH	Assisting and Supporting Direct Manager/Employees on the working mechanism of the Code.
Chief Internal Audit Officer for BSCCB S.p.A. / Interne Meldestelle (Ombudsperson) of BSCCB GmbH	Considering and analyzing breaches of this Code.
ODV of BSCCB S.p.A.	Considering and analyzing breaches of this Code if the report falls within the scope of the Organization Management and Control Model for the purposes of Legislative Decree. 231/01. Receiving and analyzing reports on the content of the Registers. Reporting to the Board of Directors of the BSCCB S.p.A. at least twice a year.

It shall be the responsibility of the General Managers of BSCCB S.p.A., jointly with the General Managers of BSCCB GmbH, to review this Code as necessary and at least every three years in order to ensure it continues to comply with relevant anti-corruption laws.

16. Questions and Information

If you want to ask a question about the requirements in this Code or are concerned that Bribery or Corruption is occurring or has occurred, you should report it immediately to one of the following:

- Direct Manager
- General Managers BSCCB S.p.A. / General Managers of BSCCB GmbH

ANNEX 1

Gifts and Entertainment

☒	In principle, there is nothing wrong with genuine relationship building gifts or hospitality. Occasional, modest gifts and entertainment are a legitimate way to foster good business relationships between BSCCB and third parties and are therefore allowed.
☒	If you are offered entertainment or a gift which is of negligible value and which is in line with normal business practices it is fine to accept this.
☐	It is prohibited to offer or receive gifts and entertainment that could influence, or be perceived to influence, business decision making including the outcome of transactions or negotiations relating to BSCCB's business or to win or secure new business.
☐	Do not offer or accept gifts or hospitality if you think they might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there is a risk they could be misconstrued or misinterpreted by others, for example lavish gifts and entertainment.
☐	You must not give or accept gifts or entertainment from or to a Third Party during a tender process or contract negotiations with that Third Party regardless of the value of the gift or entertainment.
☐	You should consider "Is this excessive? Is it a gift – or a bribe? Is it hospitality – or persuasion? Am I trying to influence someone to do something improperly or am I being influenced?". If you are struggling to justify it, it is probably not okay.

Gift

☒	You are permitted to give or accept gifts of negligible value that is, gifts worth under €50 or equivalent amount in local currency if it is customary to give or receive such a gift in the ordinary course of business.
☒	Examples of acceptable gifts might be a ball point pen, a bottle of wine, calendar or diary.
☒	You may accept other gifts if they are received on behalf of BSCCB, where they exceed the value of €50 or its equivalent in local currency and you have the prior written approval of your Direct Manager and the gift is then recorded in the relevant Gifts and Hospitality Register. At the discretion of a manager, these gifts may be disposed of, distributed or donated to charity.
☒	A good test to apply to giving or receiving gifts is: Would you be comfortable telling your line manager about the gift?

	You may not give gifts that have more than a negligible value, unless you have prior written approval from your Direct Manager.
	Examples of gifts that must not be accepted without such approval are a lavish hamper, case of champagne, tablet computer or anything delivered to your home address.
	You are not allowed to split a gift to reduce its face value (e.g. a case of wine) to bring it within this exception.
	You must not repeatedly give or accept gifts to or from the same Third Party.

	You are never allowed to give or accept a gift of cash, regardless of the value. High value cash equivalents such as gift vouchers or travel vouchers must not be offered or accepted.
	Holidays will always be considered to have more than a negligible value and must not be offered or accepted.
	Gifts offered to your relatives or friends by a Third Party must always be refused, regardless of their value.
	You should never offer a gift to the friends or relatives of any Third Party during your employment or carrying out your duties for BSCCB. Such gifts can obviously be perceived as an inducement to win or secure new business.

Entertainment

	You are permitted to give or accept corporate hospitality if it has a face value (including taxes) of not more than €75 or equivalent amount in local currency per person and it is customary to give or receive such hospitality in the ordinary course of business.
	Examples of acceptable hospitality and entertainment might be dining out or tickets to a sporting event, theatre or music concert where the host is present.
	A good test to apply to corporate hospitality is: Is it reasonable, proportionate, not lavish and would BSCCB be willing to reciprocate?
	You must take special care where there are substantial offers of social functions, travel or accommodation such as tickets to overseas sporting events and entertainment.
	You may give or accept entertainment that exceeds the value of €75 per person or its equivalent in local currency if it is in BSCCB's interests to do so, you have obtained the prior written approval of your Direct Manager and the entertainment is then recorded in the relevant Gifts and Hospitality Register
	You may not offer entertainment or hospitality that fall outside of the "reasonable and appropriate" category unless you have prior written approval from your Direct Manager.
	You must not repeatedly give or accept meals, tickets, invitations to sporting, cultural or social events to or from the same Third Party.
	You must not accept tickets to sporting or cultural events where the host is not present.
	If you are offered entertainment or hospitality that falls outside these guidelines you must, politely but firmly refuse it. If you consider that the refusal of the entertainment or hospitality would cause offence you must obtain prior written approval from your Direct Manager.

