

FERRIERE NORD S.p.A.

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# Code of Ethics

Approved by resolution of the Board of Directors on 26.05.2022





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## Introduction

Ferriere Nord S.p.A. (hereinafter also referred to as the “Company” for the sake of brevity), with its registered headquarters in Osoppo (UD), Rivoli Industrial Area, is the main industrial entity of the Pittini Group, an international leader in the production of long steels for the construction and engineering industries.

With deep ties to the territory in which it is based, Ferriere Nord S.p.A. is a steel company focused on constant growth, driven by high-tech investments, product innovation, and a careful policy of environmental sustainability.

The Company performs its work with the commitment and dedication of its employees and collaborators, basing its identity on Reliability, Innovation, and People. The key role assigned to these elements has enabled Ferriere Nord S.p.A. to follow a path characterised by constant development and improvement, geared towards the corporate values around which the Company was established.

By means of this Code of Ethics (hereinafter, for the sake of brevity, also referred to as the “Code”), Ferriere Nord S.p.A. wishes to communicate the values that have always characterised the Company’s activities and which its employees, associates, and partners are constantly inspired by.

The company governing bodies, staff, collaborators, and partners of the Company are made aware of the terms of the Code of Ethics and are required to observe them rigorously and direct their behaviour accordingly whenever they are called upon to do work with Ferriere Nord S.p.A..



## 1. Effectiveness of the Code of Ethics

- 1.1. This Code of Ethics is addressed to all company representatives, employees, collaborators, clients, suppliers, partners, and anyone who has a relationship of any nature with Ferriere Nord S.p.A..
- 1.2. The corporate values that characterise the Company, in conjunction with the principles contained in this Code, enable Ferriere Nord S.p.A. to direct its business activities towards the highest moral and ethical principles.
- 1.3. Any conduct in violation of the principles contained in this Code may constitute, depending on the case, a breach of contract and/or a disciplinary offence, with the resulting associated right for Ferriere Nord S.p.A. to claim compensation for any damages suffered by the Company and/or the application of the disciplinary measures provided for by the same or by law.
- 1.4. All the recipients of the Code of Ethics are required to carry out their activities in compliance with the principles and moral, professional, and legal values that constantly inspire the Company's activities and that are contained in this Code.

## 2. General principles of business conduct

- 2.1. Ferriere Nord S.p.A. continuously pursues the growth, development, and progress of its business, complying with the law and safeguarding the values of fairness and integrity.
- 2.2. Every business decision of the company is aimed at creating value for employees, collaborators, partners, and all stakeholders while respecting the criteria of competitiveness and competition.
- 2.3. In its relations with institutions, entities, public officials, and private companies, the Company does not pursue illicit objectives and does not pursue illicit activities in order to achieve its goals.
- 2.4. Ferriere Nord S.p.A. rejects any fraudulent, abusive, collusive, or evasive practices.
- 2.5. Ferriere Nord S.p.A. makes every effort to prevent unfair damage to third parties that may be caused by its activities.
- 2.6. The Company avoids situations and decisions that may involve conflicts of interest, real or apparent, with the Company. Similarly, each employee of Ferriere Nord S.p.A. undertakes to avoid any context in which his or her personal interests may be in conflict with the interests of the Company.
- 2.7. Ferriere Nord S.p.A. requires its partners, clients, and suppliers to comply with current labour legislation. The Company rejects all forms of forced or child labour and operates in compliance with the law and international conventions.



### 3. Administration, organisation, and control

- 3.1. Ferriere Nord S.p.A. complies with the principles and rules of proper administration by constantly guaranteeing the correct and effective functioning of its organisational and administrative system.
- 3.2. The provisions of the Code of Ethics inform the organisation, management, and control model of Ferriere Nord S.p.A. and the systems of rules adopted by the Company.
- 3.3. The procedures adopted by Ferriere Nord S.p.A. for decision-making and implementation, resource management, and control ensure the lawfulness, legitimacy, consistency, appropriateness, and accountability of each corresponding action.
- 3.4. Every decision related to the management of the company is adopted in compliance with the assigned powers and responsibilities and the authorisations which have been established.
- 3.5. The Company guarantees the correct use of its information systems and safeguards the integrity of data and information.
- 3.6. Ferriere Nord S.p.A. is committed to holding each individual responsible for updating, managing, and complying with all the control systems in the company.

