

— BREMBO SUPPLIER CODE OF CONDUCT FOR RESPONSIBLE BUSINESS

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1 ■ INTRODUCTION

At Brembo, sustainability is more than a responsibility: it's an integral part of how we do business globally, driving innovation, resilience and long-term value. The choices we make today shape the world of tomorrow and we believe that by working together, we can drive meaningful change. As a global leader in braking solutions, we know that the sustainability of our products and processes depends not only on technology but on the values upheld throughout our entire value chain. Our Supplier Code of Conduct for Responsible Business, which supersedes the previous Sustainable Procurement Policy, reflects this vision by setting clear expectations for responsible sourcing and Supplier conduct. We invite our Suppliers to join us in building a supply chain that is ethical, transparent and ready for the future by reducing environmental impact, promoting circular economy principles, ensuring fair labour conditions and fostering transparency. Together, through shared responsibility and conscious decisions, we can create a stronger, more sustainable future.

To support this goal, Brembo has implemented a structured Supplier management process. We require our Suppliers to:

- comply with regulatory requirements, laws and standards and ensure respect for human rights;
- protect the health and safety of its employees and the community;
- adopt responsible environmental protection policies through the Life Cycle Assessment (LCA) principle;
- meet quality standards while responding to evolving needs with agility and flexibility;
- foster innovation and the continuous pursuit of advanced technical solutions;

- safeguard the security, integrity and confidentiality of all exchanged and stored data and information;
- ensure competitiveness in line with market expectations through a Life Cycle Cost (LCC) approach.

Through these principles, Brembo reinforces its commitment to building a resilient, responsible, and forward-looking supply chain that aligns with its long-term sustainability vision.

Purpose

Brembo's Supplier Code of Conduct for Responsible Business reflects our commitment to responsible sourcing across our entire supply chain. We expect all Suppliers - and their Sub-Suppliers - to acknowledge, adopt and comply with the principles outlined here. Suppliers should promote these values through employee training and by extending them throughout their own supply chains. Compliance with this Code is a condition for doing business with Brembo, and violations may result in termination of the relationship. This Code will be regularly updated to ensure continued relevance and alignment with our sustainability goals.

Field of Application

This Code of Conduct applies to all Suppliers delivering goods and services to all companies within the Brembo Group.

Reference Documents

This Code should be read in conjunction with the following documents¹, which set out the principles and values by which the Group is guided:

- Code of Ethics;

- Organization, Management and Control Model pursuant to Legislative Decree 231/2001;
- Human Rights Policy;
- Occupational Health and Safety Policy;
- Anti-Bribery Code of Conduct;
- Policy on Non-Discrimination and Diversity;
- Environment and Energy Policy;
- Annual statement under the Modern Slavery Act 2015.

Regulatory Context and Requirements

This Code is based on the values set out in Brembo's Codes and Policies, which are inspired by the principles contained in:

- The UN Universal Declaration of Human Rights (which we support in all of its spheres of influence);
- The UN Guiding Principles on Business and Human Rights (UNGPs);
- The ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;
- The OECD Guidelines for Multinational Enterprises;
- The International Covenant on Economic, Social and Cultural Rights;
- The Ten Principles of the UN Global Compact;
- The 2030 Agenda for Sustainable Development, adopted on 25 September 2015

by the United Nations General Assembly, and the related 17 Sustainable Development Goals (SDGs);

- The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work;
- The ISO 20400 Guidelines for sustainable procurement.

Suppliers shall 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, Suppliers 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.

In line with global regulatory requirements, Suppliers must establish and maintain management systems that incorporate sustainability due diligence and risk assessment processes - covering both their own operations and those within their value chain - appropriately tailored to the scale and complexity of their business activities. These systems should ensure ongoing legal and regulatory compliance, assign clear roles and responsibilities, and include mechanisms for regular monitoring, review and continuous improvement. Suppliers shall operate in compliance with international trade laws including applicable economic sanctions.

¹ All related documents are available at Governance | Brembogroup.com





2 ■ HUMAN RIGHTS

In line with international standards and Brembo's commitment to sustainability and social responsibility, the Group actively promotes and supports the protection of human rights across all its operations and supply chain. To this end, Brembo Suppliers shall uphold and implement the following social standards throughout their activities and supply chains articulated through a series of core principles outlined in the Brembo Human Rights Policy. In addition to these, Suppliers are also expected to comply with further requirements set forth by Brembo and applicable to its supply chain.

