

# SLIM ALUMINIUM S.p.A. ETHICAL CODE

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## ETHICAL CODE

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## 1. GENERAL INTRODUCTION

This document, known as the Ethical Code, sets out the rights and responsibilities that Slim Aluminium S.p.A. expressly assumes toward all those with whom it interacts in the course of its activities.

In line with the principles upheld by the accreditation system it adheres to, the Company recognises that, through its actions, carried out with responsibility and moral integrity, it contributes to the development of the Italian economy and the civil growth of the country.

Slim Aluminium S.p.A. believes in the value of work and considers legality, fairness and transparency as essential prerequisites for achieving its economic, production and social objectives.

The Company affirms that this Ethical Code is consistent with the pursuit of its corporate mission.

This Ethical Code introduces and makes binding principles and rules of conduct aimed at the reasonable prevention of the offences indicated in Italian Legislative Decree No. 231/2001 and subsequent amendments.

This Ethical Code, taken as a whole and together with all specific implementing procedures approved by Slim Aluminium S.p.A., is an integral part of current and future employment contracts, pursuant to Article 2104 of the Italian Civil Code (Employee diligence).

Violations of its provisions therefore constitute disciplinary offences and will be prosecuted and sanctioned by Slim Aluminium S.p.A. in accordance with Article 7 (Disciplinary sanctions) of Law No. 300/1970 (Workers' Statute), and may also give rise to compensation for damages caused to the Company.

Signing this Ethical Code, or any extract thereof, or in any case adhering to its provisions and principles, is a condition sine qua non for the conclusion of any type of contract between Slim Aluminium S.p.A. and collaborators, consultants, independent contractors and other third parties working in favour of the Company.

The provisions thus signed or otherwise accepted also by conclusive behaviour form an integral part of those contracts.

Depending on the seriousness of the breach, violations by such parties of specific provisions of the Ethical Code may justify termination of the contractual relationship by Slim Aluminium S.p.A. and may also be identified in advance as express termination clauses pursuant to Article 1456 of the Italian Civil Code.

## 2. RECIPIENTS AND SCOPE OF APPLICATION

By adopting this Ethical Code, Slim Aluminium S.p.A. has defined moral values, clear rules and procedures to be followed.

This Ethical Code contains the ethical principles and general rules which, together with legal, regulatory and contractual provisions, characterise the organisation and corporate activities.

It also serves as a basis for the Group's organisational and control models and as a tool for preventing unlawful conduct and criminal offences.

The Ethical Code applies to the Corporate Bodies, employees, attorneys-in-fact and collaborators who, in any capacity and regardless of the type of contractual relationship, act in the name and on behalf of the Group companies. In the cases provided for by the Company's procedural system, the Company also requires third parties (partners, customers, suppliers, professionals, consultants and other categories of external parties) with whom it has business relationships to comply with the Code.

The Ethical Code is also an integral and essential element of the Organisational Model adopted by the Company pursuant to Italian legislation on "administrative liability of entities for offences".

Recipients of this Ethical Code must familiarise themselves with its content and comply with its provisions. The Code will be made available to them as outlined below.

The Human Resources Department, or its delegate, of Slim Aluminium S.p.A. is responsible for promoting the effective implementation of the Ethical Code and its dissemination within and outside the organisation.

Employees, in addition to complying with applicable laws and collective bargaining agreements where applicable, must align their work conduct with the purposes and provisions of this Ethical Code, both in internal relations and in dealings with external parties, particularly Public Administrations and other public authorities.

Respect for the principles and provisions contained in this Ethical Code is an essential prerequisite for any profitable cooperation with Slim Aluminium S.p.A. For this reason, when entering into contracts or agreements with other Recipients, the Company provides its counterparties with a copy of this document.

### **3. PRINCIPLES OF CONDUCT AND FUNDAMENTAL ETHICAL RULES**

The principles set out below are fundamental and binding for all employees and collaborators of Slim Aluminium S.p.A., who must apply them correctly in their internal and external operations and relations.

#### **3.1 LEGALITY AND INTEGRITY OF CONDUCT**

Slim Aluminium S.p.A. acts in compliance with its Articles of Association and with applicable laws and regulations in all countries where it operates. It requires all Recipients of this Code to comply with this obligation and to adopt behaviours that do not compromise the Company's moral and professional reliability.

The Company adopts specific rules, tools and controls to prevent any unlawful behaviour within the organisation and to counter potential criminal or subversive activities from third parties with whom it interacts.

Slim Aluminium S.p.A. operates in strict compliance with the law and ensures that all personnel act accordingly. Employees and collaborators must maintain behaviour consistent with the law in every context and place, acting with integrity, transparency, consistency and fairness, and conducting all business relationships honestly.



This commitment must also be upheld by consultants, suppliers, customers and anyone else dealing with the Company.

Slim Aluminium S.p.A. will not initiate or continue relationships with third parties that do not comply with this principle.

The Company is committed to manufacturing and providing quality products and to competing in the market according to principles of fair and free competition, maintaining proper relations with all public, governmental and administrative institutions, with citizens and with third-party companies.

### **3.2 SUSTAINABILITY AND ENVIRONMENTAL PROTECTION**

Slim Aluminium S.p.A. promotes sustainability, understood as the need to meet the requirements of the present generation without compromising the ability of future generations to meet theirs. In particular, it promotes respect for the environment as a common resource to be safeguarded for the benefit of the community and future generations, in a perspective of sustainable development.

### **3.3 LOCAL ROOTS AND THE SOCIAL VALUE OF THE COMPANY**

Since its foundation, Slim Aluminium S.p.A. has demonstrated a natural inclination toward social responsibility, contributing to the economic and civil development of the context in which it operates and taking into account the needs of the community.

