

# METRA S.p.A.

## Organization, Management and Control Model - Code of Ethics and Conduct

Legislative Decree 8 June 2001 n. 231 and following amendments.

Document approved on 10 febbraio 2022

CEO 

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## INTRODUCTION

### The Group:

Metra Holding S.p.A. and its subsidiaries (together the "Metra Group"), constitute an industrial Group with an international production and distribution network. The Metra Group is a leader in Europe and throughout the world in the aluminum sector for building and industry.

The mission of the Metra Group is to "spread the culture and applications of aluminum throughout the world" and the value creation chain originates from the raw material which is transformed into a very pure metal alloy and, starting from extrusion, becomes a finished and evolved product.

The Companies of the Metra Group control and guarantee the traceability and excellence of each phase of design and processing with the competence of those who shape and support the dreams of generations of all time.

### The Company:

Metra S.p.A. (hereinafter also "Metra" or the "Company") pays great attention to the ethical aspects of the business and considers legality and fairness as essential conditions for the performance of its business activities. In carrying out its activities, it intends to comply not only with the laws and regulations in force, but also with the inspiring principles and high ethical standards contained in this Code of Ethics and Conduct. This includes complying with the laws of all countries and locations in which the Company conduct business.

Ethics in entrepreneurial activity is in fact an approach of fundamental importance for the good functioning and credibility of the Company towards clients, suppliers, shareholders and, more generally, towards the entire economic context in which it operates.

Metra S.p.A. intends to transform the knowledge and appreciation of the ethical values to which it relates into a competitive advantage.

The Company has therefore decided to adopt this Code of Ethics and Conduct (hereinafter also the "Code" or the "Code of Ethics"), in order to confirm and establish in a document the principles of correctness, loyalty, integrity and transparency of behavior, of the way it operates and of the conduct of relations both within the Company and with third parties.

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“Addressees” of the Code of Ethics are those who work for the Company: employees, directors, shareholders, supervisory bodies, as well as internal and external collaborators who contribute to the achievement of the Company's objectives within the scope of its management and supervision.

These subjects are therefore required to know the content of the Code of Ethics and to contribute to its implementation and dissemination of the principles developed therein.

The rules contained in the Code of Ethics integrate the behavior that the Addressees are required to observe by virtue of the laws, the regulations in force and the obligations provided for by collective bargaining. In no way may the conviction of acting to the advantage of Metra S.p.A. or other Metra Group Companies justify the adoption of behavior that is in contrast with these rules.

Addressees of the Code of Ethics who violate its rules shall damage the relationship of trust with the Company, causing damage, and shall be subject to the sanctions foreseen.

The application of the Code of Ethics is entrusted to the Administrative Body, which avails itself of the Company structures and, for control purposes, of the Supervisory Body established pursuant to Legislative Decree 231/2001 (hereinafter “Supervisory Body”).

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## I. GENERAL PRINCIPLES

The Addressees of this Code of Ethics must, as far as they are concerned when carrying out activities in the interest or to the advantage of the Company, comply with the following guiding principles:

- act in an informed manner in compliance with the law and regulations in force;
- treat customers, partners, employees, suppliers, the surrounding community and the institutions that represent it, including any public official or public service provider, as well as any third party with whom one enters into relations for professional reasons, with honesty, fairness, impartiality and without prejudice;
- compete fairly in the marketplace with competitors;
- protect one's own health and safety and that of third parties;
- monitor and, where appropriate, minimize the potentially harmful impacts of the Company's activities on the environment;
- maintain the confidentiality of information concerning the Company, its know-how, employees, customers and suppliers;
- operate according to the principle that every operation or transaction must be correctly registered, authorized, verifiable, legitimate, consistent and congruous;
- avoid or declare in advance any conflict of interest with the Company;
- collect and process personal data in compliance with the law and with the principle of legality, necessity and proportionality;
- use the Company's intellectual and tangible assets, including IT tools, in compliance with the general rules and their intended use and in such a way as to protect their preservation and functionality, respecting the intellectual property rights of third parties, avoiding their use in violation of any legal provision.

In no case may the pursuit of the Company's interest justify a conduct of the Company's management or collaborators that is not respectful of the laws in force and in compliance with the rules of this Code.

