



Growermetal
Around ideas

Code of Ethics

Annex 1 to the Organisation, Management and Control Model

pursuant to Legislative Decree no. 231 of 8 June 2001

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PURPOSE AND SCOPE

With this Code of Ethics, Growermetal formalizes the ethical principles and behavioural standards already adopted in practice, making them binding for all recipients with whom it has relations in the exercise of its business.

The following provisions define the scope of application of this Code of Ethics, identifying the Recipients, the reference principles and the methods through which Growermetal ensures its effective implementation and compliance.

a) RECIPIENTS: all subjects with whom Growermetal has relationships of any kind, including:

- i. the corporate bodies;
- ii. the company's personnel, including employees, consultants and external collaborators;
- iii. customers, suppliers and competitors;
- iv. the public administration and any public body, political and trade union organizations;
- v. the media;
- vi. any third party who has relations with the company.

Growermetal reserves the right not to enter into or continue any relationship with anyone who contravenes the content and spirit of the Code of Ethics or violates its principles and rules of conduct.

b) SUBSIDIARIES AND ASSOCIATED COMPANIES: Growermetal, while acknowledging its autonomy, asks its subsidiaries and associates to align their activities with the values and principles expressed in the Code of Ethics.

c) COMPLIANCE WITH THE LAW: Growermetal carries out its activities in full compliance with the laws in force in all the countries in which it operates and in compliance with the principles of this Code of Ethics.

d) CONSISTENCY WITH GROWERMETAL'S VALUES: all Recipients are required to adopt behaviour consistent with Growermetal's values, helping to protect and strengthen its reputation and concretely applying the principles of the Code of Ethics.

They are also required to ensure that the ethical and behavioural provisions and company operating procedures applicable to them are respected and implemented.

e) IN-DEPTH ANALYSIS AND AWARENESS-RAISING: Growermetal promotes in-depth and awareness-raising courses aimed at all employees, with the aim of sharing the values of the Code of Ethics and fostering an increasingly aware and participatory corporate culture.

f) NON-COMPLIANCE AND DISCIPLINARY SYSTEM: failure to comply with the principles of the Code of Ethics by the Recipients will result in the application of appropriate measures based on the relationship that each person has with the company.

For employees, violations constitute a disciplinary offence and are sanctioned according to the company disciplinary system, current legislation and applicable collective bargaining.

For the other Recipients, violations may result in the adoption of measures provided for in their respective contracts or collaboration relationships, including, in the most serious cases, the suspension, interruption and possible termination of the relationship.

g) IMPLEMENTATION AND CONTROL METHODS: Growermetal ensures the implementation of this Code of Ethics through the integration of its principles into the company's business processes, operating procedures and governance systems. The correct application of the Code of Ethics is subject to periodic monitoring by the competent corporate functions, including through verification and control activities, in order to assess its effectiveness, identify any critical issues and promote corrective actions consistent with the company's values and objectives.

PRINCIPLES OF THE CODE OF ETHICS

1. GENERAL PRINCIPLES

- Growermetal adopts ethical principles of transparency, diligence, fairness, loyalty and honesty.
- Growermetal pursues its economic objectives with standards of excellence and with attention to the customer, rejecting any form of arbitrary discrimination.

