



*The Ethical Code aims to achieve ethical economics in intra-company relationships (company leadership, management, employees) and external to the company (consortium, businesses, and market), with the aim of promoting uniform behavioral guidelines as well as economic benefits induced by the consolidation of a positive corporate reputation.*

*All employees of Trafilmetal Profilatura LLC, in the pursuit of their work activities, are required to respect the set of values, principles, and behavioral guidelines contained in the document, which refer to principles of honesty and legality, solidarity, confidentiality, diligence and integrity, transparency and completeness in information, respect and fairness.*

*Recipients must never fail to respect the fundamental principles that inspire this document.*

*This Ethical Code was approved by the Shareholders' Meeting on 10/02/2025 and came into force on 24/02/2025.*



## **EMPLOYER'S LETTER**

*I believe that the success of a company is always based on values such as transparency, credibility, and loyalty, principles that represent the fundamental and indispensable heritage of a company: its reputation.*

*The Company, aware that the function performed is part of the delicate and complex process of development of the labor market, and therefore of the Italian economy, wants to position itself in this context with a sense of responsibility and moral integrity, maintaining ethically correct behavior towards the public opinion, institutions, entrepreneurship, and to anyone who may approach it for some reason.*

*I also believe that correctness should not be evaluated only in terms of strict observance of the law but also on deontologically shared behaviors.*

*The company, due to the importance of its activities, must pursue its growth on a solid reputation, faithful to values of honesty and fairness, in every daily work process involving customers, suppliers, employees, and institutions. Therefore, every corporate behavior must be immediately attributable to these principles at all levels, without distinctions or exceptions.*

*I desire that every employee directs their behavior and performs their activities according to a constant and strict observance of the principles and values contained in this document.*

**Lanocita Marco**

## SUMMARY

<i>Employer's Letter.....</i>	<i>2</i>
<i>The organization .....</i>	<i>4</i>
<b>1 GENERAL ETHICAL PRINCIPLES .....</b>	<b>5</b>
1.1 Honesty and legality .....	5
1.2 Transparency and completeness of information.....	5
1.3 Confidentiality of information.....	5
1.4 Integrity of the person.....	6
1.5 Equality and impartiality.....	6
1.6 Fairness of authority.....	6
1.7 Diligence in tasks and contracts .....	6
1.8 Fairness and equity in contract management.....	7
<b>2. SUBJECTS AND GUARANTOR.....</b>	<b>7</b>
2.1 Subjects .....	7
2.2 Guarantor .....	8
<b>3. WORK BEHAVIOR .....</b>	<b>9</b>
3.1 Information channels and work environment .....	9
3.2 Confidentiality and privacy.....	9
3.3 Protection and use of corporate assets .....	9
3.4 Internal controls.....	10
<b>4. BUSINESS BEHAVIOR .....</b>	<b>10</b>
4.1 General rules .....	10
4.2 Business fairness .....	10
4.3 Relations with institutions .....	11
4.4 Relations with the media .....	11
4.5 Gifts and donations .....	11
4.6 Compliance with laws and regulations .....	12
<b>5. RESPONSIBILITY.....</b>	<b>12</b>
5.1 General principles .....	12
5.2 External work activity .....	12
5.3 Use of time and corporate assets .....	12
5.4 Personal economic interests.....	13
5.5 Responsibility towards the community .....	13
5.6 Environmental protection .....	13
5.7 Ethical principles towards corporate governance .....	14
5.8 Ethical principles in relations with personnel.....	14
<b>6 IMPLEMENTATION AND CONTROL .....</b>	<b>18</b>
- Interpretative clarifications and reporting of violations.....	19
<b>7 UPDATES.....</b>	<b>20</b>
<b>8. ENTRY INTO FORCE and DELIVERY .....</b>	<b>20</b>



## THE ORGANIZATION

The organization was founded in 1954 and is therefore a historical reality of the territory, producing special profiles from tubes and strips in all steel qualities.

The use of a specific profile for each application is always the ideal solution in terms of economic, functional, structural, and practical convenience.

The wide range of machines used allows production with thicknesses ranging from 0.7 mm to 11 mm, with a maximum development of 1500 mm and a length of up to 24 meters. It is also possible to engrave the customer's logo directly on the produced profile. The company is recognized both in the national, European, and extra-European markets.

It regularly provides products and services that meet customer requirements and applicable regulations.

During 2024, the organization decided to adhere to the Occupational Health and Safety Management System according to the UNI EN ISO 45001:2023 standard, integrating the pre-existing quality management system UNI EN ISO 9001:2015. During 2025, the organization disseminates this Ethical Code document.

Given their effect, or potential effect, on the organization's ability to regularly provide products and services that meet customer requirements and applicable regulations, the organization has determined:

- a) the interested parties, in addition to workers, relevant and significant
- b) the requirements of these subjects
- c) the needs and expectations of workers and other interested parties and the assessment of which of these needs and expectations are or may become legal and other requirements.

