



# Code of Conduct and Ethics

## Table of Contents:

- 1. Introduction
- 2. Our Mission, Vision, and Values
- 3. Definitions
- 4. Respect for others, human rights, fair working conditions
- 5. Compliance with Laws and Regulations
- 6. Business Integrity
- 7. Conflicts of Interest
- 8. Fair Competition
- 9. Data Protection and Confidentiality
- 10. Workplace Environment
- 11. Health, Safety and Environment
- 12. Social Responsibility and Community Engagement
- 13. Reporting and Accountability
- 14. Code of Conduct Violation Management
- 15. Enforcement
- 16. Periodic Review of the Code of Conduct
- 17. Compliance contacts at Bofil

## 1. Introduction:

Compliance and Ethics form the foundation of the way we do business. We at Bofil are committed to integrity, respect, reliability, and sustainability as cornerstones of our actions.



While the enthusiasm, collaborative spirit, insights, and adaptability of our workforce fuel our enterprise, our actions are fundamentally rooted in compliance. Compliance transcends mere lawful operation; it encapsulates our adherence to internal values, standards, and guidelines, either self-imposed or derived from industry best practices. Compliance is a personal responsibility for each of us. As such, every individual within Bofil—whether a director, employee, or any other stakeholder representing the company—upholds the values and principles outlined in our Code of Conduct and Ethics.

This Code serves as a framework for ethical decision-making within Bofil. This document is binding on all employees, officers, and directors and extends to our business relations with contractors, suppliers, and customers.



## 2. Our Mission, Vision, and Values:

### Mission:

Bofil is dedicated to transforming sheet metal with excellence, aiming to be the benchmark in the industry. In addition to ensuring quality and innovation, we are committed to environmental sustainability and the safety of our collaborators. Guided by integrity, ethics, and mutual respect, we honor our commitments to customers, suppliers and employees, tackling market challenges with innovative solutions.

### Vision:

By 2028, Bofil aspires to position itself among the European leaders in sheet metal transformation, being not only the preferred choice for customers and suppliers but also a sought-after place to work. We aim to be recognized for our integrity, innovation, and commitment to the environment, creating value and trust for our stakeholders and actively contributing to the sustainability of our sector.

### Values:

1. Integrity: We act with honesty and transparency in every decision.
2. Innovation: We stay at the forefront, constantly adapting to market needs.
3. Sustainability: We commit to reducing our environmental impact and contributing positively to the planet.
4. Safety: We prioritize the safety of our collaborators in every aspect of our work.
5. Respect: We value every opinion and contribution, fostering a culture of collaboration.
6. Excellence: We strive to exceed expectations and set high standards in everything we do.

## 3. Definitions

- **Stakeholder:** Any individual, group, or organization that can affect, be affected by, or perceive themselves to be affected by Bofil's actions, objectives, and policies.
- **Compliance:** The act of adhering to, and the ability to demonstrate adherence to, laws, regulations, guidelines, and specifications relevant to our business.
- **Sustainability:** The commitment to economic, social, and environmental responsibility in a way that meets the needs of the present without compromising the ability of future generations to meet their needs.
- **Integrity:** The quality of being honest and having strong moral principles, like truthfulness and fairness.
- **Ethics:** The study of what is morally right and wrong, or a set of beliefs about what is morally right and wrong, and how they apply in a business context.
- **Innovation:** The introduction and application of new ideas, products, or methods within the business to meet market needs and foster growth.
- **Respect:** The regard for the feelings, wishes, or rights of others, including both internal and external stakeholders.
- **Safety:** The condition of being protected from or unlikely to cause danger, risk, or injury, particularly in the workplace.



#### **4. Respect for others, human rights, fair working conditions**

We treat each other with respect, dignity, and fairness. This includes protecting human rights in our business activities and ensuring healthy working conditions in line with laws and internationally applicable standards. We therefore endeavor to enhance compliance with best practices.

We thus are committed to:

- not be complicit in human rights violations within our sphere of influence;
- not practice any form of discrimination in hiring or employment practices on the grounds of race, color, ethnic origin, religion, nationality, gender, sexual orientation, age, physical ability, health condition, political or social opinion, union membership, or marital status or any other basis prohibited by applicable law;
- not engage in or benefit from any form of forced or involuntary labor;
- not engage in or benefit from any form of child labor;
- recognize and respect the employees' right of free association and to collective bargaining; ensure that the workplace is safe and contains no health hazards;
- pay all workers at least the minimum wage required by law or applicable industry regulations;
- ensure that employment conditions, including vacation, working time, and leave periods, are consistent with mandatory standard laws or applicable industry regulations.

