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CODE OF ETHICS

C. Steinweg - GMT S.R.L

Update approved and adopted by resolution of the Board of Directors on 29 April 2026

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1. THE VALUE OF THE CODE OF ETHICS

This Code of Ethics is the document drawn up by C. Steinweg – GMT S.r.l., hereinafter referred to simply as GMT for brevity, to define the set of corporate ethical values that GMT recognises, accepts and shares, and the set of responsibilities that GMT, its employees and its collaborators assume in their internal and external relations.

2. APPLICATION OF THE CODE OF ETHICS

Compliance with the provisions of the Code of Ethics by all those working for GMT is of fundamental importance for the smooth running, reliability and reputation of the Company, factors that are essential to the company's success.

The provisions of the Code of Ethics apply to all GMT employees – at Italian and foreign offices – without exception, to all those who enter into dealings with GMT, to corporate bodies, collaborators, consultants and anyone acting in the name and on behalf of the company.

Those to whom the Code of Ethics applies are required to be familiar with its contents, to contribute to its implementation and to report, within the scope of their responsibilities, any shortcomings or breaches.

GMT undertakes to facilitate and promote awareness of the Code of Ethics amongst employees and all those working for the Company, monitoring compliance and providing appropriate information and control mechanisms.

3. MISSION

GMT's corporate purpose is:

- the management, including under concession, of warehouses, port *terminals*, sorting centres and storage facilities for non-ferrous metals and other goods, both domestically and internationally;
- the related ancillary handling operations;
- port operations for the unloading, loading, custody and storage of goods;
- the containerisation and decontainerisation of goods;
- related, similar and ancillary operations pertaining to the movement and transit of goods in general, such as customs operations, national and international shipping and transport, and maritime chartering.

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Adherence to high standards of quality, environmental protection and the promotion of the economic and social development of the local area in which it operates are values constantly pursued that form an integral part of GMT's mission.

GMT aims to establish and consolidate its role of national and international significance within the sector in which it operates and within the corporate group to which it belongs.

GMT pursues these objectives through an effective and flexible organisation of managerial and technical expertise, which it constantly seeks to enhance and develop.

4. SUSTAINABLE COMMITMENT

GMT is committed to actively contributing to the promotion of sustainable development in the communities and the environment in which it operates and is present.

All activities are planned and carried out with an awareness of the social responsibility that GMT has towards employees, shareholders, customers, suppliers, communities, commercial and financial partners, institutions, trade associations and trade union representatives.

Therefore, GMT is committed to disseminating knowledge of these values and principles both within and outside the Company and to establishing appropriate control procedures.

5. INTENDED AUDIENCE AND PURPOSE

The provisions of the Code of Ethics apply without exception to the directors and employees of GMT and to all those who work towards the achievement of GMT's objectives.

GMT's management is required to observe the provisions of the Code of Ethics when proposing and implementing projects, actions and investments designed to enhance the company's financial, operational and technological assets, shareholder satisfaction, and the economic and social well-being of employees and business partners.

The members of the Board of Directors are guided by the principles of the Code of Ethics when setting corporate objectives.

It is primarily the responsibility of directors and managers to put the values and principles contained in the Code of Ethics into practice, assuming responsibility both internally and externally, and strengthening trust, cohesion and the spirit of the Company.

GMT employees must ensure that their actions and conduct comply with the principles and commitments set out in the Code of Ethics.

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All conduct of GMT employees in the performance of their duties must be guided by the utmost integrity in management, the completeness and transparency of information, formal and substantive legitimacy, and the clarity and accuracy of accounting records.

All business activities must be carried out with commitment and professional rigour.

Every employee must provide professional input commensurate with their assigned responsibilities and duties, acting in a manner that safeguards GMT's reputation.

Relationships between employees, at all levels, must be based on criteria and conduct characterised by fairness, cooperation, loyalty and mutual respect.