### a) Respect of Human Rights

Metra S.p.A. adopts a corporate policy of respect for human rights and shares international efforts to promote and protect human rights. The Company does not tolerate any abuse of human rights, including in its supply chain, and takes appropriate action to prevent and remedy any potential negative impact on human rights, and is committed to fighting any abuse of human rights and, in particular, child labor, slavery, human trafficking and forced labor.

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## II. BUSINESS CONDUCT

All actions and operations of the Company must be based on fairness and loyalty in the management of business, must be adequately recorded and it must be possible to verify the process of decision, authorization and execution.

For each operation there must be adequate documentary support in order to be able to proceed, at any time, to the performance of controls certifying the characteristics and motivations of the operation and identifying who has authorized, performed, recorded and verified the operation itself.

The Company undertakes to ensure the traceability of financial flows to and from the outside and the traceability of payments with particular reference to customers, suppliers and external consultants.

In relations with private external interlocutors, such as, for example, directors, managers or employees of customers, suppliers or competitors, relations must always be maintained on a level of fairness and professionalism, avoiding solicitations, promises or giving of money or other benefits of a personal nature; any act aimed at obtaining from such interlocutors, or even only at soliciting from them, even if through an intermediary, actions or omissions in violation of the obligations inherent to their office or their loyalty obligations towards the companies they belong to, promising or giving money or other benefits intended for them or for persons indicated by them or linked to them by any personal relationship, is prohibited.

Any request for benefits of a personal nature, for oneself or for others, received from third parties, shall be promptly reported to the Supervisory Board of the Company.

Wherever the Company and its collaborators operate in the world, they must respect the principles and rules of free competition and must not violate competition and antitrust regulations. It is forbidden to stipulate any pact or agreement with entities competing with the Company that could influence prices, terms and conditions of trade and in general hinder free, complete and honest competition.

Metra S.p.A. shall avoid entering into business relations with third parties whose participation in criminal or terrorist activities is ascertained or even only reasonably suspected and shall guarantee that its business activities are carried out in such a way as not to violate in any circumstance the international embargo and export control laws in force in the countries in which the Company or Metra Group operates.

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### **a) Relations with clients**

Metra S.p.A. bases its activities on the criterion of quality, essentially understood as the objective of fully satisfying the client, paying attention to requests that may lead to an improvement in the quality of the products and services rendered.

The Company ensures correctness and clarity in its dealings with customers, as well as correct and diligent fulfilment of the contract, taking care that the products supplied have all the characteristics and qualities promised and stated to customers. Any communication addressed to them, as well as advertising messages, shall be based on criteria of simplicity, clarity and completeness, avoiding the use of any misleading and/or unfair practice.

Unfair discrimination in negotiations is never allowed and the improper use of one's own contractual power to the detriment of any customer is forbidden.

### **b) Relations with suppliers**

Relations with suppliers, including financial and consultancy relations, shall be subject to the principles contained in this Code and shall be constantly and carefully monitored by the Company.

Metra S.p.A. exclusively uses suppliers that operate in compliance with current legislation and the rules laid down in this Code.

The selection of the aforementioned subjects and the determination of purchasing conditions shall be based on an objective evaluation of the quality and price of the products and services offered, as well as the ability to provide and promptly guarantee services and products of a level that is adequate for the Company's needs. In no case shall a supplier be preferred to another due to personal relationships or advantages other than the exclusive interest and benefit of the Company.

Metra S.p.A. undertakes not to establish or maintain business relations with suppliers that employ child labor or illegal labor or those whose conditions do not comply with the law.

Suppliers of machinery and equipment shall also be selected on the basis of the compliance of the supplies with the regulations on safety and hygiene at work.

Supplies of personal protective equipment and, in any case, general safety and prevention equipment, shall comply with the obligations concerning certification and suitability, both general and specific, in relation to the intended use.

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Before entrusting third parties with activities to be carried out within the Company or areas that are available to it, within the scope of contracts, works or supply contracts, the technical-professional suitability of the third party shall be verified, thus complying with the specific legal obligations regarding work safety and hygiene.

Metra S.p.A. undertakes to respect the industrial property rights held by third party suppliers and designers on materials, products, processes and projects used by the Company to perform its activities and manufacture its products.

### **c) Relations with employees**

Human resources are an indispensable factor for the existence, development and success of a Company. For this reason, Metra S.p.A. protects and promotes the value of human resources in order to improve and increase the assets and skills possessed by each employee, including seasonal employees, within the Company organization.

