

CODE OF ETHICS



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1. FOREWORD

"The Code of Ethics is the Constitutional Charter of the Company, a charter of rights and moral duties that defines the ethical-social responsibility of each participant in the company organisation.

The Code of Ethics is an effective means of preventing irresponsible or unlawful behaviour on the part of those who work on behalf of the Company because it introduces a clear and explicit definition of one's ethical and social responsibilities to all those involved directly or indirectly in the Company's activities (customers, suppliers, partners, citizens, employees, collaborators, public institutions, environmental associations, and anyone else affected by the Company's activities)."

The Code represents the measures that CPC Inox S.p.A. intends to adopt from an ethical-behavioural standpoint, in order to adapt its structure to the requirements of Legislative Decree No. 231/2001 and to set out the lines of conduct within and outside CPC Inox S.p.A. to be followed in the realisation of corporate objectives. Therefore, the principles contained in this code of ethics provide for and extend to the organisation and management models referred to in Art. 6 of Legislative Decree 231/01.

However, the Code of Ethics does not replace and does not override existing laws and the existing National Collective Labour Agreement.

All persons in top positions, such as directors, auditors or persons with management functions, as well as all employees, collaborators, consultants and, more generally, all third parties who enter into relations with CPC Inox S.p.A. must never fail to respect fundamental principles such as honesty, moral integrity, fairness, transparency and objectivity in the pursuit of the Company's objectives.

CPC Inox S.p.A. shall set up suitable information, prevention and control tools and guarantee the transparency of the conduct implemented, intervening, where necessary, to repress any violations of the Code and shall monitor its effective compliance.

2. THE VALUES

• **Transparency**

The principle of transparency is based on truthfulness, accuracy and completeness of information both outside and inside CPC Inox S.p.A.

• **Integrity**

CPC Inox S.p.A. is a company in which fairness, honesty, equity and impartiality of behaviour inside and outside the Company constitute a shared way of feeling and acting. Sharing these principles establishes lasting relationships with customers and suppliers, general transparency in relations with third parties, and appropriate and fair recognition of employees' work.

• **Respect**

Staff are the Company's key resource: respect, opportunities for growth and development, and recognition of personal merits are its guidelines.

Employees should all be treated with equal dignity regardless of the greater or lesser importance of each one.

3. GENERAL PRINCIPLES OF CONDUCT

In fulfilling the corporate mission, the conduct of all addressees of this Code must be inspired by the ethics of responsibility.

CPC Inox S.p.A. has as a steadfast principle the respect of the laws and regulations in force in Italy and in all the countries in which it operates.

The addressees of the Code are obliged to comply with the laws in force; under no circumstances is it permitted to pursue or realise the Company's interest in violation of the law.

• **Honesty, moral integrity, fairness, transparency and objectivity**

In the performance of activities and in relations of any kind and nature, all those who work with and for CPC Inox S.p.A. are required to diligently comply with the laws in force and the regulations of the countries in which the Company's activities are carried out, as well as the Code of Ethics and internal regulations. They must behave in accordance with the fundamental principles of honesty, moral integrity, fairness, transparency, objectivity and respect for the individual's personality in the pursuit of the Company's objectives and in all relations with internal and external persons and entities.

Under no circumstances can the pursuit of the interest of CPC Inox S.p.A. justify an action that does not conform to honest conduct.

Therefore, CPC Inox S.p.A. shall not enter into or continue any type of relationship with anyone who adopts behaviour that differs from what is established in this specific point of the Code of Ethics.

• **Equal opportunities**

CPC Inox S.p.A. is an equal opportunity employer: discrimination against any individual based on race, skin colour, sex, country of origin, age, religious belief, marital status, sexual orientation, sexual identity, individual expression, military or veteran status, disability status or any other category protected by law or any other factor, as prohibited by current law, is not permitted.

This policy is adopted for all aspects of employment at CPC Inox S.p.A. including selection, recruitment, training, career advancement and dismissal.

• **Fair Competition**

CPC Inox S.p.A. intends to develop the value of competition by adopting principles of fairness, fair competition and transparency towards all operators in the market.

• **Quality of services and products**

CPC Inox S.p.A. orients its activities towards the satisfaction and protection of its customers, listening to requests that may lead to an improvement in the quality of products and services.

For this reason, CPC Inox S.p.A. directs its research, development and marketing activities to high-quality standards for its services and products.