6. GMT'S COMMITMENTS

GMT's commitments are listed below:

- the widest possible dissemination and awareness of the Code of Ethics;
- the constant updating of the Code's contents;
- the interpretation and implementation of the provisions of the Code of Ethics;
- investigating all reports of breaches of the Code of Ethics;
- assessing the facts and applying appropriate sanctions in the event of a breach of the Code of Ethics;
- the protection of recipients' *privacy* in accordance with current legislation, with a view to preventing the communication or dissemination of personal data without the consent of the data subject. The collection, processing and storage of information and personal data relating to staff and other individuals held by GMT are carried out in accordance with the procedures adopted to ensure that unauthorised persons cannot gain access to such data;
- a management system compliant with current regulations. In order to ensure the necessary consistency between conduct and strategies, GMT has established a system of internal rules that forms a management model based on the allocation of responsibilities and a balanced relationship between operations and control;
- to maintain a corporate culture of collaboration and trust, and of mutual respect for the dignity, honour and reputation of each individual;
- to prevent employees from being subjected to unlawful pressure or distress in the workplace, by taking action to prevent abusive, defamatory, discriminatory and/or racist behaviour;

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- to prevent and address any form of harassment in the workplace – including, but not limited to: an intimidating, hostile or isolating working environment towards individual employees or groups of employees;
- to prevent any behaviour likely to infringe upon the dignity and personal and sexual freedom of workers.

7. ORGANISATIONAL MODEL PURSUANT TO LEGISLATIVE DECREE 231/2001

GMT has adopted the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 and has appointed the Supervisory Body.

This Model provides a further guarantee to shareholders regarding compliance with current regulations and the possibility of exempting the company from liability in the event of offences committed by directors, managers or employees in the interest or for the benefit of the company itself.

The Code of Ethics sets out guidelines and principles of conduct, compliance with which helps, amongst other things, to prevent the risk of offences under Legislative Decree 231/2001 being committed in the context of the specific activities carried out by GMT.

8. FUNDAMENTAL PRINCIPLES AND RULES OF CONDUCT

The fundamental principles on which GMT bases its operational strategy and the rules of conduct observed are listed below:

- **responsibility and compliance with the law:** GMT considers compliance with the laws and regulations in force in Italy, in the countries where its foreign offices are located and, in general, in those with which it operates, to be an essential ethical value. GMT is also committed to complying with EU and international legislation, with particular reference to the restrictive measures issued by the European Union. Every action must avoid the risk of involvement in criminal offences linked to the violation of international embargoes or sanctions.
- **Fairness and impartiality:** these principles entail respect for the rights of those involved in GMT's activities; the company rejects any discrimination based on gender, nationality, religion, personal or political opinions, age, health, or the economic circumstances of its stakeholders.
- **Honesty, integrity, transparency:** those bound by the Code of Ethics must be aware of GMT's ethical principles and must not pursue personal or corporate gain in breach of the law or the Code of Ethics. GMT condemns any violent action or threat aimed at inducing conduct that contravenes the Code of

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Ethics and, in general, the law. Furthermore, GMT requires that all internal and/or external information be accurate, complete and truthful: every transaction must be recorded, authorised, verifiable, legitimate, consistent and appropriate so that the decision-making process and its execution can be verified; transparency must guide every transaction, ensuring full traceability of financial flows and assets, in order to prevent the circumvention of European regulations and the use of triangulation or intermediaries to conceal the identity of counterparties.

- **relations with international operators:** GMT ensures that its dealings with parties operating internationally comply with applicable laws and undertakes to take the necessary precautions to verify, to the best of its ability, the legitimate origin of the capital and funds used in dealings with GMT: in particular, the Company works exclusively with partners who pass *due diligence* checks relating to EU restriction lists (*Asset Freeze*) and does not maintain relations with operators resident in countries subject to sanctions without the necessary authorisations from the competent authorities.
- **Protection of individual freedom:** GMT rejects and condemns all forms of violence that restrict personal freedom, as well as all forms of prostitution and/or child pornography.
- **Customer satisfaction:** GMT provides services characterised by high quality standards at competitive prices and by offers designed to meet the expressed and unexpressed needs and expectations of all stakeholders.
- **Environmental protection:** GMT is committed to managing its processes in accordance with environmental protection and efficiency criteria through the identification, management and control of its environmental aspects, as well as through the rational use of energy resources and the minimisation of emissions, in accordance with a development model compatible with the local area and the environment, with a focus also on the development of so-called renewable energy.

