

**1. PURPOSE**

The Code of Ethics of Metalgalvano S.r.l. is issued by the Management Committee, approved by the Chairman of the Board of Directors, and defines the behaviors that the interested parties, and in particular people at all levels, must observe.

The responsibility for applying the Code of Ethics is entrusted to the Management Committee. The adoption of this Code completes and enriches the rules contained in the Quality Management System Procedures.

**2. RECIPIENTS**

This Code of Ethics is aimed at all those who, whether employees or collaborators, establish direct, stable or temporary relationships with the Company or otherwise operate to pursue corporate objectives. They will be referred to below with the term "persons".

People who violate the principles and rules contained in this Code damage the relationship of trust established with Metalgalvano.

All "people" are required to know the Code of Ethics, to contribute to its implementation, its improvement and its dissemination. The Company undertakes to distribute a copy of this Code to all employees and collaborators and to disseminate its contents and objectives.

**3. VALUES**

Metalgalvano:

- wants to build trust and fairness;
- does not accept compromises on integrity;
- takes care of customers and their own people;
- follows the change to achieve results.

**4. CONTENTS**

4.1 HUMAN RIGHTS AND WORKING CONDITIONS

4.2 ENVIRONMENT

4.3 BUSINESS ETHICS

**4.1 HUMAN RIGHTS AND WORKING CONDITIONS**

Metalgalvano is committed to respecting and complying with the Universal Declaration of Human Rights, United Nation Guiding Principles on Business and Human Rights, International Labour Organization conventions (ILO conventions ng. 29, 87, 98, 100, 105,111, 138 or 182). We work to ensure that neither the company nor its employees abuse any of these principles.

**4.1.1 CHILD LABOUR AND YOUNG WORKERS CONDITIONS**

Metalgalvano will not allow any form of child labour in its business activities and in the activities of its supply chain, as described in article 3(d) of Worst Forms of Child Labour Convention, 1999 (No. 182).

**4.1.2 NO FORCED LABOUR, MODERN SLAVERY OR HUMAN TRAFFICKING.**

- Metalgalvano must not use forced or compulsory labour.
- Metalgalvano ensures that workers understand their rights with regard to payment of wages,

overtime, retention of identification documents, etc.

- Metalgalvano ensures that migrant workers are treated fairly and their rights are respected.
- Metalgalvano pays particular attention that, in cases where workers are recruited by third parties, they have not been charged any fees or commission related to the recruitment and/or employment process.

#### **4.1.3 WORKING HOURS**

Working hours (including overtime), as well as break times and periodic days off, shall be compliant with applicable laws & regulations, collective-bargaining agreements and international conventions.

#### **4.1.4 FAIR WAGES, NON-DISCRIMINATION AND EQUAL REMUNERATION (PAYMENT)**

- Metalgalvano do comply with applicable regulations in all relevant territories and industries in terms of salary and legally mandated benefits for its employees.
- Metalgalvano does not discriminate against any worker under any circumstance.

#### **4.1.5 FREEDOM OF ASSOCIATION**

- Metalgalvano respects the right of workers to associate freely, form and join workers organizations of their own choice, seek representation, and to bargain collectively, as permitted by and in accordance with the applicable laws and regulations.
- Metalgalvano ensures that representatives of such personnel are not subject to discrimination.

#### **4.1.6 IMPARTIALITY**

Metalgalvano wants to offer equal job opportunities to all employees and collaborators on the basis of professional qualifications and performance skills, without discrimination based on ethnicity, religion, opinions, nationality, sex, age, physical and social conditions;

### **4.2 WORKING ENVIRONMENT**

Metalgalvano guarantees that in internal and external work relationships, no sexual harassment is given or any behavior or initiatives that create an intimidating, hostile or isolating work environment towards individuals or groups of workers are adopted, which negatively interfere with the performance of other people's work or which obstruct the job and / or career prospects of others, for mere reasons of personal competitiveness;

#### **4.2.1 HEALTH AND SAFETY**

Metalgalvano promotes and protects the health and safety of its employees and collaborators.

#### **4.2.2 ENERGY CONSUMPTION & GAS EMISSIONS**

- Metalgalvano tracks and documents energy consumption and greenhouse gas emissions.
- Metalgalvano also looks for cost effective methods of improving energy efficiency by minimizing their energy consumption and greenhouse gas emissions.

#### **4.2.3 WATER REDUCTION, AIR QUALITY & WASTE MANAGEMENT**

Metalgalvano:

- Preserves water resources and reduce water consumption.
- Monitors air emissions and establish an air emissions management plan.
- Handles and disposes of all generated waste through safe and responsible methods that protect
- the environment and the health and safety of employees and local communities.

- Sets targets for waste reduction and establish a waste management hierarchy in the following order of priority: prevention, reduction, reuse, recovery, recycling and finally waste disposal.
- Handle and dispose of all generated waste through safe and responsible methods that protect the environment and the health and safety of employees and local communities.