The Company promotes local development through strong connections with the different stakeholders of the territorial community and acts within the local community to foster social development, well-being and integration.

### **3.4 CENTRALITY, DEVELOPMENT AND ENHANCEMENT OF HUMAN RESOURCES AND FAIRNESS IN AUTHORITY**

Slim Aluminium S.p.A. manages human resources in accordance with principles of respect for individual personal and professional characteristics, equal opportunities, gender equality and merit.

It recognises the central role of human resources as an essential factor of success and development. It therefore promotes dialogue at all levels, the professional development of employees, the strengthening of corporate identity and a sense of belonging to the professional community.

It encourages individual contribution and personal accountability as well as teamwork and the sharing of skills and knowledge.

In managing contractual relationships that involve hierarchical structures, the Company ensures that authority is exercised with fairness and correctness, avoiding any form of abuse that could undermine personal dignity and autonomy.

Without prejudice to legal and contractual provisions concerning workers' duties, employees are required to demonstrate professionalism, dedication to work, loyalty, spirit of cooperation, mutual respect, sense of belonging and morality. These values must always prevail in decisions involving the organisation of work.

### **3.5 REJECTION OF ANY DISCRIMINATION**

Slim Aluminium S.p.A. rejects any discrimination based on age, sex, gender, sexual orientation, health status, race, nationality, political or trade union opinions and religious beliefs of its counterparts.

### **3.6 DIVERSITY**

Within its internal relationships and dealings with third parties, Slim Aluminium S.p.A. recognises and respects the principles of dignity and equality and does not discriminate based on age, race or ethnic origin, nationality, political or trade union opinions, religious beliefs, sexual orientation, gender identity, physical or mental disability or any other personal characteristic unrelated to work.

It requires its directors, employees and collaborators to behave in ways that ensure full respect for human dignity, and therefore:

- strictly observes the regulations protecting child and underage labour, workers' freedoms and rights;
- guarantees free membership in trade unions;
- adopts rules that prevent and strictly sanction any form of discrimination based on gender, ethnicity, politics or religion;
- adopts rules that prevent business relations with organisations responsible for human rights violations.

### **3.7 TRANSPARENCY AND BUSINESS ETHICS**

The Company's identity is historically based on the following values:

- reliability, understood as absolute seriousness in transactions and commitments undertaken;
- financial solidity, demonstrated by its long-standing activity;
- transparency in the information provided to stakeholders and reference communities;
- fairness in contractual and competitive relations, rejecting and preventing collusive, predatory or abusive behaviour.

Slim Aluminium S.p.A. recognises free and fair competition in a market economy as a decisive factor for growth, development and continuous improvement.

### **3.8 CONFIDENTIALITY**

Slim Aluminium S.p.A. promotes the confidentiality of information used in the management of its business activities.

All employees, collaborators and consultants must not use the information acquired in the performance of their work for purposes unrelated to that work.

### **3.9 QUALITY**

Slim Aluminium S.p.A. operates through a quality management system that ensures uniformity, transparency and continuous improvement of products and services.



The Company is committed to achieving high quality standards in all activities as a long-term strategy.

## **4. RELATIONS WITH SOCIAL STAKEHOLDERS**

### **4.1 CUSTOMERS**

Meeting customer needs is a primary objective for Slim Aluminium S.p.A., which aims to execute every assignment to the highest standard and is constantly oriented toward proposing innovative solutions in terms of integration, effectiveness, efficiency and cost-effectiveness.

To meet customer requirements, the Company undertakes to ensure professionalism, punctuality, availability, courtesy, collaboration and high quality standards, offering the highest level of service.

Each Recipient, in managing customer relations and in compliance with Company procedures and policies, aims to ensure maximum customer satisfaction, including by providing exhaustive, truthful and accurate information on the products supplied.

The Company provides accurate, complete and truthful information to enable customers to make rational and informed purchasing decisions.

It protects customer privacy in accordance with applicable legislation and does not communicate or disclose their personal data, except as required by law.

Slim Aluminium S.p.A. also adopts a communication style based on efficiency, cooperation and courtesy.

### **4.2 FINANCIAL INSTITUTIONS**

Slim Aluminium S.p.A. maintains relationships with financial institutions selected based on their reputation and adherence to values consistent with those expressed in this Ethical Code.

### **4.3 SUPPLIERS OF GOODS AND SERVICES**

Slim Aluminium S.p.A. develops cooperative relationships with its suppliers in compliance with applicable laws and the principles of this Ethical Code, selecting them based on the highest professional standards and best practices in ethics, health and safety and environmental protection.

### **4.4 INTERNAL AND EXTERNAL CONSULTANTS**

Consultants are selected based on their professionalism, reputation and reliability as well as their adherence to values comparable to those set out in this Ethical Code.

Relationships with consultants are based on transparent agreements and managed in compliance with applicable laws and the principles of this Ethical Code.

### **4.5 PUBLIC ADMINISTRATION**

“Public Administration” includes any person or entity qualifying as a public official or as a person in charge of a public service, acting on behalf of central or local public administrations, supervisory authorities, independent authorities, EU institutions and private partners managing a public service.

Slim Aluminium S.p.A. aligns its conduct in relations with the Public Administration with principles of fairness and honesty. Those assigned by the Company to any negotiation, request or institutional relationship with Italian or foreign Public Administrations must not improperly influence decisions, nor may they engage in unlawful conduct such as offering money or other benefits that could compromise the impartiality of the public representative's judgement.

