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MILAN BERGAMO AIRPORT GROUP CODE OF ETHICS

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S.A.C.B.O. S.p.A.

 **BGY**
International Services

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1. General principles

1.1 Scope of application, recipients and functions of the Code of Ethics

SACBO Spa and the Group company BGY INTERNATIONAL SERVICES (hereinafter the "SACBO Group" or the "Group") intend to be inspired by principles of ethical integrity in carrying out their business and have deemed it appropriate to implement a Code of Ethics throughout the Group.

The scope of the SACBO Group's Code of Ethics, therefore, aims to identify a set of ethical values, general principles and behavioural guidelines to be observed by all recipients in the conducting of its business practises and company activities in general.

The term "Recipients" refers to all the subjects to whom the rules of this Code of Ethics apply, and therefore:

- Directors and members of the corporate bodies of the Group and any person in a management position, including those with representation, administration or management duties or who exercise, de facto or otherwise, the management and/or control of the Group or any units or departments of the same;
- All Group employees, including fixed-term or part-time workers and similar types of workers;
- All those who, directly or indirectly, permanently or temporarily, establish relationships with the Group or, in whatever manner, operate to pursue the objectives of the same.

The scope of the Code of Ethics is to ensure respect and compliance with the values it expresses and to achieve maximum efficiency as regards internal relations (senior management, directors, employees) and external relations to the Group (corporate and market), in order to accomplish unequivocal behavioural guidelines ensuring that the core ethical values of - legality, transparency, integrity and loyalty - constitute the fundamental element of the corporate culture of the SACBO Group in conducting its business practices and its activities in general. The Code of Ethics is the fundamental tool used to control economic, financial, social relations and relational aspects, with particular attention focused on conflicts of interest and relations with competitors, customers, suppliers and the Public Administration.

The Code of Ethics defines the ethical and moral standards of the Group, providing all personnel the behavioural guidelines they are required to abide by.

All recipients of the Code of Ethics are required to acknowledge, comply with and apply its provisions in all internal and external relations, to actively contribute to its implementation and to report any failings to the members of the Ethics Committee.

In order to ensure a prompt distribution and dissemination of the contents, specific training on the Code of Ethics shall be provided to all employees and collaborators whatever their capacities (employed workers, trainees, interns, consultants, etc.), with an e-learning method that verifies the learning outcomes with an online test, at the end of which a Code of Ethics Training certificate is issued. The text of the Code of Ethics is also made available to everyone, customers and suppliers, and published on the company websites.

The knowledge and compliance with the Code of Ethics by non-recipient third parties is ensured by including specific clauses in the contracts regulating all and any relationship of collaboration with the Group, to guarantee acknowledgement and respect of the ethical principles foreseen by the Code.

1.2 Moral values

The conduct of personnel in performing the tasks and activities within the scope of their duties and responsibilities, shall be based on fairness, transparency, impartiality and objectivity.

All corporate activities shall be carried out with the utmost diligence, honesty, collaboration, fairness, loyalty, moral integrity and professional skills, observing all applicable laws, corporate procedures and regulations and in compliance with the Code of Ethics. Any behaviour in violation of the ethical principles damages the image and reputation of the entire Group.

Ethical behaviour is not solely assessed by virtue of strict observance of the rules and regulations, but is also based on the wholehearted conviction and desire to pursue the highest possible standards of behaviour.

1.3 Code of Ethics Supervisory Body

Personnel can approach the Code of Ethics Supervisory Body, as well as their direct superiors, for further information on compliance and correct interpretation of the Code of Ethics.

The Group's Code of Ethics Supervisory Body consists of:

- A member appointed by the Board of Directors as Chair of the SB;
- The General Manager of Sacbo Spa and Chair of Bgy International Services;
- The Administration, Finance and Control Director of Sacbo Spa and Managing Director of Bgy International Services;
- The Director of Human Resources at Sacbo Spa.

