

CODE OF ETHICS

2021 EDITION

Acciaierie  **di Sicilia**

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INTRODUCTION

This Code of Ethics outlines the values and commitments upon which Acciaierie di Sicilia plans to base its business operations and relationships with stakeholders, in accordance with the company's mission and the social, economic, environmental and cultural context in which it operates.

By formally adopting these principles, Acciaierie di Sicilia is demonstrating its need, commitment and desire to combine sound business management with respect for people and the surrounding environment when pursuing its objectives.

The Code of Ethics applies to Acciaierie di Sicilia and any of its subsidiaries, and is to be observed by all company employees and collaborators. Furthermore, Acciaierie di Sicilia requires all associate companies, subsidiaries, major suppliers and customers to operate in line with the code's general principles.

This Code of Ethics is applicable in Italy and abroad in consideration of the cultural, social and economic diversity of the countries in which Acciaierie di Sicilia operates.

COMPANY MISSION

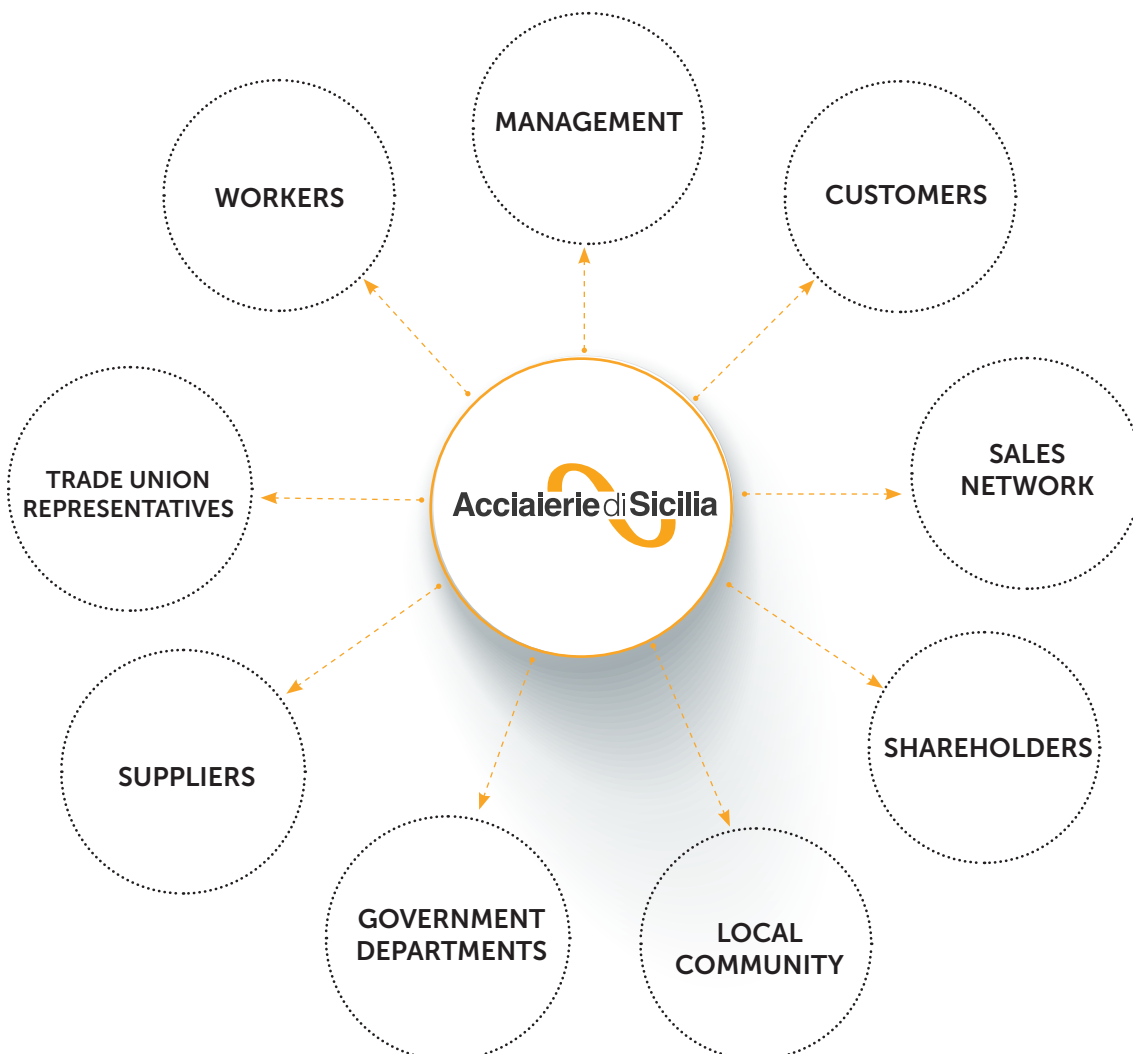
Facilitate the growth of a sustainable business, by producing and developing steel products in line with optimal working conditions and minimising the environmental impact of our operations.

