

Code of Conduct Metaltex Group



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MESSAGE FROM THE CEO

Dear Colleagues,

Present on the market since 1945 we have always had a behaviour based on fairness and transparency till the present day and that will allow us to face the future.

We are an innovative company that believes it must respect its stakeholders: Customers, Suppliers, and Colleagues. We are aware of our duties towards the environment and the community around us.

Our decisions and actions in all our daily activities must be based on fundamental values such as responsibility, reliability, and consideration for others. It is our duty to abide by laws, internal regulations, and ethical principles. Illegal and unethical behaviour are not acceptable.

We have developed this Code of Ethics that we must always abide by. It is very important that all of you are convinced of the validity of our fundamental ethical values.

I am counting on your help in achieving success in this important area as well.





PREMISE

The company Metaltex (hereinafter referred to as the "Company") ensures conditions of fairness and transparency in the conduct of business and corporate activities to protect its position and image, the expectations of its members and the work of its employees. The Company acts in accordance with the legitimate interests of the communities in which it is present with its activities and has developed its Code of Ethics ((hereinafter referred to as the "Code").

The Code contains ethical values and guidelines of conduct to which all those who work in the name and on behalf of the Company, in conducting their activities, must comply.

This will guarantee a dual function: the dissemination of homogeneous and transparent criteria for the performance of company activities, as well as creating a system suitable for the prevention of crimes in the field of administrative liability.

This document reports the lines of conduct of those who, for various reasons, work with the Company and is therefore addressed to Directors, Management and Control Bodies, Employees, Consultants, Collaborators, Agents, third parties who operate on behalf of and/or in the name of the Company (hereinafter, by convention, jointly referred to as "Collaborators").

These subjects are obliged to comply with the laws in force and the specific sector regulations, the contractual rules and all the principles established for Collaborators.

The Company undertakes to ensure that its activities are conducted in compliance with the values on which this Code is based.

All actions and in general all the conduct of Collaborators regarding the activities conducted in the exercise of their functions must be based on the utmost legitimacy, correctness, transparency, and truthfulness, even outside the workplace, to avoid situations that could lead to behaviour that does not comply with the moral values of the Company.

All business activities must be conducted with the utmost diligence, honesty, loyalty, and professional rigor, in compliance with the laws, procedures and company regulations.



METALTEX'S COMMITMENT TO ITS ACTIVITIES

Fair Competition

The Company's personnel who do business with third parties must relate to them in an ethical, fair, and impartial manner.

These principles are valid for customers, suppliers, consultants, and persons who conduct any activity directly for or on behalf of the Company. In particular, the selection of suppliers, the formulation of the conditions for the purchase of goods and services for the Company are dictated by values and parameters of competition, objectivity, fairness, impartiality, equity, price, quality of goods and service, guarantees of assistance and in general an accurate and precise evaluation of the offer.

Customer Relations

The primary purpose of the Company in conducting its activities is the protection of the Customer's rights. Each Customer or category of Customers are given care and attention, without any discrimination.

In relations with customers, and in general in external relations maintained during their work, each Collaborator conforms his conduct to criteria of courtesy, collaboration, and transparency. Any complaints will be dealt with the utmost promptness and attention. If the complaints are proven, it will be the responsibility of the competent offices to promptly identify appropriate solutions to the settlement of the dispute.





Selection of Suppliers and Fair Treatment of Suppliers

The Company promotes and conducts a careful policy in the choice of its Suppliers, creating relationships that lead to the creation of value. Relations with Suppliers are managed, in compliance with the principles of correctness and impartiality and in accordance with internal procedures and delegated powers.

The choice of suppliers and the purchase of goods and services are made based on objective assessments of competitiveness, quality, cost-effectiveness. The selection process of Suppliers will also consider their appreciation on the market, their ability to meet current regulatory obligations (example: work safety, supervisory regulations, confidentiality, etc.) and the possession of Quality Certifications.

Conflict of Interest

There is a relationship of full trust between the Company and its Collaborators, in which it is the primary duty of each one to use the company's assets and their work skills for the realization of the corporate interest, in accordance with the principles set out in the Code, which represent the values that inspire the Company.

In this perspective, all Collaborators, also in compliance with the current collective contractual provisions, avoid any situation and refrain from any activity that may oppose a personal interest to those of the company or that may interfere

and hinder the ability to take, impartially and objectively, decisions in the interest of the company. The occurrence of situations of conflict of interest, in addition to being in contrast with the law and with the principles established in this Code, is detrimental to the image and integrity of the company.





Competition

The Company believes in the value of free competition as a fundamental tool for consumer protection. To this end, it undertakes to operate with the utmost fairness and in full respect of its competitors.

Gifts

The Company's Staff may not, directly, or indirectly, offer or receive gifts, presents, money, payments, gifts for assorted reasons, procure business and/ or employment from customers, suppliers and third parties of both a tangible and intangible nature (e.g., services, promotions, etc.

Acts of commercial courtesy are permitted such as gifts or gifts of modest value, of a purely symbolic or personalized nature and in any case such as not to compromise the integrity or reputation of one of the parties.

• Privacy and Data Protection

In compliance with local legislation, the Company is committed to protecting privacy regarding information relating to the private sphere and the opinions of each of its Collaborators and, more generally, of those who interact with the Company.

Particular attention should be given to the use of computer systems and the data contained therein, which represent a fundamental component of the Company's assets. The security of corporate data is primarily the responsibility of individual users.

The use of computers, access to IT procedures and the use of e-mail must be conducted in accordance with applicable legislation and internal procedures.



METALTEX'S COMMITMENT TO ITS EMPLOYEES

• Respect for Human Rights

The Company undertakes to create a working environment that guarantees, to all those who interact with the Company in any way, conditions that respect personal dignity and in which the characteristics of individuals cannot give rise to discrimination or conditioning.

Equal Opportunities

The work environment is a diverse workplace, with people from many cultures, backgrounds, and lifestyles. We see the diversity of our employees as a success factor.

Every employee is given equal opportunities to develop and expand their skills, regardless of ethnicity, skin colour, gender, age, marital status, disability, religion, nationality, sexual orientation, and social background.







The Company is committed to spreading and consolidating a culture of safety, developing risk awareness, and promoting responsible behaviour by all Collaborators; moreover, it works to preserve, especially with preventive actions, the health and safety of workers in full compliance with the provisions of local laws.



Relationship with Colleagues

Collaborators operate impartially, avoid preferential treatment and unequal treatment, refrain from undue pressure, and reject them, adopt initiatives and decisions with the utmost transparency and avoid creating or enjoying privileged situations.

Conduct in the workplace and relations between Collaborators, at all levels, are always based on mutual fairness.

Each Collaborator strives to ensure that relations with Colleagues are inspired by harmony and avoids acts or behaviours characterized by animosity or conflict.





METALTEX'S COMMITMENT TO SOCIETY

• Environmental Sustainability

The Company acts responsibly with the ambition to reduce direct and indirect negative influences on the external environment, considering the entire life cycle of products. The Company complies with international and local laws and standards and strives to minimize environmental impact and adopt a sustainable approach.

The Company is therefore committed to adopting eco-sustainable operating practices: strict internal standards, environmental protection, eco-innovation, and preference for suppliers who are committed to promoting sustainability. The goal is to support its customers and improve environmental performance through its products and services.







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