



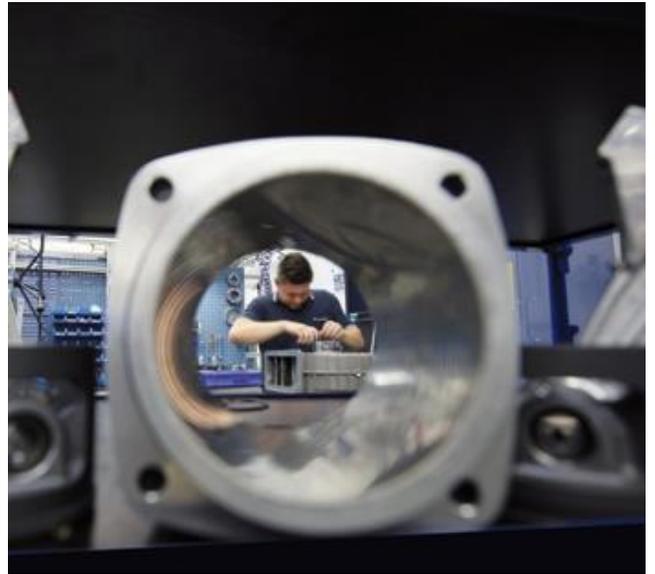
**KNORR-BREMSE**

Knorr-Bremse Rail Systems Italia S.r.l.



Approved by the Board of Directors  
on 16.12.2021

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## 1. FOREWORD

This Code of Ethics is the tool with which Knorr-Bremse Rail Systems Italia S.r.l. (hereinafter also "KBR SI" or "the Company") expresses the values, rules of conduct and commitments which are recognised as having a positive ethical value and with which all Recipients of the Code must comply.

The adoption of the Code of Ethics is intended to meet the needs and expectations of all the interlocutors of KBR SI (suppliers, subcontractors, customers, consultants,, etc.) so as to create a transparent reality that is oriented to compliance with the law and with ethical and behavioural standards.

This Code of Ethics incorporates the "**Code of Conduct**" of the Knorr-Bremse Group, a management tool and an effective element of the Group's strategy and organisation, contextualising it to the specific Italian corporate world.

The Code of Ethics is part of the Organisation, Management and Control Model within the meaning of Legislative Decree 231/01 (hereinafter "Model"), in accordance with the Confindustria Guidelines for the drawing up of Organisation, Management and Control Models under Legislative Decree 231/2001.

The Company requires its directors, executives , and all its employees and collaborators to behave in a strictly ethical manner when dealing with customers and suppliers and when representing the Company before third parties and the Public Administration.

KBR SI considers the UN Universal Declaration of Human Rights, the International Labour Conventions and Recommendations issued by ILO (International Labour Organisation), the Earth Charter prepared by the Earth Council and the principles set out in the United Nation's Global Compact, as essential points for the definition of its principles.

## 2. KNORR-BREMSE RAIL SYSTEMS ITALIA S.r.l.

KBR SI is company within the Knorr-Bremse Group, which carries out the following activities in Italy:

design, construction, testing and commissioning of braking systems for rail vehicles:

production, repair and installation of mechanical, electromechanical and electronic equipment of any kind and for any use;

research, study, patenting, trade in patents, technical assistance, trade and representation of mechanical, electromechanical and electronic equipment.

The Knorr-Bremse Group is a world leader in the production of braking systems for rail and commercial vehicles. As a technological pioneer, Knorr-Bremse has been significantly promoting for over 100 years the development, production and sale of modern braking systems for different applications in the field of rail and commercial vehicles.

Knorr-Bremse has about 500 employees in Italy at its three plants: a production plant in Arcore (Milan), a production plant in Buccinasco (Milan) and a production plant in Campi Bisenzio (Florence).

In the pursuit of its activities, the Company meets, in a transparent and accurate manner, the needs of all its stakeholders (employees, executives, shareholders, suppliers, subcontractors, customers, consultants and the Public Administration), producing wealth consistently with its own vision and with the values of responsibility, transparency, trust and respect for human beings.