The tasks assigned to the Ethics SB are:

- to distribute the Code to SACBO employees, customers, suppliers, and in general to all interested parties with the utmost diligence and incisiveness;
- to constantly update and integrate the regulatory framework on which the Code is based in order to adapt it to any evolutions of the laws in force;
- to provide support to recipients concerning the interpretation, implementation and evaluation of the Code, as an ongoing reference tool for the proper conduct to adopt during the course of business activities;
- to check, monitor and evaluate the cases of violation of the Code of Ethics, ensuring, in the case of infringements, the adoption of appropriate measures, in cooperation with the competent corporate functions, in accordance with the laws, regulations and national collective bargaining agreement in force;
- to protect and assist employees who report conduct that fails to conform with the Code, protecting them against pressure, interference, intimidation and retaliation;
- to report any abnormal situations to the competent corporate functions in order to take the necessary corrective measures;
- to prepare and promote the communication and training programmes dedicated to the recipients of the Code, aimed at achieving maximum knowledge of the objectives and the behavioural guidelines to achieve them;

- to draw up an annual report to be presented to the Board of Directors on the aspects covered by the Group Code of Ethics, illustrating the plans and initiatives undertaken to achieve its institutional goals.

2. Work conduct

2.1 Information channels and work environments

The recipients of the Code of Ethics may communicate with the Ethics SB using the email address **comitatoetico@sacbo.it** or by sending a letter in a sealed envelope to the SB directly.

Compliance with these ethics and moral values and principles must constitute the constant and systematic commitment to such conduct by every single employee and collaborator of the Group.

Communications may also be carried out anonymously if justified by the danger of serious damage, as a consequence of their being linked to the source of information.

Senior management, director and department managers of all corporate facilities must represent an example and reference model for all employees, ensuring an irreproachable conduct in the exercising of their duties and constantly promoting a spirit of collaboration, trust, mutual respect and cohesion; this aims to protect and systematically improve the corporate team spirit along with the reputation and the prestige of the Group companies.

Senior management of all Group companies are also committed:

- To promptly enforce laws, regulations, internal procedures and employment contracts;
- To behave in a fair and objective manner with regard to their collaborators, encouraging their professional growth and safeguarding their health and safety at the workplace;
- To adopt a fair, correct and impartial attitude in relations with customers, suppliers and competitors;
- To maintain relations inspired by fairness and integrity with the Public Administration;
- To consider the protection of the environment and the prevention of all forms of pollution a core value, aimed at guaranteeing compatibility between economic initiative and environmental needs, in compliance with current legislation.

2.2 Confidentiality and privacy

All information, data, knowledge acquired, processed and managed by employees in carrying out their assigned duties, shall remain strictly confidential and duly protected, and can not be used, communicated or disclosed, either inside or outside the Company, in any manner that fails to comply with current legislation and company procedures. The following are confidential data and information, and as such, exclusive property of the Group:

- Business, strategic, economic/financial, accounting, commercial, managerial and operational plans;

- Projects and investments;
- Human resource data such as attendance, absence, holidays, illnesses and salaries;
- Company performance and productivity parameters;
- Negotiations, understandings, commitments, agreements, contracts, facts, events, also future and uncertain, pertaining to the Group's business activities, as well as company documents, which are not in the public domain and those which, if made public, could damage the Company;
- The know-how related to the production, development and marketing of services, processes and patents;
- Corporate documents on which the prohibition of unauthorised reproduction is indicated;
- Databases relating to suppliers, customers, employees and collaborators in their various capacities.

Employees assigned to the processing of such data and information, must pay utmost attention, ensuring privacy and confidentiality, and preventing with their behaviour, both with colleagues and third parties, the disclosure in any form of the data and information owned by the Group, covered by confidentiality regulations and not yet disclosed to the general public.

Upon receiving any requests from external parties (family members, friends, individuals, or categories such as journalists, financial analysts, investors, etc.) regarding confidential company data and information, all employees shall refrain from providing the same directly or indirectly and reserve the right to forward the request to the designated company function.

The Group has put in place all the requirements of Leg. Decree no. 196/03, Personal Data Protection Code and subsequent amendments and additions, in addition to implementing the activity envisaged to ensure compliance with the new European Regulation 679/2016 regarding the General Data Protection Regulation.

