CODE OF CONDUCT AND ETHICS

FOUNDATION OF THE AS METAL COM ETHICS MANAGEMENT SYSTEM

This Code of Conduct and Ethics represents the foundation of AS METAL COM's Ethics Management System.

It applies to all employees, regardless of position or hierarchy, and to relevant business partners.

The Ethics Management System is designed to prevent corruption, unethical conduct, conflicts of interest and non-compliance, and to promote integrity, transparency and responsible business practices throughout the company's operations.

Our ambition is to become the preferred and most innovative supplier in the Romanian aluminum sector and, at the same time, to offer the safest and most stimulating working environment.

AS METAL was built by talented and dedicated people. As we grow, we want every employee to be empowered to make decisions that will shape our future and our success story.

AS METAL has confidence in the judgement of its employees and their honesty. However, some of our decisions are increasingly complex and may affect our employees, suppliers and customers as well as the community in which we operate. Thus, we may question the best attitude to adopt within the framework of our ethical values.

Our company's ethical integrity is an invaluable asset. Daily adherence to the Code will enable us to do things better, to continue to build and maintain our reputation and to realize our goals together in a sustainable and responsible manner.

The company's partners, in particular clients, consultants, subcontractors and suppliers, need to be aware of this Code, as well as of the standards we apply in the conduct of our business.

OUR MISSION

- **We are constantly focusing our attention on people, care for the environment and a safe, high quality product;**
- **We treat each other with appreciation and respect and we value our customers, suppliers and partners;**
- **As managers of AS METAL COM SRL, we treat our employees in a trustful and fair way;**
- **We offer young people a solid and future-orientated training;**
- **We work as a team and consider all departments. The only way we can continuously improve the company and manage processes efficiently is to think of ourselves as a whole;**
- **Transparency, co-operation and humanity are important elements of our company culture and are guaranteed by responsible leadership;**
- **As part of our quality management system, we continually improve our products and services in the interest of everyone involved;**
- **Our R&D work ensures continuous product improvements in line with market requirements;**
- **We support our customers in meeting their needs through solutions, sometimes customised;**
- **We work together to fulfil the company's goals and support each other in achieving them.**

OUR VALUES

SECURITY



At AS METAL COM, everything we undertake is, from start to finish, in compliance with the applicable provisions and regulations on environmental protection and SSM.
Safety is everyone's responsibility, regardless of function.
We all need to understand the potential risks we are exposing ourselves to and have the right approach to deal with them.
We must not 'overlook' something that is unsafe, even if it means provoking colleagues who are acting dangerously to themselves or others.

ENCOURAGE



Our approach to business is based on trust: being open and honest.
This involves creating a working environment in which employees, customers, local communities and other stakeholders can exchange views and collaborate effectively.
We also need to have confidence in our skills and abilities and take into account the opinions of colleagues who are experts in their field.

RESPECT



Respect is the basis of any relationship. This means recognising that each of us can contribute to make AS METAL COM the most successful company in Romania, in the field in which it operates in terms of safety, attractiveness and added value.
You respect someone when you take their opinion into account, when you listen to their comments and associate them with the constant improvement of our business.
We respect and value the diversity of all our employees, ensuring fair treatment.

AUTONOMY



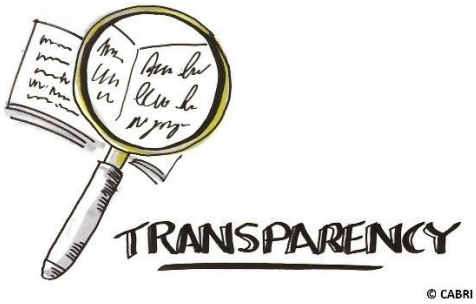
To move forward in a rapidly changing world, we need to make decisions accordingly.
But we won't be able to achieve this if our employees have to submit to their superiors every decision. Autonomy means giving employees, at all levels, the support they need to improve, to make things go faster and to constantly find ways to get the best results.
Being autonomous means being responsible and never turning a blind eye to problems.
We are always looking for opportunities to improve ourselves, our products and services.
We know that the responsibility to make things better is ours and we know that we have the permission and support to do what is necessary.