• **Child labour**

CPC Inox S.p.A. opposes the exploitation of children. For CPC Inox S.p.A. the exploitation of minors or other classes of workers is not acceptable, and the knowledge of any breach of its principles in this respect entitles CPC Inox S.p.A. to break off business relations.

4. ETHICAL PRINCIPLES IN RELATIONS WITH STAFF

4.2 Workers' rights: General criteria of conduct

Employees are obliged to be familiar with the rules of this Code, to refrain from conduct contrary to them, and to cooperate by reporting to their Supervisor all useful information about any deficiencies in controls, suspicious conduct, violations, etc. Compliance with the rules of this Code is to be considered an essential part of the contractual obligations of all employees pursuant to Article 2104 of the Italian Civil Code.

• Protection of the person

Everyone's cooperation is required in order to maintain a climate of mutual respect for each other's dignity, honour and reputation. Employees who believe to have suffered discrimination may report the incident to the Supervisory Board and/or their supervisor, who will proceed to ascertain the actual violation. Disparities that can be justified based on objective criteria do not constitute discrimination.

• Formalisation of the employment relationship

Labour relations are formalised with regular contracts, rejecting any form of irregular employment. The Addressees shall foster the utmost cooperation and transparency towards the newly recruited person, so that the latter is clearly aware of the task assigned to him/her.

• Staff Training

Each company manager must fully utilise and make the most of all the professional skills present in the organisation by activating the available resources to foster the development and growth of their employees.

In this context, it is of particular importance that managers communicate the strengths and weaknesses of the employee so that the employee can strive to improve his or her skills, including through targeted training.

CPC Inox S.p.A. makes information and training tools available to all employees with the aim of enhancing specific skills and implementing the professional value of personnel.

Institutional training is provided at certain times during the employee's life in the Company (e.g., for new recruits, training on safety at work, Legislative Decree 231/01 and related risk prevention, introduction to the Company and its business), as well as scheduled training for operational staff.

• Protection of privacy

The employee's privacy is protected by adopting standards specifying the type of information to be requested from the employee and how it is to be processed and stored. Any scrutiny of the ideas, preferences, personal tastes and, in general, information of collaborators not related to the purposes of personnel selection and management of the employment relationship in accordance with the criteria set out in this Code of Ethics is excluded. These standards also provide that, except in cases provided for by law, personal data may not be disseminated without the prior consent of the data subject.

• Safety, health and working conditions

Within the scope of its activities, CPC Inox S.p.A. is inspired by the principle of respect for and protection of the environment and pursues the objective of protecting the safety and health of workers, taking all measures provided for by law in this regard.

• Staff Evaluation

CPC Inox S.p.A. avoids any form of discrimination against its employees.

In the context of personnel management and organisation processes, decisions are based on the correspondence between expected profiles and the profiles possessed by employees.

Employees are evaluated through a periodic performance appraisal system involving the Human Resources Department, the relevant managers and the person concerned.

During the evaluation process, the Human Resources Department ensures compliance with the non-discrimination criterion and, within the limits of available information, takes appropriate measures to avoid favouritism, nepotism, or forms of patronage.

4.3 Workers' duties: General criteria of conduct

The employee must act loyally, in compliance with the obligations subscribed to in the employment contract, with the provisions of the Code of Ethics, company regulations and national standards, ensuring high standards of the services rendered (Art. 2014 of the Italian Civil Code). - Diligence of the employee and Article 2105 of the Italian Civil Code. - Duty of loyalty). Failure to comply with the duty to act with diligence and the duty of loyalty towards CPC Inox S.p.A. may lead to the application of disciplinary sanctions pursuant to Article 2106 of the Italian Civil Code.

Conduct that could damage CPC Inox S.p.A.'s assets, company management, relations with stakeholders and the image of CPC Inox S.p.A. Must be absolutely avoided.

Decisions made by each individual must be based on the principles of sound and prudent management, assessing potential risks wisely, in the knowledge that personal choices contribute to the achievement of positive business results.

All operations and transactions must be inspired by the utmost fairness from the perspective of management, completeness and transparency of information, legitimacy in form and substance, and clarity and truthfulness in accounting, in accordance with current regulations and company procedures.

• Conflict of interest

All collaborators of CPC Inox S.p.A. are obliged to avoid situations from which conflicts of interest may arise (e.g. shared interest with suppliers or customers) and to refrain from taking personal advantage of business opportunities of which they have become aware in the course of carrying out their duties (art. 2105 of the Italian Civil Code - Duty of loyalty).