Child Labour and Young Workers

Brembo does not use child labour. Suppliers shall never employ any person below the age of 15, unless this is part of a government-authorized job training, training, and apprenticeship program clearly beneficial to the participating person. Suppliers shall monitor the prohibition of child labour, manage any identified cases, and oversee learner programs in accordance with applicable laws and regulations.

Moreover, Suppliers that employ workers under the age of 18 shall not assign to the aforementioned hazardous tasks - defined as work that may endanger their physical or mental health, safety, or moral wellbeing.

Forced Labour, Human Trafficking and Modern Slavery

Brembo does not use forced labour, regardless of its form. Suppliers shall maintain and ensure a work environment based on the free choice of employment, prohibiting and not endorsing any forms of servitude or forced labour. They shall not tolerate physi-

cally abusive disciplinary practices, and shall be opposed to all kinds of human trafficking and modern slavery, requiring these principles are upheld by everyone operating on behalf of the company, including service providers and security personnel. This commitment extends to safeguarding individuals in vulnerable situations, such as migrant workers, by forbidding practices like recruitment fees for workers, retention of identity documents, and debt bondage.

Furthermore, Suppliers shall comply with applicable laws and regulations aimed at preventing forced labour (including, for example, the Uyghur Forced Labor Prevention Act - UFLPA) and ensure that their supply chains are free from any goods produced by forced labour.

Right to Work, Freedom of Association and Collective Bargaining

Brembo recognizes, respects and fully guarantees its employees the right to work and to freely associate by joining or forming trade unions based on applicable regulations in all its facilities. In line with these principles, Suppliers shall work constructively with their employees, or any organization that represents their employees, to promote their employees' best interests. Suppliers shall seek to provide opportunities for employees' concerns to be heard. They shall collectively bargain where law or welfare systems require them to do so.

Additionally, in cases where local legislation restricts the abovementioned rights, alternative and effective mechanisms for worker representation shall be established.

Diversity, Equity, and Inclusion

Brembo is committed to maintain an environment free of discrimination and to promoting a diverse and inclusive workplace. Suppliers shall not tolerate any form of harassment, bullying, intimidation, or discrimination based on gender or gender re-assignment, sexual orientation, ethnicity (including ethnic origins and nationality), age, political opinions, religious beliefs, social origin, marital or family status, disability, pregnancy, or any other personal condition. They shall be committed to maintaining an environment free of discrimination and to promoting a diverse and inclusive workplace, in line with Brembo's zero tolerance approach to any form of misconduct. They shall ensure fairness in all aspects of work, including hiring, learning, development, and rewarding, basing our decisions solely on people's competences, experience, knowledge, potential, and performance.

Working Schedule

Brembo adheres to all applicable local laws regulating work hours and is committed to the principles of the International Labour Organization. Suppliers shall be compliant to local laws and strive to align their working hour practices with International Labour Organization standards, including reasonable limitations on regular hours and adequate rest periods. Suppliers shall guarantee legally mandated and reasonable provisions for breaks, holidays, personal leave, and vacation. All overtime shall be consensual, accurately recorded, and compensated according to local labour laws.

Compensation and Benefits

Brembo provides compensation and benefits in full compliance with applicable laws and regulations. In accordance with these principles, Suppliers shall promote their employees' material well-being and guarantee fair wages for all their employees, considering legal minimums, collective agreements, and market benchmarks where applicable. Suppliers shall strive for equal pay for equal work and progressive wage improvements, alongside legally mandated social insurance. In addition to fair wages, Suppliers shall of-

fer supplementary benefits tailored to local practices and regulations, contributing to a supportive and equitable work environment.

Local Population and Communities

Brembo recognizes the importance of the local population and communities as key stakeholders in its activities and projects. Reflecting these principles, Suppliers shall commit to thoughtfully considering their perspectives when planning and executing their activities. Suppliers shall foster open



communication and share relevant information about their plans with recognized stakeholders, seeking to understand and address their interests and concerns in a transparent manner.

Moreover, Suppliers shall, when relevant to their business, actively safeguard the dignity and wellbeing of indigenous communities, who may be affected by their business practices or operations. In these cases, Suppliers shall also take steps to identify and address any risk of forced evictions linked to their activities of any community or individual from their lands or territories, as these may result in serious human rights impacts.



3 • BUSINESS ETHICS

Brembo is committed to fostering a business environment rooted in integrity, responsibility and transparency. Ethical conduct is essential to building strong long-term relationships across our value chain. In pursuing this purpose, the adoption of a Code of Conduct and a periodic audit of its application are strongly recommended.