Those in charge of managing relations with any Public Administration must verify the correctness and completeness of the information provided in any form and for any reason.

Only expressly authorised persons may have direct contact with the Public Administration on behalf of Slim Aluminium S.p.A.

No other employee or collaborator may maintain any kind of relationship with the Public Administration regarding activities related to the Company's corporate purpose.

When participating in public tenders, representatives of Slim Aluminium S.p.A. must comply with the law and relevant regulations.

Assumption of commitments and management of relations with Public Administrations and Supervisory Authorities is reserved exclusively to the competent and authorised Company functions, in strict compliance with national, European and international laws and applicable regulations.

The Company requires the Recipients of this Ethical Code to offer maximum availability and cooperation to anyone carrying out inspections or controls on behalf of public bodies.

It is forbidden to hide, destroy or alter records, minutes, accounting documents or any type of document, or to lie or make false statements to the competent Authorities.

Slim Aluminium S.p.A. guarantees that relations with the Judicial Authority of every order and level, its auxiliaries and the Judicial Police are based on maximum transparency, fairness and cooperation. Recipients of this Ethical Code must refrain from adopting behaviour that could hinder the work of the judicial authorities, even indirectly (for example, inducing persons to make false or reticent statements to the Judicial Authority).

#### **4.6 EMPLOYMENT RELATIONSHIPS WITH FORMER PUBLIC ADMINISTRATION EMPLOYEES**

The hiring of former employees of the Public Administration who, in the course of their duties, had relations with Slim Aluminium S.p.A., or of their relatives, is carried out in strict compliance with the standard procedures defined by the organisation for personnel selection.

The same applies to the establishment of other employment or consultancy relationships with former Public Administration employees or their relatives.

#### **4.7 GRANTS AND FUNDING**

Slim Aluminium S.p.A. prohibits Recipients of this Ethical Code from using funds received from Public Administrations and/or inter-professional funds for purposes other than those for which they were granted.

Contributions, grants or funding obtained from the European Union, the State or other public entities, even of modest value or amount, must always and exclusively be used for the purposes for which they were requested and granted.

When participating in public procedures, Recipients of this Ethical Code must act in compliance with the law and fair commercial practice, avoiding conduct that might induce the Public Administration to act improperly in favour of Slim Aluminium S.p.A.

The Company adopts specific rules and controls to prevent Recipients of this Ethical Code from engaging in conduct aimed at obtaining unlawful advantages.

It is also unlawful to use altered or falsified documents or statements or to omit information or generally resort to deceit in order to obtain concessions, authorisations, funding or contributions from the EU, the State or other public entities.

#### **4.8 RELATIONS WITH POLITICAL AND TRADE UNION ORGANISATIONS**

Slim Aluminium S.p.A. does not make contributions to political parties, committees or political and trade union organisations.

Recipients of this Ethical Code must recognise that any form of involvement in political activities occurs on a personal basis, in their own free time, at their own expense and in compliance with applicable laws.

The Company maintains a collaborative and open dialogue with trade unions and professional associations, in compliance with principles of fairness and transparency and with the law and applicable collective bargaining agreements.

#### **4.9 PUBLIC SUPERVISORY AUTHORITIES**

Slim Aluminium S.p.A. engages in transparent dialogue with all political forces, associations and public institutions operating in its territory and at national level in order to properly represent its positions on relevant issues.

#### **4.10 POLITICAL FORCES, ASSOCIATIONS AND INTEREST GROUPS**

Recipients of this Ethical Code must:

- scrupulously observe instructions issued by competent institutions or public supervisory authorities to comply with the applicable laws in sectors related to their activities;
- refrain from submitting applications or requests containing untrue statements, in dealings with institutions or Public Supervisory Authorities, in order to obtain public funding, contributions or subsidies or to obtain concessions, authorisations, licences or other administrative acts;
- comply with any request from these institutions or Authorities in the exercise of their supervisory functions, providing full cooperation and avoiding any obstructionist behaviour.

## **5. BINDING PRINCIPLES OF CONDUCT FOR PERSONNEL**

### **5.1 PROFESSIONALISM**

Every employee and collaborator of Slim Aluminium S.p.A. performs their work and duties with diligence, efficiency and correctness, making the best use of time and tools made available and assuming responsibility for the tasks performed.

### **5.2 LOYALTY**

All personnel must act loyally toward Slim Aluminium S.p.A.

### **5.3 LEGALITY**

The Company adopts systems and tools to ensure compliance with all laws, national and international regulations, directives and commonly recognised practices.

Within their work activities, employees and collaborators of Slim Aluminium S.p.A. must be familiar with and diligently comply with the applicable Organisational Model 231 and with the law.

Honesty is a fundamental principle for all Company activities and initiatives and is an essential value of organisational management.

Relations with stakeholders at all levels must be based on fairness, cooperation, loyalty and mutual respect.

Under no circumstances can pursuit of Company interest justify dishonest conduct.

### **5.4 FAIRNESS AND TRANSPARENCY**

Recipients of this Ethical Code are prohibited from:

- using for personal purposes any information, assets or equipment at their disposal in connection with their function or duties;
- accepting or making, for themselves or others, any pressures, recommendations or reports that could be detrimental to Slim Aluminium S.p.A. or result in undue advantages for themselves, the Company or third parties;
- promising improper offers of money or other benefits.

### **5.5 CONFIDENTIALITY**

Recipients of this Ethical Code are required to operate with maximum confidentiality regarding information and news that constitute Company assets or relate to Company activities, in compliance with applicable laws, regulations and Company procedures.

They are also prohibited from using confidential information for purposes unrelated to their work.