In the event of even the appearance of a conflict of interest, the employee is required to notify his or her direct superior, who must inform the top management in order to assess its actual existence.

• Use of computer systems and other corporate tools

Company assets, and in particular communication tools, telephone equipment and personal computers, as well as CPC Inox S.p.A.'s means of transport, are assigned to personnel based on their work activity. Therefore, their use should be limited to professional needs.

The use of company property for personal purposes is permitted within the limits and in situations of particular necessity and, in any case, any use for personal purposes must not jeopardise the performance of the service.

All computer equipment as well as personal computers, whether fixed or mobile, and their programs and/or applications, entrusted to "company users" are working tools, therefore:

- must be stored properly;
- may only be used for professional purposes in connection with the assigned tasks and not for personal or even unlawful purposes;
- storage of files or documents of an unlawful, outrageous or discriminatory nature, or in breach of copyright law, is not permitted.

5. CRITERIA OF CONDUCT TOWARDS SUPPLIERS

• Selection of suppliers

Every purchase in favour of CPC Inox S.p.A. must be conducted with loyalty, integrity, confidentiality, diligence, professionalism and objectivity of judgment, by qualified personnel who take responsibility for their assessments and judgements, ensuring compliance with all relevant regulatory provisions in their purchasing activities.

Those responsible for and involved in the purchasing process:

- are bound to respect the principles of impartiality and independence in the tasks and functions entrusted to them, operating with the adoption of objective and documentable criteria;
- must remain free from personal obligations towards suppliers; any personal relationships of employees and/or consultants with suppliers must be reported to the relevant management prior to any negotiations;
- must maintain relations and conduct negotiations with suppliers in such a way as to create a sound basis for mutually beneficial relations of appropriate duration, in the interest of the Company;
- are under an absolute obligation to immediately report to the Supervisory Board any attempt or case of alteration of normal business relations;
- must not offer goods or services, in particular in the form of gifts, to personnel of other companies or entities in order to obtain confidential information or direct or indirect benefits relevant to themselves or the Company, without prejudice to the general provisions of this Code of Ethics;
- must not accept goods or services from external or internal parties in return for the release of confidential information or the initiation of actions or conduct aimed at favouring such parties, even if there are no direct repercussions for the Company.

• Transparency

Relations with CPC Inox S.p.A.'s suppliers, including financial and consultancy contracts, are governed by the rules of this Code and are subject to constant and careful monitoring by CPC Inox S.p.A.,

including from the standpoint of the adequacy of services or goods supplied in relation to the agreed consideration. CPC Inox S.p.A. sets up appropriate procedures to ensure maximum transparency in the selection of suppliers and the purchase of goods and services.

• **Fairness and diligence in the performance of contracts**

CPC Inox S.p.A. and the supplier must work to build a collaborative relationship of mutual trust. CPC Inox S.p.A. undertakes to inform the supplier in a correct and timely manner regarding the characteristics of the activity, the forms and timing of payment, in compliance with the regulations in force as well as the expectations of the counterparty, given the circumstances, the negotiations and the content of the contract. The performance of contractual services by the supplier shall be in accordance with the principles of fairness, correctness, diligence and good faith and shall be carried out in compliance with applicable regulations.

6. CRITERIA OF CONDUCT TOWARDS CUSTOMERS

• **Equality and impartiality**

CPC Inox S.p.A. is committed to:

- satisfying its customers through the fulfilment of its contractual obligations;
- not arbitrarily discriminating against its customers.

CPC Inox S.p.A. establishes a relationship with customers characterised by high professionalism and marked by helpfulness, respect and courtesy, by pursuing and offering maximum cooperation.

• **Contracts and Communications**

Contracts and communications with customers of CPC Inox S.p.A. are:

- clear, simple and formulated in language as close as possible to that habitually used by the interlocutors;
- in compliance with the regulations in force and the indications of the Authorities, without resorting to elusive or otherwise unfair practices (such as, for example, the inclusion of unfair practices or clauses against consumers);
- complete, so that no element relevant to the client's decision is overlooked.

CPC Inox S.p.A. undertakes to communicate promptly and in the most appropriate manner any information relating to changes and variations in service provision.