Brembo Suppliers are also expected to uphold the standards outlined in Brembo Code of Ethics - ensuring that all activities are carried out in an ethical, fair, and lawful manner - and to align with the following principles.

Anti-corruption

Brembo firmly rejects all forms of corruption and complies with applicable anti-corruption laws in every country where it operates, as outlined in its Anti-Bribery Code of Conduct. Suppliers shall conduct their business with the same level of transparency and integrity, ensuring full compliance with anti-corruption regulations in their respective jurisdictions.

Any form of corruption, incitement to commit a crime, extortion and embezzlement are prohibited. Suppliers shall not offer, promise, pay, or request money directly or indirectly (by means of bribes and/or gifts and inducements in money or other benefits), to obtain an undue advantage, whether for themselves or through an intermediary.

Fair Competition

Fair competition is a fundamental prerequisite in creating business success, achieving positive financial performance and generating value for shareholders. Suppliers shall comply with all applicable competition, antitrust, and trade regulations in every

jurisdiction where they operate. Any agreements that restrict fair competition, as well as practices that violate antitrust laws, shall be prohibited.

Conflict of Interest

Properly addressing situations that may compromise impartiality is essential to ensuring transparency, integrity and trust in business relationships. Suppliers shall promptly report any actual, potential or perceived circumstances that could give rise to a conflict between personal interests and their professional obligations to Brembo. These situations may involve relationships or external activities that affect, or could affect, objective and independent decision-making.

Money Laundering

Preventing money laundering is essential to protecting the integrity of financial systems and ensuring responsible and lawful business conduct. Suppliers shall actively oppose all forms of money laundering and implement measures to ensure that every economic and financial transaction is properly documented and transparent. This enables the identification of the origin of assets or funds involved in each transaction, helping to prevent their use by third parties for money laundering purposes.

Intellectual Property

Protecting intellectual property and sensitive information is vital to maintain trust, safeguarding innovation and ensuring legal compliance in all business relationships. Suppliers 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.

Reporting Violations

Encouraging the reporting of violations is key to upholding integrity and addressing issues effectively within business. Brembo encourages its Suppliers and other external parties to report any violations, irregularities or misconduct related to its Code of Conduct,

policies or procedures. Reports can be submitted through the Whistleblowing Channel which ensures protection from retaliation for those who act in good faith, as foreseen by EU Directive 2019/1937.

Suppliers shall adopt their own whistleblowing systems, ensuring that similar protections and procedures are in place within their organization and stakeholders.



4 • DATA PROTECTION AND INFORMATION SECURITY

Brembo considers information security an indispensable factor for the protection of its own assets and those of its stakeholders, as well as a factor of strategic value that can be translated into competitive advantage.

Brembo adheres to industry security standards (e.g., ISO 27001, TISAX) and is continuously working to enhance its security maturity. This includes implementing both technical and organizational measures to safeguard the integrity, confidentiality and availability of its information assets, as well



as those of its Customers, Partners, Suppliers and Employees. To extend this protection throughout the supply chain, Brembo requires its Suppliers to:

- process the information provided by Brembo in an appropriate way and implement organizational, physical and technical controls that are no less stringent than Industry standards, in particular **ISO/IEC 27001:2013**, **TISAX** and other applicable information security standards;
- ensure that the following are included as a minimum in the aforementioned checks:
 - the securing of company facilities, paper archives and IT equipment;
 - the protection of the transmission and storage of information;
 - the adequate disposal of information and equipment;
 - the implementation of access and authentication controls;
 - the segregation of Brembo's confidential information from that of other customers and Suppliers;
 - the provision of appropriate Information Security training to their employees;
 - the control of the copying and printing of Brembo's information;
 - the implementation of security controls throughout the supply chain;
 - the definition of plan to ensure the continuity of the business with Brembo;
- implement and maintain additional security controls as agreed between Brembo and the Supplier;
- promptly notify Brembo of any Information Security breaches and take immediate action to resolve the issue while implementing measures to prevent future occurrences;
- retain Brembo data in compliance with the indication provided by Brembo and specified in the contract, especially after the termination of the partnership.

Prototype Protection

Suppliers shall implement all necessary measures to ensure the protection of prototypes, in accordance with TISAX requirements², safeguarding them against unauthorized access, use or disclosure throughout its lifecycle, with particular attention in the physical handling of the prototypes themselves.

A *prototype*, as defined by TISAX, is an early version of a product developed for testing and evaluation before mass production. It is considered highly sensitive since it represents potential new market offerings or proprietary designs, as it can be linked to a specific market player and is often identifiable through labels, molds or other distinctive markings.