GMT's policy is implemented in accordance with the following principles:

- ensuring compliance with environmental legislation (national, regional or local), internal regulations and all requirements arising from contractual agreements and protocols entered into with third parties;
- disseminating the environmental policy externally and communicating its environmental aspects and impacts through the establishment of appropriate associated indicators;
- promoting sustainable development through activities aimed at preventing pollution, reducing consumption, recycling/reusing raw materials and energy, and reducing the production of hazardous

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waste and the level of waste generated, using specific technologies and appropriate environmental standards;

- to promote involvement and awareness within the Company, in order to raise staff awareness of environmental issues;
 - ensure that all company activities are geared towards the continuous improvement of performance;
 - constantly monitor developments in European environmental legislation to prevent new types of environmental offences;
 - extend environmental responsibility throughout the supply chain, verifying that partners comply with EU environmental standards;
- **Occupational health and safety:** GMT regards the allocation of human, professional, organisational, technological and financial resources to safety as a productive investment.

GMT considers the protection of workers' health and safety to be of paramount importance, setting itself the objective not only of complying with the requirements of the relevant regulations, but also of taking action aimed at the continuous improvement of working conditions.

It also believes that the prevention programme cannot succeed without the committed and informed participation of all staff. It is therefore necessary to continuously and effectively promote a culture of safety at all levels.

In light of this, GMT promotes the integration of safety into all company activities and fosters a sense of responsibility among staff, who, based on their individual skills and duties, must take the necessary actions, aware of the importance of their role and their responsibility.

GMT believes that every line manager has a responsibility to assess the risks to the health and safety of workers and to take action aimed at eliminating such risks or, if this is not possible, at minimising them.

GMT also considers that those 'working on the ground' are best placed to identify issues relating to staff health and safety and can contribute to the investigation, identification and removal of causes, and that risk analysis helps to enhance safety training.

Therefore, GMT undertakes to operate:

- taking into account technological developments;
- by planning preventive measures, providing appropriate instructions to workers and organising regular training activities.

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- **value of human resources:** GMT recognises human resources as a fundamental factor in the company's development and is committed to safeguarding professional growth and development in compliance with applicable laws, particularly regarding the physical and moral integrity of employees. It also undertakes to respect the principles of equality and equal opportunities in staff selection and recruitment, and not to condone favouritism, cronyism or nepotism, and to employ staff solely on regular employment contracts.

GMT encourages all staff to listen to and express differing opinions, and to be proactive and willing to seize opportunities as they arise, in order to meet the challenges of the liberalised market with efficiency and competitiveness.

- **efficiency in carrying out its business activities:** GMT conducts its business thanks both to the proven expertise of its staff and to the use of state-of-the-art technology.

The analysis of the needs and feedback of all parties with whom the Company operates in general, and of customers in particular, with specific reference to the various sales channels in which they operate, is considered a valuable benchmark for optimising its production processes.

- **Quality of goods supplied:** GMT, whilst ensuring the cost-effectiveness and quality of the products procured, selects its suppliers based on the principles of commercial integrity and market reputation, in compliance with the required quality standards.

The process of acquiring new suppliers and managing existing ones is based on a specific analysis centred on criteria of transparency, mutual benefit and, in any case, the pursuit of the best possible service to meet customer needs; the quality of goods includes a guarantee of their legal origin. GMT rejects supplies that violate dual-use regulations or that originate from conflict zones in breach of EU regulations.

- **Anti-corruption:** GMT condemns corruption and rejects any act of a corrupt nature towards public officials or public service employees. The fight against corruption extends to practices aimed at obtaining authorisations that derogate from EU sanctions regimes. All dealings with national or European public authorities must be conducted with the utmost rigour, avoiding any pressure aimed at circumventing *compliance* controls.
- **Relations with the Public Administration:** GMT pursues the objective of integrity and fairness in its dealings with public institutions and ensures the utmost transparency, in harmony with the need for organisational and managerial autonomy typical of a business operator. To this end, GMT ensures that relations with representatives of the Public Administration are conducted by persons appointed

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for this purpose and, should GMT use a third party to represent it in dealings with public institutions, that third party will be required to comply with GMT's guidelines and, in any event, must not have any conflicts of interest with GMT. It is prohibited to promise, pay or offer, directly or indirectly, various forms of aid or contributions (e.g. sponsorships, assignments, consultancy, advertising), payments or material benefits (sums of money or goods) of any amount or value to public officials or public servants, in order to influence or reward an act performed in the course of their official duties, or to promote or favour GMT's interests, even where such conduct is intended to circumvent EU restrictive measures or sanctions. Gifts and acts of commercial courtesy or hospitality are permitted only if of modest value and in any case such as not to compromise the reputation of either party, and must always be duly authorised by the relevant company department and properly documented.

- **Privacy:** GMT recognizes the protection of privacy and compliance with relevant laws as a core value.

