

IL 14 Code of conduct

Gerli Metalli is a trading company that has worked for over a century in the non-ferrous metals, ferro alloys and pig iron market. In this context **Gerli plays the role of intermediary between production and distribution to the metal industry.**

The international sourcing of raw materials enables us to have up to date market information and a global accurate view. The diversification of our product range puts us in daily contact with the main sectors of the economy and their operators: automotive industry, constructions, cables, logistics, transport and energy.

The constant relationships with the financial sector and the LME's brokerage houses allow us **flexibility and efficiency over price execution on metals and the forex market.** To this regard, we also provide dynamic hedging in order to reduce the risk exposure and stabilize price fluctuations.

Gerli Metalli's focus on cost, global footprint, conservative risk management, expert market intelligence, innovative trading and strategic relationships, combined with logistics, storage and structured finance solutions have created long-term value for stakeholders.

Gerli Metalli is focused on delivering further growth through sustainable and responsible trading.

Gerli Metalli's Code of Conduct applies to all levels of the organisation. We aim to comply with international standards. We encourage and expect our business partners and counterparties ('third parties'), to follow similar levels of ethical principles. Our partners and counterparties, including joint ventures and subsidiaries, as well as suppliers, customers and contractors should be familiar with the practices of their supply chains, to ensure they are operating to similar principles and following all relevant laws.

Anti-Bribery & Corruption

Gerli Metalli requires that all third parties have appropriate Anti-Bribery & Corruption policies and procedures in place that comply with all applicable local and international laws and, ensure they do not assist or participate in bribes, corruption, extortion or other fraudulent practices in any country. Corporate entertainment and gifts given or received must be appropriate and authorised and should not be used to obtain favourable treatment. We maintain an Anti-Bribery & Corruption policy and a related education program for employees. (see our document: Rating di legality)

Anti-Money Laundering

Gerli Metalli maintains an Anti-Money Laundering Policy. We will not participate or assist in any third-party performing money laundering activity. Anyone concerned who knows or even suspect that an existing or prospective commercial partner is seeking to be or engaged in money laundering must report it immediately to the Management.

Charities and Donations

Gerli Metalli does not allow funds or resources to be used as a contribution towards political campaigns of any parties, candidates or any affiliated organisations and does not use charitable donations as a substitute for political payments. Gerli Metalli expects our third parties to adopt the same ethical conduct.

Conflict Minerals

Gerli Metalli's main business is metal trading. We support humanitarian goals to end all violent conflict in these regions, which sometimes have been partially financed by the exploitation and trade of conflict minerals. To do so, Gerli Metalli goes to extreme lengths to ensure that such metals are not directly or indirectly sourced from such regions.

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Gerli Metalli and our business partners and counterparties work toward establishing compliance with OECD Responsible Mineral Supply Chains, Responsible Minerals Initiative Due Diligence Guidance for the Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and US Conflict Minerals Law. (see our documents: Conflict minerals report e Due diligence report)

Economic and Trade Sanctions

In conducting business, Gerli Metalli has policies and procedures in place to ensure we comply with all applicable governmental laws, regulations and compulsory measures. Similarly, we expect our third parties to comply with applicable sanctions regulations. (see our documents: REACH and RoHS)

Quality, health, safety, and environment (QHSE)

Gerli Metalli has been doing business for years in compliance with a Quality Management System compliant with UNI EN ISO 9001. (see documents: ISO 9001 certificate and Quality Policy statement).

Gerli Metalli has the highest regard for the health and safety of our employees and community, and the protection of our environment and its resources and to minimize environmental impact. Gerli Metalli seeks to fully comply with all applicable labour laws and regulations wherever it operates. We encourage our third parties to do the same and to maintain environmental policies and procedures

Privacy

Even in this regard, in accordance with the law, Gerli Metalli is committed to the protection of privacy – the information related to the private life and opinions – of each of its employees and, more generally, of all those who interact with the company. Gerli Metalli undertakes to process personal data received by the company in accordance with the provisions issued by the DGPR (regulation (EU) no. 2016/679).

Human Rights

Upholding the dignity, fundamental freedoms, equal opportunities and human rights of our employees, contractors and communities, irrespective of their ethnicity, creed, colour, gender, nationality, orientation or political or religious conviction, is a core principle at Gerli Metalli. We do so in a manner consistent with the Universal Declaration of Human Rights. We promote the fair and professional treatment of all employees, free from harassment. As Gerli Metalli's business partner and counterparty, we expect you to show respect, dignity and professionalism relating to your own and our employees.

We have a zero-tolerance policy relating to all forms of modern slavery and human trafficking in our supply chains or in any part of our business. As our third party, you must not knowingly or willingly assist in nor benefit from any violation of human rights.

Trading Practices

Trading activities must be undertaken in accordance with national and international competition laws for the genuine purposes of carrying on our legitimate business. We do not engage in manipulating, price fixing, insider trading or other market distortion strategies. We expect all our third parties to conduct their businesses in the same legitimate way as us.

Gerli Metalli is determined to be at the forefront of the metal merchanting and trading industry. The company's reputation is built over decades of history and is based on **reliability and transparency** that we have safeguarded and reinforced even during these last years of a difficult economic environment.

We will continue to manage our business, with the utmost care and discipline as it underpins our long-term success as a sustainable and responsible organisation.

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