### 4. Staff, collaborators, and partners

- 4.1. The staff working with Ferriere Nord S.p.A. perform their work with dedication and loyalty, complying with the Code of Ethics, the organisation, management, and control model, and the rules and procedures established by the Company. The aforementioned individuals undertake to not engage in conduct that is contrary to the law and damaging to the Company's interests, safeguarding confidentiality and privacy and guaranteeing the correct and lawful use of the Company's assets and resources.
- 4.2. Ferriere Nord S.p.A. makes sure that the equipment, organisation, and training of personnel are appropriate to the characteristics of its business and promotes their professional growth in compliance with its corporate values.
- 4.3. Ferriere Nord S.p.A. safeguards and protects its staff from any disturbance and condemns any discrimination, whether direct or indirect.
- 4.4. Ferriere Nord S.p.A. ensures that its employees receive appropriate remuneration, in line with all applicable legislation and the relevant collective bargaining agreement.
- 4.5. Ferriere Nord S.p.A. makes sure that third-country nationals who are illegally living in Italy are neither directly nor indirectly employed in its activities.
- 4.6. Ferriere Nord S.p.A., in order to safeguard workers, undertakes to comply with all regulations related to the management of staff and concerning occupational hygiene and safety.
- 4.7. The employees, collaborators, clients, suppliers, and partners of Ferriere Nord S.p.A. guarantee tangible and constant compliance with this Code of Ethics and the organisation, management, and control model adopted by the Company, inspiring their actions with the principles and provisions contained therein.



- 4.8. Ferriere Nord S.p.A., its employees, and collaborators condemn all forms of association that pursue unlawful and immoral objectives.
- 4.9. Ferriere Nord S.p.A. refrains from engaging in any kind of direct or indirect relations with individuals, organisations, or associations that are engaged in the pursuit of criminal activities or, in any event, prohibited by law.
- 4.10. All the employees of the Company are free to exercise their legal right to form organisations representing their interests, to associate with, or to refrain from taking part in such organisations. No employee of the Company is subject to intimidation or harassment in the peaceful exercise of these rights. The Company respects the right of its employees to collective bargaining.
- 4.11. No employee of Ferriere Nord S.p.A. is subject to harassment or abusive behaviour, nor intimidation or abuse. In particular, it is absolutely forbidden to engage in harassment of any kind in work relations or, more generally, to engage in conduct that is likely to compromise the smooth performance of the functions assigned and in any case to undermine the dignity of all workers.
- 4.12. Ferriere Nord S.p.A., in full compliance with national and European Community legislation governing the protection of personal data, adopts special rules aimed at providing, specifically, the prohibition of undue disclosure and/or dissemination of personal data without the prior consent of the interested party.

## 5. Competitors

- 5.1. Ferriere Nord S.p.A. shapes its presence on the market with complete respect for competition and the laws that protect it.
- 5.2. Ferriere Nord S.p.A. recognises the importance of competition as a fundamental element for economic development and rejects any conduct that could constitute unlawful interference in the free market.
- 5.3. No employee or collaborator of Ferriere Nord S.p.A. undertakes initiatives aimed at unfairly affecting the market.
- 5.4. The Company, its employees, and collaborators are prohibited from pursuing unlawful agreements aimed at controlling prices, subdividing the market territorially, and any other action aimed at creating conditions of unlawful advantage or contrary to the free market.
- 5.5. Ferriere Nord S.p.A. delegates the management of any relations with the authorities responsible for the protection of the market and competition exclusively to individuals specifically authorised to do so by means of a specific delegation or power of attorney and, in any event, in accordance with the principles of fairness and loyalty.
- 5.6. Every activity promoted by Ferriere Nord S.p.A. is carried out in compliance with the relevant legislation in force and, in any case, in accordance with the values of truth and integrity.



