

GROUP CODE OF ETHICS AND CONDUCT 2024



Revision	Date	Reason	Drafting and Verification	Approval
00	30/07/2024	Standard edition of the Group Code of Ethics and Conduct	Anti-Corruption Ethics Committee	Board of Directors

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A close-up photograph of a hand holding several colorful paper cutouts of human figures with their arms raised. The figures are in shades of yellow, green, and purple. The background is blurred, showing more of the same figures, suggesting a larger group or community. The overall mood is positive and collaborative.

1. GENERAL PRINCIPLES



1. GENERAL PRINCIPLES

1.1 Field of application, recipients and purpose of the Code of ethics and conduct

The objective of SACBO S.p.A. and the Group Company BGY INTERNATIONAL SERVICES (hereinafter referred to as the “SACBO Group” or the “Group”) is to base the carrying out of their activities on the principles of ethical integrity, to apply principles of ethics and conduct and encourage respect of the same. To this end, the Companies have deemed it opportune to provide the Group with a Code of ethics and conduct (hereinafter referred to as the “Code of ethics”).

The aim of the Code of ethics is therefore to identify a series of ethical values, general principles and guidelines for conduct that must be observed by all recipients in conducting company business and activities in general.

The “recipients” are all the subjects to whom the regulations in this Code of ethics are addressed, and are identified as follows:

- Directors and members of the corporate bodies within the group, and any subject in a senior management position, understood to be those who hold a role of representation, administration or direction, or who are responsible, including in a de facto manner, for the management and/or control of the Group or of one of its units or divisions.
- All the employees of the Group, including fixed-term and part-time personnel and workers in analogous positions.
- External collaborators who either directly or indirectly provide services related to the company activities (consultants, external professionals).
- Commercial and operational partners who play a role in plans and operations.
- All those who, either directly or indirectly, establish either regular or temporary relations with the Group, or who, in any case, work towards the pursuit of its goals.

Il Codice Etico si pone come obiettivi il rispetto e l'adeguamento ai valori di cui è espressione e
The aim of the Code of ethics is to ensure the respect for and adaptation to the values that

it expresses, and to achieve the utmost efficiency in the Group's internal (top management, management and employees) and external (enterprises and the market) relations, with a view to encouraging clear guidelines for conduct, ensuring that the fundamental ethical values, both human and environmental, of excellence, balance, the creation of value, and responsibility, serve as founding elements of the corporate culture of the SACBO Group in the carrying out of business and activities in general. The Code of ethics is a fundamental means of controlling economic, financial, corporate and social relationships, with a particular focus on conflict of interest and relations with competitors, clients, suppliers and Public Administration.

The Code of ethics defines the Group's ethical standards, providing its personnel with the necessary guidelines for conduct.

All the recipients of the Code of ethics are required to learn, observe and apply its provisions in both internal and external relationships, actively contributing to ensuring its implementation and reporting any breaches. Failure to report constitutes a violation of the Code and its principles. With a view to ensuring full communication of its contents, the Code of ethics is a subject for training for all company employees and those collaborating with the company in various roles (trainees, apprentices, consultants, etc.), with verification of the results of said training. The content of the Code of ethics is also available for consultation by anyone, including clients and suppliers, and is published on the company websites. Knowledge of and compliance with the Code of ethics by third parties

is ensured through the inclusion of dedicated clauses in the contracts governing any relationship of collaboration with the Group, guaranteeing awareness of and respect for the ethical principles contained within the Code.

All recipients and third parties undertake to work in a loyal, professional, honest, competent and transparent manner, in full compliance with current laws and regulations.

The Code is a fundamental element of the Organisational, Management and Control Models adopted by the Companies pursuant to Italian Legislative Decree 231/2001 (hereinafter referred to as OMCM) and is based on the principles illustrated below.

1.2 Vision e Mission

The SACBO Group aims to manage and adapt the airport in accordance with the forecast evolution in national and local demand for the transportation of persons and goods.

With a view to achieving this goal, the Group intends to promote prompt and sustainable adaptation and effective and informed management of the airport infrastructure and passenger services, planning investments in human capital and technology, and respecting the essential role that the airport plays on a national and international level.

1.3 Valori e competenze

The conduct of personnel in performing the tasks within their field of competence and responsibility must be characterised by correctness, loyalty, transparency, impartiality and objectivity.