The Company is also ISO/TS 22163:17-certified, this being an internationally recognised standard dedicated to the field of rail vehicles and aimed at assessing Business Management systems.

### 3. RECIPIENTS

The principles and provisions set out in this Code of Ethics are binding on all the following subjects (hereinafter, the “Recipients”):

- ✓ the members of the Board of Directors, when setting objectives, deciding on activities, implementing projects, suggesting investments and for any decision or action relating to the Company’s progress;
- ✓ the members of the Board of Statutory Auditors, when controlling and verifying the formal and substantive correctness of the Company’s business and the operation of its internal control system;
- ✓ Senior managers and Executives, when implementing the Company’s executive activities, both in the management of internal and external activities;
- ✓ all Employees and Collaborators with whom the Company has a contractual relationship, in any capacity, also on an occasional and/or only provisional basis;
- ✓ all partners, suppliers and in general all those who, in various capacities, act in the name or on behalf and in the interest or to the benefit of the Company, regardless of the legal qualification of their relationship (including, but not only, contract workers, temporary workers, agency workers, etc.).

All the recipients are required to comply and cause compliance with the principles of the Code of Ethics in the performance of their duties and responsibilities, and undertake to pursue their objectives in accordance with principles and values such as respect, expertise, merit, innovation, excellence, internationality, multiculturality, lawfulness and sustainability.

Under no circumstances can a person’s belief to be acting to the Company’s benefit justify conduct that is in contrast with the principles enshrined in this Code of Ethics.





## 4. OUR VALUES<sup>1</sup>

The Group's five values provide a framework for our daily activities and dealings with colleagues, partners and society.



### ***Entrepreneurship***

We set ourselves clear targets and focus on performance with a view to achieving our business goals. We have the open-mindedness and courage to develop new business areas, anticipating solutions that meet customer needs.



### ***Technological excellence***

We offer technological expertise and competence in all the areas in which we operate. Our objective is to anticipate customer needs and create customer value, offering innovative, leading-edge and competitive system solutions.



### ***Reliability***

Safety is Knorr-Bremse's main focus. Our products and services call for excellent quality standards in all areas and processes. We keep our promises and ensure that the demands of our customers, partners and colleagues are met.



### ***Passion***

We love what we do. Challenges and changes inspire our creativity. We are all passionate about performing well and are determined to develop and implement new ideas.



### ***Responsibility***

We value and promote diversity and foster personal development as a key factor for success. As our company grows, so too does our sense of responsibility- not just to Knorr-Bremse but also towards society at large, the environment and ourselves.

We value a culture of mutual respect and honesty. We encourage our employees to grow personally through global talent development and training programmes.

<sup>1</sup> Source "***Growing with values***" of the Knorr-Bremse Group



## 5. CORPORATE RESPONSIBILITY<sup>2</sup>

The corporate responsibility of Knorr-Bremse takes the shape of six focus areas, in which relevant measures for corporate responsibility are grouped and processed.

Sustainability issues, which are especially important to us, are given priority based on a relevance analysis in which we align the environmental and social challenges of our business with our stakeholders' needs. We focus especially on issues that are particularly important to our stakeholders and business.



### ***Strategy and Management***

Knorr-Bremse includes the issues of sustainability in strategic planning and operations and thereby systematically aims to produce sustainable value.



### ***Environment and Climate***

Knorr-Bremse has set itself the goal of handling resources in a responsible manner, minimising and where possible avoiding undesirable impact on nature and the environment and actively using opportunities to protect the environment.



### ***Employees and Governance***

Knorr-Bremse intends to offer an attractive and safe working environment in which the principles of trust, team-work, equality of opportunity as well as fair and respectful conduct are recognised and practiced.



### ***Commitment and Society***

Knorr-Bremse is involved in social and economic issues and is also engaged worldwide as a good corporate citizen.



### ***Products and Partners***

Knorr-Bremse develops solutions that specifically ensure a high degree of customer value and the production of sustainable value. We work closely with our customers and suppliers to jointly improve the safety and quality as well as the environmental and social sustainability of our products.