## 6. Environment and community

- 6.1. Ferriere Nord S.p.A. undertakes to comply with and enforce all environmental and territorial protection regulations.
- 6.2. Through an ongoing investment programme, Ferriere Nord S.p.A. pursues the objectives of limiting emissions for each of the environmental matrices, promoting the rational use of resources and efficient management of production facilities, aimed at reducing impacts on the environment.
- 6.3. The Company conducts its business activities in strict compliance with the regulations in force, including with regard to the use of any hazardous products.
- 6.4. Ferriere Nord S.p.A. takes all necessary measures to avoid accidents that may harm the community and the environment.
- 6.5. Ferriere Nord S.p.A. undertakes to ensure the safety of the products it offers.
- 6.6. Ferriere Nord S.p.A. carries out its activities with respect for environmental factors, starting from the process and product design stage, implementing actions aimed at continually improving its performance, identifying areas for improvement and, where possible, applying the best available techniques, conserving energy, saving water, minimising the production of waste and recovering it.

## 7. Occupational hygiene and safety

- 7.1. The Company bases its activities on the highest level of attention and care with regard to occupational health and safety. The commitment of Ferriere Nord S.p.A. towards people's health and safety is combined with the search for technical and managerial solutions that enable it to go beyond what is prescribed by law and implement a state-of-the-art management system that in any event is in compliance with the highest standards.
- 7.2. Ferriere Nord S.p.A. undertakes to comply with and enforce all statutory provisions relating to occupational health and safety.
- 7.3. Protecting the health of workers is a primary objective for Ferriere Nord S.p.A., which is pursued through an articulated plan of activities and continuous investment in plants and the workplace in general.
- 7.4. All employees of the Company, moreover, receive specific and continuous training concerning the safety risks in their area of operation.
- 7.5. All Ferriere Nord S.p.A. employees are guaranteed a healthy and safe working environment, in compliance with the requirements of the applicable legislation. The Company implements the necessary actions to prevent and manage potential accidents and occupational diseases.



- 7.6. The company evaluates health and safety risks in the workplace. Appropriate technical measures are identified and applied promptly to prevent the risk of accidents or injuries.
- 7.7. Ferriere Nord S.p.A. recognises the importance of adapting work to human beings, particularly with regard to the design of workplaces and the choice of equipment and working and production methods, in order to mitigate monotonous and repetitive work and reduce the possible effects of these tasks on health.
- 7.8. Ferriere Nord S.p.A. undertakes to train and inform employees and collaborators on the conduct to be adopted to ensure greater safety in the workplace, also in consideration of the continuous evolution of technology.

## 8. Clients and suppliers

- 8.1. Ferriere Nord S.p.A. pursues excellence in the quality of the products it offers, including through the continuous technological innovation of production processes and an accurate control system of all steel processing phases.
- 8.2. The relationships with clients and suppliers do not have any unlawful content or purpose and are characterised by fairness and respect for the law, competition, and market rules.
- 8.3. In relations with its customers and suppliers, the Company and its staff undertake to not engage in fraudulent, abusive, collusive, or evasive practices.
- 8.4. The choice of suppliers and the content of relations with suppliers are determined exclusively by the quality and convenience of the products and/or services provided.
- 8.5. The Company's staff and collaborators do not accept gifts, presents, or any other benefits that go beyond normal practice, which exceed a modest value, or that may influence their work.
- 8.6. In its relations with clients, suppliers, their employees, and collaborators, the Company undertakes to not give or provide gifts, presents, or any other benefit that goes beyond normal practice or that exceeds a modest value, or that in any case may influence its operations.

## 9. Institutions, public entities, and public officials

- 9.1. Ferriere Nord S.p.A. rejects any form of corruption and takes steps to ensure compliance with the anti-corruption legislation that is applicable to such corruption.
- 9.2. If relations with clients and suppliers involve any dealings with institutions, public entities, and individuals exercising public functions or providing public services, the Company guarantees absolute compliance with the law, the principles defined in the Code of Ethics, and the provisions of the organisation, management, and control model it has adopted.