The principal values of the Group are:

- **Excellence:** the continuous improvement of its activities with regard to all the stakeholders involved.
Excellence can be represented by skills such as: Efficiency - Practicality - Quality - Willpower - Determination - Responsiveness - Innovation - Training/information.
- **Balance:** the constant striving for the best solutions that satisfy and adapt to the needs of all the stakeholders involved.
Balance can be represented by skills such as: Equilibrium - Mediation - Transparency - Communication - Cooperation.
- **The creation of value:** understood not only as profit for the company but as value and wealth for our local community and the country as a whole.
The creation of value can be represented by skills such as: Innovation - Systematic thinking - Integrity - Resilience - Orientation towards goals - Cultural and social awareness.
- **Responsibility:** understood as awareness for the role of the company and the positive and negative effects of its activities.
Responsibility can be represented by skills such as: Professionalism - Identity - Diversity - Teamwork - Resilience - Coherence - Ethics.

The Group is committed to bringing out the best in people and fostering physical and moral integrity, promoting the sharing of the principles of ethics and conduct, encouraging compliance and punishing breaches. The recipients are required to comply with and apply all the aforementioned principles, applying the shared values of morality and conscientiousness to every duty and in all circumstances.

1.4 Supervision of the implementation of the Code of ethics and conduct

For the correct implementation of, and full compliance with, the Code of ethics, personnel may refer to their immediate superiors and successively to the Anti-Corruption Ethics Committee, which is responsible for supervising observance of the Code.

The Anti-Corruption Ethics Committee is composed of a Chair, appointed by the Board of Directors and chosen from among external consultants and from the areas of Legal and Corporate Affairs, Internal Auditing and Human Resources.

The tasks of the Anti-Corruption Ethics Committee are:

- The decisive and efficient communication of the Code of ethics and the Anti-corruption model to employees and collaborators of the SACBO Group, clients, suppliers, shareholders and all stakeholders.
- The constant updating and enhancement of the Code with a view to adapting it to evolutions in legislation.
- The provision of support to the various recipients in the interpretation, implementation and assessment of the Code, seen as a constant point of reference for the proper conduct to adopt in carrying out their respective activities.
- The verification and assessment of violations in breach of the provisions of the Code of ethics and the adoption of any opportune measures necessary, in collaboration with the company departments responsible, respecting the law, regulations and National Collective Bargaining Agreements.
- The reporting of any anomalies to the relative company departments in order to adopt the necessary corrective measures.
- The preparation and promotion of communication and training programmes dedicated to the recipients of the Code, for the purpose of ensuring the utmost awareness of the goals and the conduct to assume in order to achieve them.



ethics

respect

honesty

integrity

2.2. PRINCIPLES OF CONDUCT



2. PRINCIPLES OF CONDUCT

2.1 Working environment

The observance of ethical values must be a constant and systematic aspect of the conduct of every single Group employee and collaborator.

The senior management, management and supervisors of the corporate structures must serve as an example and a model for all employees, assuming impeccable conduct in the carrying out of the activities within their field of competence and constantly promoting a spirit of collaboration, trust, reciprocal respect and cohesion, in order to safeguard and systematically improve the company climate, as well as the image and prestige of the Group Companies.

The senior management of all the Group Companies are also committed to:

- precisely applying laws, regulations, internal procedures and professional contracts.
- behaving in a fair and objective manner towards their collaborators, favouring professional growth and safeguarding occupational health and safety.
- assuming fair, correct and impartial conduct towards clients, suppliers and competitors.
- maintaining relationships with Public Administration inspired by correctness and integrity.
- considering environmental protection and the prevention of all forms of pollution as a fundamental value, with the purpose of guaranteeing compatibility between business initiatives and environmental requirements, in compliance with current legislation.
- preventing the occurrence of corruption-related practices, and of offences in general, in the carrying out of their activities, and contrasting all possible episodes.

2.2 Relations between Employees

The employees of the SACBO Group are in direct contact with both internal and external environments.

