

ETHICAL CODE 2023



IMPORT & EXPORT S.R.L.

AUGUST 4 2023

TAV METALLI IMPORT & EXPORT S.R.L.

Vers. 1



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INTRODUCTION

Since its creation TAV Metalli Import & Export S.r.l. (hereinafter "TAV Metalli" or "Company") has wanted to be inspired by the principles of ethical integrity and has therefore considered it appropriate to provide the Company with a Code of Ethics, that is, a company document that represents the Charter of Rights and Moral Duties and that defines the ethical-social responsibility and the principles of each component of the company organization, as well as external collaborators and any person who collaborates in any capacity with the Company.

This Code of Ethics collects the principles and general rules of conduct that must be observed in order to guarantee the reputation, reliability and proper functioning of TAV Metalli.

The behavior of anyone who seeks to appropriate the benefits and collaboration of others, exploiting positions of power or strength, is not ethical.

The Company has decided to act in a market in which the principles of capacity, legitimacy and fairness prevail.

TAV Metalli is aware that unethical behavior in the conduct of business compromises the reputation of the same. Therefore, this Code of Ethics is valid both in Italy and abroad.

The Code expresses the ethical responsibilities and commitments to which TAV Metalli intends to direct, as applicable, its behavior.

In compliance with this Code of Ethics, the Company binds the conduct of the director, managers, all employees and collaborators of the Company.

1 PREMISE AND PURPOSE OF THE CODE OF ETHICS

The Code of Ethics is the corporate document that represents the Charter of Rights and Moral Duties that defines the ethical-social responsibility and the principles of each component of the corporate organization of the Company TAV Metalli Import & Export S.r.l.

It is an effective mean of preventing irresponsible or possibly unlawful behavior by those who work in the name and on behalf of the company because it introduces a clear and explicit definition of the responsibilities of each company operator towards those who are directly or indirectly involved in the company's activity, namely customers, suppliers, partners, employees, collaborators, public institutions, and anyone else affected by the activity of the company. Its recipients are called to strict and integral respect for the values and principles contained therein and are required to protect and preserve, through their behavior, the respectability and image of TAV Metalli, as well as the integrity of its economic, social and human heritage.

However, the Code of Ethics does not replace and does not prevail over the laws in force and the National Collective Labor Agreement in place, which retain their express and fundamental effectiveness and value.

Through the Code of Ethics, TAV Metalli intends in particular:

- define and explain the values and general ethical principles that inform its business activities and relations with customers, suppliers, partners, employees, collaborators, administrators, public institutions and any other subject involved in the company's activity;
- formalize the commitment to behave on the basis of the ethical principles of moral legitimacy, fairness and equality, protection of the person, diligence, transparency, honesty, confidentiality, impartiality, health protection;
- indicate to its employees, collaborators and directors the principles of conduct, values and responsibilities of which it requires timely compliance during the provision of work performance;
- define the implementation tools and the implementation methodology.

2 COMPANY COMMITMENTS

In the awareness of its responsibilities, and inspired by the principles contained in this Code of Ethics, TAV Metalli undertakes to orient its activity to the values of honesty, integrity in the pursuit of company objectives, loyalty, fairness, respect for people and

rules and mutual collaboration. In responsibly conducting the company for the pursuit of value creation objectives, the director undertakes:

- to ensure the maximum dissemination of the Code of Ethics among employees and external collaborators;
- to provide any possible clarification regarding the interpretation and implementation of the rules of the Code of Ethics and in particular with regard to its application in company procedures;
- to carry out checks on any news of violation of the rules of the Code of Ethics and, in case of ascertained violation, to adopt the appropriate sanctioning measures;
- to adopt all the safety measures required by technological developments and to ensure that the physical integrity and moral personality of the workers is guaranteed.

TAV Metalli also guarantees the protection and safety in the workplace for its staff and for third parties, committing itself to compliance with the legislation on safety at work; ensures the protection of the principle of equal opportunities and manages career and salary advancement on this basis, in a continuous and balanced comparison with the reference market, committing itself to ensuring transparency, seriousness, correctness and clarity on the evaluation methods applied.

It also undertakes to operate in compliance with the laws in force on environmental matters.

The principle that inspires TAV Metalli stems from the desire to create, offer and maintain a healthy environment within the company.

3 THE RECIPIENTS OF THE CODE OF ETHICS

This Code of Ethics is addressed to all those who work and collaborate, for any reason, with TAV Metalli and, in general, to all those with whom they come into contact in the course of their activity (here in after "Recipients") with the Company.

All Recipients of this Code of Ethics are required to observe, in any situation and context, the contents and inspiring principles within the scope of their specific functions, attributions and activities.