Metra S.p.A. offers equal opportunities to all employees on the basis of their professional qualifications and individual skills, without any discrimination on the basis of age, religion, ethnic or geographical origin, sexual orientation, or political or trade union membership.

Therefore, the Company, through the relevant functions, selects, hires, remunerates and manages human resources on the basis of criteria of merit and competence, in compliance with current collective bargaining agreements, and the bonus system adopted and based on criteria of objectivity and reasonableness.

Metra S.p.A. does not employ any form of forced, compulsory or child labor.

The work environment is based on reciprocal collaboration and fostering team spirit with respect for the moral personality of each individual, and is free of prejudice, intimidation, unlawful conditioning or undue discomfort.

Employees work according to the highest standards of quality and hygiene, in compliance with the rules defined in this Code of Ethics and in the operating procedures defined by the Company. This means that employees get to work in an environment free from all forms of unlawful discrimination, including sexual harassment and harassment based on gender, national origin, ancestry, nationality, citizenship, religion, age, sexual orientation, gender identity or expression, physical or mental disability, genetic information, uniformed service, veteran's status or any other characteristic protected by applicable law, ordinance or regulation.

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#### **d) Relations with competitors**

Metra S.p.A. believes in free and fair competition and directs its actions towards obtaining competitive results that reward capacity, experience and efficiency.

Each Addressee shall behave correctly in business activities of interest to the Company and in relations with the Public Administration.

Any action aimed at altering the conditions of correct competition is contrary to Metra S.p.A. Company policy and is forbidden for any subject acting on behalf of the Company.

In no case may the pursuit of the Company's interest justify conduct that does not comply with the rules of this Code.

In any communication with the outside world, information concerning the Company and its activities must be truthful, clear and verifiable.

In the context of fair competition, Metra S.p.A. shall not knowingly violate the intellectual property rights of third parties.

#### **e) Relations with the Public Administration**

In its relations with the Public Administration, the Company shall pay particular attention to every act, behavior or agreement, so that they are marked by maximum transparency, correctness and legality. To this end, Metra S.p.A. shall avoid, as far as possible, entrusting the entire process to a single individual, on the assumption that the plurality of subjects and functions allows minimizing the risk of interpersonal relationships that are not consistent with the Company's intentions. In application of the foregoing principle, in occasion of inspections or requests of authorization, the Company shall favor the plurality of corporate interlocutors, always on the assumption that this makes it possible to minimize the aforementioned risk.

In relations with public officials, no conduct shall be adopted, directly or indirectly, such as to improperly influence the decision of the counterparty. In particular, it is not allowed to propose employment and/or business opportunities that may benefit, even indirectly, employees of the Public Administration. If the Company uses consultants to represent it or to receive technical-administrative assistance in relations with the Public Administration, such persons shall comply with the directives given to Company employees. In the choice of such consultants, the Company shall give priority to the criteria of professionalism and fairness, evaluating with extreme care and caution the establishment of cooperation relationships with those persons who have been employed by the Public Administration or are related to certain officials by family ties.

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All requests for grants, contributions, financing and relief from public bodies, whether national, European or foreign are made in compliance with the applicable rules and, in particular, with the principle of separation of duties, registration and documentation; once granted, they can only be used for the sole purposes for which they were allocated.

**f) Gifts, presents and benefits**

No form of gift, gratuity or benefit is allowed that may be interpreted as exceeding normal business practices or courtesy, or in any case aimed at acquiring unlawful favorable treatment in the conduct of any activity connected with the Company. In particular, it is forbidden to make any kind of gift to public officials, both Italian and foreign, or to members of their families, aimed at influencing their independence of judgement.

Any gifts offered to third parties must only be of modest value, duly documented and authorized by the relevant department manager.

The Addressees of this Code of Ethics who receive gifts, gratuities or benefits that are not of modest value, or receive solicitations for the provision of gifts, gratuities and benefits that are not of modest value, are required to promptly notify the Supervisory Body established pursuant to Legislative Decree 231/2001, which will coordinate with the Administrative Body of the Company for the appropriate measures.

**g) International Business**

As a Company with global operations, the Company is subject to the laws and regulations of the jurisdictions in which it operates. Among other areas, these laws cover economic and trade sanctions, and export controls.