	Hospitality or entertainment offered to relatives or friends by a Third Party must always be refused, regardless of their value.
	You should never offer hospitality to the friends or relatives of any Third Party during your employment or carrying out your duties for BSCCB. Such hospitality can obviously be perceived as an inducement to win or secure new business.

Government Officials

	You must never provide business gifts, hospitality and business entertainment to a Government Official regardless of value.
	You must never make facilitation or grease payment (a payment to a Government Official to speed up a routine government action e.g. processing government paperwork such as a visa, work permit, license, etc.).
	You must not pay for expenses including business related travel for a Government Official
	Political donations must not be made on behalf of BSCCB for the benefit of any government official. Donations must not be made to improperly influence the recipient or in exchange for any business advantage and must follow the principles at paragraph 8 of this Code.

ANNEX 2

BSCCB GIFTS AND HOSPITALITY DISPENSED FORM

Name of Employee (Donor)	
Title & Department	
Name of Receiver & Name of Organization	
Position of Receiver	
Existing or New Business Partner	
Number of times Gift or Hospitality dispensed to this Business Partner over past 12 months	
Government Official (yes/no)	
Description of Gift and/or Hospitality dispensed	
Date Gift and/or Hospitality	
Value of Gift and/or Hospitality dispensed	
Reason for Gift and/or Hospitality being dispensed	
Evidence of value of Gift and/or Hospitality attached (yes/no)	
If entertainment, will donor be present at entertainment?	
Signed	
Date	

For Official Use only

Authorised by	
Signed	
Date	
Rejected by	
Signed	
Date	

ANNEX 3

BSCCB GIFTS AND HOSPITALITY RECEIVED FORM

Name of Employee (Receiver)	
Title & Department	
Name of Donor & Name of Organization	
Position of Donor	
Existing or New Business Partner	
Number of times Gift or Hospitality Received from this Business Partner over past 12 months	
Government Official (yes/no)	
Description of Gift and/or Hospitality received	
Date Gift and/or Hospitality received	
Value of Gift and/or Hospitality received	
Reason for Gift and/or Hospitality being received	
Evidence of value of Gift and/or Hospitality attached (yes/no)	
If entertainment, will donor be present at entertainment?	
Signed	
Date	

For Official Use only

Authorised by	
Signed	
Date	

Rejected by	
Signed	
Date	

ANNEX 4

BSCCB INTEROFFICE MEMORANDUM – TRAVEL POLICY

Basis

Brembo Travel Policy (PG.W.DRUO-09 rev. 02 Data 30/04/2015)
SGL Business Travel Management (GP-P-GLO-001 Version 1.0 – 2014-09-22)
SGL globale Richtlinie Group Purchasing – Dienstreisen Management /Anhang Deutschland
(GP-P-DE-1002 Üb. 01 – 11.06.2015)

Purpose of memorandum

The audit of 2016 revealed, that the valid travel policies for Stezzano and Meitingen, in part, haven't been correctly implemented. Therefore the intention of this memorandum is to expand the existing valid travel policies, which are listed above, by a few further action guidelines. This will enhance transparency and make sure that all valid guidelines are complied with. This applies equally for the BSCCB S.p.A as well as the BSCCB GmbH.

Flights

Generally the rules for flights for both locations are explained in the existing guidelines.
Should however two members of staff from both locations have the same destination for a common business trip, care should be taken, that the trip has similar conditions (e.g. the same class of flight). Before booking, the trip must be signed off by a member of the MC.
First class flights are generally excluded.

Rental cars

Should an employee for any comprehensible reason need a car that does not comply with the travel policies, it is necessary that either the relevant manager or an MC member agrees to the booking, in writing. This basically means: no signature, no up-grade.

Accounting of hospitality costs

Hospitality costs on business trips, which are disbursed by the employee must be submitted with the travel expense report. Here it is important that the host supplements the bill with a list of the attending guests. All further regulations concerning the accounting of hospitality costs will remain valid, independent of this.

Prompt travel accounting

For enabling a prompt travel expense accounting process, the employees travel costs must be handed in as soon as possible and at the latest three months in arrears. Furthermore the original bills are required for the travel expense reports. Internal receipts are the only exception. The submitter, and their superior must sign the submitted original travel expense reports.

We ask all employees from both locations for their understanding that the processes outlined above be consequently adhered to.