2.3 Safeguarding and use of corporate assets

The Group's corporate assets consist of tangible assets, both owned and licensed for use, (such as computers, printers, equipment, buildings, infrastructures, apron vehicles) and intangible assets (such as confidential information, know-how, procedures, technical knowledge, developed and disseminated by Company employees). The protection and safeguarding of these assets and resources constitutes a fundamental value for the protection of corporate interests, and all personnel (in carrying out their individual work activities) shall protect these assets, using them efficiently and refraining from any improper or fraudulent use, or preventing such fraudulent or improper use by third parties.

The use of corporate assets by employees shall always be functional and exclusive to the performance of their work activities or to the purposes authorised by the company departments concerned.

2.4 Recording and disclosure of information

In carrying out their work and within the scope of their competences and responsibilities, all personnel shall record, process, disseminate, communicate data, information and knowledge that is true, accurate, precise and complete.

All Corporate accounting, economic and financial records and documents shall be based on these values, reflecting exactly what is described in the supporting documentation. No accounting records, economic or financial information can be transmitted or disclosed to third parties without the authorisation of the competent corporate function involved.

Employees and collaborators who are aware of possible omissions, falsifications, alterations of accounting records and / or current documents shall promptly inform their superior or the competent company function, so that the Ethics SB is always informed of such situations.

2.5 Internal controls

All activities and actions carried out and pursued within the Group must comply with the laws and company procedures and be based on the validity, reliability, completeness and correctness of the information.

The SACBO Group views an internal control system which is correctly applied and respected as a fundamental element of corporate culture, aimed at improving the efficiency and efficacy of company operations, and something which all Company employees have been made of aware of. The term internal control system means the set of processes, tools and procedures necessary or useful for addressing, verifying and controlling company activities.

In cases of illicit conduct such as, by way of example only, theft, omissions, falsifications, alterations, improper use of confidential information, misappropriation of corporate tangible and / or intangible assets, the Group shall take all necessary disciplinary measures and, depending on the infringements committed, the most appropriate legal action.

With regard to the application of the Organisational Management and Control Model (OMCM 231) on administrative liability, the Group has introduced the Disciplinary Regulation Model 231 - with suitable training foreseen for all recipients - providing the penalties and sanctions for behaviour and omissions, including negligence, carried out in an unequivocal manner to infringe the rules of conduct imposed by the OMCM and by this Code of Ethics, as well as, in general, by the prevention protocols (procedures, instructions, etc.) that are integrated by the OMCM.

2.6 Drawing up financial statements and corporate communications

When drawing up financial statements and corporate communications the behaviour of the recipients of this Code of Ethics must guarantee the maximum collaboration, completeness and clarity of the information provided, the accuracy of the data and relative processing and the timely notification of any conflicts of interest.

Every operation and transaction must be correctly recorded, authorised, verifiable, legitimate, coherent and consistent with the internal procedures drawn up for the preparation of financial statements.

3. Business conduct

3.1 General rules and regulations

In business relations with third parties, the Company's personnel and directors are required to maintain a behaviour that complies with all corporate ethics, laws and internal regulations, based on maximum transparency, clarity, correctness, efficiency, fairness and impartiality.

In relations of a commercial or promotional nature, it is forbidden to engage in illegal and collusive practices and conduct, illicit payments, attempts at bribery and favouritism, direct solicitation, or through third parties, regarding of financial and non-financial advantages for oneself or for others and, more generally, all conduct and behaviour contrary to the laws, regulations and standards of conduct which are the object of this Code of Ethics.



In relations with third parties, and to the extent of their competences, all personnel shall provide clear and comprehensive information on obligations, constraints and compliance with the law and ethical standards that directly affect their work tasks, in addition to the standards foreseen by this text.

3.2 Business integrity

Company personnel who engage in business relations with third parties shall maintain a fair, impartial, correct and respectful ethical conduct.

These principles are applicable to customers, suppliers, consultants and all those who carry out any activity directly for or in the name of Group companies.

In particular, the selection of suppliers and the preparation of procurement conditions for the purchase of goods and services for the Company shall be based on the granting of equal opportunities for each supplier. Pre-contractual and contractual conduct shall be based on an indispensable and reciprocal loyalty, transparency and collaboration, dictated by values and parameters of competition, objectivity, correctness, impartiality, fairness, price, quality of the goods and service, support warranties and, in general, an accurate and precise evaluation of the quotation.