### ***Communication and Co-operation***

Knorr-Bremse seeks open and constructive dialogue with the different groups of stakeholders and provides them with regular and transparent updates on the progress of its sustainability performances.

<sup>2</sup> Source "**Corporate Responsibility Policy**" of the Knorr-Bremse Group

## 6. GENERAL PRINCIPLES

### *Respecting rules and regulations*

An essential principle for the Company is the pursuit of its business in accordance with current laws and regulations applicable thereto.

The Company's relations with any interlocutor, whether it be public or private, must be conducted in compliance with the law and in accordance with the principles of transparency, fairness and verifiability. In this context, as regards, in particular, the management of its tax obligations, the Company does not tolerate any fraudulent declaration made by using invoices or other documents for non-existent transactions.

The Company ensures an ongoing training and awareness programme concerning the regulations and themes pertaining to the Code of Ethics. In case of doubts or should further information be required, the Company's employees and collaborators may contact, in addition to their direct superiors, also the Supervisory Board, specifically appointed by the Company.

The Company operates in compliance with professional ethics and internal regulations. The pursuit of the Company's interest can never justify conduct that is not in accordance with the principles of fairness and honesty; also for this reason, the Company refuses any fact, act or conduct that can be intended as designed to affect the independent judgement and conduct of the parties concerned.

KBRSI also firmly objects to any conduct involving the use, replacement and transfer into company activities of money, goods or other benefits deriving from offences, prohibiting its employees, including executives, members of corporate bodies, all collaborators and, in any case, all Recipients of this Code of Ethics, from committing or participating in acts related to money laundering, self-laundering, receiving and using money, goods and other benefits of unlawful origin. Anyone who becomes aware of any acts or conduct among those set out above, shall immediately inform his/her superiors and the Supervisory Board, in accordance with the procedures expressly indicated in the relevant corporate policies and in the Information Flow Procedure towards the Supervisory Board.

In addition, it is forbidden to use violence with respect to property or use fraudulent means to prevent or disrupt an industry or trade.

The Company also ensures compliance with export and import rules and regulations.

### *Competition*

The Company believes in free and fair competition and shapes its actions and conduct to obtain competitive results which reward skills, expertise and efficiency.

Any action that is intended to alter the conditions of fair competition is contrary to the Company's corporate policy and is prohibited to any subject acting therefor.

In addition, to protect the national economy and free competition, it is prohibited to use violence or any instrument that can prevent or disrupt another subject's activity and free competition.

The Company undertakes to comply with the law on the protection of fairness in business dealings. In fact, a fundamental principle for KBRSI is the statutory prohibition to market products which are different, in terms of quality or quantity, from those declared or agreed on.



## ***Rules of conduct in relation to the Financial Statements***

KBRSI has as its fundamental value also compliance with the principles of truthfulness and fairness with regard to any document indicating economic, asset and financial values relating to the Company itself. To this end, by way of example and without limitation:

- ✓ KBRSI condemns any type of conduct designed to alter the accuracy and truthfulness of data and information contained in the Company's Financial Statements, reports or other corporate communications required by law and intended for members, the public and the firm entrusted with auditing;
- ✓ accounting and administrative procedures should be adopted that are suitable to ensure an easy and immediate control in order to comply with the "Accounting Standards" issued by the appropriate Commissions of the National Councils of Chartered Accountants and Bookkeepers;
- ✓ the bodies in charge of drawing up the Financial Statements and corporate communications, shall base their activity on compliance with internal procedures, inspiring their actions on the principles of fairness and good faith, i.e. acting with the standard of care of a reasonable man. They shall also avoid any conflict of interest, even if only potential, in the performance of their duties;
- ✓ it is prohibited to engage in any conduct intended to damage the integrity of the Company's assets.

## ***Confidentiality and protection of company data***

The Company ensures the confidentiality of all data and information held thereby. All Recipients are prohibited from using confidential or privileged information before it is formalised, authorised or communicated to the parties concerned, for purposes other than those connected with the performance of their activities or duties in the Company.