**Economic Sanctions**

The Company must comply with applicable economic and trade sanctions programs and laws such as those maintained by the US Treasury Department and by the Italian Treasury Department - Financial Security Committee (FSC). Restrictions and prohibitions cover Metra S.p.A. and its personnel when conducting business with or providing services to certain countries, entities and individuals. The Company must ensure that it only conducts business with reputable partners that are not prohibited or restricted under applicable law.

**Export Controls**

The Company must comply with all applicable national and multinational export control laws. Export control laws apply whenever Metra S.p.A. ships products from one country to another and sometimes even when the Company transfers a product from one owner to another in the same country.

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## **h) Relations with the Public**

Only authorized personnel are permitted to speak on behalf of the Company through public communications, including the media.

Unless authorized to do so, Company employees must never give the impression that they are speaking on behalf of the Company in any communication that may become public, including social media. Company employees must use good judgment when using social media, including expressing ideas and opinions in a respectful manner. Ultimately, each Company employee is solely responsible for what they post online.

## **III. HEALTH, SAFETY, ENVIRONMENT**

### **a) Health, hygiene and safety at work**

The protection of health and safety in the workplace is a primary objective of the Company.

Metra S.p.A. operates at all levels in order to guarantee the physical and moral integrity of its collaborators, working conditions that respect individual dignity and safe and healthy working environments, in full compliance with current regulations.

Due to the activities carried out by the Company, hygiene and safety in the workplace represent essential elements for the success of the Company; it is therefore necessary that each employee contributes to this.

Metra S.p.A. assesses all risks to the safety and health of workers, including in the choice of work equipment and chemical substances or preparations used, as well as in the layout of workplaces.

Every Company decision, of every type and level, regarding work safety and health, shall take into account the following principles and fundamental criteria:

- avoiding risks;
- assessing risks that cannot be avoided;
- combating risks at source;
- adapting work to man - particularly as regards the design of workplaces and the choice of work and production equipment and methods - in order to reduce monotonous and repetitive work and to reduce the effects of such work on health;
- take account of the degree of technical progress;
- replacing what is dangerous with what is not or is less dangerous;
- giving collective protection measures priority over individual protection measures.

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The Company plans prevention, aiming for a coherent whole that integrates technology, organization, working conditions, social relations and the influence of factors in the work environment.

Metra S.p.A. undertakes to disseminate and consolidate a culture of safety among all its collaborators, developing risk awareness and promoting responsible behavior by all collaborators, also by giving appropriate instructions.

The Addressees of this Code, and in particular the Employer and his delegate, if any, the Managers, the Persons in Charge, the Workers, the Health and Safety Officer, the competent Doctor and the Workers' Safety Representative, contribute to the process of risk prevention and health and safety protection for themselves, their colleagues and third parties, without prejudice to individual obligations and responsibilities under the applicable provisions of law.

The use of alcoholic or narcotic substances is generally prohibited in the context of Company activities.

It is also forbidden to smoke in the workplace - in compliance with the law - and in any circumstance in which smoking may endanger the Company's structures and assets or the health or safety of colleagues and third parties.

#### **b) Environmental protection**

The environment is a primary asset of the community, which Metra S.p.A. wishes to contribute to safeguarding. To this end, it shall plan its activities by seeking a balance between economic and environmental needs, in full compliance with the applicable legal and regulatory provisions, providing the utmost cooperation to the public authorities responsible for verifying, monitoring and protecting the environment.

The Addressees of this Code contribute, in carrying out their business activities, to the full protection of the environment. In particular, they shall pay the utmost attention to ensure compliance with current legislation on the subject and avoid illegal discharges, emissions, inputs and spills. Company waste shall be managed in compliance with current regulations.

Metra S.p.A. undertakes to spread and consolidate a culture of environmental protection and pollution prevention, developing risk awareness and promoting responsible behavior.

#### **c) Environmental impact and product safety**

Metra S.p.A. undertakes to produce and market, in full compliance with legislative and regulatory requirements, products that meet the highest standards in terms of environmental performance and safety.

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#### IV. PROCESSING OF DATA AND INFORMATION

The processing of data and information that Metra S.p.A. becomes aware of during the execution of its Company activities shall be carried out in full respect of confidentiality and the correct treatment of the data of the interested parties.

The separation of roles and responsibilities shall be ensured in the processing of data and information. Third parties involved in the processing are bound to confidentiality.