The organization monitors and reviews information regarding interested parties and their relevant requirements, including activities, products, and services within the control or influence of the integrated system, which is implemented, maintained, and continuously improved with the necessary processes and their interactions, in accordance with the required standards.

Since the beginning of its activity, Trafilmatal Profilatura LLC has pursued market expansion objectives through elements always considered strategic for the company's success, such as the cultural growth of employees and collaborators, the technological evolution of equipment, the diversification of products and processes, paying particular attention to principles of economic sustainability and social promotion.

Trafilmatal Profilatura LLC respects the legitimate expectations of its stakeholders, i.e., those subjects (managers, employees, collaborators, customers, suppliers, partners, etc.) who have significant relationships with the company and whose interests are involved in the company's activities.

Relations with these subjects are based on criteria and behaviors of fairness, collaboration, loyalty, and mutual respect. For this reason, this Ethical Code has been developed as a tool to express and disseminate ethical commitments and responsibilities in business conduct and corporate activities; the Ethical Code is therefore based on an ideal of cooperation, support, and mutual benefit of the parties involved.



The Ethical Code does not overlap or replace laws, regulations, or internal rules. Instead, it represents a tool that integrates and strengthens principles with specific reference to ethical profile of corporate behaviors. This Code is therefore a public declaration of Trafilmetal Profilatura LLC's commitment to promoting the highest levels of ethics in fulfilling the company's mission.

## **1. GENERAL ETHICAL PRINCIPLES**

This Code contributes to ensuring that the activities and behaviors of the subjects to whom it applies are carried out in respect of the values listed below.

In no way can the belief of acting in the interest or advantage of Trafilmetal Profilatura LLC justify the adoption of behaviors in contrast with the principles expressed in the Ethical Code and detailed below.

### **1.1 Honesty and legality**

This represents the fundamental principle for any activity of Trafilmetal Profilatura LLC, for initiatives, reports, and communications. Honesty is an essential element of corporate management. Trafilmetal Profilatura LLC is committed to respecting all laws, codes, regulations, community directives, and all generally recognized best practices. No corporate objective can be pursued in violation of the current legislation.

### **1.2 Transparency and completeness of information**

Collaborators of Trafilmetal Profilatura LLC are required to provide complete, transparent, understandable, and accurate information, so that stakeholders can make autonomous and informed decisions about the interests involved, alternatives, and relevant consequences when establishing relationships with the company. In the formulation of any contracts, in particular, Trafilmetal Profilatura LLC takes care to specify to the counterparty the behaviors to be adopted in all the circumstances provided, in a clear and understandable manner.

### **1.3 Confidentiality of information**

Trafilmetal Profilatura LLC ensures the confidentiality of the information in its possession, compliance with the regulations on the protection of personal data, and refrains from seeking confidential or sensitive data, except in cases of express and conscious authorization and compliance with current legal standards. Furthermore, collaborators of Trafilmetal Profilatura LLC are required not to use confidential information for purposes unrelated to their work activities, such as market manipulation or unfair competition.

Personnel, in the performance of their work and within their competencies and responsibilities, must record, process, disseminate, and communicate data, information, and knowledge with validity, accuracy, precision, and completeness, avoiding creating wrong impressions, providing biased or untrue information, and avoiding circumventing the confidentiality of data.

The company's accounting, economic, and financial records must be inspired by these values, accurately reflecting what is described in the supporting documentation.

Accounting records, economic and financial information cannot be transmitted or disclosed to third parties without authorization from the competent corporate function.



Employees who become aware of possible omissions, falsifications, alterations of accounting records and/or related documents are required to promptly inform the Employer.

#### **1.4 Integrity of the person**

Trafilmetal Profilatura LLC guarantees the physical and moral integrity of its collaborators, working conditions respectful of individual dignity, behavioral rules of good manners, and safe and healthy work environments. Furthermore, it acts to ensure that no episodes of intimidation, discrimination, sexual harassment, psychological violence, mobbing, or stalking occur in the workplace. Requests or threats aimed at inducing people to act against the law, against their will, and against the content of this document, or to adopt behaviors harmful to the moral and personal convictions and preferences of everyone, are not tolerated.

#### **1.5 Equality and Impartiality**

Trafilmetal Profilatura LLC rejects any discrimination based on age, gender, race, nationality, political beliefs, and religious creed in all decisions affecting relationships with stakeholders.

#### **1.6 Fairness of authority**

In the signing and management of contractual relationships that imply the establishment of hierarchical relationships - especially with collaborators - Trafilmetal Profilatura LLC is committed to ensuring that authority is exercised fairly and correctly, avoiding any abuse. Trafilmetal Profilatura LLC guarantees, that authority does not turn into an exercise of power harmful to the dignity and autonomy of the employee or collaborator and that work organization choices safeguard the value of those who work for the company.