When selecting suppliers, no undue pressures are allowed and accepted, aimed at favouring one supplier rather than another, undermining the credibility and trust that the market has in the Group with regards to transparency and the rigour with which it applies the law and the Passive Cycle company procedures.

In relations with customers, suppliers or third parties, it is forbidden to donate or accept money offers or any form of gift or benefit exceeding normal commercial or courtesy practices and, in any case, those attempting to obtain, either for themselves or for others, real or apparent advantages of any kind (such as economic benefits, favours, recommendations).

In relations with competitors or target companies, employees are required to comply with the rules of fair competition, transparency and traceability of behaviour and not to accept gifts or promises of benefits.

The acquisition of information concerning third parties, both public and private, through specialised bodies and/or organisations, shall be carried out using lawful means in compliance with the laws in force, in particular with regard to privacy legislations.

Personnel who are in a position to receive confidential information, shall manage the same with the utmost confidentiality to prevent the Group from being accused of misappropriation and/or misuse of such information.

Group personnel are not permitted to use confidential data and information, received from third parties, before the SACBO Group has signed a written agreement or contract with such third parties, authorising their use.

3.3 Relations with public institutions

Relations with Public Institutions necessary for the development of the Group's corporate programs, are strictly reserved exclusively to the designated corporate functions.

All such relations shall guarantee maximum transparency, clarity and fairness, and not lead to partial, false, ambiguous or misleading interpretations by private and public institutional bodies with whom it engages in relations with for various reasons.

The Group is not permitted to grant direct or indirect contributions in any form, nor allocate funds and loans to support political parties, movements with political or trade union connotations or their representatives.



3.4 Relations with professionals and subjects belonging to third-party enterprises

In relations with professionals or subjects belonging to third-party enterprises, the recipients of this Code shall promptly report to their superiors and the Ethics SB, who shall report to the corporate Supervisory Body as and when necessary, any request for money or gifts which is not justified by standard administrative relations, received from subjects belonging to other enterprises.

If any assignments are appointed to consultants or professionals and in any case to subjects belonging to third party enterprises and in the management of relations with said subjects, the recipients of this Code shall comply with criteria of legality, transparency, functional sharing, pertinence and justifiability.

The aforementioned criteria shall also apply to the management of the management and intellectual property, in particular in the case of the acquisition of individual innovative inventions or solutions for the company or those developed by third parties.

3.5 Relations with the mass media

All Group communications to the external world shall be truthful, clear, transparent, unambiguous or instrumental, consistent, homogeneous and accurate and, in any case, consistent with corporate policies and programmes.

Personnel shall refrain from issuing, for any reason, formal or informal communications to the outside world without the prior authorisation of the designated corporate function (Press Officer).

3.6 Gifts and gratuities

It is forbidden for Group personnel, either directly or indirectly (even through members of their own family), to offer or receive gifts, gratuities, money, payments, complementary items or various kinds, procure business and / or any kind of benefit from customers, suppliers and third parties, of either a tangible and intangible nature (such as services, promotions, discounts with the exception of those envisaged by standard business transactions).

Only gifts or gratuities of a symbolic nature can be accepted, in any case of a value not exceeding €500.00, and not exceeding standard commercial or courtesy practices. The offering of money or benefits not expressly provided for and / or permitted to Group personnel or to the employees of customers, suppliers or third party enterprises constitutes a criminal offence liable to prosecution.

3.7 Health and Safety

Within the scope of its institutional activities, the Group undertakes to comply with current legislation on Occupational Health and Safety to prevent risks and ensure the health and safety of its employees, including the implementation of preventive actions.

To accomplish this goal, the Group undertakes to disseminate and consolidate a safety-based culture, developing risk awareness and promoting responsible conduct and behaviour by all employees.

The Group has obtained BS OHSAS 18001 certification, voluntarily applying the provisions of art. 30 of Leg. Decree no. 81/08, aimed at setting up and maintaining an Occupational Safety Management System. The OSMA guarantees ongoing monitoring, with verification and control activities aimed at achieving continuous improvement of all related processes and procedures.