All data and information received by the Addressees of this Code of Ethics, in relation to their working or professional relationship, are strictly confidential and remain the property of the Company.

In the collection and processing of personal data, the Company pursues and ensures compliance with the principles of legality, necessity and proportionality, guaranteeing the interested parties the exercise of their rights as provided for by the relevant laws.

Those who, by virtue of the exercise of a function, profession or office, have access to confidential data and information concerning the Company's business or products, may not use them for their own or others' benefit, but exclusively for the performance and within the scope of their office or business activity.

In any case, confidentiality is recommended with regard to data and information of a public nature concerning the Company and the work or professional activity carried out by it.

External disclosure of data and information shall be carried out by the competent corporate functions in compliance with the law, transparency and truthfulness thereof.

In particular, all data and information transmitted to the Public Administration must be truthful, correct, transparent and complete, and must be produced and disclosed in accordance with corporate organizational procedures and the relevant authorization flows.

The following principles must be respected in processing activities:

- accountability;
- transparency;
- limitation of collection;
- purpose in use;
- verifiability and quality;
- security.

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## V. USE OF IT RESOURCES

Computer and telematic resources are a fundamental tool for the efficient and competitive operation of the Company, ensuring the rapidity, breadth and correctness of the information flows necessary for the efficient management and control of Company activities.

All data and information stored in the Company's computer and telematic systems, including e-mail messages, are the property of the Company and are to be used exclusively for the performance of Company activities, according to the methods and within the limits indicated by the same.

In order to ensure compliance with data processing and privacy regulations, the correct and responsible use of computer and telematic tools is pursued; any use for the purpose of collecting, storing and disseminating data and information for purposes other than those connected with the Company's business is prohibited.

It is forbidden to use any computer or telematic program on which third parties hold copyright and which has not been previously licensed to the Company.

For the purposes of preventing the relevant offences of Legislative Decree 231/2001 and for the protection of the Company and its assets, the use of computer and telematic tools could be subject to monitoring and verification by the Company, within the limits and conditions established by laws and regulations.

## VI. ACCOUNTING BOOKS AND CORPORATE RECORDS

The Company keeps accurate and complete records of all Company activities and operations, in order to implement maximum accounting transparency and avoid the appearance of false, misleading or deceptive entries.

Administrative and accounting activities are carried out using up-to-date IT tools and procedures that optimize efficiency, correctness, completeness and correspondence with accounting principles, as well as favoring the necessary controls and checks on the legitimacy, consistency and congruity of the process of decision-making, authorization and performance of Company actions and operations.

Metra S.p.A. believes that the correctness of Company financial statements is a fundamental value and shall provide, at all levels, its maximum collaboration, supplying correct and truthful information regarding

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activities, assets and Company operations, as well as any reasonable request received from the competent bodies.

## VII. TAX AND CUSTOMS COMPLIANCE

Metra S.p.A. and its employees and collaborators comply with fiscal/tax laws and regulations. They maintain a cooperative and transparent relationship with the Authorities in order to truthfully and completely provide the information necessary for the fulfillment and control of fiscal/tax obligations and provide for fiscal/tax compliance within the timeframe and in the manner defined by the laws, regulations and Authorities.

Similarly, Metra S.p.A. and its employees and collaborators shall refrain from introducing, transporting, holding or exchanging goods in violation of the requirements, prohibitions and limitations set out in the laws and regulations in force, including the Italian Consolidated Law on Customs.

In any case, the principles of traceability, segregation of duties, verifiability and up-to-dateness must be observed, in order to prevent any conduct that might generate violations in the fiscal/tax and customs area.

## VIII. CORPORATE CONDUCT

Metra S.p.A. believes that corporate conduct must always comply in form and substance with the law and that, in particular, it is necessary to ensure the free determination of the shareholders' meeting; to behave in a transparent and reliable manner, also towards creditors; to protect the integrity of the share capital and of the non-distributable reserves; to ensure maximum cooperation with the Authorities responsible for controls and audits.

In carrying out Company activities or activities that have an effect, even indirectly, on the same, the Addressees of this Code shall avoid any form of association that could in any way be functional to the commission of an offence.

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## IX. CONFLICTS OF INTEREST

The Addressees of the Code of Ethics must avoid all situations and activities in which a conflict of interest may arise between personal economic activities and the duties covered within the structure to which they belong.