KBRSI also ensures a high security standard in the selection and use of its information technology systems, intended for the processing of confidential information, adopting all the security measures required by current laws to protect such information.

The categories of information and data that are subject to confidentiality obligations and which must not be communicated and disclosed to third parties include, but not only: company performance and productivity parameters; company agreements; agreements and contracts with suppliers and third parties; economic operations; company documents of a strictly confidential nature; information covered by professional secrecy; know-how relating to the planning of relations with operators in the relevant industry and their development; judicial and administrative procedures involving the Company.

## ***Protection of personal data and management of reports containing this type of data***

The Company protects the privacy of its employees, in accordance with the laws in force, undertaking not to communicate or disseminate, without prejudice to its legal obligations, their personal data without the prior consent of the person concerned. To this end, all employees, including executives, members of corporate bodies and all other collaborators, are required to treat as strictly confidential all information and data acquired and processed in the course of their employment or collaboration with the Company, which, therefore, must remain duly protected and cannot be used for purposes not related to the exercise of their professional activity, with the prohibition to communicate or disclose the same, both inside and outside the Company, except in compliance with current laws and corporate procedures.

In this respect, the Company ensures compliance with Legislative Decree 196/2003 and also complies with the provisions on personal data processing introduced by European Regulation 2016/679. In accordance with the recent provisions of Law 179/2017, the Company also grants the protection introduced by the new legislation for the benefit of whistleblowers. For this reason, KBRSI imposes sanctions in case of violation of the measures for the protection of whistleblowers, as better specified in the Disciplinary System adopted by the Company.



## **Conflicts of interest**

In the pursuit of all its activities, the Company takes steps to prevent any conflicts of interest, whether they be actual or even only potential. A “conflict of interest” arises both in the cases established by law and also when a person pursues an interest that is different from the company’s and its shareholders’ to obtain a benefit for himself or third parties.

In order to make the pursuit of this principle a reality, KBRSI has laid down the following obligations:

- ✓ to comply with the law and with the Company’s internal regulations in all personal and business dealings outside the Company;
- ✓ to avoid acts or dealings which might be or might appear to be in contrast with the obligations arising from each function held within the Company or with its interests;
- ✓ to assess the pros and cons, for the Company, of acceptance of another position at another company;
- ✓ to report to the Company (or to one’s direct superior or Supervisory Board) any dealing or situation that is relevant to the Company’s business, which involves personal interests or interests of persons close thereto (such as one’s relatives, friends and acquaintances).

Any conflicts of interest, even only potential ones, between shareholders, employees, directors, collaborators and the Public Administration are prevented and managed when the assignment is granted or when the work relationship starts, asking them to sign a specific statement in which they undertake to avoid situations that can amount to a conflict of interest in their dealings with representatives of the Public Administration and, if this happens, to report them promptly to the Supervisory Board.

Whoever becomes aware of a conflict of interest is required to report it promptly in detail, using the dedicated channels ([kbrsi.organismo.vigilanza@knorr-bremse.com](mailto:kbrsi.organismo.vigilanza@knorr-bremse.com) or sending an internal email to the Supervisory Board).

## **Safety and hygiene at work**

KBRSI guarantees to its employees and collaborators that all work areas are suitable to protect their health, safety and physical/moral integrity in accordance with current rules and regulations and with the Group’s HSE Policy.

The UNI ISO 45001:2018 certification obtained by the Company certifies the application of a system that ensures an adequate control as to occupational health and safety as well as compliance with mandatory rules.

The Company intends to operate whilst respecting the safety of its employees, suppliers, subcontractors, customers and third parties in general, preventing accidents and mitigating their harmful effects.

Therefore, the Company develops, issues, reviews and implements safety plans for its employees and undertakes to spread its workers’ health and safety policy and to provide all human, instrumental and economic resources to implement it throughout its organisation. All its workers are responsible for its implementation, based on their responsibilities and duties.