9. MANAGEMENT OF CORPORATE RELATIONS AND STAKEHOLDERS

9.1 Internal Relations

All GMT staff are required to:

- familiarise themselves with the contents of the Code of Ethics and contact their superiors or the Supervisory Body pursuant to Legislative Decree 231/01 to seek clarification, where necessary, regarding the application of the Code of Ethics;
- report to their superiors or to the internal departments responsible for this, including the Supervisory Body referred to in Legislative Decree 231/01, any possible breach of the provisions of the Code of Ethics or any request to breach it that has been made to them;
- cooperate with the internal departments responsible for this, including the Supervisory Body referred to in Legislative Decree 231/01, to investigate possible breaches of the provisions of the Code of Ethics;
- refrain from conduct contrary to these rules;
- take the immediate and essential corrective measures required by the emergency situation, within the limits of their capabilities;
- refuse gifts, remuneration or benefits, favours or services of any kind from customers or other parties with whom the company has a business relationship, with a view to favouring in any way suppliers

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of goods or services of any kind, or to propose or determine the recruitment, transfer or promotion of employees;

- not to use the company's human resources or assets, nor to use or disclose confidential information, for purposes or interests other than those of the company;
- not to make statements or provide information relating to GMT, unless they are appointed to do so, or are generally or specifically authorised to do so, or are required to do so by a public authority;
- not to conduct business, on their own behalf or on behalf of third parties, in competition with GMT, nor otherwise engage in conduct that gives rise to a conflict of interest, whether actual or potential, with regard to the employer or its shareholders, limited to the scope of the company's corporate purpose; by way of example, the following situations give rise to conflicts of interest:
 - economic and financial interests of the employee and/or their family, or of acquaintances, in the activities of suppliers, customers and competitors;
 - the use of one's position within the company or of information acquired in connection with one's work in such a way as to create a conflict between one's personal interests and the company's interests;
 - carrying out work of any kind for customers, suppliers or competitors;
 - accepting money, favours or benefits from persons or third parties who are, or intend to enter into, business relations with GMT.

Every employee is required to strictly comply with company procedures designed to ensure compliance with European Union restrictive measures. It is strictly forbidden to engage in conduct, even if only through negligence, that could facilitate breaches of international sanctions or cross-border environmental offences. GMT promotes a culture of whistleblowing for any suspicious activity that may constitute a breach of EU regulations, guaranteeing the utmost confidentiality and protection from retaliation.

GMT requires every employee to personally contribute to maintaining a workplace environment that respects the sensitivities of others. It will therefore be considered a conscious assumption of the risk of compromising such environmental characteristics, during the course of work and in the workplace:

- working whilst under the influence of alcohol and/or drugs and/or substances with similar effects, with a blood alcohol level exceeding 0.00 per mille, regardless of any legal limits for non-punishment of such consumption established by law, decrees and regulations;
- consuming or supplying, for any reason, alcohol and/or drugs and/or substances with similar effects whilst on duty.

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Chronic addiction to substances of this nature, where it affects the workplace, shall – for contractual purposes – be treated in the same way as the cases mentioned above.

GMT undertakes to promote the social initiatives provided for in collective bargaining agreements.

GMT undertakes to ensure the participation of corporate bodies in shareholders' meetings by informing them in a timely manner of the agenda and to exercise the utmost transparency in corporate communications and personal relations.

Corporate bodies must comply with the provisions of the Code of Ethics, and GMT requires them, in particular, to:

- awareness of their role;
- informed and consistent participation;
- to conduct themselves with integrity, loyalty and responsibility towards the company, whilst remaining independent of public institutions and private entities;
- declare any conflicts of interest or incompatibilities regarding external or internal roles and/or functions within GMT;
- submit an annual report on the implementation of the Code of Ethics.

9.2 Relations with customers

GMT bases its relations with customers on the principles of legality and transparency.

All employees are required to treat customers with respect and courtesy at all times, regardless of the customers' attitude towards them, to answer their queries, to assist them in exercising their rights and fulfilling their obligations, meeting their needs and expectations and anticipating future needs, without any reticence, and to report any matters deemed appropriate in accordance with the Reporting Procedure. In their dealings with customers, GMT employees are required to:

- comply with internal procedures for managing customer relations;
- provide high-quality services efficiently, contributing to continuous improvement;
- provide accurate, comprehensive and truthful information.