2. COMPLIANCE WITH COMPANY LAWS AND PROCEDURES

- Growermetal carries out its activities in full compliance with the laws and regulations in force in all the countries in which it operates, market rules and competition and export legislation. In particular, the company shall refrain from any practice that may distort the free play of competition or violate the provisions applicable in the relevant markets.
- Employees and corporate bodies undertake to know, for their area of activity, the rights and obligations that derive for Growermetal from laws, regulations, contracts and relations with the public administration, and to adopt conduct that does not cause any prejudice to the company.
- Growermetal periodically verifies that its organization and business processes comply with the applicable regulations and the commitments undertaken, ensuring complete and continuous compliance.
- All employees, within the scope of their responsibilities and functions, must comply with company procedures, ensuring that each operation is adequately documented and verifiable in its motivations, responsibilities and operational phases.
- Administrators and area managers ensure that the staff of their respective functions correctly apply the procedures laid down.
- Employees and directors who become aware of omissions, falsifications or violations of company rules or principles must promptly report them to the competent internal bodies, including the Supervisory Body, which will carry out the necessary checks and take the necessary measures.
- Growermetal requires that, in the context of their professional activity, customers, suppliers, external collaborators, consultants and in general anyone who has relations with it, behave correctly and transparently in the performance of their function, respecting the principles set out in this Code of Ethics and punctually observing the laws and regulations in force.

3. FUNDAMENTAL HUMAN RIGHTS AND PROHIBITION OF LABOUR EXPLOITATION

- Growermetal protects fundamental human rights, including those protected by the Italian Constitution and the European Charter of Human Rights, and is committed to preventing all forms of exploitation, forced or child labour, guaranteeing decent working conditions that respect hours, wages, minimum age, maternity, prohibition of harassment and ensures the free termination of employment without withholding personal documents.
- Growermetal refuses any collaboration with suppliers who employ child labour, forced labour or forms of illegal hiring and, where possible, inserts contractual clauses that allow it to terminate the relationship in the event of recurrence of such practices.

GENERAL RULES OF CONDUCT

4. STANDARDS OF CONDUCT

- Any person, internal or external to Growermetal, is responsible for safeguarding, preserving and defending the assets and resources of Growermetal entrusted to him as part of his activity, using them in his own way and in accordance with the social interest and preventing any improper use.
- Corporate office holders must regularly attend scheduled meetings, carry out their duties fairly and fairly in the interest of the company and ensure transparent communication by sharing clear, complete and truthful information.

INTERNAL REPORTS

5. GENERAL PRINCIPLES ON HUMAN RESOURCES

- Growermetal considers the enhancement of human resources to be central. The company manages employment relationships in compliance with equal opportunities, workers' rights provided for by the CCNL and current regulations, with particular attention to the protection of health and safety.
- Growermetal promotes the professional growth of each worker and guarantees all external collaborators fair treatment, based on merit and free of any form of discrimination.

6. PERSONNEL SELECTION

- The selection of personnel is carried out on the basis of company needs and is conducted with impartiality, traceability and objective criteria, protecting both candidates and the interests of the company.
- The information requested is only that necessary to assess professional skills, attitudes and ethical elements, and is processed in compliance with current privacy legislation.

7. EMPLOYMENT RELATIONSHIP

The staff is hired with a regular employment contract, according to current legislation, and signs the commitment to comply with the Code of Ethics. From the moment of hiring, the company provides employees with all the necessary information regarding:

- the functions and activities to be carried out;
- the elements of the employment contract;
- internal regulations and company procedures;
- the Code of Ethics;
- possible disciplinary measures.

8. PERSONNEL MANAGEMENT

- Growermetal ensures compliance with laws, including, but not limited to, those relating to minimum wages, the granting of vacation days and paid annual leave.
- The definition of the roles, assignments and related remuneration of employees is based on the level of professionalism achieved and the objective of ensuring a competitive salary structure consistent with the markets in which the company operates. Salary updates take place in compliance with ethical principles and regulations in force, through clear and fair criteria and methodologies, communicated to employees.

9. TRAINING

Every employee must have the necessary knowledge and skills to perform their duties. Growermetal considers training a long-term investment and is committed to fostering the professional development of each person through:

- a work environment that values individual skills and stimulates their full potential;
- the recognition of professional growth;
- periodic refresher and training programs.

10. WORKPLACE

- Growermetal is committed to ensuring a working environment that protects the dignity of every person and the right to privacy; controls or behaviours that may harm the personal sphere of workers or anyone who interacts with the company are therefore prohibited.
- Similarly, Growermetal requires all its stakeholders to ensure that all internal and external employment relationships are respectful and do not give rise to any form of harassment.