## **5.6 RESPONSIBILITY TOWARD THE COMMUNITY**

Personnel of Slim Aluminium S.p.A., aware of the Company's social role in its territory, its contribution to economic and social development and to the general well-being of the community, act in respect of national and local communities, supporting cultural and social initiatives of value.

## **5.7 RESOLUTION OF CONFLICTS OF INTEREST**

Employees and collaborators of Slim Aluminium S.p.A. pursue and promote Company objectives and interests in carrying out their work activities. They must promptly inform their superiors or designated contacts of situations or activities that may constitute a conflict of interest with the Company's interests, whether such situations concern them personally or their relatives, and must comply with the Company's decisions in such cases.

## **5.8 SENSE OF BELONGING AND RESPECT**

In carrying out their work activities, Recipients of this Ethical Code must:

- foster and reinforce a sense of belonging to the Company;
- actively demonstrate and require respect for duties, skills and methods of performing work.

# **6. CONDUCT CRITERIA**

## **6.1 INTRODUCTION**

The rules in this section are intended to guide Recipients of this Ethical Code on conduct and behaviour to be observed in performing Company activities in line with the values inspiring this document.

All Recipients must act correctly and transparently in performing their duties, thus contributing to the effectiveness of the internal control system and safeguarding Company values and assets.

In compliance with legal provisions, all Recipients must maintain a cooperative attitude toward corporate bodies and supervisory authorities.

## **6.2 RELATIONS WITH PERSONNEL**

Personnel management is regulated by specific procedures and the protocols of the applicable Organisational Model 231, whose essential elements are outlined below.

## **6.3 PERSONNEL SELECTION**

Personnel selection is managed based on the match between candidates' profiles and Company needs, in compliance with equal opportunities for all applicants.

The information requested is closely related to verifying the aspects required by the professional and aptitude profile, with full respect for candidates' privacy and opinions.

General Management adopts appropriate measures to avoid any form of favouritism or undue advantages and carries out careful selection based not only on mandatory aspects but also on preferential criteria decided by the Board of Directors.

#### **6.4 ESTABLISHMENT OF THE EMPLOYMENT RELATIONSHIP**

Personnel are hired under regular employment, professional service or internship contracts. No form of irregular work is tolerated.

#### **6.5 INTEGRITY AND PROTECTION OF THE PERSON**

In personnel management and development processes, as well as in the selection phase, decisions are based on the match between expected and actual profiles and/or on considerations of merit.

Access to roles and assignments is based on demonstrated competencies and abilities.

Where compatible with overall work efficiency, the Company encourages flexible work arrangements that help employees who are mothers and those responsible for childcare.

#### **6.6 VALORISATION AND TRAINING OF HUMAN RESOURCES**

Slim Aluminium S.p.A. provides its staff with information and training tools with the aim of enhancing specific skills and preserving the professional value of personnel.

Training includes induction programmes for new hires, periodic training for operational staff (for example, on workplace safety, Model 231 and the Ethical Code) and specialist training to increase technical and managerial expertise.

#### **6.7 SAFETY AND HEALTH**

Slim Aluminium S.p.A. is fully committed to ensuring a work environment that protects the health and safety of its personnel, promoting and consolidating a culture of safety, developing risk awareness and encouraging responsible behaviour by all staff.

The Company also works to protect the health and safety of workers, primarily through preventive actions.

Slim Aluminium S.p.A. constantly seeks the necessary synergies not only within the Company but also with suppliers, external consultants and customers involved in Company activities.

All employees, through operational procedures and Organisational Model 231 protocols, are required to comply with rules and internal procedures on risk prevention and health and safety protection and to promptly report any deficiencies or non-compliance with applicable rules.

Slim Aluminium S.p.A. adopts the general measures for protecting health and safety at work prescribed by applicable legislation, in particular Legislative Decree No. 81/08 and subsequent amendments.

The Company is committed to full compliance with all workplace health and safety regulations for employees, collaborators and users.

In particular, the Company:

- defines and updates operating procedures and coordinates activities in the field of health and safety at work;
- ensures the application of applicable rules, including through risk assessment documents and work procedures aligned with safety standards;
- constantly monitors legislative developments and ensures they are incorporated into Company regulations and operating processes.

Slim Aluminium S.p.A. is committed to ensuring:

- assessment of all health and safety risks;
- prevention planning aimed at integrating operating conditions and the influence of environmental and organisational factors into prevention measures;
- elimination of risks and, where not possible, their reduction to a minimum in light of technical progress;
- compliance with ergonomic principles in work organisation, workplace design, equipment selection and work methods, particularly to reduce the impact of monotonous and repetitive work;
- risk reduction at source;
- replacement of hazardous equipment and machinery;
- minimisation of the number of workers exposed or potentially exposed to risk;
- limited use of chemical, physical and biological agents in the workplace;
- priority of collective protection measures over individual protection;
- health surveillance of workers;
- removal of any worker from exposure to risk for health reasons and, where possible, reassignment to another role;
- adequate information and training for workers, managers, supervisors, workers' representatives and all staff;
- adequate instructions to workers;
- participation and consultation of workers and their representatives;
- planning of measures to ensure continuous improvement of safety levels, including through codes of conduct and good practices;
- emergency measures for first aid, fire-fighting, evacuation and serious and immediate danger;
- use of warning and safety signs;



- regular maintenance of workplaces, equipment and systems, with particular regard to safety devices in accordance with manufacturers' instructions;
- adequate instructions and, where required, training for employees, collaborators and users.