It is prohibited to promise, pay or offer, directly or indirectly, in various forms, contributions or gifts (e.g. sponsorships, assignments, consultancy, advertising), payments or material benefits (sums of money or goods) of any amount or value to customers, in order to promote or favour GMT's interests. Gifts and acts of commercial courtesy or hospitality are permitted only if of modest value and in any case such as not to



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compromise the reputation of either party, and must always be duly authorised by the relevant company department and properly documented.

Any employee who receives explicit or implicit requests for benefits must immediately suspend all business dealings with the requester and report the matter in accordance with the Reporting Procedure.

GMT refuses any transactions with entities included on the EU Restriction Lists (*Asset Freeze*). Prior to any supply, GMT verifies the customer's true identity and the final destination of the goods or services, in order to prevent triangulation aimed at circumventing international sanctions. No business relations will be entered into with customers who refuse to provide the information necessary for the due diligence required by European regulations.

9.3 Relations with suppliers, external collaborators and consultants

It is in GMT's primary interest that all those who enter into business relations with the Company conduct their activities in accordance with the principles and values set out in the Code of Ethics.

GMT therefore includes in its contracts with suppliers, external collaborators and consultants a termination clause in the event of serious or repeated breaches of the principles contained in the Code of Ethics or the commission of an offence under Legislative Decree 231/01, as amended. Any breach of these rules, or inclusion on an international *blacklist*, shall constitute grounds for immediate termination of the contractual relationship.

In their dealings with suppliers, GMT employees are required to:

- comply with internal procedures for the selection and management of relationships with suppliers;
- adopt objective, stated and transparent selection criteria;
- secure the cooperation of suppliers to meet customer needs and ensure the consistent provision of quality services;
- use, to the greatest extent possible and in compliance with applicable laws, products and services offered by the Company's businesses on competitive terms;
- strictly comply with the terms of the contract, maintaining relationships with suppliers in accordance with good commercial practice;
- report any issues arising with suppliers, so as to assess the consequences for the GMT supplier qualification system.

9.4 Relations with political and trade union organisations

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GMT does not make any contributions, whether direct or indirect and in any form, to political and trade union parties, movements, committees and organisations, or to their representatives and candidates, except where required by law.

10. CONFIDENTIALITY

Every GMT employee must ensure the necessary confidentiality regarding any news and information acquired in the course of their duties.

Confidential information relating to GMT's sphere of activity, if made public, could be detrimental to the Company or constitute inside information within the meaning of Article 181 of the Consolidated Law on Finance and Article 66 of Consob Resolution No. 11971 of 14 May 1999 ("inside information").

"Inside" information is defined as any specific information that has not been made public, concerning, directly or indirectly, one or more issuers of financial instruments or one or more financial instruments, which, if made public, could have a significant effect on the prices of such financial instruments for GMT.

In accordance with the "Regulations for the Management and External Disclosure of Confidential and/or Inside Information", should a GMT employee be in possession of confidential information which they consider to fall within the definition of inside information, they must continue to keep such information confidential and promptly inform GMT's body responsible for financial reporting, so that disclosure to the public takes place in compliance with legal provisions.

11. EXTERNAL COMMUNICATION

External communications must be truthful, clear and transparent.

Relations with the *media* are the sole responsibility of the company departments and personnel designated for this purpose.

GMT employees may not provide information to representatives of *the media* nor undertake to provide it without the authorisation of the General Management.

GMT employees may not offer payments, gifts or other benefits intended to influence the professional activities of *the media*.

GMT employees called upon to provide external information regarding the company's objectives, activities and results, through participation in public events, conferences, congresses, seminars or the drafting of articles, essays and publications in general, are required to obtain authorisation from the senior management



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of their organisational unit regarding the texts, reports prepared and communication strategies, agreeing and verifying the content with the relevant company department.

12. ACCOUNTING AND INTERNAL CONTROLS

In order to ensure the reliability of the administrative and accounting system and the accurate representation of GMT's economic, equity and financial position in internal documents, financial statements and other corporate communications, as well as in information provided to investors, the public or the Supervisory Authorities, accounting records must be transparent and based on the truth, accuracy and completeness of the information.

All GMT employees are required to cooperate to ensure that management data is recorded correctly and promptly in the accounts.

Every accounting entry must accurately reflect the supporting documentation.

GMT employees who become aware of omissions, falsifications or oversights in accounting records or supporting documentation must report them immediately in accordance with the Reporting Procedure.