DEFINITION OF STAKEHOLDERS

Acciaierie di Sicilia believes that achieving its objectives means establishing and developing positive ethical relationships with its stakeholders, namely Italian or foreign private and public parties directly involved in company business, or directly/indirectly affected by it.

Stakeholders therefore include shareholders, management, employees, collaborators, customers, suppliers and business partners. In the wider sense, stakeholders also include individuals, groups and organisations representing them whose interests are directly/indirectly affected by Acciaierie di Sicilia operations. This may include local and national communities in which Acciaierie di Sicilia operates, union organisations, environmental organisations, future generations etc.

MAP OF ACCIAIERIE DI SICILIA STAKEHOLDERS



UNETHICAL CONDUCT

In business operations unethical conduct will compromise the relationship of trust between Acciaierie di Sicilia and its stakeholders. As a general rule, the conduct of an individual or organisation that involves obtaining additional benefits from a collaboration by abusing a position of power shall constitute unethical conduct and encourage hostile behaviour towards the company.

BASIC VALUES

COOPERATIVE APPROACH

Acciaierie di Sicilia aims to maintain and develop a relationship of trust with its stakeholders, i.e. the individuals, groups or organisations whose input is necessary for achieving company objectives, or who have a stake in their achievement.

PROPRIETY

Situations in which parties involved in business transactions have or appear to have a conflict of interests must be avoided when undertaking any activity. This includes cases in which a collaborator pursues an interest that differs to the company mission and balancing stakeholder interests, or gains personal benefit from company business opportunities, and cases in which the representatives of customers, suppliers or government departments operate in conflict with the duties of trust relating to their position in relationships with Acciaierie di Sicilia.

IMPARTIALITY

Acciaierie di Sicilia does not discriminate on the basis of age, gender, sexual orientation, health, race, nationality, personal opinion or faith in decisions that affect stakeholders (customers, relationships with associates, personnel management, allocation of duties, supplier selection and management, relationships with local communities and their representative organisations).

INTEGRITY

All actions carried out by corporate governing bodies, employees and external collaborators must comply with existing legislation and standards, and be based on principles of the utmost integrity, objectivity, loyalty and transparency. All company resources and assets must be used efficiently and according to their intended use. The company uses organisational tools designed to prevent employees and collaborators from breaching principles of integrity, transparency and lawfulness and monitors compliance.

STRUCTURE OF THE CODE OF ETHICS

The code of ethics is split into the following sections:

- **Part 1:** general principles in relationships with stakeholders, with the definition of the basic values that underpin Acciaierie di Sicilia operations;
- **Part 2:** principles of conduct in relation to stakeholder category, with specific guidelines and standards which Acciaierie di Sicilia collaborators must observe to comply with the general principles and prevent unethical conduct;
- **Part 3:** implementation mechanisms describing the system to monitor compliance with the code of ethics and its ongoing improvement.

PART 1: GENERAL PRINCIPLES

CONFIDENTIALITY

Acciaierie di Sicilia ensures the confidentiality of the information in its possession in accordance with current national legislation on the protection of personal data.

Employees and collaborators shall keep confidential the news and information acquired when performing their activities and which are not subject to disclosure in accordance with laws and regulations, with particular reference to:

- know-how and everything protected by industrial secrecy
- business, strategic, economic, financial, accounting, commercial, management and/or operational plans
- projects and investments
- company production, operating and productivity parameters
- corporate agreements and commercial contracts.

In addition, Acciaierie di Sicilia employees and collaborators are required not to use confidential information for purposes that are not related to their own duties.

OPTIMISING SHARE INVESTMENT

Acciaierie di Sicilia endeavours to ensure that its economic/financial performance safeguards and increases the value of the business, in order to sufficiently remunerate the risk that shareholders assume by investing their capital.

VALUE OF HUMAN RESOURCES

Acciaierie di Sicilia employees and collaborators constitute an indispensable element for the company's success. As a result, the company protects and develops human resources in order to improve and enhance individual skills and hence company assets and competitiveness.