## **6.8 PRIVACY PROTECTION**

In processing personal data of its staff, Slim Aluminium S.p.A. complies with the provisions of EU Regulation 679/2016 (GDPR).

The Company has implemented a Privacy Management System and appointed a Data Protection Officer (DPO), who is responsible for monitoring compliance.

Employees and staff receive periodic training on data protection legislation.

## **6.9 ENVIRONMENTAL PROTECTION**

Slim Aluminium S.p.A. pursues environmental protection by complying with national and EU legislation and regulations. It is committed to preventing pollution and raising awareness among employees and collaborators on environmental issues.

## **6.10 DUTIES OF PERSONNEL**

The provisions of the applicable Organisational Model 231 apply.

Employees of Slim Aluminium S.p.A. must act loyally to comply with obligations under their employment contract and the Ethical Code, ensuring that the required performance is provided.

## **6.11 PROTECTION OF COMPANY ASSETS**

Each Recipient of this Ethical Code is directly and personally responsible for protecting and preserving Company assets, whether tangible or intangible, and for using them properly and in line with Company interests.

Company assets and resources must not be used for purposes other than those specified by Slim Aluminium S.p.A.

In particular, it is strictly forbidden to alter the functioning of IT or telematic systems, or the data and information contained therein, to install and use unauthorised software or to unlawfully duplicate software and databases in violation of copyright laws.

## **6.12 DELEGATIONS AND RESPONSIBILITIES**

Through specific resolutions and/or procedures, the Company defines the roles, responsibilities and powers of directors, employees and collaborators.

These roles, responsibilities and powers must be known, accepted and respected.

The Company's system for the distribution of powers is described in the applicable Organisational Model 231.



#### **6.12.1 OBLIGATIONS OF FUNCTION MANAGERS REGARDING THE ETHICAL CODE**

Each function manager, identified as such in the organisation chart, role descriptions and/or delegation system, must:

- ensure compliance with the Ethical Code by all persons directly or indirectly under their responsibility;
- act as a role model for staff through their own behaviour;
- ensure that staff understand that the provisions of this Ethical Code are an integral part of their work;
- promptly report to General Management or a delegate or to the Supervisory Body any notifications or specific needs expressed by staff.

Failure by function managers to comply with these obligations may result in disciplinary sanctions, as provided for by the disciplinary system.

#### **6.12.2 OBLIGATIONS OF ALL EMPLOYEES REGARDING THE ETHICAL CODE AND COMPANY DOCUMENTATION**

Each employee is required to know the provisions contained in the Ethical Code and in the documents referred to therein, as well as the legal provisions governing the activities within their role. These provisions form an integral part of each employee's work obligations.

Employees who become aware of alleged unlawful conduct must report such conduct solely to their superiors or to the Supervisory Body and/or General Management using the internal reporting procedures.

General Management adopts systems to monitor the effective reading and understanding of mandatory legal documents by employees and collaborators, including anonymous tests, and takes appropriate measures to constantly improve the dissemination and understanding of their content.

The Company has implemented a whistleblowing procedure in accordance with legal requirements and has provided appropriate training for staff.

The Supervisory Body is responsible for receiving reports and conducting related investigations.

Recipients of this Ethical Code are also required to:

- refrain from behaviour contrary to Company rules and regulations;
- contact their superiors or the Supervisory Body and/or delegate responsible for the prevention model for clarification on how to apply the Ethical Code or related rules;
- promptly report any information about possible violations of the Ethical Code to at least one of the above parties;
- cooperate with the Company in any investigations aimed at verifying and, where appropriate, sanctioning possible violations.

These conduct requirements also apply to external consultants and all types of collaborators.

### **6.12.3 PROTECTION OF COMPANY ASSETS**

Each Recipient must act diligently to protect Company assets from improper or incorrect use.

Staff must know and follow internal policies on information security in order to ensure the integrity, confidentiality and availability of information.

Information and Company know-how must be treated as confidential: significant data acquired or created by Slim Aluminium S.p.A. in the course of its activities must be considered confidential and carefully protected. This includes information acquired from or concerning third parties (customers, contacts, partners, employees, etc.).

Staff who, in performing their duties, come into possession of confidential information, materials or documents must inform their superiors.

During and after termination of the employment relationship with Slim Aluminium S.p.A., staff may only use confidential data in the interest of the Company and never for their own benefit or that of third parties.

### **6.12.4 CONFIDENTIAL INFORMATION ABOUT THIRD PARTIES**

Company staff must refrain from using unlawful means to obtain confidential information about other organisations or third parties.

Those who, in the context of a contractual relationship, obtain confidential information about other parties may only use such information as provided for in the contract.

Without proper authorisation, staff may not request, receive or use confidential information about third parties.

If staff become aware of confidential information about another party that is not already subject to a non-disclosure agreement or other protection, they must contact their manager for guidance on how to handle such information.

### **6.12.5 USE OF COMPANY ASSETS**

Each employee of Slim Aluminium S.p.A. must act diligently to protect Company assets by behaving responsibly and in line with operating procedures governing their use, and by accurately documenting their use.

In particular, each employee must:

- use the assets entrusted to them carefully and sparingly;
- avoid improper use of Company assets that could cause damage or reduced efficiency or otherwise conflict with Company interests;
- adequately safeguard resources entrusted to them and promptly inform the relevant units of any threats or harmful events for Slim Aluminium S.p.A.

As regards IT applications, each employee must:

- apply the security policies to their own activities, to avoid compromising the functionality and protection of IT systems;
- refrain from sending threatening or insulting emails or messages with inappropriate comments that might offend people or damage Slim Aluminium S.p.A.'s image;
- refrain from browsing websites with indecent or offensive content and, in any case, not relevant to professional activities.