#### **1.7 Diligence in tasks and contracts**

Contracts and work assignments must be executed according to what has been consciously agreed upon by the parties. Trafilmetal Profilatura LLC is committed not to exploit conditions of ignorance or incapacity of its counterparts, as well as any positions of strength in contractual power with its suppliers and collaborators.

#### **1.8 Fairness and equity in contract management**

Anyone operating in the name and on behalf of Trafilmetal Profilatura LLC will avoid taking advantage of contractual gaps or unforeseen events to renegotiate the contract solely to exploit the position of dependence or weakness in which the interlocutor finds themselves.

## **2. SUBJECTS AND GUARANTOR**

#### **2.1 Subjects**

The recipients of this document, already obliged to comply with the laws and regulations in force, are also required to adapt their behavior and actions to the principles, objectives, and commitments expressed in this document.

Each recipient must always act in a manner consistent with the protection of their own prestige and that of Trafilmetal Profilatura LLC and is also encouraged to provide professional and personal contributions appropriate to the responsibilities exercised, to improve and promote the social role and economic position of the company.



The shareholders of Trafilmetal Profilatura LLC, each within their competencies, must act in full sharing of corporate values and fulfill their official duties while maintaining full confidentiality on the acts taken and, in general, on the corporate documentation they come to know or possess. Shareholders must also maintain discretion on acts regarding which they may disagree, refraining from spreading their opinions within or outside Trafilmetal Profilatura LLC.

Employees of Trafilmetal Profilatura LLC, in addition to fulfilling the general duties of loyalty, fairness, and punctual fulfillment of the employment contract in good faith, must respect corporate rules and the dictates of this document and must also refrain from engaging in activities in competition with those of Trafilmetal Profilatura LLC.

Each organizational and/or functional manager is required to:

- represent with their behavior an example for their subordinates;
- promote compliance with this document;
- ensure that their subordinates understand that adherence to the Ethical Code is an essential part of the quality of work and their role;
- take immediate corrective measures when required by the situation;
- strive to prevent, within their responsibilities and competencies, any violation of this Code.

External collaborators of Trafilmetal Profilatura LLC are required to maintain the utmost confidentiality about the activities, acts, information, and documents they may come to know or possess. They must also refrain from using materials and tools provided to them for purposes and interests other than those related to the service intended for Trafilmetal Profilatura LLC.

The contents of this document are applied without any exception:

- to the heads of corporate functions;
- to employees and collaborators;
- to any other subject, private or public, who directly or indirectly establishes any form of relationship and collaboration, even temporary, with Trafilmetal Profilatura LLC.

## **2.2 Guarantor**

For the correct interpretation and observance of the Ethical Code, personnel can refer not only to their direct supervisors but also to the following corporate functions:

- Employer
- Human Resources

The Guarantor, in the person of the Employer, will have the institutional activities of:

- ♦ disseminating the Code to Trafilmetal Profilatura LLC employees, customers, suppliers, partners, affiliated companies, and generally to all interested third parties;
- ♦ managing, implementing, deepening, and verifying the regulations subject to the Code to ultimately adapt it to the evolution of laws;



- ◆ operationally supporting the interpretation, implementation, and evaluation of the Code, as a constant reference tool for correct behavior during the performance of one's activities;
- ◆ verifying, controlling, and evaluating cases of violation of written rules, adopting appropriate measures in collaboration with the competent company functions, in compliance with laws, regulations, and the CCNL;
- ◆ protecting and assisting employees who report non-compliant behaviors to the Code, shielding them from pressures, interferences, intimidations, and retaliations;
- ◆ reporting any abnormal situations to the competent company functions to adopt necessary corrective measures;
- ◆ promoting and preparing communication and training programs for employees, aimed at better understanding the objectives and behavior modalities to achieve them;
- ◆ drafting an annual report to the Employer on the state of implementation of the Code of Ethics, illustrating the programs and initiatives undertaken to achieve institutional goals.

If a recipient becomes aware of illegal situations or contrary to the principles expressed in this document, directly or indirectly, that may generate an interest or advantage for Trafilmetal Profilatura LLC, they must inform their direct supervisor. In such a situation, the recipient is exempt from the obligation to observe the pre-established company hierarchy and can directly contact the Employer if they believe the violation is committed by their function managers or higher hierarchical subjects.

A similar obligation to inform with exemption from the hierarchical bond exists for information transmitted to the Supervisory Body, especially if the recipient does not deem it appropriate to activate internal communication channels within the company. The Employer commits to mutual information about received reports and their prompt treatment, guaranteeing the anonymity of the informant.

Relations between recipients must be oriented towards fairness, collaboration, and mutual respect; therefore, it constitutes behavior contrary to the ethics expressed in this Code to abuse the duty of information for retaliation or merely emulative purposes.

## **3. WORK BEHAVIOR**

### **3.1 Information channels and work environment**

Ethical and moral values are a constant and systematic duty of the operational conduct of each Trafilmetal Profilatura LLC employee.