The director of the Company is required to be inspired by the principles of the Code of Ethics and must comply with it, in setting company objectives, in proposing and implementing projects, actions and investments useful for increasing the economic value

of the company and the well-being of its employees, customers and suppliers in the long term.

In the same way, managers and sector leaders must assume responsibilities internally and externally, strengthening trust, cohesion and team spirit, with an explicit prohibition on resorting to illegitimate favoritism, collusive practices, corruption and / or solicitation of personal advantage for themselves or for others.

The employees of the company must commit themselves to compliance with the laws and regulations in force in the national territory and in compliance with the rules applicable in all the countries in which it operates, with fairness and transparency in the conduct of business. In the presence of doubts and perplexities about how to proceed, they will have to ask their superiors to offer the necessary directives and operational information.

4 DISSEMINATION AND KNOWLEDGE OF THE CODE OF ETHICS

TAV Metalli undertakes to ensure the maximum dissemination of this Code of Ethics by providing for every useful cognitive tool and to carry out a process of awareness of its contents, as well as to constantly verify the degree of compliance within the Company itself, as well as taking care to update this Code in line with organizational developments, commercial and financial of the Company.

Each recipient of this Code of Ethics is expressly required to know the content, to actively contribute to its implementation and to report any shortcomings and violations. In particular, employees are obliged to promptly report to the Director any news they learn about the violation of the rules of the Code of Ethics, so that the company can promptly prepare all the necessary protection initiatives and all the interventions that are in any case useful to bring the work back to the rules of ethics and to restore compliance with the law, in case of violations.

5 ETHICAL PRINCIPLES

TAV Metalli acts in its business activity respecting the ethical principles established by this Code, as an essential condition for achieving the primary objective of the Company, protecting the fundamental rights and moral integrity of each individual and ensuring equal opportunities.

Internally, TAV Metalli wishes to maintain a serene work environment, in which everyone can work in compliance with the laws, principles and shared values; in particular, it does

not tolerate any form of isolation, exploitation or harassment for any cause of discrimination, for personal or work reasons. It is therefore expressly forbidden any type of discrimination based on diversity of race, language, color, faith and religion, political affiliation, nationality, ethnicity, age, sex and sexual orientation, marital status, disability and physical appearance, economic and social condition; concessions of any privilege related to the reasons listed above are also prohibited, without prejudice to the provisions of current regulations. TAV Metalli prohibits any disciplinary sanction against those who have legitimately refused a work requested by any person linked to it.

TAV Metalli also believes that compliance with the ethical principles established by this Code is an essential condition for achieving the creation of economic value, for collaborators and employees, as well as for customers and the community as a whole.

For these reasons, business strategies (economic and financial) and operational conduct are inspired by transparency, fairness and efficiency in the use of resources.

To achieve the objectives, TAV Metalli complies with the following ethical principles:

5.1. LEGALITY:

The Company undertakes to conduct its activities in compliance with EU and national regulations, rejecting corruption, forms of money laundering, and any illegal practice even in the forms of conduct that directly or even indirectly can integrate forms of collaboration with criminal associations, however called.

The company's administrator, management, employees and collaborators, as part of their professional activity, are required to diligently comply with current legislation, this Code of Ethics and internal protocols and regulations, where established.

It is expressly forbidden any and all transactions that may result in the use of money, goods or utilities of illicit origin as well as any activity and / or form of money laundering. The pursuit of an interest of the Company cannot be considered, in any case, an exemption from non-compliance with the law, nor can it justify an honest and transparent conduct.

5.2. FAIRNESS, TRANSPARENCY AND OBJECTIVITY:

In relations with third parties, the Company follows the principles of maximum transparency and fairness, also in order to put its interlocutors in a position to make autonomous decisions, aware of the interests involved and the relevant consequences.

To this end, the Company, and with it its employees and collaborators, undertakes to provide complete and transparent information, as well as comprehensible and accurate.

5.3. LOYALTY IN THE EXERCISE OF COMMERCIAL ACTIVITY:

Respect for the ethical principles of transparency, honesty, fairness, are placed to protect the market and the good faith of third parties, to guarantee the values of fair competition and commercial loyalty.

5.4. IMPARTIALITY:

The Company considers the impartiality of treatment a fundamental value in the performance of any internal and external relationship, therefore it rejects and contrasts any discrimination with regard to age, sex, state of health, race, nationality, political opinions and religious beliefs of all its interlocutors.

5.5. RECIPROCATION

The Company requires that suppliers and all those who maintain relations with the same, have a conduct in line with the principles set out in this Code of Ethics.