11. INTERNAL ORGANIZATION

- Every operation conducted by Growermetal personnel must be **legitimate, authorized, consistent, documented, verifiable and respectful of company procedures**. Company procedures allow the control of all phases of the process, the identification of those responsible for the activities and the separation of duties, so as to avoid concentrations of power.
- Directors and employees are required to ensure the truthfulness, authenticity and originality of the documentation produced.
- The staff is required to maintain a **respectful, decent and consistent behaviour with the image of Growermetal**, operating at all levels according to fairness, collaboration, loyalty, diligence, mutual respect and without carrying out any activity in conflict of interest.
- In the management of hierarchical relationships, the **authority of the superior in rank must be exercised fairly**, valuing the contribution of individuals and preventing any abuse that may harm the dignity of the employee.
- **Any conduct that may create dangerous situations during work is prohibited**: those who carry out their activity, even occasionally, under the influence of alcohol or drugs, or use or dispose of them during working hours, are subject to disciplinary liability; states of dependence on these substances are equated with these conducts.

12. HEALTH AND SAFETY

- Growermetal protects **health and safety in the workplace by adopting a preventive approach**: it reduces risks at source, assesses those that cannot be eliminated and ensures continuous compliance with current legislation. The company mitigates risks using the safest alternatives available, applies ergonomic principles, plans improvement measures, intervenes promptly on non-conformities and periodically reviews its processes.
- Growermetal promotes a **solid safety culture**, favouring collective protections, providing adequate instructions to workers and encouraging the involvement and consultation of workers and their representatives. To this end, it allocates organizational, technical and economic resources to ensure full compliance with the regulations and the constant improvement of health and safety conditions.

13. CONFIDENTIALITY AND COMPLIANCE WITH PRIVACY REGULATIONS

- Growermetal considers confidentiality to be a fundamental principle and requires its staff: (i) to maintain the utmost confidentiality on all information learned in the performance of their functions, in full compliance with the company procedures in force from time to time and the measures implemented by the company to prevent destruction, loss, unauthorized access, improper use of data, use of confidential information for personal purposes; and (ii) to refrain from deriving any advantage from them, even indirectly, as well as from communicating them to third parties or inducing others to use them. Personnel are also required to protect the intellectual property rights owned by the company and not to obtain or misuse the intellectual property of third parties.
- Personal data must be processed in full compliance with current data protection legislation and company procedures.

14. ACCOUNTING TRANSPARENCY AND CORPORATE COMMUNICATIONS AND TAX OFFENCES

- Documents, accounting data, corporate communications and administrative records must be drawn up accurately, fairly, truthfully, transparently and clearly, on the basis of complete and previously verified information. Valuations and estimates must be based on criteria of prudence and reasonableness and be adequately supported by appropriate documentation. The employees and external consultants involved in the preparation of the financial statements and documentation relevant for accounting purposes and tax legislation operate in compliance with the principles of truthfulness, fairness, completeness and collaboration.
- Growermetal guarantees adequate communication tools with stakeholders and ensures the dissemination of complete and reliable information.
- The procurement, management and control of financial resources must be carried out in accordance with the company procedures in force.
- It is forbidden for staff to obstruct the control and audit activities of the competent bodies or to provide the supervisory authorities with untruthful information or omit material facts that should have been disclosed.