The company leadership, management, and heads of company structures must serve as an example and reference model for all employees, demonstrating impeccable conduct in the exercise of their activities, constantly promoting the spirit of collaboration, trust, mutual respect, cohesion, and team spirit to systematically protect and improve the company climate, image, and prestige.





### **3.2 Confidentiality and privacy**

The information, data, and knowledge acquired, processed, and managed by employees in the exercise of their work must remain strictly confidential and appropriately protected, and may not be used, communicated, or disclosed, either inside or outside the company, except in compliance with current legislation and company procedures.

The confidential information, to be encoded as the exclusive property of Trafilmetal Profilatura LLC, are:

- ◆ the business, strategic, economic/financial, accounting, commercial, managerial, and operational plans;
- ◆ the projects and investments;
- ◆ the data related to personnel such as absences, attendances, holidays, illness and pay;
- ◆ the company's performance and production parameters;
- ◆ the corporate agreements, commercial agreements and contracts, corporate documents;
- ◆ the know-how related to the production, development, and marketing of services, administration, intermediation, research and selection of personnel, and support for professional relocation;
- ◆ the company manuals with the indication of the prohibition of reproduction;
- ◆ the databases of suppliers, customers, and employees.

Employees, in handling such data and information, must exercise the utmost care and confidentiality, avoiding through their behavior, both with colleagues and third parties, the disclosure of information that is proprietary to the company and not yet public.

Employees, in the event of requests for confidential corporate data and information, from external parties such as friends, private individuals, journalists, etc., must refrain from providing information directly or indirectly, reserving the right to direct the request to the appropriate corporate function.

### **3.3 Protection and Use of corporate assets**

The corporate assets of Trafilmetal Profilatura LLC consist of tangible physical assets, such as computers, printers, equipment, vehicles, and intangible assets such as confidential information, know-how, technical/commercial knowledge, developed and disseminated by the employees of the Company.

The protection and preservation of these assets constitutes a fundamental value for safeguarding corporate interests, and it is the responsibility of the personnel (each in the performance of their business activities) not only to protect such assets but also to prevent their fraudulent or improper use. The use of these assets by employees must be functional and exclusive to the performance of business activities or for purposes authorized by the relevant business functions.

### **3.4 Internal Controls**

All activities and actions performed and carried out within the Company must be legitimate, verifiable, and compliant with laws, corporate procedures, and based on the validity, reliability, completeness, and accuracy of the information.



Trafilmetal Profilatura LLC, in cases that are confirmed and verified, of fraud, theft, omissions, falsifications, alterations, improper use of confidential information, misappropriation of physical and intangible assets of the company's possessions, will take the necessary disciplinary measures and, depending on the severity of the violations committed, may initiate legal actions against the individuals involved.

## **4. BUSINESS BEHAVIOR**

### **4.1 General rules**

The Company's personnel are required, in business dealings with third parties, to maintain ethical behavior and compliance with the law, characterized by maximum transparency, clarity, correctness, efficiency, and fairness as defined.

In commercial or promotional relationships and dealings, illegal practices and behaviors, collusion, illicit payments, attempts at corruption and favoritism, direct solicitations, or solicitations through third parties for personal and career advantages, for oneself or others, that are contrary to the laws, regulations, and standards outlined in this Ethical Code are prohibited.

The staff in relations with third parties, with reference to their own competencies, is required to provide them with clear and comprehensive information regarding obligations, constraints, and compliance with the law and ethical standards that directly pertain to their activities, as well as the general principles that should guide the employees of Trafilmetal Profilatura LLC in their dealings with third parties.

### **4.2 Business fairness**

The personnel of the Company that engages in business relations with third parties must interact with them in an ethical, fair, and correct manner.

These principles are valid for customers, suppliers, consultants, and individuals who carry out any activities directly for the Company or on its behalf.

In particular, the selection of suppliers and the formulation of the purchasing conditions for goods and services for the Company is dictated by values and parameters of competition, objectivity, fairness, impartiality, and equity. The selection of suppliers, price, quality of the goods and services, assistance guarantees, and in general a careful and precise evaluation of the offer must adhere to the ethical values just mentioned.

In the selection of suppliers, undue pressures that favor one supplier over another and undermine the credibility and trust that the market places in the Company regarding transparency and rigor in the application of the law and corporate procedures are not permitted or accepted.

Among competing companies, actions related to unfair competition or behaviors aimed at disparaging or diminishing the activities of competing agencies are prohibited, also avoiding provisions that may lead to misleading advertising and using forms of advertising that, through direct or indirect comparison, may harm the image of competing companies.



In dealings with clients, suppliers, or third parties, offers of money or gifts aimed at obtaining real or apparent advantages of various kinds (e.g., economic benefits, favors, recommendations) are not permitted. In any case, acts of commercial courtesy must never be carried out in circumstances that could give rise to suspicions of illegality.

The acquisition of information related to third parties that is sourced from public or private entities and/or specialized organizations must be carried out through lawful means in compliance with current laws (e.g., privacy regulations).