They are required to fully and constantly respect the principles of moral integrity and those of ethics and conduct; as employees of the Group, irrespective of their position within the hierarchy, they are obliged to observe and apply the ethical and behavioural principles of diligence, honesty and equality, promoting reciprocal collaboration and solidarity, fostering the creation of a working environment that favours the protection of the individual and of workers from both a professional and a relational point of view; they are required to use the resources and infrastructure owned by or controlled by the company within the confines of the duties they are called on to perform, without ever abusing them or using them for other purposes or beyond the hours required for their working activities; lastly, they are required to comply with all the provisions of the Collective Bargaining Contract.

Senior management is required to exercise its powers towards employees in a balanced, fair and non-discriminatory manner, respecting the individual and their personal dignity; they must not, in any manner, abuse their position, either while recruiting employees (which must take place exclusively on the basis of merit and/or in accordance with the law) or in the fulfilment of working relationships; they must always give orders exclusively in compliance with the law and the principles of the Code, and must abstain from any form of harassment and/or intimidation aimed at inducing employees to violate the aforementioned principles.

2.3 Personnel management

In general, the Group requires all those operating within the organisation to respect every single individual, their personality and dignity, including during the selection process.

To this end, in compliance with all current laws, regulations and company policies, and through the departments responsible, the Group undertakes to:

- select, employ, pay, train and assess employees on the basis of merit, competence and professionalism, without any form of discrimination.
- offer all its employees equal employment opportunities, in accordance with their relative professional characteristics and performance, without any form of discrimination.
- offer all its employees equal employment opportunities, in accordance with their relative professional characteristics and performance, without any form of discrimination.
- offer working conditions that are suitable in terms of health and safety, and that respect the individual nature of everyone, in order to foster interpersonal relationships devoid of prejudice.
- ensure a working environment in which relationships between colleagues are characterised by loyalty, correctness, collaboration, reciprocal respect and trust.
- intervene in cases of conduct that does not comply with the principles

set out above.

- combat, in particular, any form of intimidation, hostility, isolation, undue interference or brainwashing, or sexual harassment.
- favour the development of each and every employee's potential and professional development, organising specific moments for training and refresher courses in relation to their individual professional profile and potential.

2.4 Protection and use of company assets

The assets of the Group consist of tangible assets, both owned and used by the company (for example digital devices, printers, equipment, buildings, infrastructure, apron vehicles), and intangible assets (for example confidential information, know-how, procedures and technical knowledge, developed and communicated by Company employees). The protection and the preservation of these assets and resources are of fundamental value in protecting company interests, and it is the duty of the personnel both to protect said assets, using them in an efficient manner and abstaining from any improper or fraudulent use, and to impede their fraudulent or improper use by others.

The use of company assets by employees must be functional and exclusively related to the carrying out of company activities or for the purposes authorised by the relative company departments.

2.5 Confidentiality and privacy

The information, data and knowledge acquired, processed and managed by employees in the performance of their professional duties must remain strictly confidential and suitably protected, and must not be used, communicated or disclosed either within or outside the Company unless in compliance with current legislation and company procedure. The following information and data are confidential, and as such, are the exclusive property of the Group:

- Company, strategic, economic/financial, commercial, managerial and operational plans.
- Projects and investments.
- Data regarding personnel, such as presences, absences, holiday leave, sick leave and remuneration.
- Company parameters concerning performance and productivity.
- Negotiations, agreements, commitments, pacts, contracts, facts, events, including future and unconfirmed events, related to the scope of activity of the Group, as well as company documentation, which is not in the public domain and that, if rendered public, could harm the Company.
- The know-how relative to the development and commercialisation of services and processes.
- Company documentation carrying a statement prohibiting copying.
- Databases regarding suppliers, clients, employees, collaborators of various nature and passengers.

Personnel are required to treat said data and information with the utmost attention and confidentiality, avoiding any conduct with both colleagues



and third parties that may reveal any form of data or information belonging to the Group, considered as confidential and not yet rendered public.

On receiving any requests from external subjects (family members, friends, private individuals, or from categories such as journalists, financial analysts, investors, etc.) for confidential company data or information, employees are required to abstain from providing said information either directly or indirectly, simply forwarding the request to the relative company department.

Group Companies have adopted their own Model for the protection of personal data that contains the organisational, operational, architectural and control-related decisions taken to ensure that personal data belonging to the Group is suitably protected, in compliance with the requirements of the GDPR and other measures related to the protection of personal data.