The existence of an adequate system of internal controls is a value recognised by GMT for the contribution that controls make to improving business efficiency.

Internal controls refer to all tools designed to direct, manage and verify business activities, to ensure compliance with laws and company procedures, to achieve the company's objectives, and to provide accurate and complete accounting and financial data.

All GMT employees, within the scope of their duties, are responsible for the definition and proper functioning of the company's control system.

No employee may misuse GMT's assets and resources or allow others to do so.

Auditors shall have unrestricted access to the data, documentation and information necessary for the performance of their audit and review work.

13. REFERENCE, IMPLEMENTATION AND CONTROL STRUCTURES AND REPORTING OF BREACHES

The role of "Code of Ethics Guardian" is carried out by all heads of departments, whose task is to:

- promoting awareness of the contents of the Code of Ethics;
- ensuring the dissemination and constant updating of the Code's contents;
- ensure the interpretation and implementation of the provisions of the Code of Ethics;
- establish criteria and procedures to reduce the risk of breaches of the Code of Ethics;

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- promote and verify knowledge of and compliance with the Code of Ethics both within and outside the company;
- ensure the investigation of any reports of breaches of the Code of Ethics, the assessment of the facts and the application, in the event of a breach of the Code of Ethics, of appropriate sanctions;
- in accordance with the provisions of Article 6, paragraph 2-bis of Legislative Decree 231/01, the recipients of the Code of Ethics may report any breaches or irregularities of the Code of Ethics in accordance with *the Whistleblowing Policy* and the *Code of Conduct* adopted by the C. Stweinweg Group, as well as the General Part of the Model adopted by GMT;
- GMT guarantees that the data provided by the whistleblower to report alleged unlawful conduct – of which they have become aware by virtue of their employment relationship with the company – will be processed for the purpose of carrying out the necessary investigations to verify the validity of the matter reported and to take the appropriate measures. GMT prohibits any acts of retaliation or discrimination, whether direct or indirect, against the whistleblower for reasons related to the report – reference is made to the provisions of the General Model adopted by GMT.

14. CONTRACTUAL VALUE OF THE CODE OF ETHICS

Compliance with the provisions of the Code of Ethics is an essential part of the contractual obligations of GMT employees pursuant to and for the purposes of Articles 2104 and 2106 of the Civil Code (see footnote 1 below).

Breach of the provisions of the Code of Ethics constitutes a breach of the contractual obligations of the employment relationship and may result in the application of disciplinary sanctions in accordance with the provisions of the law, the National Collective Labour Agreement and the disciplinary code referred to in the Model, including with regard to the continuation of the employment relationship, and may entail compensation for damages arising therefrom.

Compliance with the Code of Ethics is also required of:

- directors, who, in the event of non-compliance, are liable under Article 2392 of the Civil Code;
- all third parties with whom the Company has contractual relationships, on pain of termination of the contract itself.

This is without prejudice to the Company's right to claim compensation for all damages caused to it as a result of the aforementioned breach.

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The application of the disciplinary system is independent of the outcome of any criminal proceedings initiated by the judicial authorities in the event that the conduct in question constitutes a criminal offence.

Note 1

“Art. 2104 – Diligence of the employee – The employee must exercise the diligence required by the nature of the work to be performed, the interests of the undertaking and those of national production. He must also comply with the instructions regarding the performance and discipline of work issued by the employer and by the employer’s staff to whom he is hierarchically subordinate”.

“Art. 2106 – Disciplinary sanctions – Failure to comply with the provisions contained in the two preceding articles may give rise to the application of disciplinary sanctions, depending on the seriousness of the offence.”

“Art. 2392 – Liability towards the company – Directors must fulfil the duties imposed on them by law and the articles of association with the diligence required by the nature of the office and their specific competences. They are jointly and severally liable to the company for any damage arising from failure to comply with such duties, unless such duties fall within the remit of the executive committee or are functions specifically assigned to one or more directors. In any event, without prejudice to the provisions of the third paragraph of Article 2381, directors shall be jointly and severally liable if, being aware of prejudicial facts, they have not done everything in their power to prevent their occurrence or to eliminate or mitigate their harmful consequences. Liability for the acts or omissions of directors shall not extend to any director who, being free from fault, has promptly recorded his or her dissent in the minutes of the board meetings and resolutions, and has immediately notified the chairman of the board of statutory auditors in writing.”

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