15. CONFLICTS OF INTEREST

- In the sole interest of Growermetal, employees and contractors are required to make neutral and impartial decisions. To this end, they must refrain from participating in activities or decision-making processes in which there may be a conflict of interest, even if only potential. Conflict of interest means any situation in which personal or professional interests, held in a private capacity by the employee or collaborators, are capable of influencing the impartial performance of the functions and responsibilities entrusted by Growermetal, compromising the ability to operate in the full interest of the companies.
- In the presence of a conflict of interest, even potential, it is necessary, alternatively:
 - refrain from carrying out the tasks or assignments concerned, giving timely notice to their direct manager so that the latter can assess how to proceed; or
 - request specific authorisation from their manager, who, if necessary, will submit the matter to the competent administrator in order to assess the possible continuation of the activity.
- In case of doubt about the existence of a conflict of interest, prudential behaviour is required, verifying one's position in advance, also in the following example cases: (i) when the employee, external collaborator or persons close to him or her hold interests in companies or entities that are clients, competitors or suppliers of the company; (ii) when professional activities are carried

out outside the company; (iii) when holding positions or responsibilities in associations or public bodies.

16. MEMBERS AND CORPORATE BODIES

- Shareholders are defined as those who own shares in Growermetal. Growermetal guarantees these subjects:
 - equality and equity of treatment towards all categories of present and future members, avoiding the implementation of preferential behaviour;
 - the correctness, clarity and full availability of information so as to allow them to make choices based on full awareness.
- The activities of the corporate bodies are inspired by full compliance with the rules enshrined in the Articles of Association, by the law in force and, where applicable, by codes of professional ethics, refraining from carrying out actions that, by virtue of a personal interest, may conflict with the correct management of the company.

RELATIONS WITH THIRD PARTIES

17. INFORMATION TO THE OUTSIDE WORLD

- Growermetal recognizes the importance of a correct and transparent circulation of information for the market, investors and stakeholders in general. To this end, it identifies as privileged information, to be treated with confidentiality to protect the company's interests, information relating to economic and financial data, investment projects, acquisitions, mergers and commercial strategies, all in compliance with current market protection legislation.
- It is forbidden to intentionally spread false news, either internally or externally, concerning the company or its external collaborators.

18. CUSTOMERS

- Growermetal aims to win over and satisfy customers in compliance with current regulations and through a clear, transparent and truthful flow of information.
- Growermetal guarantees the quality and safety of the products through: a careful selection of raw materials, components, semi-finished and finished products; a rigorous management of production and marketing processes, based on procedures in compliance with current legislation; and a constant control of operational activities until the finished product is obtained and sold.
- Growermetal prohibits the marketing of products that differ, in origin, provenance and quality from what is declared, or that have characteristics that do not comply with the applicable regulations.
- Growermetal establishes and manages quality assurance mechanisms for products and services.

19. SUPPLIERS OF GOODS AND SERVICES

- Growermetal, in the pursuit of maximum competitive advantage, recognizes equal opportunities for each supplier. Relationships with suppliers are based on mutual loyalty, transparency and collaboration. Corporate functions that purchase goods and/or services, including external consultants, are required to:
 - always act in compliance with the principles of fairness, cost-effectiveness and quality;
 - adopt the principle of separation of roles where possible;

- adopt formalities to document the reasons behind the choices made, also with reference to economic profiles;
- observe and enforce legal provisions and contractual conditions.

20. EXTERNAL COLLABORATORS

- Compliance with the Code of Ethics and current regulations, including those on relations with the public administration, is essential for the initiation and continuation of the relationship with external collaborators. Each external collaborator is responsible for the truthfulness and authenticity of the documentation and information provided and is required to collaborate with the corporate bodies responsible for internal control. External collaborators are also required to maintain confidentiality on all information learned during the collaboration, with particular attention to absolute compliance with the legislation on the protection of privacy for the personal data processed, which must be collected, recorded and stored for specific, explicit and legitimate, relevant, complete and not excessive purposes, and processed in a lawful and correct manner.