2.6 External communication

Communications made by the Group towards the external environment must be true, clear, transparent, unambiguous and with no ulterior motive, coherent, consistent and accurate, and in any case compliant with company policies and programmes.

Personnel must abstain from making formal or informal statements of any nature outside of the Company without prior authorisation and in compliance with the provisions of the Social Media Policy procedure.

2.7 Conflict of interest

The SACBO Group maintains a relationship of trust and loyalty with its personnel, who are required, in the performance of their relative duties, to pursue the general goals and interests of the Group, avoiding any situation or carrying out any activity that may contradict these principles.

With regard to conflict of interest, considering the relationship of trust between the Group and all those who operate on its behalf, all recipients must avoid all situations and abstain from all activities

that may lead to a contrast between their personal interests and those of the Company, or that may interfere or hinder their ability to make impartial and objective decisions in the interest of the Group.

The recipients of this Code must therefore avoid situations and/or activities that may result in conflicts of interest with the Group or that may interfere with the aim of making impartial decisions, thus protecting the best interests of the Group Companies.

The recipients are obliged to report the existence of any such situations that they are aware of.

No employee of the Group is allowed to carry out any activity that favours competitors, serve as a consultant or member of the Board of Directors of a competing company, or provide their professional services in favour of competitors; furthermore, no-one is allowed to use company assets or provide services that the SACBO Group offers its clients either while working or in their free time, without prior authorisation from the relative company department or their direct superior; no-one is permitted during their working hours to carry out any other activity that is not in line with their duties or organisational responsibilities, or to use company assets beyond the confines of the aforementioned duties.

The Group has adopted a specific “PERSONNEL ANTI-CORRUPTION POLICY” which introduces more specific measures for governing potential conflicts of interest, limitations to the freedom to negotiate, and authorisation to carrying out non-company related activities, to which this Code of ethics makes reference.

2.8 Correct business conduct

Company personnel who have business relationships with third parties

must conduct their relations with the latter in a fair, impartial, correct and ethical manner.

These principles are applicable to clients, suppliers, consultants and all those who directly carry out activities for the Group Companies or on their behalf.

The giving and receiving of offers or money or any form of gift or benefit in relationships with clients, suppliers or third parties that exceeds normal business practices or forms of common courtesy, and is in any case a means to obtain real or apparent advantages of any nature (such as economic benefits, favours or endorsements), is forbidden.

2.9 Fairness in relations with suppliers and clients

In particular, the selection of suppliers and the drawing up of terms and conditions for the procurement of goods and services for the Company must be characterised by the granting of equal opportunities to all suppliers. Pre-contractual and contractual conduct must be based on the essential and reciprocal concepts of loyalty, transparency and collaboration, inspired by the values and parameters of competition, objectivity, fairness, impartiality, equality, price, quality of goods and services, guaranteed support and, in general, an accurate and precise assessment of the offer.

Undue pressure to favour one supplier over another is neither allowed nor accepted in the process of selecting suppliers, as this undermines the credibility and trust that the market places in the Group in terms of transparency and the strict application of laws and company procedures concerning the passive cycle.

Favouritism is not permitted in the issuing of payments to suppliers, and more generally, no actions may be taken that harm their status as creditors. The type of contract applied must be in line with the type of product or service purchased.

2.10 Competition

In relations with competing companies or target markets, employees are required to respect the rules of fair competition, transparency and traceability of actions, and not to accept gifts or promises of favours. All forms of conduct that violate competition legislation or fail to respect sector laws or regulations are forbidden, as are all agreements with competitors to fix or control prices or sales policies, or to interfere with the free commercialisation of the Services supplied by the Group. The acquisition of information regarding third parties either from public or private sources, via specialised entities and/or organisations, must be carried out with legitimate methods that comply with current legislation.

Personnel who find themselves in the condition to receive confidential information must handle said information with the utmost secrecy and confidentiality in order to avoid exposing the Group to liability for the

undue appropriation and/or use of said information.

Favouritism is not permitted in the issuing of payments to suppliers, and more generally, no actions may be taken that harm their status as creditors. The type of contract applied must be in line with the type of product or service purchased.

2.11 Relations with Institutions, Authorities and Public Administration

Relations with Institutions that are instrumental to the development of the Group's corporate programming are restricted exclusively to the company departments appointed for this purpose.