5.6. DILIGENCE, EFFICIENCY AND PROFESSIONALISM:

TAV Metalli considers it important to provide high quality services to the subjects with whom it has relationships. To this end, management, employees and collaborators must perform their professional services with the utmost diligence, accuracy and professionalism, acting with the principles expressed in this Code of Ethics.

5.7. RESPECT FOR THE VALUE OF THE PERSON AND HUMAN RESOURCES:

TAV Metalli considers the individual, his values and rights, intangible values to be protected. Therefore, it affirms respect for the person and his dignity, condemning any harmful, offensive and/ or abusive behavior, psychological and physical harassment or sexual harassment.

Human resources are recognized as an indispensable and fundamental element for the achievement of the objectives pursued.

Its employees and collaborators have the widest freedom of expression of their ideas and beliefs, in compliance with company regulations, the rights and dignity of others and orderly coexistence in the workplace.

The criteria of fairness, collaboration, loyalty and mutual respect must also shape relations with third parties unrelated to the Company.

5.8. RISK MANAGEMENT:

TAV Metalli intends to increase in its employees a sensitivity to the risks underlying their daily operations. This awareness must shine through in the concrete behavior of each one. There must be a widespread perception of how the internal control system concretely safeguards these risks without harmful overlaps or culpable gaps.

5.9. PROTECTION OF HEALTH AND SAFETY AT WORK:

The utmost commitment is guaranteed to comply with current legislation in the workplace and to work to preserve, especially with preventive actions, the health and safety of workers.

To this end, the internal structure, attentive to the evolution of the reference scenarios and the consequent change in risks, carries out technical and organizational interventions, through:

- the introduction of a risk and safety management system;
- a continuous analysis of the risk and criticality of the processes and resources to be protected;
- the adoption of the best solutions, the best methods and timing of work.

5.10. PRIVACY POLICY:

The Company ensures and guarantees full compliance with the rules for the protection of privacy, adopting and implementing appropriate procedures and effective management tools.

The privacy of collaborators, suppliers and customers is protected by adopting standards that specify the information that TAV Metalli requests from them and the related methods of treatment and storage, being excluded any investigation on the ideas, preferences, personal tastes and private life of collaborators and third parties. These standards also provide for the prohibition, without prejudice to the hypotheses provided for by law, to communicate / disseminate personal data without the prior consent of the

interested party and establish the rules for the control, by each owner, of the rules to protect privacy; in the case of processing of sensitive data, pursuant to Legislative Decree 196/2003, TAV Metalli adopts all the necessary precautions and obligations prescribed by law.

5.11. CONFIDENTIALLY:

TAV Metalli ensures the utmost confidentiality of the information in its possession and refrains from seeking confidential data, except in the case of express and conscious authorization of the interested party and in accordance with the legal regulations in force.

In addition, employees and collaborators of the Company are required to maintain confidentiality on confidential information acquired by customers or which they have due to their function, therefore they will not be able to disclose it to third parties or make improper use of it.

5.12. COMBATING MONEY LAUNDERING, RECEIVING STOLEN GOODS AND COUNTER-TERRORISM:

The members of the Company, employees and collaborators of the same, are required to comply with all the rules and provisions, both national and international, as well as internal procedures to prevent money laundering, receiving stolen goods and terrorism. TAV Metalli undertakes to refuse to carry out suspicious transactions in terms of fairness and transparency in all the States in which it operates.

The Recipients are therefore required to check in advance the information available on commercial counterparties, suppliers, partners, collaborators and consultants, in order to ascertain their respectability and the legitimacy of their activity before establishing business relationships with them. Furthermore, they must avoid any involvement in operations that are likely, even potentially, to promote terrorism or money laundering from illegal or criminal activities, and act in full compliance with internal control legislation and procedures.

5.13. CONFLICT OF INTEREST:

In conducting any activity each person involved must avoid any conflict between his personal, social, financial or political interest and the progress of the business interests

of the Company or its customers and suppliers. It is necessary to act in favor of the Company in a way that increases and does not damage its reputation.

5.14. MANAGEMENT:

The Company guarantees to operate with seriousness and correctness, ensuring strict control over the work activity.

6 RELATIONS WITH THIRD PARTIES

TAV Metalli promotes, as far as possible and in compliance with company procedures, customer satisfaction, guaranteeing adequate quality standards of the services offered, engaging in periodic monitoring of the same.

6.1. RELATIONS WITH PUBLIC INSTITUTIONS:

TAV Metalli pursues the objective of maximum integrity and correctness, in compliance with the provisions of the law and compliance with the principles of this Code.

Acting in compliance with the law, it favors and collaborates with public administrations and institutions also during investigations and inspections.

