BRAGA TRASFORMATORI s.r.l.
25131 Brescia (loc. Fornaci), Via Labirinto, 245
Tel. 030 2681511 - Fax 030 3580512
C.F. e P.Iva 03537270179
Capitale Sociale: € 30.000 i.v.
N° REA : BS-415105
www.braga-trasformatori.it

Braga Trasformatori s.r.l. Code of Ethics

Introduction

Since 1960, Braga Trasformatori s.r.l. has designed and manufactured low-voltage transformers and electrical windings at its Brescia plant, for Customers in Italy and around the world. The Owners are directly present in the Company, guide its day-to-day decisions and work alongside a close-knit team, in which experience is built over time and passed on between Colleagues.

This Code of Ethics has been adopted **voluntarily**, as a Company choice and not to fulfil any legal obligation. It sets out in writing the principles the Company has always worked by, so that Staff, Customers, suppliers and external parties can know them. It complements the Quality, Environment and Safety Policy.

1. Recipients

The Code applies to everyone who works for the Company or on its behalf: employees, collaborators and consultants. The Company also makes it known to Customers and suppliers, as a reference for its relationships with them.

2. Lawfulness and fairness

The Company operates in compliance with the laws in force in Italy and in the countries where it does business. Honesty, fairness and transparency guide internal and external relationships, even when a different choice might seem more convenient in the short term.

3. Relationships with Customers

The relationship with the Customer is founded on product quality and clear terms. The Company provides truthful information on products, prices and terms of supply, reviews requests before confirming them and tests every item produced before delivery. Products comply with applicable regulations, including those on restricted substances (REACH, RoHS).

Drawings, specifications and technical documents received from the Customer remain the Customer’s property: they are used solely for the order to which they refer and are treated confidentially.

4. Relationships with suppliers

Suppliers are selected on the basis of objective criteria (quality, reliability, price and punctuality) and are periodically assessed on their actual performance. Relationships with them are based on fairness, clear orders and respect for agreements, with a view to long-lasting cooperation. The Company asks its suppliers to comply with the law and with the principles of this Code.

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5. Gifts, presents and undue advantages

It is not permitted to offer, promise or accept money, gifts or favours in order to obtain or grant undue advantages in dealings with Customers, suppliers, Public Administration or any other party. Gifts of modest value are permitted, provided they fall within normal business practice and cannot be interpreted as a means of influencing decisions.

6. Conflicts of interest

Anyone working for the Company avoids situations in which a personal interest, or that of family members, may conflict with the Company's interest or influence its decisions. Should such a situation arise, they inform Management.

7. Fair competition

The Company competes fairly on the market, relying on the quality of its products and the expertise of its Staff, in compliance with competition rules and without disparaging competitors.

8. Relationships with Public Administration

Relationships with Public Administration, supervisory bodies and Authorities are based on transparency, fairness and cooperation. The information and documents provided are truthful and complete; no form of unlawful pressure is permitted.

9. Staff

Staff are the Company's main resource, and their skills are the foundation of product quality.

The Company respects the dignity of every person and does not tolerate discrimination based on gender, sexual orientation, age, origin, religion, opinions, trade union membership or disability, nor harassment or offensive or abusive behaviour. Staff are employed under the applicable national collective labour agreement (CCNL) and current legislation; the Company does not use child or forced labour and respects Workers' freedom of association and their right to representation. Training, both technical and on safety, supports each person's onboarding and growth.

10. Health and safety

Protecting health and safety at work is part of the way the Company works. Risks are assessed in the Risk Assessment Document under Italian Legislative Decree 81/2008, which also sets out emergency management procedures; Staff are trained and informed about the risks of their role, and everyone is asked to contribute by following the rules and instructions received and by reporting hazardous situations.

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11. Environment

The Company operates in compliance with environmental regulations, in particular regarding waste management and atmospheric emissions, which are authorised and monitored according to the applicable requirements. Reducing the environmental impact of production activities is one of the objectives of the Company Policy and also guides investment decisions on plant and equipment. The plant is equipped with a photovoltaic system that contributes to the energy needs of production.

12. Confidentiality and personal data

Company information and information received from Customers and suppliers is treated confidentially and used only for the purposes for which it was provided. Personal data is processed in compliance with EU Regulation 2016/679 (GDPR). IT systems are managed in-house, with access restricted to those who need it for their work and with regular backups.

13. Company assets and intellectual property

Company assets are used with care and for work purposes. The Company uses properly licensed software and respects the intellectual property of others.

14. Accuracy of records

Accounting and management records are truthful, complete and supported by appropriate documentation, so that transactions can be reconstructed at any time. Payments are made using traceable means.

15. Communication

This Code is made available to Staff and published on the Company website. Any doubts about its application may be referred to Management. Anyone who reports to Management, in good faith, conduct that does not comply with the Code will suffer no consequences for doing so. The Code is reviewed periodically and updated whenever the Company's development requires it.

Brescia, 3 July 2026

The Director

Claudio Braga