These relations must be characterised by the utmost transparency, clarity and honesty, and must be such as to not lead to incomplete, distorted, ambiguous or misleading interpretations by the private and public institutional figures with which relations of any nature are maintained.

The relations that the SACBO Group maintain with public officials or persons in charge of a public service - whether they operate on behalf of central or local public administration or legislative bodies, community institutions, international public organisations or entities of any foreign country -, with the Judiciary, with the public supervisory authorities and with other independent authorities, as well as with private partners providing public services, must be entered into and managed with the utmost and strictest respect for current laws and regulations, for the

principles established by the Code of ethics and by internal procedures and protocols. In particular, recipients are required to actively and fully cooperate with the Authorities, avoiding all conduct aimed at hindering the exercising of public duties or failing to provide due information.

2.12 Administrative liability pursuant to Italian Legislative Decree 231/01

With regard to Administrative Liability for offences, the Group Companies have adopted and implemented their own Organisational, Management and Control Model (231 OMCM), which is dedicated to preventing the committing of offences pursuant to Italian Legislative Decree 231/2001, with which they aim to pursue the following main objectives:

- To stress that the Company strongly condemns all conduct that is illicit and in any case contrary to law, rules or supervisory regulations.
- To raise awareness among all those operating in the name and on behalf of the Company of the need to respect company regulations and of the fact that the violation of said regulations may result in the committing of offences that may in turn see them subject to criminal sanctions and the company subject to administrative sanctions.
- To enable the Company, through control and monitoring of areas of sensitive activities and the implementation of dedicated tools, to intervene promptly to prevent or combat the committing of the offences identified.

2.13 Anti-corruption Legislation

Respect for current State laws and regulations is a founding principle for the SACBO Group. In light of this, senior company management is committed to:

- approving, maintaining and updating the Anti-corruption Model, which is an integral part of the 231 OMCM.
- allocating resources for the effective functioning of the corruption prevention management system



- monitoring the effectiveness of the Anti-corruption Model.

Each and every recipient is obliged to operate with integrity, transparency, coherence and fairness in all situations, conducting every business relationship with honesty.

This Code is applicable to all the processes and all the areas of activity provided by the Group through the relative Anti-corruption Models.

Every single action and operation must be suitably recorded and documented, enabling the decision, authorisation and implementation processes to be verified.

2.14 Donations and gifts

The SACBO Group refrains from making any direct or indirect contribution, in any form whatsoever, to political parties, movements, committees, or either political or trade union organisations, their representatives and candidates, with the exception of that permitted and provided for by applicable laws and regulations. In particular, the sponsoring of events, rallies, meetings or other similar initiatives is only permissible in compliance with the law and the principles of integrity, fairness, transparency, and verifiability, as well as with the internal procedures adopted by the SACBO Group.

The SACBO Group may allow contributions and donations to subjects for social, ethical, scientific or cultural purposes, abstaining in the event that

possible personal or corporate conflicts of interest are identified.

Group personnel may not, either directly or indirectly (even through members of their household) offer or receive gifts, donations, money, payments or free items on various grounds, obtain business deals and/or any form of benefit from clients, suppliers or third parties of either a material or immaterial nature (such as services, promotions or discounts, with the exception of those permitted for corporate negotiations). The SACBO Group has the exclusive authority to decide the company policy regarding donations and allocate the relative funds; this requires essential documentation of the expenses incurred and the transparent accounting of said expenses.

Under exceptional circumstances, only gifts or presents of a symbolic nature and in any case of a value of no more than EUR 100.00 may be accepted, and in any case only within the limits of normal business practices or forms of common courtesy. The offering of money or benefits not expressly provided for and/or permitted to Group personnel or the employees of clients, suppliers or third parties is a criminal offence.

Offers, gifts, benefits (either direct or indirect), free items, acts of courtesy or hospitality for the purpose of obtaining favourable treatment are forbidden in relations with third parties; so-called customary gifts - understood to be those traditionally exchanged on special occasions such as, for example, Christmas - when common practice, must comply with the dual requirements of moderation (i.e., of modest symbolic value) and of equality (i.e., gifts chosen of reciprocal cost).