#### **4.3 BUSINESS ETHICS**

Metalgalvano maintains the highest standards of corporate ethics and lawful conduct, and requires that these standards be passed through to the supply chain.

All business relationships and transactions by the companies in the supply chain must conform to local laws and be conducted with the utmost integrity and honesty; including:

##### **4.3.1 RESPONSIBLE SOURCING OF MATERIALS**

- Metalgalvano is expected to not provide products containing materials that contribute to human rights abuses, bribery and violation of ethics, or negatively impact the environment.
- Therefore, we expect suppliers to conduct due diligence to understand the source of materials used in their products, identify risks and mitigate human rights breaches.
- Metalgalvano expects its suppliers to use validated conflict free smelters and refiners for procurement of Tin, Tungsten, Tantalum and Gold contained in the products they produce.

##### **4.3.2 ANTI-CORRUPTION**

Metalgalvano actively and consistently fights against any form of bribery, corruption, extortion or embezzlement, and comply with all applicable laws pertaining to these issues. Our policy goes beyond these laws and prohibits improper payments in all of our activities, both with governmental entities and in the private sector. Negotiations in which transactions are made using illicit means will not be tolerated.

Of particular importance is the ethical escalation policy ("whistle-blowing" policy) to ensure information in cases a person identifies an activity in which those who, while working within the company, detect possible fraud, a danger or other serious risk that could damage customers, colleagues, shareholders or the company's reputation, decides to make a report.

Metalgalvano encourages "people" to report irregularities: all reports, both signed and anonymous, will be handled confidentially.

Procedures for reporting an irregularity are implemented and will be applied in an appropriate manner to ensure that all data processed will remain confidential.

For anonymous reports, no effort should be made to obtain the identity of the person.

Immediately after reporting an irregularity, an investigation is initiated by the Program Manager with coordination by the Management Committee.

The result of the processing of the report will be brought to the attention of people through the Quality Board, guaranteeing the anonymity of the whistleblower, if required.

##### **4.3.3 PRIVACY AND CONFIDENTIALITY**

- Metalgalvano is expected to comply with all applicable laws concerning data protection and information security, ensuring that privacy is safeguarded, personal data is protected, and all business information is kept secure. We expect our Suppliers to ensure that they cascade these principles in relation to information security and data privacy to any subcontractors or Tier N suppliers.

- Metalgalvano ensures that any confidential business information or trade secrets obtained under business activities with Customers/Suppliers are held in strict confidence and not improperly used or revealed to third parties.

#### **4.3.4 FINANCIAL RESPONSIBILITY/ACCURATE RECORDS**

All records and reports, whether internal or external, must be accurate and truthful. Metalgalvano Suppliers acts in accordance with applicable law and generally applicable accounting Principles, which require that data and other records always be complete, correct, up-to-date, and System-compliant.

#### **4.3.5 FAIR COMPETITION/ANTI-TRUST**

Metalgalvano strictly complies with all applicable antitrust laws, trade practice laws and any other competition laws, rules and regulations dealing with unfair competition and restraints of trade.

### **5 PEOPLE - COMMITMENT**

Metalgalvano people are committed to:

**RESPONSIBILITY:** providing collaboration and activities, consistently with the assigned tasks, objectives and responsibilities;

**THE COMPANY CONDITIONS:** contributing to the creation of a professional condition in which all people feel positively involved in the achievement of company objectives;

**HONESTY:** using company assets and resources in order to protect their conservation, functionality, and compliance with the provisions for the use of the computer system, the Internet and e-mail;

**CONFIDENTIALITY:** ensuring the utmost caution and care in the use of non-public information deriving from the performance of one's duties;

**CONFLICT OF INTEREST:** avoiding all situations and activities in which a conflict of interest may arise between personal economic activities and duties held in the Company or interests of the Company itself;

**GIFTS:** accepting or offering, directly or indirectly, acts of commercial courtesy, such as gifts, payments and benefits, only when they are such that they cannot be interpreted as intended to improperly acquire advantages for themselves or for the Company;

**HEALTH AND SAFETY:** actively participating in the process of risk prevention, environmental protection and health and safety protection towards oneself, colleagues and third parties.

### **6. RESPONSIBILITIES**

The responsibility for applying the Code of Ethics is entrusted to the Management Steering Committee (CDD).

The duties of the CDD are as follows:

- ensure the maximum circulation of the Code of Ethics towards all "people";
- inform the Management on the state of implementation of the Code at least once a year;
- ensure that the Code of Ethics and the conduct of the "people" are consistent and therefore verify

- any news of violation, involving the functions concerned in the appropriate measures;
- verify the adequacy of the Code and the rules introduced with it to prevent unwanted behaviors by the Company;
- update the Code to always keep it adequate to the Company's reality.