To this purpose, the internal structure which focuses on the evolution of the reference scenarios and the consequent change in risks, designs and puts in place technical and organisational measures, by means of:

- continuous improvement of the risk and safety management system, in relation to the knowledge acquired based on technological progress;

- continuous analysis of risks, critical processes and resources to be protected;
- putting in place the best technologies in order to improve safety levels over time;
- the control and updating of work methods and the adoption of codes of conduct and safe working practices;
- the planning of training and communication interventions.

3.8 Antitrust

In accordance with applicable antitrust regulations and the provisions issued by the market regulatory authorities that prohibit the forming of monopolistic agreements, cartels and interference in the competition regulatory mechanisms, the Group hereby undertakes not to stipulate agreements, informal or otherwise, directly with other companies that may influence correct competition practices between the various operators on the market.

4. Conflict of interests

4.1 General principles

The SACBO Group bases its personnel relations on trust and loyalty who, in carrying out their respective tasks and duties, shall pursue the Group's general objectives and interests, avoiding situations or activities that may contradict such principles.

The Recipients shall avoid situations and/or activities that may lead to any conflict with the interests of the Group or might interfere with their ability to make impartial decisions, in order to safeguard the best interest of the Group companies.

Conflicts of interests may arise from situations that include but are not limited to the following:

- sharing in profits and losses (evident or hidden, direct or indirect) of the Recipients in activities of suppliers, customers, competitors and, in any case, with external individuals trying to enter in business with the Group;
- Exploitation of the Recipients' own functional position in the pursuance of interests in conflict with those of the Group;
- Use of information, acquired when carrying out work activities, to the Recipients' own advantage or that of third parties and, in any case, in conflict with the interests of the Group;
- assumption of corporate posts or pursuance of work activities, of whatever kind and even indirectly, with customers, suppliers, competitors and third parties in general in conflict with the interests of the Group;
- assumption of a post as mediator, broker or other intermediary on behalf of third parties in operations concerning the Group and its interests.

If a situation of conflict, even if potential, with the interests of the Group occurs, the Recipients shall immediately notify their superior and, in more important cases, the Supervising Organism, and abstain from any activity connected with the situation that is the source of the conflict.

In relations with the Group or third parties, the Recipients shall act in accordance with ethical and legal norms, with explicit prohibition of resorting to illicit favouritism, collusive practices, corruption or solicitation of personal advantages for themselves or others. The Recipients shall promptly report to their own superior and, in more important cases, the Supervising Organism, regarding any information that may lead to the presumption or prediction of a situation of potential conflict of interests with the Company and shall also avoid situations and/or activities that are in conflict with the regulations provided for in Legislative Decree no. 231/2001 and / or with similar regulations that may be applicable.

All of the above is without prejudice to the current norms and laws regarding conflict of interests with members of corporate bodies.

4.2 External Working Activities

In performing their duties, Group personnel shall refrain from:

- Working or providing any services to the benefit of competitors.
- Providing professional services, without the consent of the Group, as an employee, consultant, member of the Board of Directors or the Board of Statutory Auditors, to the benefit of competitor organisations of the Group.
- Using, at work or during free time, company assets to provide third parties with services that the Group offers to its customers, without prior authorisation by the competent company function or by one's direct superior.
- Representing, acting and / or receiving money or other favours for advice or services rendered, in relation to standard working activity.

4.3 Correct use of time and company assets

Personnel shall not carry out, during their working hours, any activities which are not consistent with their duties and organisational responsibilities. It is prohibited to use company resources, such as for instance premises or equipment or confidential information reserved to the Group companies only, for any form of personal use or interest.

Group personnel shall pay utmost attention and caution when expressing opinions and comments on issues of public and / or social importance that could directly or indirectly, and in any way, damage the interests, the prestige and the reputation of the Group.

4.4 Personal economic interests

Group personnel shall not have any form of economic-financial interests in the business activities of group customers, suppliers and competitors, so as to avoid any form of conflict of interest.

4.5 Use of internal information

Whilst carrying out their assigned tasks and jobs, personnel may become aware of confidential information relating to Group companies. The use of such information for private, personal and economic purposes constitutes not only an infringement of a moral and ethical nature, but also a violation of the law, and as such is a civil and criminal offence and liable to civil law proceedings and prosecution.