2.15 Health, security and safety in the airport

Within the context and the fulfilment of its institutional activities,

the Group is committed to respecting current legislation regarding occupational safety to prevent risk and guarantee the health and safety of its employees, including through preventive actions.

With a view to this goal, the Group is committed to fostering and consolidating a culture of safety, developing awareness of risks and promoting responsible behaviour among all its collaborators.

The Group has obtained ISO 45001 certification, voluntarily choosing to apply the requirements of art. 30 of Italian Legislative Decree 81/08 regarding the construction of an Occupational Safety Management System. The Management System guarantees constant oversight, with verification and control activities aimed at constant improvement of the relative processes and procedures.

Within the scope of their individual duties and activities, the recipients of the regulations of this Code of ethics and behaviour play a role in the processes for the prevention of risk and for the protection of their own health and safety and that of their colleagues and third parties.

The Group is committed to guaranteeing both the highest levels of security, to prevent illicit interference, and of the safety of airport operations, identifying and implementing increasingly precise, effective and innovative control activities and systems.

Security and safety can only be achieved through the involvement, assistance and support of the entire airport community, and are the responsibility of each and every one of us.

2.16 Sustainable development - environmental protection

One of the Group's goals is to operate with a view to constantly improving environmental sustainability, closely monitoring sector regulations applicable to its activities and rigorously planning its goals and relative objectives.

The involvement and training of the Group's employees with regard to environmental matters plays a fundamental role in achieving this goal, and employees are required to consider environmental protection and the prevention of all forms of pollution to be of prime importance, on a par with maximum company profit, with a view to guaranteeing that economic initiatives are compatible with the needs of the environment, in compliance with current legislation.

The Group also intends to offer its experience in the field of environmental management to the entire local community and social fabric, in order to promote general progress in terms of sustainable development.

The environmental values pursued by the Group are expressed in detail in the Environmental Policy, which is communicated to all employees, suppliers and clients, and they form the foundation of the Environmental Management System adopted by each Group Company and certified in accordance with UNI-EN-ISO-14001 - Environmental Management Systems standards.

All employees are obliged, within the context of their

individual roles and responsibilities, to embrace the intentions and the goals defined with regard to environmental sustainability, drawing on them as a constant source of inspiration for the proper fulfilment of their duties.

The SACBO Group promotes its commitment to the community through donations and sponsorships in support of cultural or social initiatives, events and entities within the territory.

2.17 Preparation and recording of financial statements, communication of information

In carrying out their duties and within the scope of their individual competence and responsibility, Company personnel are required to record, process, share and communicate data, information and knowledge in a truthful, accurate, precise and complete manner.

The accounting, economic and financial records and information of the Company must draw on these values, reflecting precisely what is described in the supporting documentation. Accounting records and economic and financial information cannot be transmitted or disclosed to third parties without the authorisation of the relative company department. Employees and collaborators who are aware of any omissions, falsifications or alterations concerning accounting records and/or documentation must promptly inform their direct supervisor or

the relative company department.

In the preparation of financial statements and in corporate communications, the conduct of the recipients of this Code must guarantee the utmost collaboration, the completeness and clarity of the information provided, the accuracy of the data and its processing, and the prompt reporting of any conflicts of interest.

2.18 Anti-money laundering legislation

The SACBO Group is committed to respecting legislation regarding anti-money laundering and requires all of the recipients of the Code of ethics to do the same; in particular, all forms of use of money, assets or benefits of unlawful provenance are forbidden.

The Company has adopted an Anti-money laundering model that provides for the preliminary verification of information, including of a financial nature, regarding its principal commercial counterparties and its suppliers, for the purpose of ascertaining their respectability and the legitimacy of their activities before forming business relations with them, in order to avoid being implicated in any operations even potentially aimed at favouring the laundering of money from illicit or criminal activity.

The SACBO Group is committed to acting in full respect for internal control procedures, the principles of segregation of duties and anti-money laundering legislation, also with a view to preventing the committing of self-laundering offences.

2.19 Internal control system

All the activities and actions carried out and implemented within the Group must respect the law and company procedures, and be based on the validity, reliability, completeness and correctness of information.