- 9.3. Ferriere Nord S.p.A. undertakes to refrain from any offer, promise, or gift of money or other benefits that may condition the performance of the duties of the office or service of a public official or an individual in charge of public service.
- 9.4. Ferriere Nord S.p.A. does not engage in any fraudulent practices to the disadvantage of public entities, companies exercising public functions, or public services.
- 9.5. Ferriere Nord S.p.A. does not engage in any conduct aimed at or otherwise instrumental to the fraudulent and unlawful achievement of grants, loans, subsidies, or other payments from public institutions and entities.
- 9.6. Ferriere Nord S.p.A. guarantees the correct and timely use of contributions, financing, grants, and other funding from public institutions and entities.
- 9.7. Any relations of the Company with public organisations, political parties, associations, or committees comply with current legislation and the principles of the Code of Ethics.
- 9.8. Ferriere Nord S.p.A. does not engage in and condemns any initiative designed to induce directors, statutory auditors, employees, collaborators, and third parties in general from making statements to the judicial authorities or from making reluctant and/or false statements to the judicial authorities.

## 10. Accounting and control

- 10.1. Ferriere Nord S.p.A. guarantees the adequacy, correctness, and effective functioning of the accounting structure it has adopted, making sure that the accounts are maintained properly and that the operating events are recorded correctly in the accounting records, in compliance with the applicable regulations and regulatory principles.
- 10.2. Ferriere Nord S.p.A. ensures that the financial statements correspond to the results in the accounting records and that they comply with the regulations and regulatory principles.
- 10.3. Ferriere Nord S.p.A. adopts planning and control models consistent with and appropriate to its accounting structure.
- 10.4. Ferriere Nord S.p.A. guarantees that all transactions are duly authorised, documented, verifiable, legitimate, consistent, recorded, and accounted for. Accounting transparency is based on the truth, accuracy, completeness, clarity, and reliability of the documentation of management events and related accounting records. Each employee of the Company is required to cooperate in order to guarantee that management events are correctly and promptly represented in the accounts. The Company guarantees that the administrative and control bodies are granted access to the data, documents, and information necessary for the performance of their respective activities.
- 10.5. The Company is inspired by processes that will guarantee management choices based on rigorous economic analyses and prudent risk assessments, in order to safeguard the optimal use of assets and resources.
- 10.6. The Company undertakes to guarantee the lawful origin of the money, goods, and utilities it uses.



10.7. Ferriere Nord S.p.A., in compliance with the anti-money laundering and anti-terrorism regulations in force, is committed to preventing the use of its economic-financial system for the purposes of money laundering, self-money laundering, and the financing of terrorism (or any other criminal activity) by its managers, employees, and counterparties with whom it interacts in the performance of its activities. The Company verifies the information available on its clients, suppliers, collaborators, partners, and consultants, in order to establish the respectability and legitimacy of their respective activities before establishing any professional relationships. The Company also ensures that the operations to which it is a party do not present, even potentially, the risk of favouring the receipt, transfer, substitution, or use of money or other assets deriving from unlawful activities or, in any case, the use of the same in such a way as to prevent the identification of their criminal origin..

## 11. Intellectual and industrial property

- 11.1. Ferriere Nord S.p.A. guarantees the protection of trademarks, distinctive marks, patents, models, designs, and other intellectual and industrial property rights.
- 11.2. Ferriere Nord S.p.A. does not use the intellectual and industrial property rights of third parties other than where this is permitted by law.
- 11.3. All employees and collaborators are required to maintain the confidentiality of ideas, models, and any other forms of intellectual and industrial property developed in the course of the company's work, in relation to which the company may obtain patent coverage or any other type of protection on its own behalf, without prejudice to the individual rights of employees and collaborators recognised by law.
- 11.4. The Company undertakes to guarantee that the duplication, reproduction, possession, use, distribution, and dissemination of copyrighted works by its employees and collaborators is carried out in compliance with the law.
- 11.5. All employees and collaborators are bound by licence agreements in all cases where the Company is authorised to use the intellectual and/or industrial property of a third party.

## 12. Privacy

- 12.1. The processing of personal data and the use of information technology tools are characterised by compliance with the principles of fairness, protection of the secrecy of correspondence, and privacy, and in a manner that guarantees the integrity of the information systems as well as the data processed, in order to protect the interests of the Company and third parties. Ferriere Nord S.p.A. adopts appropriate measures to ensure that access to personal data is in compliance with the law and the privacy of any parties involved and in order to guarantee the confidentiality of the information and to ensure that it is processed by individuals who are authorised to do so, thus preventing any unlawful interferences and violations of the law.

 **PITTINI**  
STEEL AHEAD