If the personnel find themselves in a position to receive confidential information, they must handle it with the utmost confidentiality and discretion to prevent the Company from being accused of misappropriation and improper use of such information.

The Company's personnel are not permitted to receive and use confidential data and information obtained from third parties unless Trafilmetal Profilatura LLC has signed a written and formalized agreement or contract with those third parties for the use of such information.

The document must be pre-approved by the relevant business function.

#### **4.3 Relations with institutions**

The relationships with institutions, necessary for the development of the Company's business programs, are reserved exclusively for the corporate functions delegated to do so.

The relationships must be characterized by maximum transparency, clarity, correctness, and should not lead to partial, distorted, ambiguous, or misleading interpretations by the private and public institutional subjects with whom various types of relationships are maintained.

Trafilmetal Profilatura LLC cannot provide direct or indirect contributions in any form, nor allocate funds and financing to support public entities (e.g., political parties, committees), except as permitted and provided by laws and regulations, such as the allocation to the interprofessional fund "FONDIMPRESA."

#### **4.4 Relations with the media**

The communications of the Company towards the external environment must be truthful, clear, transparent, unambiguous, and non-instrumental; they must, in fact, be consistent, homogeneous, and accurate, in accordance with the corporate policy and programs, and always directed towards both genders.

The personnel must refrain from issuing any formal or informal communications to external parties without prior authorization from the relevant corporate function.

#### **4.5 Gifts and donations**

The Company's personnel may not, directly, or indirectly (e.g. through members of their household), offer or receive gifts, benefits, money, payments, presents of any kind, procure business and/or employment with customers, suppliers and third parties of a material or intangible nature (e.g. services, promotions, discounts except those specifically provided for by company bargaining).

In exceptional cases, and with prior authorization from the Employer, only gifts or donations of a purely symbolic or personalized nature may be accepted, and they must always fall within the criterion of modest value.



To all interested parties, Trafilmetal Profilatura LLC does not accept any form of gift, gratuity, or promise of future benefits that could be interpreted as exceeding the normal expressions of courtesy belonging to polite and honest business practice.

Therefore, initiatives aimed at obtaining illicit preferential treatment in the conduct of business are prohibited.

Trafilmetal Profilatura LLC operates actively, through appropriate forms of promotion and invitation, so that the recipients of this Code and generally all collaborators replace any gifts and presents with concrete support for charitable initiatives aimed at social, cultural, artistic, sporting, environmental purposes, etc.; in these circumstances, Trafilmetal Profilatura LLC acts as a vehicle for information and communication with the recipients of such initiatives.

The offer of money to the personnel of the Company or to employees of clients, suppliers, or third parties constitutes a legally prosecutable offense.

#### **4.6 Compliance with laws and regulations**

The Company, in the context of its institutional activities, is committed to preventing risks and ensuring the safety and health of its employees.

The personnel, in compliance with antitrust regulations that prohibit the formation of monopolistic agreements, cartels, and interference in competition regulation mechanisms, must avoid entering into agreements, even informal ones, with other companies to influence fair competition among the various market operators.

## **5. RESPONSIBILITY**

### **5.1 General Principles**

Trafilmetal Profilatura LLC has a relationship of trust and loyalty towards its personnel and the context in which it is embedded and operates.

### **5.2 External work activity**

The staff of Trafilmetal Profilatura LLC, in carrying out their activities, cannot:

- ◆ carry out work activities in favor of competition;
- ◆ lending, without the consent of the Company, in the capacity of employee, consultant, or delegate of the Employer, one's professional activity in favor of competing organizations;
- ◆ use, in the workplace or during leisure time, company assets or provide services offered to clients, without prior authorization from the relevant business function or direct supervisor;
- ◆ represent, act and work on behalf of a supplier / former supplier or a customer / former customer of Trafilmetal Profilatura LLC



### **5.3 Use of time and corporate assets**

The personnel cannot engage in activities that are not consistent with their duties and organizational responsibilities during working hours.

The use of company assets, such as premises, equipment, and confidential information of the Company, is not permitted for personal use or interest of any kind.

The personnel of Trafilmetal Profilatura LLC must exercise the utmost attention and caution when expressing opinions and comments on issues of public and/or social relevance that could directly or indirectly, in various ways, harm the interests, prestige, and image of the Company.

### **5.4 Personal economic interests**

The personnel of the Company may not have economic-financial interests of any kind in activities or participation in companies with clients, suppliers, or competitors, in cases where this may constitute a conflict of interest. It is prohibited to foresee costs or fees to be borne by candidates and/or workers for services related to the institutional activity of Trafilmetal Profilatura LLC, or to accept and/or request money or other favors for advice or services rendered, in relation to the normal activities of workers to be placed or about to be placed in temporary employment.

In conducting any activity, situations must be avoided where the parties involved or affected are, or may even appear to be, in a conflict of interest. This includes cases where a collaborator pursues an interest different from the company's mission or personally benefits from business opportunities of the company, as well as cases where representatives of clients, suppliers, or public institutions act in dealings with Trafilmetal Profilatura LLC in violation of the fiduciary duties associated with their position.