## *Environment*

In the pursuit of its business, KBRSI undertakes to strictly comply with all legislation and environmental standards applicable to its industry, protecting the environment of the area where the Company's office is based and contributing to the sustainable development of the territory. The Company ensures the transparent management of environmental issues, the active participation of all its employees and the constant monitoring of corporate processes, as well as the identification of industrial solutions with the lowest environmental impact.

KBRSI is aware of the impact of its business on economic-social development and on the quality of life in the relevant territory and, therefore, when promoting and designing mechanical, electromechanical and electronic equipment of any kind and for any use, the Company shall carry out or ensure that all necessary investigations are carried out, inter alia, to check any possible environmental risks and prevent damage.

With this in mind, when promoting, designing or assigning the above-mentioned activities to third parties, the Company ensures the prior technical and professional qualification of its suppliers as well as the establishment of specific contractual clauses requiring them to comply with applicable environmental legislation, the procedures laid down and the ethical principles defined by KBRSI.

In order to strengthen its duty to protect the environment, KBRSI has specified the obligation to act strictly in accordance with the provisions of law, of other directives on the environment and with corporate procedures.

Being aware of the importance of minimising the environmental impact as much as possible and of constantly improving the protection of the surrounding environment, the Company has obtained the UNI EN ISO 14001:2015 international certification.

## *Use of computer or telematic systems*

KBRSI undertakes to guarantee the proper use of computer or telematic services, making sure that access to telematic and computer data is in full compliance with current rules so as to ensure data confidentiality and guarantee that data are processed solely by expressly authorised staff.

In any case, no employee, member of corporate bodies or collaborator can access another person's computer or telematic system without being authorised to do so and violating the law, and infringe the corresponding access limits. These obligations must be fulfilled also with respect to any access limits relating to the Company's computer system, where such access is reserved solely to given individuals.

Except as provided for by civil and criminal regulations, the use of network connections for purposes other than those related to one's work or to send offensive messages or messages that might damage the Company's image, is a misuse of the Company's assets and resources.

## *Protection of corporate assets*

KBRSI endeavours to make sure that the use of the resources available - in accordance with current rules and the Bylaws and with the values of the Group's Code of Conduct - is designed to guarantee, increase and strengthen corporate assets, protecting the Company itself, its Shareholders, creditors and the market.

Therefore, corporate assets must be used in accordance with the law and current regulations and in compliance with operating procedures.

The assets owned by KBRSI must be used solely for corporate purposes. The Company's employees are required to protect corporate assets against any case of loss, theft or misuse and may not disclose corporate secrets either during or after their work relationship.



## *Product quality and safety*

The Knorr-Bremse Group supports the rail vehicle sector in shaping mobility to make it futable, environmentally sustainable and safe. To achieve these goals, the Company focuses on product safety, quality and reliability, meeting the most rigorous safety requirements and top quality standards across all sectors and processes.

This development is fostered by the Group not only with tried-and-tested braking technologies but also with innovative electronic systems for collision prevention and vehicle stabilisation as well as intelligent solutions for integrating mechatronic systems.

The requirements of the products marketed by KBRSI originate from a corporate management system that is implemented under a quality assurance system, according to the UNI EN ISO 9001:2015 and ISO/TS 22163:17 standard of excellence. In this respect, our focus is not only on the system of controls concerning finished products and, upstream, raw materials and components; but it is also on the guarantee that all controls and decisions will be implemented “under an adequacy assurance system”.

## *Gifts and benefits*

The Company condemns any conduct, put in place by anyone, consisting in promising or offering, whether directly or indirectly, gifts and benefits to representatives of partner companies and/or competitors, Italian and/or foreign Public Officials and/or Public Servants, or their relatives, which may result in an undue or illicit interest and/or benefit to the Company.

The Company's Collaborators may not ask, whether for themselves or others, for any gifts or other benefits, or accept the latter, unless they are of little value or are in accordance with normal business practice and courtesy, from anyone who has benefited or who may otherwise benefit from the Company's activities.





## 7. RULES OF CONDUCT

### *The Group*

The circulation of information and other communications within the Group must always be in accordance with the principles of truthfulness, loyalty, fairness, accuracy, clarity, transparency, reasonableness, respecting the autonomy of each company and its specific fields of business.