### **6.13 RELATIONS WITH CUSTOMERS**

The provisions of the applicable Organisational Model 231 apply.

#### **6.13.1 IMPARTIALITY**

Slim Aluminium S.p.A. undertakes to offer its products and services without any discrimination among customers, with particular attention to those in more vulnerable conditions where relevant.

#### **6.13.2 CONTRACTS AND COMMUNICATIONS WITH CUSTOMERS**

Contracts and communications with customers from Slim Aluminium S.p.A. must always:

- comply with applicable laws and not constitute evasive or unfair practices;
- be complete and not omit any relevant element for the customer's decision.

#### **6.13.3 STAFF CONDUCT TOWARDS CUSTOMERS**

The conduct of Slim Aluminium S.p.A. staff towards customers is characterised by availability, respect and courtesy, with a view to a collaborative relationship and high professionalism.

#### **6.13.4 DATA PROCESSING**

Customer personal data is processed in compliance with EU Regulation 679/2016 and with the procedures of the Company's Privacy Management System.

Each employee and collaborator receives a privacy notice specifying:

- purposes and methods of processing;
- any parties to whom data is communicated;
- information required for exercising the right of access under Article 15 of the GDPR.

### **6.14 RELATIONS WITH SUPPLIERS**

The provisions of the applicable Organisational Model 231 apply.

#### **6.14.1 SELECTION OF SUPPLIERS**

Purchasing processes are managed according to the following criteria:

- seeking the maximum competitive advantage for Slim Aluminium S.p.A.;
- granting equal opportunities to suppliers;

- ensuring loyalty and impartiality.

Supplier selection and definition of purchasing conditions are based on an objective assessment of quality, price, actual availability of the good or service and guarantees of assistance and promptness.

Suppliers subject to criminal proceedings for mafia-type crimes in connection with contracts or similar are always excluded.

#### **6.14.2 INTEGRITY AND INDEPENDENCE IN RELATIONS**

Relationships with suppliers, including those concerning financial and consultancy contracts, are subject to constant monitoring by Slim Aluminium S.p.A.

Contracts with suppliers must always be based on clear relations and, where possible, must avoid forms of dependence.

Documents exchanged with suppliers must be appropriately filed and, in particular, accounting documents must be kept for the periods established by law.

#### **6.15 RELATIONS WITH PUBLIC ADMINISTRATIONS**

Slim Aluminium S.p.A. intends to conduct relations with Public Administrations with maximum transparency and ethics, in compliance with applicable laws and according to general principles of fairness and loyalty, so as not to compromise the integrity of either party.

##### **6.15.1 GIFTS, HOSPITALITY AND BENEFITS**

All persons working for or on behalf of Slim Aluminium S.p.A. are prohibited from giving money or offering economic advantages or other benefits to persons in Public Administrations in order to obtain assignments or other personal or Company advantages.

No form of gift that could be interpreted as exceeding normal commercial or courtesy practice, or as intended to obtain favourable treatment in any activity relating to Slim Aluminium S.p.A., is permitted.

For this purpose, a gift is considered a “normal commercial or courtesy practice” if its value is less than €50.00.

In particular, any gift to Italian or foreign public officials or their relatives that may influence their independence of judgement or induce them to provide undue favourable treatment or advantages of any kind is prohibited.

A “gift” means any kind of benefit: not only material goods, but also, for example, free participation in conferences, training courses, job offers or similar.

The above rules cannot be circumvented by resorting to third parties: corruptive acts include not only unlawful payments made directly to public bodies or their employees, but also those made to persons acting on their behalf.

On the occasion of anniversaries, holidays or similar, it is permitted to give gifts of modest value and, in any case, within the limits decided by the Board of Directors or General Management, subject to notification to the Supervisory Body with adequate documentation for verification purposes.

If an employee, collaborator or consultant of Slim Aluminium S.p.A. receives explicit or implicit requests for benefits from a public official, they must immediately inform the Board of Directors or the person to whom they report, so that appropriate verifications and actions may be taken.

#### **6.16 EXTERNAL EFFECTIVENESS OF THE ETHICAL CODE**

Anyone acting in the name and on behalf of Slim Aluminium S.p.A. and dealing with third parties with whom the Company intends to start business relationships, or with whom it has institutional, social, political or any other kind of relationship, must:

- inform such parties of the commitments and obligations imposed by the Ethical Code;
- demand compliance with the obligations of the Ethical Code in the performance of their activities;
- take appropriate action if third parties refuse to comply with the Ethical Code and, if they fail to comply fully or partly with their commitment to adhere to its provisions, inform General Management or its delegates and the Supervisory Body.

##### **6.16.1 CONFLICT OF INTEREST**

Without prejudice to what is already provided for in paragraph 5.7, Recipients of this Ethical Code must ensure that every decision taken in the course of their activities is made in the interest of Slim Aluminium S.p.A. They must avoid any activity or situation of personal interest that constitutes or may constitute, even potentially, a conflict with the Company's interests and, in any case, must comply with specific procedures in this area.

All Recipients must refrain from taking advantage of their relationship with Slim Aluminium S.p.A. to favour themselves or third parties to the detriment of the Company.

It is forbidden for any employee of Slim Aluminium S.p.A. to participate, directly or indirectly and in any capacity, in business activities in direct competition with the Company, unless such participation has been previously communicated to the competent Board of Directors and approved by it, after consulting the Supervisory Body.