When the Company uses third parties to be represented, they are required to strictly comply with the principles of the Code and the rules of conduct.

6.2. RESPECT FOR COMPETITION, CUSTOMERS AND SUPPLIERS:

TAV Metalli believes it is of fundamental importance to develop relationships with counterparties of excellent reputation and consolidated experience, setting up these relationships in compliance with current regulations and the principles of this Code of Ethics, as indispensable tools for the development of the economic system.

TAV Metalli promotes transparent and collaborative agreements, enhancing synergies and committing itself not to exploit situations of dependence or weakness of the counterparty, from which it expects an identical behavior.

In the supply of goods and services, TAV Metalli operates in compliance with the regulations, the principles of this Code and the internal procedures adopted.

Those in charge of relations with suppliers and customers must proceed with the selection of the same and the management of the related relationships according to

criteria of impartiality and correctness, avoiding situations of conflict of interest, even potential, with them. It is in any case forbidden to promise or pay sums of money or other benefits to representatives and / or employees of suppliers or potential suppliers (or to people close to them) with the aim of promoting or favoring the interests of TAV Metalli, even as a result of unlawful pressure.

6.3. COMPLIANCE WITH THE REGULATIONS IN FORCE IN THE COUNTRIES IN WHICH THE COMPANY OPERATES:

The Company has as a mandatory principle the respect of the laws and regulations and rules in force in all the countries in which it operates. Under no circumstances can the pursuit of the Company's interest justify non-honest conduct.

6.4. CYBERSECURITY:

The personnel involved in any capacity in the operations of management of the computer data of TAV Metalli and the use of the software available, as well as those who are authorized to use the Internet navigation tools, are required to use data, computer equipment and software within the limits strictly necessary for the execution of the activities (administration, database management, etc.), the practices and work to be carried out and developed. The IT activity must be carried out by each subject using their credentials and refraining both from accessing computer systems through credentials or authorizations of third parties, and from providing any other subject with their credentials to access computer systems. Staff must refrain from carrying out fraudulent computer activities.

7 MARKETING ACTIVITIES AND SPONSORSHIPS

In the marketing activity, TAV Metalli undertakes to provide only information corresponding to reality, respecting the rules on Privacy, equipping itself with technological tools to avoid that during the sending of emails files containing computer viruses are not attached. For marketing activities, the Company may make gifts of small commercial value.

It may also initiate sponsorships for events that offer guarantees of quality and seriousness.

8 EXTERNAL COMMUNICATIONS

Any external communication of documents and information concerning TAV Metalli, must take place in compliance with the laws, regulations and professional conduct practices in force. It is however forbidden to disclose confidential information acquired in the performance of company activities, false or tendentious news concerning TAV Metalli or other subjects with whom the Company relates, of any form of pressure aimed at acquiring favorable attitudes by the organs of communication / information to the public.

9 VIOLATIONS OF THE CODE OF ETHICS AND DISCIPLINARY MEASURES

It is TAV Metalli's intention to preserve the credibility and appreciation of customers and suppliers. Unethical or illegal behavior would determine for the company the damage of the fiduciary relationship with very serious damage to the image, reputation and credibility. Therefore, the administrator, all employees and collaborators are required to comply with this Code of Ethics in all respects. Compliance with the rules of this Code is an essential part of the contractual obligations of the workers (employees and collaborators) of TAV Metalli, pursuant to and for the purposes of Articles 2104 and 2106 of the Italian Civil Code.

The violation of these provisions constitutes a breach of contractual obligations and may determine, depending on the case, the application of sanctions and disciplinary measures provided for by the Collective Agreement applied, the termination of the relationship, compensation for damages.

TAV Metalli will take appropriate action against those whose actions have been found to be in violation of this Code of Ethics.

At the Company's sole discretion, disciplinary action may include written relief, suspension or immediate termination of employment or business, or any other disciplinary action deemed appropriate by the circumstances.

Violations of this Code of Ethics may also be prosecuted civilly and / or criminally by administrative authorities or other authorities and the Company may take legal action for compensation of damages.

10 FINAL PRINCIPLES

The rules contained in this Code of Ethics are not an exhaustive list of the rules adopted by TAV Metalli, nor an exhaustive list of the types of conduct that can be followed by disciplinary measures, including dismissal.

This Code of Ethics is applied to all employees (hired or to be hired) upon specific acceptance.

11 APPROVAL AND EFFECTIVE DATE OF THE CODE OF ETHICS

This Code of Ethics is approved today and adopted by TAV Metalli Import & Export S.r.l. with effect from 01 September 2023.

In faith,

Maurizio Tavini
Sole Director