Any individual who believes they are in a situation of conflict between their personal interests or those of third parties and the interests of Trafilmetal Profilatura LLC must immediately inform the Employer.

### **5.5 Responsibility towards the community**

Trafilmetal Profilatura LLC is aware of the influence, even indirect, that its activities can have on living conditions, economic and social development, and the overall well-being of the community, as well as the importance of social acceptance within the community in which it operates.

For this reason, Trafilmetal Profilatura LLC intends to conduct its investments sustainably, in accordance with the values shared by local and national communities.

Trafilmetal Profilatura LLC promotes and supports initiatives of social and cultural value to instill in all its collaborators a sense of responsibility towards society and, above all, towards those who objectively lack the necessary resources to ensure essential levels of survival.

### **5.6 Environmental protection**

The environment is a primary asset that Trafilmetal Profilatura LLC is committed to safeguarding; to this end, it plans production activities and related services seeking a balance between economic initiative and essential environmental needs, considering the rights of future generations.



Trafilmetal Profilatura LLC is therefore committed to progressively reducing the environmental impact of its activities, as well as preventing risks to populations and the environment, not only in compliance with current regulations but also considering the development of scientific research and best practices in the field.

### **5.7 Ethical principles towards corporate governance**

Trafilmetal Profilatura LLC therefore encourages the regular participation of the Members to obtain clarifications, express their opinions, and formulate proposals.

Trafilmetal Profilatura LLC aims to disseminate information related to corporate accounting with the utmost transparency, reliability, and integrity. Every operation involving the transaction of values is recorded, authorized, legitimate, consistent, aligned with corporate purposes, and made available for any audits.

All accounting actions and operations are supported by adequate records, to enable the verification of the decision-making, authorization, and implementation process.

Recipients who become aware of omissions, falsifications, or negligence are required to report such circumstances to the Employer.

Trafilmetal Profilatura LLC is equipped with an internal control system that contributes to the correct and consistent economic management of the Company, to the improvement of the efficiency and effectiveness of business processes, to the implementation of legal obligations, and to the containment of risks affecting business operations. The internal control system is managed and implemented by a specific corporate function, with the possible support of external competent parties for specific sectors.

### **5.8 Ethical principles in relations with personnel**

Trafilmetal Profilatura LLC promotes respect for the principles of equality and equal opportunities in the selection and recruitment activities of personnel, rejecting any form of favoritism, nepotism, or clientelism. The evaluation of personnel is carried out based on the correspondence between the candidate's professional profile and the one deemed necessary to meet the company's needs.

Employment relationships are formalized with a regular contract; all forms of irregular work are rejected.

The Recipients promote maximum transparency and collaboration towards the newly hired employee, so that they have a clear understanding of the assigned role. At the time the collaboration begins, the newly hired employee receives comprehensive information about the characteristics of their role and the organizational structure. The newly hired employee is also required to assimilate, accept, and sign the rules and procedures related to workplace safety, environmental protection, and compliance with this document.

Trafilmetal Profilatura LLC promotes conditions that enhance well-being at work and safeguard the physical and moral integrity of individuals. For this reason, it is committed to providing clean, orderly workplaces that comply with legal provisions regarding health, occupational safety, and environmental respect.



Trafilmetal Profilatura LLC fosters a culture of health and safety in the workplace and raises awareness, informs, and trains all company personnel accordingly. To this end, starting from December 2024, Trafilmetal Profilatura LLC has obtained certification in accordance with the UNI EN ISO 45001:2023 standard.

All collaborators are required to constantly adhere to laws and good practices regarding health and safety, as well as to respect the environment; they are also required to comply with the internal policies and regulations of Trafilmetal Profilatura LLC when these impose stricter requirements than legislative and regulatory standards.

To promote and maintain the highest level of safety during their time at the company, Trafilmetal Profilatura LLC does not permit the consumption of any type of alcoholic beverage during working hours and encourages maintaining this restriction in the immediate time before the work shift or entering the company, including organized lunch breaks and during the hospitality of clients, suppliers, and visitors.

To further raise awareness among its employees regarding workplace well-being, Trafilmetal Profilatura LLC is in favor of promoting initiatives for smoking reduction; in any case, designated outdoor areas for smokers are provided. For obvious safety reasons, the prohibition of smoking is strictly enforced in all indoor premises, including offices, production departments, restrooms, and support areas such as cafeterias and changing rooms.

Trafilmetal Profilatura LLC aims to create a work environment free from discrimination or harassment of a physical or psychological nature; therefore, harassment or any form of conduct likely to create a hostile atmosphere at work is not tolerated.