The SACBO Group considers a correctly applied and respected internal control system to be a fundamental element of corporate culture, aimed at improving the efficiency and effectiveness of company operations and raising awareness of the same among Company employees. The term “internal control system” is understood to refer to the series of processes, tools and procedures required or beneficial to guide, verify and control company activities.

In the event of illicit conduct, such as, for example, theft, omission, falsification, alteration, undue use of confidential information, misappropriation of tangible and/or intangible assets belonging to the Company, the Group will take the necessary disciplinary measures as well as, according to the violations committed, the most opportune legal action.





3. CLARIFICATIONS REGARDING THE CODE



3. CLARIFICATIONS REGARDING THE CODE

For employees of the SACBO Group, the principal contact for any clarifications regarding the principles of the Code and its application is their direct superior, who will be able to provide an answer or forward the request to the Anti-Corruption Ethics Committee.

A direct superior may also be the principal contact for reporting violations, who, where possible, may take the opportune corrective measures or proceed with a whistleblowing report.



4. **WHISTLEBLOWING**



4. WHISTLEBLOWING

The SACBO Group has provided for specific procedures for the receipt, analysis and processing of reports of alleged violations of national or European legislation, as identified by Italian Legislative Decree 24/2023, and of which knowledge has been gained within the working environment.

These reports may also concern breaches of this Code of ethics and conduct and of the 231 OMCM.

Reports regarding disputes, claims or requests related to interests of a personal nature, which pertain solely to individual working relationships, or that are inherent to the working relationship with hierarchical superiors, are excluded, as these should be referred to the Human Resources Directorate. Anonymous reports, i.e., those made without identification of the whistleblower, may also be taken into account, provided that they are adequately substantiated, i.e., when they are able to bring to light facts and situations relating them to specific contexts.

Reports that respond to the requirements set out in the Whistleblowing procedure are handled with the utmost confidentiality, and all violations reported are subject to preliminary analysis and followed up by enquiries where necessary.

Reports may be made via the digital platform, which can be accessed via the link:

 milanbergamoairport.segnalazioni.net/



5. SANCTIONS AND DISCIPLINARY CODE



5. SANCTIONS AND DISCIPLINARY CODE

Failure to observe the Code of ethics and conduct harms the Group, and in compliance with current legislation, applicable National Collective Bargaining Agreements and current internal measures and procedures, the Group therefore reserves the right to adopt disciplinary measures against those identified as responsible for the violations and the consequential harm.

Violation of the principles set out in this Code, of the rules specified in the 231 OMCM, of the Anti-corruption model and of the relative protocols for prevention (procedures, instructions, etc...) will result in the application of a specific disciplinary system, of which all employees, company bodies and the SB are made aware of.

The Group therefore reserves the right to implement disciplinary proceedings, irrespective of any proceedings involving the judicial authorities, against any personnel who assume conduct in violation of the values and principles established by this Code of ethics, applying sanctions proportional to the gravity of the violations committed and of the violation of obligations undertaken in compliance with the provisions of art. 7 of Italian Law 300/70, the current pro tempore National Collective Bargaining Agreement, and in the wake of detailed enquiries, while also reserving the right to protect company interests to the fullest extent.

A close-up photograph of several hands of different skin tones working together to assemble light-colored wooden puzzle pieces. The hands are positioned around the puzzle, with some fingers holding pieces in place and others reaching to fit them together. The background is a soft, out-of-focus gradient of warm colors, likely from a window or light source. A semi-transparent white rectangular box is overlaid on the right side of the image, containing the section header text.

6. PUBLICATION AND IMPLEMENTATION



6. PUBLICATION AND IMPLEMENTATION

The Code of ethics and the principles it contains are communicated to all recipients through publication on the Group corporate website and on the corporate intranet, accessible to employees and collaborators.

This Code of ethics is immediately effective as of 30 July 2024.

BGY INTERNATIONAL SERVICES has also received and adapted this Code of ethics and conduct with a successive motion on 30/07/2024 passed by the relative administrative body.

Furthermore, the Code of ethics and conduct will be periodically revised and updated in order to adapt it to legislative and corporate developments and in accordance with the experience gained as a result of its application. Any modification and/or supplement to the Code must be made with the same methods adopted for its initial approval and will be reported by the Anti-Corruption Ethics Committee via a dedicated statement.

Any variation or supplement must be approved by the relative Boards of Directors.



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