KBRSI endeavours to ensure that intercompany communications include the exchange of information, objectives and strategic guidelines and are a fundamental element for the involvement and motivation of its staff.

### *Collaborators*

People are crucial to the Company's existence. The dedication and professionalism of the Company's management and employees are essential values and conditions to pursue the objectives of KBRSI.

The provisions, principles and obligations of this paragraph apply also to all the Company's collaborators, including agency workers, contract workers as well as the staff and executives of other companies with whom common or coordinated activities are pursued, even concurrently. In particular:

- ✓ the Company undertakes to ensure a collaborative work environment and to prevent any type of discriminatory conduct;
- ✓ all employees and collaborators must act loyalty and in good faith, acting in accordance with their contractual obligations and ensuring the services requested. They must also be familiar with and abide by the content of this Code of Ethics, shaping their conduct around respect, cooperation and mutual collaboration;
- ✓ staff selection is subject to controls as to the full correspondence of candidates with the professional profiles required by the Company, offering equal opportunities to candidates so that each of them receives an equal treatment based on their merits. The Company adopts appropriate measures to avoid any favouritism, nepotism or form of clientelism in staff selection and recruitment;
- ✓ staff are hired under regular employment contracts inspired by the provisions of the applicable National Collective Labour Agreement and in full compliance with the applicable provisions on working hours, leave and holidays. In fact, the Company does not tolerate any form of undeclared work, child labour and illegal labour, even among its own suppliers and/or subcontractors, firmly condemning the use, recruitment or employment of labour through any form of illegal intermediation (so-called 'caporalato' in Italian, i.e. Illegal recruitment) that leads to the exploitation of workers and takes advantage of their potential state of need, and the Company's relationship with its staff is based on the principles of transparency and lawfulness,
- ✓ the Company employs foreign workers only if they have a regular permit of stay or their permit has not expired, has not been revoked or annulled and its renewal has been applied for within the statutory deadline;
- ✓ in the performance of their duties, staff must act in accordance with the law and must ground their conduct and behaviour on this Code of Ethics;
- ✓ the Company undertakes to comply with all laws and regulations on wages and ensures that all employees are adequately paid;
- ✓ the Company protects and respects freedom of opinion, association, assembly and collective bargaining of salaries;



- ✓ the Company offers equal career opportunities to its Collaborators and does not tolerate any form of discrimination or harassment. In this respect, the Company prohibits any act of propaganda, instigation and incitement to discrimination or violence based on racial, ethnic, national or religious grounds which, when carried out in such a way as to cause an actual risk of propagation, is based, in whole or in part, on the denial, gross trivialisation or apologia of the Shoah or of genocide crimes, crimes against humanity and war crimes;
- ✓ all collaborators are required to respect the privacy of their colleagues;
- ✓ all collaborators shall refrain from adopting any conduct or decision that can favour their interest, whether directly or indirectly.

## *Customers and Suppliers*

All operations and transactions, intended in the broadest sense of the word and relating also to intercompany activities, must be in accordance with the principles of fairness, honesty and impartiality.

When dealing and negotiating with and when assuming contractual obligations toward customers, suppliers and subcontractors, KBRSI is guided by the principles of lawfulness, loyalty and efficiency and establishes therewith highly professional and mutually collaborative relationships. Therefore, the Company ensures that:

- ✓ it acts in compliance with all administrative laws and regulations in the field;
- ✓ it does not prevent any suitably qualified company from competing in the process for the award of part of works or supplies;
- ✓ it avoids situations in which the subjects involved have or might appear to have a conflict of interest;
- ✓ it selects suppliers and subcontractors by assessing their offers based on the quality and inexpensiveness of their services, on their technical-professional suitability, on their environmental respect and social commitment according to the rules established in appropriate regulations and procedures;
- ✓ it conducts business negotiations according to transparency and fairness making sure that:
  - the minimum requirements established for the selection of subjects offering (movable and immovable) goods and/or services which the company intends to purchase, are rigorously complied with;
  - specific criteria for the assessment of offers are established;
  - all necessary information is requested and obtained as regards the business/professional reliability of customers, suppliers, subcontractors and partners.
- ✓ it prompts its suppliers' collaboration to constantly ensure that the Company's needs are met in terms of quality and delivery terms in accordance with freely established rules;
- ✓ it maintains an open and honest dialogue with customers and suppliers, in line with good business practices;
- ✓ it does not disclose information which, pursuant to the Company's decision or based on agreements with the customer and the supplier, is to be kept confidential;
- ✓ it defines rules of conduct to prevent the following behaviours (which are indicated by way of example and not exhaustively):
  - simulate fictitious expenses in order to create hidden funds with which money is given or promised to directors, general managers, executives responsible for preparing the company's accounts, auditors, liquidators of third (private) companies or to persons under the direction or supervision of any person mentioned above, so that they engage in acts or omissions in breach of the obligations pertaining to their office or their obligations of loyalty, thereby causing damage to their company;
  - purchase goods or services to be donated to senior management of third companies or to persons under their direction or supervision, so as obtain from them unfaithful conduct that is economically disadvantageous for their company.



## *The Public Administration*

### ***Integrity and independence in dealings***

To ensure utmost clarity in any dealings with the Public Administration, aimed at overseeing the Company's overall interests and connected with the implementation of its programmes, such dealings are established solely via representatives expressly authorised by the Company's bodies, who do not have any conflict of interest in relation to the representatives of the institutions themselves.

In particular, relations with public employees must comply with the principles and provisions laid down in the Prime Minister's Decree of 28 November 2000, as updated by Legislative Decree 150/2009 (Code of Conduct for Public Administration Employees) setting out the disciplinary sanctions and responsibilities of public employees.

### ***Business negotiations***

In the course of any business negotiation, request or dealing with the Italian and/or foreign Public Administration, it is forbidden to put in place in any conduct that is intended to unlawfully influence the decisions of Public Officials or Public Servants in order to obtain an undue or illicit profit or benefit to the Company, even by relying on third parties who illegitimately present relations of contiguity and/or relationships with them.

By way of example, in the course of a business negotiation, request or dealing with Public Officials and/or Public Servants, whether they be Italian or foreign, the following actions cannot be taken, whether directly or indirectly:

- ✓ to take into account or offer - in any way - employment and/or business opportunities that might benefit Public Officials and/or Public Servants or their relatives and relatives in law;
- ✓ to offer complimentary items;
- ✓ to solicit or obtain confidential information that might compromise the integrity or reputation of either party;
- ✓ to engage in any act designed to induce Italian or foreign Public Officials to act or omit an act in such a way as to violate the rules of the legal system they belong to;
- ✓ to abuse one's position or powers to induce or force someone else to unduly promise money or other benefits to him/herself or others.

### ***Loans, contributions and subsidies***

It is forbidden to use any contributions, subsidies or loans granted by the State or another Public Entity or by the European Community for purposes other than those for which they were granted.

The Company condemns any conduct that is intended to obtain from the State, the European Community or another national and foreign Public Entity, any type of contribution, loan, loan at preferential conditions or any other payment, by making statements and/or producing false or forged documents, or omitting information or, more generally, using expedients or schemes, including with computer or telematic means, designed to mislead the granting entity.

People who have been delegated functions or duties must pay special attention to any confidential information which they become aware of as well as to the meticulous recording and reporting of any document or paper prepared thereby and/or transmitted to the Public Administration and to Public Entities in general.



### ***Involvement in Court proceedings***

Where KBRSI is involved in Court proceedings, it undertakes to act fairly, in compliance with the law, the provisions of this Code of Ethics and of internal procedures, also to avoid any possible damages to its image.