To create a serene working environment, Trafilmetal Profilatura LLC promotes the establishment of personal relationships oriented towards respect and courtesy, especially in dialogue and collaboration between individuals of both genders. To this end, sexual harassment, whether real or suspected, as well as the excessive display of behaviors indicative of personal emotional ties, even if legitimate, are not tolerated, nor are behaviors or discussions of a sexual nature that may disturb the sensitivity of individuals, particularly women of any age, nationality, or social background (for example, through the display of images with explicit sexual references, discussions with persistent and continued innuendos, etc.).

The employee or collaborator who believes they have been subjected to harassment or discrimination related to sexual orientation, race, health status, nationality, political beliefs, religious faith, sports or cultural preferences, personal habits, or any other unjustified reason based on reasonable and objective criteria, has the freedom to report the incident to the Employer, who will carefully assess whether any laws have been violated in addition to this document and, if so, will take appropriate measures.

Every employee and collaborator are required to use company assets diligently, to protect their integrity, and to avoid using them for personal purposes or for any other purposes for which such assets are made available. Fraudulent or improper use of the assets and equipment provided to perform assigned tasks must be avoided or prevented.

Every recipient is responsible for the security of the information systems and communication means used and is subject to the applicable regulations and the terms of the license agreements.



Except as provided by civil and criminal laws, it falls under the improper use of company assets and resources:

- the use of telematic connections for purposes other than those related to the employment relationship established with Trafilmetal Profilatura LLC;
- the sending of offensive messages or those that may harm the image of Trafilmetal Profilatura LLC or otherwise interfere with work activities;
- the use of telematic connections for recreational or entertainment purposes, especially if such uses are directed towards disorderly behaviors such as, for example, pornography or violence;
- access to information systems of other parties to appropriate information, damage or disrupt information systems, or appropriate codes for the operation of the system itself.
- each Recipient is also required to make the necessary commitment to prevent the possible commission of crimes using IT tools. Recipients are required to use the IT tools and the related authorizations provided exclusively by the competent functions.
- regarding the use of telematic communication tools, Trafilmetal Profilatura LLC invites all its Employees and Collaborators not to replace interpersonal dialogue, when possible, with one-way communications conducted through text messages (SMS or MMS), internal emails, discussions on social networking platforms, etc.
- to ensure maximum respect for the participants in meetings, all Collaborators are invited to limit the use of mobile phones and other communication tools to occasions where it is strictly necessary.

**Clients.** The relationships with clients are oriented towards maximum collaboration and transparency in the perspective of mutual benefit. Company personnel are required to maintain the correct balance between the transparency and confidentiality necessary to ensure the protection of the company's know-how. To achieve this balance, it is essential to follow the instructions of the Employer and to adopt the commitments made at the contractual level.

All individuals involved in client relationships are required to promote maximum courtesy and availability in managing dialogue with the client.

**Suppliers.** The processes of selection and choice of suppliers are also based on principles of legality, fairness, and transparency. The choice of the supplier is based on objective and impartial criteria in terms of product and service quality, punctuality in meeting commitments (delivery of products or provision of services), technological and production capacity, financial reliability, and cost adequacy.

The violation of the principles of legality, fairness, transparency, confidentiality, fair competition, and respect for individuals is considered just cause for the termination of supply contracts. If the Recipients receive proposals for benefits from a supplier to favor their activity, they must immediately suspend the relationship and report the incident to the Employer.





**Public administration and public Entities.** For the purposes of this document, public administration refers to any public entity, independent administrative agency, or even a natural or legal person acting in the capacity of a public official. The definition of a public entity includes those private subjects that, for political-economic reasons, fulfill a function aimed at safeguarding general interests, such as the managing entities of regulated markets, transport regulatory bodies, registration entities, certification bodies, telecommunications companies, public transport companies, energy supply companies, etc.

The use or presentation of false statements or documents, or obtaining information to secure contributions, funding, contracts, or other forms of assistance to the advantage or interest of the company is not permitted.

It is also prohibited to induce anyone into error through tricks or deceit to procure an unjust profit for Trafilmetal Profilatura LLC to the detriment of others. The violation of this prohibition is even more serious if the State or a public entity holding funding or economic support proceedings is misled.

It is forbidden to use contributions, funding, or other disbursements by any public entity for purposes other than those for which they were granted.

**Political forces and interest-bearing associations.** Trafilmetal Profilatura LLC maintains relationships with trade associations, unions, and related organizations, with the aim of developing its activities, establishing forms of mutually beneficial cooperation, and presenting its positions.

The public presentation of its positions with political forces or other entities may only occur with the formal consent of the Employer.

Trafilmetal Profilatura LLC is willing to support, through contributions and sponsorships, in accordance with the established procedures, initiatives proposed by public and private entities, non-profit associations that are duly established and registered, which promote the values expressed in this Code. Such measures may pertain to events of a social, political, cultural, artistic, and sporting nature, focusing on themes of collective and/or specific interest to Trafilmetal Profilatura LLC.