#### **5. Compliance with Laws and Regulations**

We are committed to conducting our business in compliance with all applicable local, national, and international laws and regulations. Employees are expected to be aware of and understand these laws and regulations as they apply to their job functions across different jurisdictions.

#### **6. Business Integrity**

We act with integrity in all business dealings, avoiding bribery, corruption, and fraudulent practices. All employees and partners are expected to adhere to this principle.

#### **7. Conflicts of Interest**

Employees must avoid situations where personal interests could conflict, or appear to conflict, with the interests of the company.

#### **8. Fair Competition**

We believe in fair and open competition and are committed to complying with antitrust and competition laws in the jurisdictions in which we operate.

#### **9. Data Protection and Confidentiality:**

All employees must safeguard confidential information and adhere to data protection laws and regulations.

#### **10. Workplace Environment:**

We are committed to providing a workplace that is free from discrimination, harassment, and retaliation. We value diversity and inclusion and aim to provide equal opportunities to all.



## 11. Health, Safety, and Environment:

The health and safety of our employees and stakeholders are paramount. We are also committed to minimizing our environmental impact.

## 12. Social Responsibility and Community Engagement:

We strive to be good corporate citizens, actively engaging with our communities and working to create a sustainable future.

## 13. Reporting and Accountability:

Employees are encouraged to speak up about any concerns or breaches of this Code, including but not limited to compliance with local, national, and international laws and regulations. We strongly endorse a culture of openness and accountability. We have a zero-tolerance policy for retaliation against any employees who, in good faith, report violations or concerns. Individuals found to be engaging in retaliation will be subject to disciplinary action, up to and including termination.

## 14. Code of Conduct Violation Management:

### Reporting Violations:

All employees are encouraged to report any behavior they believe violates this code of conduct. Reports can be made anonymously and will be treated with the utmost confidentiality.

### Investigation of Violations:

Once a report is received, the ethics committee will initiate an investigation. This may include interviews with the individuals involved and the collection of relevant documentation.

### Decision and Disciplinary Actions:

Upon completion of the investigation, the ethics committee will provide a recommendation on disciplinary actions to be taken, which can range from a simple warning to more severe measures such as suspension or termination.

### Appeal:

In the event that the employee believes that the disciplinary actions were unjust, they will have the opportunity to appeal the decision through a formalized process.

### Documentation:

All stages of the process will be documented and archived to ensure transparency and accountability in the system.

## 15. Enforcement

Compliance with this Code of Conduct and Ethics is mandatory for all employees, officers, and directors, as well as contractors, suppliers, and customers engaged in business with Bofil. Failure to adhere to this Code may result in disciplinary action, up to and including termination of employment or termination of business relations. The specific actions taken will depend on the nature and severity of the violation and may involve both internal and legal remedies.

## 16. Periodic Review of the Code of Conduct:

### Frequency of Review:

This code of conduct will be reviewed at least once a year to ensure its relevance and effectiveness.

### Review Responsibility:

The responsibility for the review falls on the company's ethics committee, in collaboration with the human resources department.

### Feedback Collection:

Employees and other stakeholders are encouraged to provide feedback and suggestions for improving the code of conduct throughout the year, which will be evaluated during the review phase.

### Communication of Changes:

Any changes made to the code of conduct will be communicated to all employees through the appropriate internal communication channels.

## 17. Compliance contacts at Bofil

The right course of action in a complex or uncertain situation may not always be immediately clear. If you find yourself unsure about the proper course of action, have additional questions, or wish to report a suspected violation of our Code of Conduct and Ethics, we strongly encourage you to directly contact Bofil's General Manager for guidance.

**Antonio A. De Vasconcelos**  
General Manager

E-mail: [vasco@bofil.ba](mailto:vasco@bofil.ba)

Mobil: +387 61 192 510

This Code of Ethics and Conduct has been approved and adopted by the Board of Directors/Shareholders of Bofil d.o.o. and is binding on all employees, managers, and directors of the company.

Gianluigi Filippi  
AMG SpA

Stefano Boschetti  
BO.MO Srl

Antonio A. De Vasconcelos