If situations of actual or potential conflict of interest are identified, whether internal or external to the activities of Slim Aluminium S.p.A., each person involved must refrain from engaging in the conflicting conduct and promptly report the situation to the Supervisory Body, which is responsible for assessing, on a case-by-case basis, the existence of any incompatibility or prejudice.

##### **6.16.2 COMPETITIVE PRACTICES**

Slim Aluminium S.p.A. is committed to strictly complying with competition laws and cooperating with market regulatory authorities. In particular, the Company:

- competes fairly in the market, respecting competition rules;

- undertakes to provide correct information on its activities both internally and externally or in response to legitimate requests;
- ensures the truthfulness and correctness of corporate data in financial statements, reports and other official documents.

#### 6.16.3 GIFTS AND BENEFITS

Employees of Slim Aluminium S.p.A. are prohibited from making any gifts to Italian or foreign public officials or their relatives that may influence their independence of judgement or obtain favourable treatment or undue services or advantages.

No person of Slim Aluminium S.p.A. may give or promise to representatives of Public Administrations:

- money;
- economic advantages;
- any type of benefit;

in order to obtain undue advantages for the Company.

Employees of Slim Aluminium S.p.A. are prohibited from receiving any gifts aimed at influencing their independence of judgement in assigning or managing professional assignments, services or consultancy.

No person of Slim Aluminium S.p.A. may receive:

- money;
- economic advantages;
- any type of benefit.

Therefore, no form of gift is permitted that could be interpreted as exceeding normal commercial or courtesy practice or aimed at inducing or receiving favourable treatment in any activity linked to the Company.

For this purpose, a gift is considered a “normal commercial or courtesy practice” if its value is less than €50.00.

A “gift” means any kind of benefit: material goods, free participation in conferences, training courses, job offers, etc.

The above rules cannot be circumvented by resorting to third parties: corruptive acts include not only unlawful payments made directly to public bodies or their employees, but also those made to persons acting on their behalf.

On the occasion of anniversaries, holidays or similar, it is permitted to receive and give gifts of modest value (in no case exceeding €50.00) and, in any case, within the limits decided by the Board of Directors or

General Management, subject to appropriate notification to the Supervisory Body, with adequate documentation to enable necessary checks.

If a person of the Company receives explicit or implicit requests for benefits from a public official, they must promptly and in detail report them to the CEO, the Board of Directors and the Supervisory Body.

## **7. APPLICATION MECHANISMS OF THE COMPANY ETHICAL CODE**

### **7.1 ORGANISATIONAL PRINCIPLES**

Slim Aluminium S.p.A. ensures that its organisational system is based on the separation of functions, i.e. separation of responsibility for decision, execution and control.

In particular, the Company ensures that all operations are verifiable, as they are recorded.

The Company requires those carrying out audit functions to guarantee the truthfulness and correctness of data and information.

Each operation or activity must be lawful, authorised, consistent, documented and verifiable, in accordance with the principle of traceability and with Company procedures, according to prudence criteria and in protection of Company interests.

Company procedures must allow for controls on operations, on authorisation processes and on the performance of the operations themselves.

Each employee or collaborator conducting operations involving sums of money, goods or other assets belonging to Slim Aluminium S.p.A. must reasonably provide the necessary evidence to allow verification of such operations.

### **7.2 ACCOUNTING TRANSPARENCY**

Accounting at Slim Aluminium S.p.A. complies with generally accepted principles of truthfulness, accuracy, completeness and transparency of recorded data.

Recipients of this Ethical Code undertake to refrain from any behaviour, active or omissive, that directly or indirectly violates legal provisions and/or internal procedures relating to the preparation of accounting documents and their disclosure.

Recipients must keep and make available, for each transaction, adequate supporting documentation to allow:

- accurate accounting records;
- immediate identification of the transaction's characteristics and reasons;
- easy formal and chronological reconstruction;

- verification of the decision-making, authorisation and implementation process in terms of legitimacy, consistency and appropriateness, as well as identification of the various levels of responsibility.

Recipients who become aware of omissions, falsifications or negligence in accounting records or supporting documentation must promptly report the matter to their superior or to the Supervisory Body and/or General Management.

Slim Aluminium S.p.A. promotes training and updating initiatives to ensure that Recipients of this Ethical Code are informed of the rules (laws, regulations, internal provisions, instructions from professional associations) governing the preparation and management of accounting documentation.

### **7.3 CONTROLS AND VERIFICATIONS**

Slim Aluminium S.p.A. ensures, through qualified professional staff, the availability of all necessary information to audit and supervisory bodies and allows them access to the relevant documents.

The Company ensures that authorised persons have access to all information and documents and that Company directors, employees and managers responsible for their functions provide all information necessary to facilitate supervisory activities.

The Company prohibits its directors, employees and collaborators from making false statements or presenting false documents or documents attesting to untrue situations, including through IT systems, in order to unlawfully obtain public funds or maintain any benefits.

#### **7.3.1 SUPERVISION OF THE IMPLEMENTATION OF THE ETHICAL CODE**

The responsibility for verifying the implementation and application of the Ethical Code lies with:

- the Board of Directors;
- General Management;
- coordinators;
- the Supervisory Body (OdV). This body, in particular, in addition to monitoring compliance with the Ethical Code, with access to all sources of information at Slim Aluminium S.p.A., recommends appropriate updates to the Code itself, including on the basis of reports received from staff.

In particular, the Supervisory Body:

- notifies the Board of Directors/General Management of reports of breaches of the Ethical Code for appropriate action;
- issues binding opinions on the revision of major policies and procedures to ensure consistency with the Ethical Code;
- contributes to periodic review of the Ethical Code and submits appropriate proposals to the Board of Directors, which evaluates, approves and formalises them where appropriate.