• **Interaction with customers**

The Company is committed to facilitating interaction with its customers through the prompt handling and resolution of any complaints and by using appropriate communication systems. The Company repudiates litigation as a means of obtaining undue advantages and resorts to it on its own initiative only when its legitimate claims do not find due satisfaction in the interlocutor.

• **Confidentiality of Customer Information**

The protection of our customers' confidential information is of crucial importance to CPC Inox S.p.A. Customers entrust their confidential information and we must therefore take all necessary measures to ensure that this confidential information is kept confidential.

7. CRITERIA OF CONDUCT TOWARDS PUBLIC ADMINISTRATION AND INSTITUTIONS

For the purposes of this Code of Ethics, Public Administration shall mean, in addition to any public body, also any independent administrative agency, person, natural or legal, acting as a public official or person in charge of a public service or as a member of a body of the European Community or as an official of a foreign state.

Also under the terms of this Code of Ethics, the definition of a public body includes those private entities that, for overriding political-economic reasons, perform a public function to safeguard general interests, such as the managing bodies of regulated markets.

• **Rules of conduct on corruption and bribery risks**

It is not permitted, directly or indirectly, nor through a third party, to offer or promise money, gifts or compensation, in any form whatsoever, nor to exert unlawful pressure, nor to promise any object, service, performance or favour to executives officials or employees of the Public Administration or to persons in charge of a public service or to their relatives or cohabitants for the purpose of inducing them to perform an official act or an act contrary to their official duties, this also being deemed to be with the purpose of favouring or damaging a party in a civil, criminal or administrative trial, in order to directly or indirectly benefit the Company.

Moreover, anyone who receives explicit or implicit requests for benefits of any kind from persons in the Public Administration, as defined above, shall immediately:

- suspend all relations with them;
- inform in writing the Supervisory Board and his/her company manager.

The requirements set out in the preceding points must not be circumvented by resorting to various forms of aid and contributions that, in the guise of appointments, consultancy, advertising, etc., have similar purposes to those prohibited in the same points.

• **Fairness in business dealings with the PA**

Although the supply of products to the Public Administration is not part of CPC Inox S.p.A.'s normal business strategies, when establishing business relations with the Public Administration, including participation in public tenders, it is necessary to always operate in compliance with the law and correct business practice.

In particular, the following actions must not be taken, directly or indirectly:

- examining or proposing employment and/or business opportunities that may benefit employees and/or their direct superior in a personal capacity;
- offer free gifts in any way;
- soliciting or obtaining confidential information that may compromise the integrity or reputation of either party.

• **Use of contributions and financing received**

It is forbidden to use contributions, financing, or other disbursements, howsoever called, granted to the Company by the State, a Public Entity or the European Union, for purposes other than those for which they were assigned.

• **Alteration of PA Information Systems**

It is prohibited to alter in any way the operation of a computer or telecommunications system or to intervene illegally in any manner whatsoever on the data, information and programmes contained therein or pertaining thereto, in order to obtain an unfair profit to the detriment of others. The prohibition is reinforced if the State or a public body is harmed.

8. CRITERIA OF CONDUCT TOWARDS POLITICAL PARTIES AND TRADE UNIONS

• **Contributions to political and trade union organisations**

CPC Inox S.p.A. does not make contributions, direct or indirect or in any form whatsoever, to political parties, movements, committees, associations or other bodies of a political or trade union nature, or to their representatives.

Addressees are free to provide political funding, on a personal level, to candidates, parties or committees of their choice, within the limits provided for by law. Under no circumstances will Addressees be reimbursed or compensated for any personal political funding.

9. CRITERIA OF CONDUCT RELATING TO ACTIVITIES OF AN ACCOUNTING, ADMINISTRATIVE OR FINANCIAL NATURE

CPC Inox S.p.A. endeavours to ensure that its economic/financial performance is such as to safeguard and increase the value of the Company, in order to adequately remunerate the risk assumed with the investment of its capital. CPC Inox S.p.A. is committed to maximising long-term value. To fulfil this commitment, the Company adopts financial planning standards and accounting systems that are consistent with and appropriate to the accounting principles applicable to the Company.

In carrying out this practice, CPC Inox S.p.A. operates with the utmost accounting transparency, consistent with best business practices.

This transparency is based on the truth, accuracy and completeness of the basic information for the relevant accounting records.

Adequate supporting documentation of the activity carried out is kept on file for each operation, so as to enable the easy recording of accounts, the identification of the various levels of responsibility and the accurate reconstruction of the operation.