21. COMMUNITY AND ENVIRONMENTAL PROTECTION

- Growermetal promotes the social development and well-being of the community in which it operates, also by actively supporting the reality of the territory through the support of initiatives and organizations dedicated to the care and progress of the local community. The company maintains relationships based on collaboration, fairness and transparency with public authorities at all levels and does not make contributions to political parties and trade unions.
- The company's activities are carried out in compliance with a balance between social, environmental and economic responsibility, paying particular attention to the impact on the ecosystem and adopting an approach based on prevention and precaution in protecting the environment. Growermetal ensures constant compliance with current legislation and promotes an efficient use of energy and resources, the reduction and recovery of waste, the containment of greenhouse gas emissions and noise, as well as the adoption of suitable measures to prevent negative environmental impacts.
- When it comes to the management of chemicals, Growermetal is committed to specifying and handling them safely, ensuring that we do not include banned chemicals in products or use any in production processes. In addition, Growermetal undertakes to record and report to the relevant authorities the quantities of emissions of the chemicals indicated by the laws of each relevant country and region.

RELATIONS WITH THE PUBLIC ADMINISTRATION

22. REFERENCE PRINCIPLES

- Relations with interlocutors belonging to the "public function" or with private interlocutors representing "public service" concessionaires are inspired by compliance with the principles of legality, fairness and transparency, in order not to induce the public administration to violate the principle of impartiality.
- The Recipients are required to manage relations with the public administration in compliance with the laws and regulations in force, as well as the principles of this Code of Ethics, so as not to compromise the integrity and reputation of both parties.

- It is forbidden to allocate contributions, subsidies or funding obtained from the State or from another public body or community bodies, even when of modest value and/or amount, for purposes other than those for which they were paid.
- Growermetal prohibits any active or passive conduct aimed at obtaining the disbursement by the State, community bodies or other public body, of any contribution or financing through the use of untrue or incomplete documentation, the failure to communicate relevant information, the presence of conflicts of interest or the adoption of misleading conduct, including through IT tools, likely to unduly influence the decisions of the public administration
- External collaborators, on the occasion of checks and inspections by the competent public authorities, must maintain an attitude of maximum availability and collaboration, in compliance with their specific skills, without hindering in any way the functions of the inspection and control bodies.

23. GIVEAWAYS

- Growermetal prohibits employees and external collaborators from offering, promising or soliciting money, goods, services or other benefits, either in the name and on behalf of the company or in a personal capacity, in order to obtain favourable conditions in the conduct of the company's activities. This prohibition applies in relations with any public or private entity, in Italy and abroad. In any case, it is forbidden to pursue the same purposes through indirect means, such as sponsorships, assignments, consultancy, advertising or through intermediaries.
- As the only exception to the above, **gifts of modest value are allowed**, attributable to normal courtesy practices and in any case such as not to compromise the impartiality and autonomy of judgment of the recipient.
- Gifts or other benefits received in violation of these principles must be refused or, where not possible, made available to the company for management in accordance with the Code of Ethics.
- With specific reference to relations with the public administration, Growermetal condemns any conduct aimed at illegitimately influencing the decisions of public officials or public service officers, in order to obtain an undue or unlawful profit or advantage. In particular, in addition to the conduct indicated above, conduct that has as its object the following is prohibited:
 - to examine or propose employment opportunities for public administration employees or for their relatives, friends or relatives;
 - provide or obtain confidential information and/or documents from which an undue or unlawful interest and/or advantage may result;
 - induce public officials and/or persons in charge of public services, Italian or foreign, to use their influence on other subjects belonging to the public administration;
 - any other conduct aimed at obtaining an advantage such as to compromise the integrity of one or both parties.

UPDATE AND INTERPRETATIONS

The Board of Directors of Growermetal may review and update this Code of Ethics at any time, the current version of which is made available on the company website <https://growermetal.com/>.

In addition, a copy of the Code of Ethics is made available to all employees and members of Growermetal's management and control bodies and is attached, where possible, to contracts governing the activities of collaborators who have a contractual relationship with the company (including, for example, agents, consultants, partners, suppliers and any other counterparty). If you have any doubts about the interpretation of the Code of Ethics, or if the Code of Ethics conflicts with company policies or procedures, please contact management.