It is not permitted to pursue one's own interests to the detriment of the interests of the Company, nor to make unauthorized personal use of Company assets; without prejudice to the foregoing, Directors are not permitted to hold interests directly or indirectly in competing Companies, customers, suppliers or Companies responsible for certifying accounts, unless they inform the Supervisory Board in advance, which will supervise accordingly, informing the Management Body where appropriate.

Each Director must inform the other Directors and the Board of Statutory Auditors of any interest he/she may have, on his/her own account or on behalf of third parties, in a certain operation of the Company, specifying its nature, terms, origin and scope. In the case of a Managing Director, he must also abstain from carrying out the operation and refer it to the Board of Directors. In such cases, the Board of Directors must adequately justify in its resolutions the reasons and the convenience for the Company of the operation.

## X. SECURITIES TRADING

Trading in the stock or other securities of publicly traded companies or “tipping” others on the basis of material, non-public information is forbidden as a matter of law. Every effort should be taken to avoid even an appearance that a Company employee who buys or sells securities (such as securities of the Company’s customers or suppliers) did so in a manner to profit from any inside information. Company employees are not permitted to use or share any material, non-public information for stock trading purposes.

Inside information is not easily defined, but generally means non-public information that a reasonable investor would consider in making a decision about buying, holding or selling stock in a publicly traded company. Because this standard can be imprecise, we must err on the side of not trading to make sure there is not even the appearance of improper conduct.

In order to maintain compliance with this Code and applicable law, the Company requires any employee who generally has access to material non-public information, even if that person does not have access to such

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information at the time of the contemplated purchase or sale, to obtain clearance for any trade in advance of the actual trade.

## XI. IMPLEMENTATION AND CONTROL

In compliance with current regulations and with a view to planning and managing Company activities in order to achieve efficiency, correctness, transparency and quality, Metra S.p.A. shall adopt organizational and management measures that are suitable for preventing illicit behavior or behavior that is in any case contrary to the rules of this code by any subject acting for the Company.

Due to the structure of its activities and internal organization, the Company may adopt a system of delegation of powers and functions, providing for the assignment of specific tasks to persons with appropriate skills and expertise.

The Company adopts and implements organization and management models that provide for appropriate measures to ensure that activities are carried out in compliance with the law and with the rules of conduct of this Code, and to promptly discover and eliminate risk situations.

The application of the Code of Ethics is entrusted to the Administrative Body, which avails itself of the Supervisory Body, set up ad hoc pursuant to Legislative Decree 231/2001, and which is entrusted with the tasks of

- a) supervise compliance with the Code and its dissemination among all Addressees;
- b) verify all reports of violations of the Code and inform the competent corporate bodies and functions of the results of the checks, for the adoption of any sanctions;
- c) propose amendments to the content of the Code to adapt it to the changing context in which the Company operates and to the needs arising from its organizational evolution.

This Code of Ethics is widely distributed internally and is available to any Company interlocutor.

## XII. REPORTING VIOLATIONS

Cases of violation of this Code of Ethics may be reported by any addressee in a confidential manner directly to the Company's Supervisory Body, as per Legislative Decree 231/2001, at the following address:

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Metra Supervisory Body

c/o Metra S.p.A.

Via Stacca 1 - 25050 Rodengo Saiano (BS)

or via email to:

odv@metra.it

The procedures for reporting and verifying violations, also in the interest of truthfulness, shall be based on criteria of confidentiality and protection of privacy, in order to prevent retaliation of any kind against the person making the report, but also to ensure that the actual facts are ascertained.

### **XIII. SANCTIONS**

Violation of the provisions of this Code of Ethics will constitute a disciplinary offence and breach of contractual obligations of the employment or functional relationship or professional collaboration, with all the consequent effects of law and contract, also pursuant to Articles 2104 and 2105 of the Italian Civil Code; it may also constitute just cause pursuant to Articles 2383 and 2400 of the Italian Civil Code.

It will therefore entitle the Company to apply the disciplinary sanctions provided for in the CCNL, as well as those provided for in the Organization, Management and Control Model pursuant to Legislative Decree 231/2001 adopted by the Company and to which reference should be made for details of the disciplinary system.

### **XIV. FINAL PROVISIONS**

This Code of Ethics is effective immediately and until revised. All Addressees are obliged to take adequate cognizance of it and to observe it.

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