**Competitors.** Trafilmetal Profilatura LLC avoids negative comments and judgments regarding competitors, instead favoring fair comparison on the quality and transparency of products and services. Anyone who operates, directly and/or indirectly, in the name and/or in the interest and/or for the benefit of Trafilmetal Profilatura LLC must always adhere to the above and in particular:

- cannot use names or distinctive signs likely to cause confusion with names or distinctive signs legitimately used by others, or slavishly imitate the products of a competitor or other organization in general, or carry out by any other means acts likely to create confusion with the products and activities of a competitor or other organization in general;
- cannot disseminate news and assessments about the products and activities of a competitor or other organization in general, likely to bring them into disrepute, or appropriate the merits of the products or the business of a competitor or other organization in general;
- cannot directly or indirectly resort to any other means that does not comply with the principles of professional fairness and is likely to harm another organization;



- cannot commit acts of violence or threats against anyone, particularly against individuals directly and/or indirectly connected to competing organizations or any other organization in general.

In relation to the **Judicial Authority**, the administrators, executives, employees, and anyone associated with Trafilmetal Profilatura LLC must maintain a conduct characterized by maximum cooperation, transparency, and honesty.

No one may exercise violence, threats, offers, or promises of money or other benefits to induce any person called to testify before the judicial authority to refrain from making statements or to make false statements that could be used in a criminal or civil proceeding, when that person has the right not to respond. Any behavior contrary to the above must be immediately reported to the Employer.

## 6. IMPLEMENTATION AND CONTROL

Trafilmetal Profilatura LLC ensures the promotion of the principles expressed in this document through:

- the timely and systematic dissemination of the Code itself to the Recipients and those who enter relationships with Trafilmetal Profilatura LLC
- the in-depth study and updating of the Code;
- the implementation of information programs for external Recipients, as well as training for internal Recipients for a better understanding of the contents and objectives of the Code;
- the conduct of objective and impartial checks regarding reports of violations of the Code;
- the application of sanctioning measures, because of established violations of the Code;
- the complete protection of individuals who provide information on possible violations of the Ethical Code.

The text of the Ethical Code is delivered to all internal recipients and is made available for consultation on the company website.

External recipients are managed directly by the Employer.

### **Interpretative clarifications and reporting of violations**

To ensure the interpretative correctness of the applicable laws and this Ethical Code, Trafilmetal Profilatura LLC establishes a specific service based on the contribution of qualified external consultancy from the Employer. Among its activities, such subjects:

- they keep the Employer and all company collaborators informed and updated on the evolution of applicable legislation and regulations;



- they provide interpretative and operational clarifications of the applicable legal norms;
- they monitor compliance with the provisions of this document.
- they receive and/or analyze reports of any illegal activities committed within the Organization and inform the Employer
- they promote any changes to the crime prevention model to keep it adequately updated;
- they conduct internal verification activities promoting the prescribed sanctioning procedures.

Trafilmetal Profilatura LLC is committed to ensuring that the reporting system for violations is clear to everyone and that the contacts for clarifying the interpretation of the Ethical Code are known. Trafilmetal Profilatura LLC takes the principles outlined in this Code very seriously and therefore requires those in positions of responsibility to make an even greater commitment to respecting these principles and supporting their dissemination and understanding at all levels.

Regarding reports of violations, there is an obligation to communicate them immediately to the Employer.

The contact details (addresses, emails, and phone numbers) are made known and updated through specific corporate communications.

Failure to comply with the obligation to report violations constitutes a serious breach of this Code.

The failure to respect the hierarchical order of reporting, unless adequately justified, constitutes a breach of this Code.

The direct verification of the behaviors prescribed by this document and, in general, the full execution of legal provisions, is primarily the responsibility of the Employer, who exercises this function through an organized and structured system, primarily based on:

- internal control activities;
- conducting periodic internal audits;
- periodic checks of legal compliance;
- operational oversight conducted by function and department heads;

The Company intends to sanction the behaviors of personnel that are not consistent and respectful of the values and principles outlined in this document, according to the severity of the infractions committed and the behaviors exhibited, reserving the broadest protection of its interests, with reference to the Regulations, Laws, and legislative decrees.

The Disciplinary System is communicated to the interested parties, who may express their opinions and submit appropriate requests, which are examined and discussed within the Employer. The considerations that the SOCI expresses regarding the requests of the interested parties are formally communicated to them.



## 7. UPDATES

Trafilmetal Profilatura LLC is committed to integrating and/or reviewing the Code and/or company procedures when necessary to update the document itself, introduce cases not covered in the current version, clarify those already covered, or adapt to new needs of any kind, through dissemination on the same network of specific communications used for its normal distribution.

The update of the Ethical Code is entrusted to the Employer, who makes use of external consulting services.

## 8. ENTRY INTO FORCE AND DELIVERY

The present Ethical Code must be made known to employees, clients, suppliers, consultants, and all those who carry out any activity directly for the Company or on its behalf, acknowledging receipt of it.

The present Ethical Code comes into effect as of 24/02/2025 following the shareholders' meeting on 10/02/2025.