5. Anti-corruption legislation

5.1 Relations with the State, Public Authorities, Supervisory Authorities and individuals

Respecting the laws and regulations in force in the State and in the countries in which it operates is a fundamental principle for the SACBO Group.

Carrying out the Group's own business activities entails relations with the State, with local Public Bodies, with the Public Authorities in general, both locally and at a state level, and with Supervisory Authorities.

Persons who are assigned to representation, administration or management functions, or who carry out the management and control of the Group, including internal collaborators and anyone who is delegated by the Group to engage in the same, shall manage such relations with the Bodies and persons referred to in the previous paragraph in full compliance with the laws, regulations in force, good business practices and the provisions of this Code of Ethics, in order to avoid committing crimes or offences related to corruption, bribery, inducement to give or promise benefits.

The same criteria shall apply to the conduct between private individuals.

Every action and operation shall be duly recorded with documentary evidence so as to make it possible to check the decision, authorisation and execution processes.

5.2 Corporate business activities and related crimes

With regard to corruption and crimes related to the relations referred to in the previous paragraph, compliance with the provisions of this Code of Ethics is applicable, within the Group, to all business activities and, in particular, for specification purposes only and by no way exhaustive, to activities related to:

- Recruitment and remuneration policy;
- Human Resource management, incentive and development policies;
- Preparation of the financial statements and accounting practices;
- Cash flows;
- Complimentary gifts;
- Agency and entertainment expenses;
- Consulting, sponsorships, advertising and donations.

6. Environmental protection and policy

The Group strives to operate its business by pursuing continuous improvement in relation to environmental sustainability, ensuring compliance with all sector regulations applicable to its specific activities and rigorously planning its objectives and related targets.

The involvement and training of its employees on environmental aspects is of fundamental importance in achieving this objective and all employees are required to consider the protection of the environment and the prevention of all forms of pollution as a primary value, alongside that of maximum business performance, aimed at guaranteeing a level of compatibility between economic initiatives and environmental needs, in compliance with current legislation.

The Group also intends to make its experience in the field of environmental management available to the entire community and the local social fabric so as to promote general progress towards sustainable development.

The environmental values pursued by SACBO are clearly expressed in its Environmental Policy, distributed to all employees, suppliers and customers, and act as the foundations for the Environmental Management System which in 2008, was certified according to the UNI-EN -ISO-14001 - Environmental Management Systems standard.

All employees are required, within the scope of their individual roles and responsibilities, to embrace the goals and objectives in terms of environmental sustainability, making reference to them on an ongoing basis so as to ensure the correct performance of their duties.

7. Sanctions

The Group reserves the right to sanction, regardless of any proceedings before judicial authorities, the behaviour of personnel who do not respect the values and principles of this Code of Ethics, applying in compliance with the *inter partes* procedure and prior to strict assessment of the facts, penalties that are proportionate to the gravity of the infringements committed and the violation of the obligations assumed thereto, whilst reserving the right to ensure maximum protection of corporate interests.

In this regard, the Group has introduced the Disciplinary Regulation Model 231 - with suitable training foreseen for all recipients - within the scope of the application of the Organisational Management and Control Model pursuant to Legislative Decree 231/01 (OMCM) on the subject of administrative liability. The Disciplinary Model in question provides the penalties and sanctions for all behaviours and omissions, including negligence, carried out in an unequivocal manner to infringe the rules of conduct imposed by the OMCM and by this Code of Ethics, as well as, in general, by the prevention protocols (procedures, instructions, etc.) that are integrated by the OMCM. In particular, the Disciplinary Regulations indicate the penalties and sanctions applicable according to the role played by the infringer and the level of gravity of the offences themselves.

8. Intercompany Relations

SACBO promotes the sharing and application of this Code of Ethics within all GROUP enterprises. All relations and transactions with Group enterprises are carried out in compliance with the criteria of legality, substantive and procedural correctness and those provided in this Code.

9. Entry into force

This Code of Ethics enters into force on 21.02.2018 with immediate effect.

BGY INTERNATIONAL SERVICES shall also receive and adapt this Code of Ethics, with subsequent resolution dated 27.03.2018 of the competent administrative body.

Any variation or integration shall be approved by the relevant Boards of Directors.





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