Each accounting entry, in turn, must reflect exactly what is shown in the supporting documentation.

10. GENERAL PRINCIPLES TO PROTECT HEALTH AND SAFETY AT WORK

CPC Inox S.p.A. considers the allocation of human, professional, organisational, technological and economic resources to safety as a productive investment. CPC Inox S.p.A. considers safeguarding the safety and health of workers to be of primary importance, aiming not only at the

compliance with the requirements of the specific regulations, but an action aimed at continuous improvement of working conditions.

In virtue of this consideration, CPC Inox S.p.A. promotes the integration of safety in all company activities. All personnel, according to their individual skills and duties, must implement the necessary actions and be aware of the importance of their role and responsibility. Lastly, CPC Inox S.p.A. believes that, at each hierarchical level, during the performance of his or her role and in accordance with the training received, each person must endeavour to assess the risks to the safety and health of workers, undertaking and implementing measures aimed at eliminating risks or, if this is not possible, at minimising them.

CPC Inox S.p.A. therefore adopts the following principles:

- the best risk prevention comes from knowledge of hazards and their assessment;
- risk assessment carried out with the cooperation of those "working in the field" may be more realistic. It is believed that those who "work in the field" can provide significant elements to increase the level of safety by contributing to the search, identification and removal of causes, and that risk analysis is an integral component of work activity and an element of professional growth and enrichment.

11. GENERAL PRINCIPLES TO PROTECT THE ENVIRONMENT

CPC Inox S.p.A. pays particular attention to environmental issues and, in this sense, undertakes to adopt corporate strategies and techniques that improve the environmental impact of its activities, in compliance with current legislation and also taking into account the development of scientific research and best experiences.

In order to reduce environmental risks, CPC Inox S.p.A. undertakes to operate in line with the following principles:

- progressive integration of the environmental aspects of the activities carried out with corporate strategies;
- sustainable management of environmental resources, including through policies to enhance the use of natural resources;
- implementation of all necessary actions to ensure compliance and adaptation to current regulatory requirements;
- constant updating of staff on legislative and regulatory developments in environmental matters;
- raising awareness of and involvement of staff in environmental issues, in order to achieve high standards of professionalism.

12. INTERNAL CONTROL SYSTEM AND IMPLEMENTATION OF THE CODE OF ETHICS

• Knowledge and understanding of the Code of Ethics

Each person at CPC Inox S.p.A. is required to be familiar with the principles and contents of the Code, as well as with the reference procedures governing the functions and responsibilities covered. It is the obligation of each person at CPC Inox S.p.A. to:

- refrain from conduct contrary to these principles, contents and procedures;

- carefully select, to the extent of their competence, their collaborators and guide them to full compliance with the Code;
- require third parties, with whom CPC Inox S.p.A. enters into relations, to confirm that they have taken cognisance of the Code;
- promptly report to his/her superiors or to the body to which he/she belongs, and to the Guarantor, his/her own findings or news provided by stakeholders concerning possible cases or requests of violation of the Code; reports of possible violations shall be sent in compliance with the operating procedures established by the Board of Auditors and the Supervisory Board of CPC Inox S.p.A.;
- cooperate with the Guarantor and the functions entrusted with the specific procedures in the verification of possible violations;
- take immediate corrective measures when required by the situation and, in any case, prevent any kind of retaliation.

• Dissemination and communication

CPC Inox S.p.A. undertakes to disseminate the Code of Ethics, using appropriate means of communication and company tools, including the Company's website (www.cpcinox.com), information meetings and staff training.

All persons must be in possession of the Code of Ethics, be familiar with its contents and observe its provisions.

CPC Inox S.p.A., also based on the indications of the Supervisory Board, prepares and implements a permanent training plan aimed at ensuring knowledge of the principles and ethical standards defined by this Code. The training initiatives are differentiated, depending on the role and responsibility of the trainees; a special training programme is provided for new recruits, illustrating the contents of the Code of Ethics that they are required to observe.

The Supervisory Board and the company management are available for any clarification and explanation regarding the Code of Ethics. An email address will be set up for enquiries concerning compliance with the Code of Ethics (odv@cpcinox.com).

• Supervision of the implementation of the Code of Ethics

The following parties have the task of verifying the implementation and enforcement of the Code of Ethics:

- Chairman of the Board of Directors;
- Board of Directors;
- Board of Auditors;
- Supervisory Body: This body, in addition to monitoring compliance with the Code of Ethics, suggests appropriate updates to the Code, also based on reports received from staff.