For relevant Suppliers, Brembo reserves the right to verify compliance to the requirements defined in the updated version of the TISAX checklist.

Personal Data Protection

Brembo is committed to ensuring the protection of information and personal data concerning its employees and third parties, in accordance with personal data protection applicable laws and best practices (e.g. the General Data Protection Regulation – GDPR). Brembo Suppliers shall safeguard personal data, take appropriate steps to protect it from misuse, and comply with all applicable personal data protection laws.

Responsible Use of AI

Brembo 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. Aligned with this commitment, Suppliers 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.

² TISAX requirements are a set of standardized procedures and standards used in the automotive industry to ensure information security, particularly for sensitive data like prototypes and blueprints. These requirements, based on the VDA Information Security Assessment (VDA ISA), are designed to protect information and build trust among automotive suppliers and manufacturers.



5 • QUALITY

Brembo promotes the continuous improvement of its Suppliers' performance and their involvement in product innovation processes, with a view to strategic partnerships.

To guarantee the maximum safety and quality of its products, Brembo is committed to involving Suppliers from the earliest stages of project development, adopting a preventive and proactive approach that allows it to foresee and resolve any critical issues identified.

In particular, to pursue its Quality Policy, Brembo requires Suppliers to have a certi-

fied Quality Management System. Brembo's objective is for all Suppliers of direct materials, services and/or product-related services to be at least ISO 9001 certified, with the goal of achieving IATF 16949 certification, obtained from accredited certification bodies. Brembo manages all direct material Suppliers in compliance with the requirements contained in these standards. In addition, for Suppliers of mechatronic components, the ISO 26262 and ASPICE standards are also a reference model for managing the product development and realization phases.



6 • OCCUPATIONAL HEALTH & SAFETY

Brembo considers the protection of occupational health and safety a key principle of its activities and way of doing business, as set out in the Group's Occupational Health and Safety Policy. It therefore requires Suppliers to define and maintain Occupational Health and Safety Policies to provide safe and healthy working conditions for their employees in compliance with applicable legal requirements. In particular:

- Suppliers are required to implement the principles of Management Systems which, inspired by ISO 45001 (or equivalent), promote continuous performance improvement;
- Suppliers undertake to disseminate and consolidate a safety culture that promotes responsible behavior on the part of workers;
- if a production process has been outsourced to the Supplier, the latter undertakes to adopt the applicable legislation and to eliminate, where possible, hazards to the health and safety of workers, and to assess residual risks, implementing solutions to reduce them to a minimum level;
- in particular, those Suppliers who carry out their activities at Brembo sites are required to adopt Brembo's Health and Safety Standards.





7 • ENVIRONMENTAL PROTECTION

Brembo is committed to sustainable development, as outlined in the Group's Environment and Energy Policy, and actively works to reduce its environmental impact. Achieving this goal depends on the active involvement of our supply chain, and this is why Brembo expects its Suppliers to demonstrate ongoing efforts to minimize the environmental impact of their products and services. Suppliers shall implement and maintain an ISO 14001-aligned Environmental Management System, preferably certified by a third party. Suppliers are also encouraged to promote these commitments throughout their own supply chains, in line with Brembo's environmental values.

Climate Emissions and Reduction

Brembo is committed to reducing CO₂ emissions throughout the entire product life cycle as a key objective in its sustainability strategy. To reduce the impact of the Supply Chain on the carbon footprint of its products, Brembo expects willingness and transparency from Suppliers in terms of disclosure of emissions resulting from business processes and upstream activities and commitment to implement effective measures to reduce direct and indirect CO₂ emissions. Suppliers may be requested to take part in emission monitoring initiatives and to report CO₂ emissions associated with activities linked to Brembo's production processes.

Suppliers are encouraged to define and implement science-based greenhouse gas emission reduction targets in line with the guidelines of the Science Based Targets initiative (SBTi), to support the transition toward a low-carbon economy and contribute to global climate goals.

Waste, Circular Economy, and Water Management

Brembo is committed to minimizing the production of waste and increasing waste destined for recycling/recovery/reuse and has defined a strategy that promotes the rational use of water and its progressive use reduction. In line with this approach, Suppliers are strongly encouraged to adopt sustainable practices across their operations. This includes the implementation of innovative waste management solutions that prevent materials from reaching landfills or polluting aquatic ecosystems. Brembo encourages its Suppliers to carry out Life Cycle Assessments (LCA) to support the development of products and processes that minimize environmental impact across their entire life cycle, with particular emphasis on water conservation and energy efficiency.