The Supervisory Body maintains autonomy and independence, has investigative and control powers and initiative for the performance of the functions assigned to it.

### **7.3.2 REPORTING PROBLEMS OR SUSPECTED BREACHES**

Breaches of the Ethical Code by Recipients are subject to the disciplinary system provided for in the applicable Organisational Model 231.

In the event of breaches of the Ethical Code, Slim Aluminium S.p.A. adopts disciplinary measures against those responsible, including dismissal of those responsible where necessary to protect Company interests, in addition to compensation for any damages resulting from the breaches.

Non-compliance with the Ethical Code by members of Company Bodies may result in the adoption, by the competent bodies, of the most appropriate measures provided for and permitted by law.

Breach of the Ethical Code by employees constitutes a violation of contractual obligations arising from the employment relationship, with all contractual and legal consequences, including the relevance of such breach as a disciplinary offence.

Breaches by suppliers and external collaborators will be sanctioned in accordance with the relevant contractual provisions, without prejudice to more serious breaches of law.

With regard to the use of IT data processing systems: any problems or suspected breaches must be immediately reported to the Head of IT Services and General Management for appropriate measures.

### **7.3.3 DISCIPLINARY MEASURES FOLLOWING BREACHES**

The provisions of this Ethical Code are an integral part of the contractual obligations undertaken by employees and by those having business relationships with Slim Aluminium S.p.A.

Breach of the principles and behaviour indicated in the Ethical Code undermines the relationship of trust between Slim Aluminium S.p.A. and the persons committing the breach, whether directors, employees, consultants, collaborators, customers or suppliers.

For details of the disciplinary system and sanction mechanisms, reference is expressly made to the provisions of the applicable Organisational Model 231.

In general, breaches will be prosecuted as follows:

- in the case of employees (including members of Company Bodies and the Supervisory Body), through appropriate disciplinary measures, irrespective of the possible criminal relevance of the conduct and the initiation of criminal proceedings where the conduct constitutes an offence. In particular, sanctions will comply with the rules and logic of the applicable employment contract. Disciplinary measures range from warning or reprimand to fines, suspension without pay and, in the most serious cases, dismissal. Before any disciplinary action is taken, the employee is given the opportunity to explain their conduct;
- in the case of consultants, collaborators, customers, suppliers and other parties having contractual relations with Slim Aluminium S.p.A., appropriate procedures will be activated to terminate the contractual relationship;

- this is without prejudice to any compensation for damages suffered by Slim Aluminium S.p.A. as a result of breach by such parties of the provisions of the Ethical Code.

#### **7.4 PUBLIC SERVICE ASSIGNMENT**

If Slim Aluminium S.p.A. carries out public service activities, it adopts the following conduct:

- respect for principles of impartiality typical of Public Administrations;
- refusal of any benefits, money or undue advantages;
- refusal of unlawful influences by third parties;
- avoidance of conflicts of interest involving those appointed.

#### **7.5 CONFIDENTIALITY**

Recipients of this Ethical Code must maintain maximum confidentiality regarding information, documents, studies, initiatives, projects and contracts they become aware of in the performance of their duties.

Slim Aluminium S.p.A. takes appropriate measures to protect the information it manages and prevent access by unauthorised staff.

#### **7.6 DISSEMINATION, COMMUNICATION AND TRAINING**

This Ethical Code is an integral part and implementation of the Organisational Model 231 adopted by Slim Aluminium S.p.A. to prevent offences committed in the interest or to the advantage of the organisation by those identified in Legislative Decree 231/01.

Slim Aluminium S.p.A. provides for the adoption of specific procedures by all those involved in operational processes, aimed at identifying those responsible for decision-making, authorisation and performance of operations, in order to prevent breaches of applicable legislation and the Ethical Code itself.

This Ethical Code is brought to the attention of all internal and external parties concerned or in any case affected by the mission of Slim Aluminium S.p.A. through specific communication and training activities.

#### **7.7 OPERATING PROCEDURES AND DECISION-MAKING PROTOCOLS**

This Ethical Code is an integral part and implementation of the Organisational Model 231 adopted by Slim Aluminium S.p.A. to prevent offences committed in the interest or to the advantage of the organisation by those identified in Legislative Decree 231/01.

In order to prevent breaches of applicable legislation and of the Ethical Code itself, Slim Aluminium S.p.A. provides for the adoption of specific procedures by all those involved in operational processes, aimed at identifying those responsible for decision-making, authorisation and performance of operations.

#### **7.8 DELEGATION SYSTEM**

In addition to already established positions (such as General Management), Slim Aluminium S.p.A. uses a delegation system under which certain activities may only be carried out by expressly authorised persons holding appropriate powers conferred through an official delegation and/or notarial power of attorney.

It is essential that individual operations be carried out at different stages by different persons whose responsibilities are clearly defined and known within the organisation, so as to avoid granting unlimited or excessive powers to any individual.

## **8. FINAL PROVISIONS**

### **8.1 CONFLICTS WITH THE ETHICAL CODE**

If any provision of this Ethical Code conflicts with internal regulations or procedures, the Ethical Code shall prevail over all such provisions.

Approval and amendments

This Ethical Code was approved by the Company's Board of Directors on the following date:

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Any amendment or integration of this Ethical Code will be approved by the Board of Directors after consultation with the Supervisory Body and will be promptly communicated to all Recipients. In particular:

- the Supervisory Body periodically reviews the Ethical Code in light of legislative or corporate changes and proposes amendments or additions;
- the Board of Directors examines the Supervisory Body's proposals and decides accordingly, making any approved amendments immediately effective.