The Supervisory Board is responsible for the following tasks:

- communicate to the Chairman, for the adoption of appropriate measures, reports received on violations of the Code of Ethics;
- express binding opinions on the revision of procedures, in order to ensure their consistency with the Code of Ethics;

- contribute to the periodic review of the Code of Ethics. To this end, the Supervisory Board formulates appropriate proposals to the Board of Directors, which assesses them and, if necessary, approves and formalises them.

• Control and updating

The Supervisory Board is assigned the following tasks:

- verify the application of and compliance with the Code of Ethics through a monitoring activity consisting of ascertaining and promoting the continuous improvement of ethics within the Company;
- monitor initiatives for the dissemination of knowledge and understanding of the Code of Ethics, ensuring the development of communication and ethical training activities, analysing and integrating proposals for the revision of company policies and procedures with a significant impact on company ethics;
- receive and analyse reports of breaches of the Code of Ethics from all parties concerned;
- provide for the periodic review of the Code of Ethics.

• Reporting problems or suspected violations

Anyone who becomes aware of, or is reasonably convinced of, the existence of a breach of this Code, of a particular law or of company procedures, has a duty to immediately inform his/her supervisor and the Supervisory Board (odv@cpccinox.com).

Reports must be made in writing, possibly also anonymously, in accordance with the forms and channels provided for this purpose.

CPC Inox S.p.A. shall put in place the necessary measures to protect whistleblowers from any kind of retaliation, understood as an act that may give rise to forms of discrimination or penalisation (e.g. interruption of relations with partners, suppliers, consultants, etc., denial of promotions to employees).

To this end, the confidentiality of the reporting person's identity is ensured, without prejudice to legal obligations.

The responsibility for investigating possible breaches of the Code of Ethics lies with the Supervisory Board, which may, if necessary, hear the author of the report, as well as the person responsible for the alleged breach: staff are required to fully cooperate with any internal investigations.

As a result of this activity, the Supervisory Board shall report to the management those behaviours that motivate the application of possible disciplinary sanctions, or the activation of contractual termination mechanisms.

• Disciplinary measures resulting from violations

The provisions of this Code form an integral part of the contractual obligations undertaken by personnel and persons having business relations with CPC Inox S.p.A.

Violation of the principles and conduct indicated in the Code of Ethics compromises the relationship of trust between CPC Inox S.p.A. and the perpetrators of the violation, be they directors, employees, consultants, collaborators, customers or suppliers.

Violations will be prosecuted by CPC Inox S.p.A. under the following terms:

- As far as employees are concerned, by means of appropriate disciplinary measures, regardless of whether the conduct constitutes a criminal offence, and by initiating criminal proceedings where the conduct constitutes a criminal offence. In particular, sanctions will be in accordance with the rules and logic of the employment contract applied. Disciplinary measures range from a warning or reprimand to suspension without pay and, in the most serious cases, dismissal.

Before taking disciplinary measures, the person concerned is given the opportunity to justify his/her conduct in accordance with the Workers' Statute.

- As far as consultants, collaborators, customers and suppliers are concerned, specific termination modalities will be activated, to be specified in the individual contracts.
- With regard to top managers, Directors or Legal Representatives, the Supervisory Board shall formalise a communication to the Shareholders' Meeting, which shall be convened in ordinary session or even extraordinary session in the event of urgency at the express request of the Supervisory Board itself, for the relevant resolutions. All this without prejudice to compensation for any damages that CPC Inox S.p.A. may suffer as a result of the breach of the provisions of the Code of Ethics by the aforementioned persons.

13. CLARIFICATIONS ON THE CODE AND REPORTING VIOLATIONS

For employees of CPC Inox S.p.A., the first point of reference for clarification on the principles of the Code and its application is their direct superior, who may provide a reply or refer to other company departments and the Supervisory Board. Ethical questions must be treated seriously and those in positions of responsibility must facilitate their resolution.

Also for reports of violations, the first point of reference is the direct superior, who can implement corrective measures and exercise a mediating role, or report to the company management and the Supervisory Board.

However, the direct supervisor is not the only possible contact person. For clarifications, as well as for reports, employees may also personally address the company management and the Supervisory Board. These channels are also in charge of collecting any reports of violations of the Code from stakeholders outside the Company.