FAIR TREATMENT

When managing contractual agreements that involve a hierarchical relationship, especially in relation to employees, Acciaierie di Sicilia is committed to applying principles of fair treatment and integrity, and preventing any abuse of power. In particular, Acciaierie di Sicilia undertakes to ensure that treatment does not involve exercising power that is detrimental to employee autonomy or dignity, and that work organisation decisions safeguard self-worth.

PERSONAL INTEGRITY

Acciaierie di Sicilia ensures that the physical and moral integrity of employees and collaborators is safeguarded, and provides safe, healthy workplaces and conditions that guarantee personal dignity. Therefore requests or threats designed to persuade individuals to act illegally or in breach of the code of ethics, or to use conduct that is detrimental to personal beliefs or moral choices, will not be tolerated.

INFORMATION TRANSPARENCY AND COMPLETENESS

Acciaierie di Sicilia undertakes to provide complete, transparent, comprehensible and accurate information such that stakeholders, when establishing relationships with the company, can make autonomous decisions with an awareness of the interests involved, the alternatives and significant consequences. In particular, when agreeing contracts, Acciaierie di Sicilia clearly and comprehensively specifies the conduct to be adopted by contracting parties in all expected circumstances.

DILIGENCE AND CARE IN EXECUTING CONTRACTS AND RESPONSIBILITIES

Contracts and work agreements must be carried out as knowingly stipulated by the parties. Acciaierie di Sicilia shall not exploit a lack of knowledge or inability of its counterparts.

INTEGRITY AND FAIRNESS WHEN MANAGING AND RENEGOTIATING CONTRACTS

Anyone operating in the name or on behalf of Acciaierie di Sicilia must avoid profiting from contractual omissions or unexpected events in existing relationships, with the sole aim of renegotiating the contract to exploit the reliance or weakness of a party's circumstances.

PRODUCT AND SERVICE QUALITY

Acciaierie di Sicilia gears its operations to satisfying and safeguarding customers by welcoming requests that can improve product and service quality. As a result, Acciaierie di Sicilia models its research, development and marketing operations on high standards of product and service quality.

FAIR COMPETITION

Acciaierie di Sicilia safeguards the importance of competition by refraining from practices that constitute unfair competition.

PART 1: GENERAL PRINCIPLES

SOCIAL RESPONSIBILITY

Acciaierie di Sicilia is aware of the direct and indirect effect that company activities can have on the conditions, economic and social development, and general wellbeing of society, in addition to the importance of a good reputation within the communities where it operates. For this reason, Acciaierie di Sicilia aims to make environmentally sustainable investments in full consideration of local communities, also supporting initiatives with cultural and social value in order to improve its reputation and social standing.

SAFEGUARDING THE ENVIRONMENT

The environment is a valuable resource that Acciaierie di Sicilia is committed to safeguarding, and the company plans activities by striving for balance between economic initiative and environmental requirements, out of consideration for future generations. Acciaierie di Sicilia therefore undertakes to improve the impact of its business operations on the environment and landscape, and to prevent risk to communities and their surroundings not only in line with legislation, but also according to technological development and the best industry practices.

SAFEGUARDING HEALTH AND SAFETY

Acciaierie di Sicilia SpA operates in compliance with the safety legislation issued via legislative decree 81/2008 and subsequent amendments, and has established its own governance model in line with prevention and continuous improvement objectives.

PART 2: PRINCIPLES OF CONDUCT IN EXTERNAL AND INTERNAL RELATIONSHIPS

PRINCIPLES OF CONDUCT IN RELATIONSHIPS WITH SHAREHOLDERS

With regard to its shareholders, Acciaierie di Sicilia is committed to:

- optimise investments while implementing socially responsible management that complies with international diligence criteria;
- operate such that company resources are safeguarded, avoiding improper use that could result in loss or reduce efficiency, while prioritising company interests over those of individual shareholders;
- keep all information relating to corporate business strictly confidential;
- provide all shareholders, including minority shareholders, with clear, comprehensive and timely information on company strategies, in accordance with their rights, such that they receive the same information to freely make responsible decisions;
- guarantee the reliability of accounting information, which must represent the business situation correctly and provide tools for identifying and preventing financial and operational risks;
- facilitate communication between management bodies and shareholders' meetings, ensuring that these meetings are implemented satisfactorily and are attended by management body representatives.