Moreover, they shall manage waste responsibly and in full compliance with applicable regulations. Priority should be given to reducing the generation of landfill-bound waste in favor of recovery and recycling solutions.

Brembo further encourages Suppliers to adopt circular economy principles in their operations, including promoting material recovery, designing sustainable packaging and enhancing waste management practices throughout manufacturing processes. Additionally, Suppliers shall take proactive steps to prevent water pollution and reduce water consumption by implementing responsible practices in both production and waste management activities.

Brembo highly values proposals from Suppliers that offer alternative products or processes designed to enhance environmental performance.

Chemical Substances

Brembo is committed to reducing the impact of emissions, particularly those related to Substances of Very High Concern (SVHCs), across all environmental matrices, with special attention to air, soil, and water. To this end, the company operates a robust system for monitoring and upgrading its treatment plants, in line with the Best Available Techniques, with the ambitious goal of keeping emissions well below regulatory thresholds. In parallel, ongoing research into innovative materials and technical solutions - both in processes and products - enables Brembo to progressively adopt lower-impact substances, thereby minimizing environmental impact throughout the product lifecycle. In alignment with this approach, Brembo requires its Suppliers to fully comply with all applicable chemical regulations, ensure transparency regarding the presence of SVHCs, avoid the use of prohibited substances, and actively pursue safer alternatives and improved environmental practices.

Responsible Minerals

Brembo is committed to sourcing raw materials and components from Suppliers and business partners that demonstrate respect for human rights throughout their supply chains. Accordingly, Brembo requires Suppliers to declare the presence and origin of specific materials, including:

- Conflict Minerals (3TG): Gold, Tantalum, Tin, and Tungsten;
- Cobalt and Mica.

If applicable to their business, Suppliers are expected to carry out comprehensive due diligence on their supply chains in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and in compliance with relevant legislation, including the U.S. Dodd-Frank Act and applicable EU Conflict Minerals Regulation.

In the event of non-compliance, Brembo expects Suppliers to take prompt and proactive measures to address the issues identified. This includes the submission of a detailed Corrective Action Plan outlining specific remediation steps and a clear timeline for res-

olution. Where applicable, Brembo may also require Suppliers to remove from its supply chains any smelters or refiners associated to products delivered to Brembo found as non-compliant with the Responsible Minerals Assurance Process (RMAP), in order to ensure alignment with our responsible sourcing standards.

Brembo reserves the right to request information on the presence and origin of other materials and minerals that are considered critical due to their environmental or social impact (e.g. rare earth elements) in alignment with evolving regulatory requirements and specific customer demands. Suppliers shall also ensure full compliance with the applicable requirements.



Deforestation and Biodiversity

Brembo aims to prevent deforestation and biodiversity loss by promoting sustainable raw material sourcing and minimizing the environmental impact of extraction activities. Suppliers shall not, directly or indirectly, source or procure raw materials that contribute to illegal deforestation or cause environmental or social harm related to deforestation, in accordance with applicable regulations (e.g., EUDR).

If applicable to their business, Suppliers shall assess the risk of biodiversity loss and implement appropriate mitigation measures. This includes avoiding the use of products derived from endangered species, preventing excessive land consumption, and ensuring that their operations do not negatively impact ecosystems.



8 ▪ MONITORING AND CORRECTIVE ACTIONS

Brembo shall request information from its Suppliers on the aforementioned matters by means of specific questionnaires and surveys and reserves the right to carry out checks by means of audits conducted by Brembo personnel and/or third parties, subject to appropriate notification, on the matters covered by this Code.

In case of non-compliance, Brembo:

- will require Suppliers to prepare and subsequently implement a Non-Compliance Recovery Plan;
- will carry out documentary checks and/or additional Audits to ascertain the effective implementation of the above recovery plans, subject to prior notification.

If the Supplier breaches the principles of this Code, fails to actively cooperate in providing the requested information, or is found to be non-compliant without having implement-

ed appropriate corrective measures, Brembo reserves the right to suspend or immediately terminate the business relationship as a precautionary measure. Brembo also retains the right to seek compensation for any losses, damages, expenses, or other costs incurred as a result of the Supplier's breach or misconduct.

By accepting this Code, the Supplier confirms that it has read, understood and accepted all the principles, terms and conditions contained herein, and has aligned its operational practices accordingly for the supply of goods and provision of services to Brembo Group.

The Brembo Codes and Policies mentioned in this document can be found at the following link:

[Governance | brembogroup.com](https://www.brembogroup.com/governance)



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