1. INTRODUCTION

AS METAL COM's **anti-bribery and anti-corruption policy**, hereinafter referred to as the "Policy", highlights the organisation's ethical values and principles and serves as a working tool containing rules, values, principles and responsibilities that will be taken into account and respected in all company activities, both within AS METAL COM and in relation to its business partners.

AS METAL COM adopts a zero-tolerance policy towards any form of bribery and corruption.

The company is committed to conducting its business with integrity, transparency and strict compliance with applicable legislation and best business ethics practices.

This policy aims to prevent, identify and manage the risks of bribery and corruption in all of the company's activities.

In this context, AS METAL COM attaches particular importance to and considers essential the laws governing bribery and corruption practices both between private companies and between private companies and government entities.

2. UNDERSTANDING THE POLICY

2.1. DEFINITIONS

Corruption and bribery are illegal and unethical.

A bribe is a sum of money or any other object given or promised to a person in order to induce them to violate their official duties or to perform them in accordance with the illegal wishes of an individual.

Two parties can be identified in the act of bribery:

- one who gives the bribe, which constitutes active corruption, and
- the one who receives the bribe, the latter being accused of bribery - passive corruption.

Bribes can be monetary or non-monetary, tangible or intangible. A bribe can take the form of or be facilitated by:

- cash payments;
- gifts or entertainment;
- discounts, loans and/or financing granted on non-commercial terms;
- rebates or commissions in connection with services provided;
- excess payments to business partners;
- information, etc.

Corruption is the abuse of entrusted power for personal gain. This definition does not refer only to public power, as corruption can also occur in the private sector. It is not only about financial benefits, but also about advantages of any kind, including non-material ones, such as the fulfilment of political or professional ambitions, or promotions or awards. It is, in fact, a deviation from morality, honesty and duty.

2.2. WHY DOES IT MATTER?

Our company is committed to applying the highest standards of ethical conduct and integrity, both in its work

2.3. TO WHOM DOES IT APPLY?

This zero-tolerance policy applies to all persons working within AS METAL COM at all levels: directors, employees, visitors and contractors.

3. COMPANY PRINCIPLES AND RULES

Bribery and corruption are prohibited by law;

Failure to address the risk of corruption and bribery can undermine our company's reputation and lead to investigations, fines and/or other sanctions for the company and/or individuals.

AS METAL COM adheres to the following principles:

- zero tolerance for bribery and corruption;
- compliance with all applicable anti-corruption laws;
- prohibition of any improper payments, direct or indirect;
- transparency in commercial relations;
- individual and collective responsibility.

3.1. BASIC RULES

It is strictly prohibited to:

- offering or accepting bribes in any form;
- making facilitation payments;
- offering gifts, hospitality or other benefits that may influence business decisions;
- using third parties to circumvent legal or ethical obligations.

Gifts and hospitality are only permitted if they are:

- modest, reasonable and in accordance with legal customs;
- transparent and approved in accordance with internal procedures.

3.2. RELATIONSHIP WITH PUBLIC OFFICIALS

Public office = the set of duties and responsibilities established by law for the purpose of exercising public power by the central public administration, local public administration and autonomous administrative authorities.

Public official = a person appointed, under the law, to a public office;
= any person who exercises a public function, permanently or temporarily, at national or international level .

Examples:

- Any employee of a government or department, agency or instrument of a government;
- Any person acting in an official capacity for or on behalf of a government or department, agency or instrument thereof;
- Any official or employee of a company wholly or partly owned by a government;
- Any official or employee of a public international organisation;
- Any official or employee of a political party or any person acting in an official capacity on behalf of a political party;
- Any candidate for political office who, in the performance of his or her duties as a public official, conducts periodic inspections, grants authorisations and licences, etc.
- Any official or employee of a political party or any person acting in an official capacity on behalf of a political party;
- Any candidate for political office who, in the performance of their duties as a public official, carries out periodic inspections, grants authorisations and licences, etc.

Interactions with civil servants must be conducted:

- in a transparent and legal manner;
- without undue promises or advantages;
- in strict compliance with applicable legislation.

3.3. INTERACTIONS IN THE PRIVATE SECTOR

AS METAL COM applies the same ethical standards in its relations with private sector partners, prohibiting any behaviour that could be considered bribery or undue influence.

4. IMPLEMENTATION, TRAINING AND AWARENESS

AS METAL COM ensures the implementation of this policy by:

- communicating the policy to relevant employees and partners;
- training and awareness activities on ethics and anti-corruption;
- integrating the principles of this policy into the company's internal processes.

5. REPORTING AND PROTECTION

Any suspicion or incident of bribery or corruption must be reported through internal reporting mechanisms, including the company's Whistleblowing Policy.

AS METAL COM guarantees the confidentiality and protection of persons who report in good faith and prohibits any form of retaliation.

6. MONITORING AND SANCTIONS

The application of this policy is monitored by AS METAL COM management.

Violation of this policy may lead to disciplinary measures, including termination of contractual relations, as well as referral to the competent authorities, if necessary.

During the recent reporting period, no confirmed cases of bribery or corruption were identified within the company.

7. APPROVAL OF THE POLICY

This Anti-Bribery and Anti-Corruption Policy is approved by the management of AS METAL COM and enters into force on the date of signing.

GENERAL MANAGER,

Constantin APOSTOL