PRINCIPLES OF CONDUCT IN RELATIONSHIPS WITH EMPLOYEES AND COLLABORATORS

With regard to its employees and collaborators, including executive personnel, Acciaierie di Sicilia undertakes to:

- only recruit the resources required to meet concrete and contingent company requirements, on the basis of the profile required to fill a vacancy and in line with an equal opportunities policy, avoiding favouritism and discrimination relating to non-professional factors;
- provide a nurturing work environment based on continuing professional development and skills acquisition, where the abilities and knowledge of each individual can be optimised and increased on an ongoing basis;
- develop a culture of health and safety in the workplace;
- remunerate employees and collaborators accordingly and adequately in relation to their duties, paying incentive benefits solely in relation to the criticality of the role held and the corresponding responsibilities;
- foster a harmonious, harassment-free work environment based on mutual respect, appropriate conduct and communication;
- discipline employees or collaborators who abuse their position to request favours from subordinates, or who act illegally or in breach of the principles contained in this Code of Ethics.

PART 2: PRINCIPLES OF CONDUCT IN EXTERNAL AND INTERNAL RELATIONSHIPS

PRINCIPLES OF CONDUCT IN RELATIONSHIPS WITH CUSTOMERS

Relationships with customers must be based on the utmost professionalism and competence, with any information obtained kept strictly confidential. In order to safeguard the company's reputation, every relationship must be conducted in accordance with legislation and principles of transparency and autonomy.

Contact with parties implicated in activities which are illegal or do not meet requirements of professionalism and reliability must be avoided, in addition to relationships with third parties carrying out activities that are detrimental to the environment, health and human rights.

PRINCIPLES OF CONDUCT IN RELATIONSHIPS WITH SUPPLIERS

Similar principles must be applied to relationships with suppliers. Particular focus must be put on the quality of services provided and how they are implemented. Suppliers are selected on the basis of their credentials, considering factors such as quality, innovation and market reputation, and priority is given to suppliers with policies to safeguard the environment.

PRINCIPLES OF CONDUCT IN RELATIONSHIPS WITH THE COMMUNITY

• *Environmental policy*

Acciaierie di Sicilia has defined an environmental policy through system definition in accordance with standard UNI EN ISO 14001. The company fully complies with environmental legislation, and is committed to preventing the contamination of nature and protecting the environmental landscape of the industrial location.

• *Occupational health and safety policy*

Acciaierie di Sicilia has defined the occupational health and safety policy by establishing a system in accordance with the BS OHSAS 18001 standard. Acciaierie di Sicilia seeks full compliance with the regulations in force on health and safety in the workplace, striving to ensure adequate control in this field and the prevention of situations that may be hazardous for workers.

• *Relationships with government departments*

Relationships of any kind with government departments and similar organisations are based on ethical conduct and the utmost integrity.

In particular, it is prohibited to give public officials, or their relatives, gifts of any kind which could influence decisions or ensure any type of benefit for Acciaierie di Sicilia.

Acciaierie di Sicilia also undertakes to fully collaborate with public officials with whom the company is in contact, gathering, processing and promptly providing any information requested, and operating with maximum transparency and clarity to ensure that authorities are not deceived or misled.

PART 3: IMPLEMENTATION METHODS

SUPERVISORY BODY

Acciaierie di Sicilia has set up an internal supervisory body, which is tasked with overseeing the implementation and observation of this Code of Ethics and the Organisational, Management and Control Model established in accordance with the requirements of legislative decree 231/01.

Its duties include the following:

- overseeing the distribution of and compliance with the Code;
- coordinating the company procedures that implement the contents of the Code;
- suggesting changes to the contents of the Code and the implementation mechanisms;
- regularly reporting to the Board on actions taken and issues that transpire.

The Supervisory Body may enlist the support of external professionals when carrying out the aforementioned activities.

Any breach of the Code, however it comes to light, must be reported to the Supervisory Body. The Supervisory Body will protect anyone reporting breaches from potential reprisals, and keep their identity confidential, subject to legal obligations.

Any breach of the Code of Ethics shall constitute non-fulfilment of contractual obligations by employees or collaborators, and be dealt with in accordance with legal and contractual stipulations.

PART 3: IMPLEMENTATION METHODS

PUBLICATION

The Code of Ethics is made available to all stakeholders requesting it at company headquarters.

It can also be viewed on the company's website. (www.alfaacciai.it)

In order to maximise understanding of the Code's contents among directors, employees and collaborators, Acciaierie di Sicilia plans regular training sessions and updates, which are organised in relation to the department and role of participants.

Acciaierie di Sicilia works to inform all employees and collaborators of the requirements of the Code of Ethics and its implementation through a communication action plan, and highlights the need for compliance with the Code. In particular, the company focuses on interpreting and clarifying the principles and requirements of the Code, checking that it is observed, updating its principles in line with requirements that transpire in different contexts and settings (e.g. company organisation, industry, market).