Specifically, in the course of any Court proceedings which the Company is involved in, employees, members of corporate bodies and collaborators shall refrain from:

- ✓ promising/giving to a Public Official (e.g. a judge, court clerk or another official), for himself or a third party, an undue pecuniary retribution or another benefit in return for an act required by his office, so as to obtain a benefit to the Company in the proceedings or make him omit/delay an act required by his office or make him engage in an act that is contrary to his duties so as to obtain a benefit to the Company in the proceedings;
- ✓ misleading the State/another public entity with expedients or schemes, so as to obtain a benefit to the Company in the proceedings;
- ✓ altering (in any way) the operation of a computer/telematic system or intervening (without being entitled to do so and in any way) on data/ information/programmes contained in or pertaining to a computer/telematic system in order to obtain a benefit to the Company in the proceedings;
- ✓ inducing a person called to make declarations before a Court which may be used in a criminal case, not to make such declarations or to make false declarations, with violence or threats or offering or promising money or another benefit.



## 8. COMPLIANCE WITH DISQUALIFICATIONS

KBRSI pays attention to conveying ethical principles to its employees and collaborators, which must guide their actions also where the Company has been involved in a Court case and has been held liable under Legislative Decree 231/ 2001.

Therefore the Company condemns any type of act or omission put in place by subjects engaged (in various capacities) in the conduct of its business, which is such as to cause the violation of obligations deriving from any disqualification imposed upon the entity following the establishment of its administrative liability.

## 9. COMMUNICATIONS AND TRAINING

The Code of Ethics is brought to the knowledge of the parties concerned, whether internal or external to the Company, through appropriate communications.

Within the Company, the staff's suitable knowledge and understanding of the Code of Ethics is ensured through information and training programmes, defined according to the rules laid down by the Company's Model, of which the Code of Ethics is an integral part.

All employees are required to consult their direct manager in case of any doubt as to the interpretation or application of the rules of conduct contained in the Code of Ethics.

## 10. CONTROL AND MONITORING

### *The Supervisory Board*

The Code of Ethics is a general and mandatory principle of the Model. The entity in charge of overseeing the correct and accurate application of the Model as well as compliance with the principles of this Code, is the Supervisory Board.

In the performance of its functions, the Supervisory Board has free access to any corporate data and information that is useful to its activities.

### *Reporting*

In accordance with Law 179/2017 ("Provisions for the protection of persons reporting offences or irregularities of which they become aware in a public or private employment relationship"), the Company allows its Corporate Bodies and their members, employees, consultants, collaborators and third parties acting on behalf of the Company to promptly report to the Supervisory Board any violations of the Model and relevant offences pursuant to Legislative Decree 231/2001.

Such reports must be sent by email to [kbrsi.organismo.vigilanza@knorr-bremse.com](mailto:kbrsi.organismo.vigilanza@knorr-bremse.com) or by mail to the "Supervisory Board at KNORR BREMSE RAIL SYSTEMS ITALIA S.r.l."

Depending on the type of reported suspected violation, the Supervisory Board appointed pursuant to Legislative Decree 231/2001 or the HR Manager will deal with the report and the ensuing controls, in accordance with the procedures adopted by the Company.

In addition, the identity of the whistleblower and the information provided shall be treated confidentially and their confidentiality shall be guaranteed in any case.

In this respect, the Company prohibits any retaliation against any person who reports or participates in an investigation into any violations of the Model, the control protocols and corresponding operating procedures, this Code of Ethics, as well as any regulations, State laws or other applicable provisions. Any established retaliation shall be sanctioned in accordance with the Disciplinary System adopted by the Company, as well as in accordance with any other applicable legislation.

### *Disciplinary measures*

Compliance with the provisions of the Code of Ethics is an essential part of the Company's contractual obligations.

The failure to comply with the principles set out in this Code might result in the application of sanctions in accordance with current rules, with the applicable C.C.N.L.s [National Collective Labour Agreements] and the Disciplinary System, which is an integral part of the Model and which reference is hereby made to.

Any infringements by third parties shall be punished in accordance with the criteria indicated in the specific contractual clauses.

KBRSI undertakes to ensure compliance with this Code of Ethics also by accurately applying the sanctions laid down in the Disciplinary System of the Model and the Disciplinary System established by the applicable C.C.N.L.s and the corresponding contracts entered into with the relevant counterparties.