COLLABORATE



We believe that we are better and stronger as a single, tight-knit group.
But true collaboration goes even deeper than that. It means taking the time to really get to understand each other. It means working with colleagues, customers and other stakeholders to identify and solve problems and find ways to make things better. Collaboration means bringing new ideas and perspectives, it means challenging each other to make AS METAL COM the most exciting business in our industry.

TRANSPARENT



Transparency requires that every employee has all the information they need to do their job and understand how to make their own contribution to our collective success.
Transparency means working as a team to achieve our common goals, listening to each other's opinions about our objectives and action plans, learning from each other's failures and good examples.

And without internal political maneuvring!

KEY ELEMENTS

Ethics Governance and Responsibilities



"AS METAL COM's Management is responsible for the implementation, effectiveness and continuous monitoring of the Ethics Management System."

The General Manager ensures that ethical principles are integrated into business decisions and that reported ethical concerns are addressed appropriately.

Managers are responsible for promoting ethical behavior within their teams and for ensuring that employees are aware of and comply with the Code of Conduct and Ethics.

All employees are responsible for complying with this Code and for reporting, in good faith, any suspected or actual violations.

Health and safety at work



"In terms of safety, no compromise is possible"

At AS METAL COM we have always placed great importance on protecting and promoting the health and safety of our employees and the community in which we operate.

In our approach to environment, health and safety, each of us must:

- **know and adhere to all environmental and SSM policies, procedures and practices;**
- **to apply these procedures, policies and practices in its work;**
- **identify hazards, assess risks and whenever possible, initiate corrective action and bring the problem to the attention of management;**
- **to report, without delay, environmental and SSM incidents (e.g.: spills, emissions, injuries, occupational diseases, etc.) so that the causes can be investigated and corrective and preventive actions can be initiated;**
- **use personal protective equipment (PPE) correctly;**
- **actively participate in environmental and SSM training;**

- to respect safety rules at all times;
- never "turn a blind eye" when they see a safety risk, even if it means provoking colleagues who are acting dangerously to themselves or others.

Drugs, alcohol and firearms

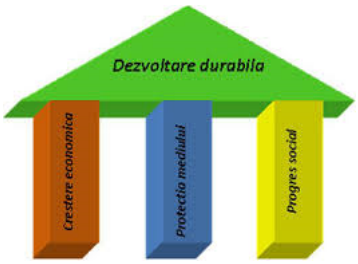
"Any violation of this Code regarding drugs, alcohol and firearms must be reported"

It is forbidden to possess or consume alcohol and / or illegal substances in the premises of AS METAL COM.

In addition, decision making and behaviour should not be affected by drugs or alcohol while on company premises.

Firearms are prohibited on the premises of AS METAL COM.

Environment and sustainable development



" AS METAL COM is committed to minimising the environmental impacts of its activities and the use of resources "

In addition to the above-mentioned points regarding the Health and Safety at Work section, AS METAL COM is committed:

- to respect all legal regulations regarding environmental protection and to report any problems to the person responsible for environmental issues;
- to limit its impact on the environment by reducing our consumption of resources (water, energy), air emissions, water discharges, and reducing our waste;
- to limit the use of hazardous substances to what is strictly necessary and to monitor, on an ongoing basis, whether such use complies with laws and regulations;
- limit the amount of waste generated by encouraging sorting and recycling;

- to reflect on how our behavior can influence the environment and to take every opportunity to limit this impact.

Human rights



" AS METAL COM does not tolerate any violation of human rights "

AS METAL COM respects the laws and regulations on non-discrimination, human rights and individual freedoms and does not tolerate any violation of human rights.
Everyone has the right to be treated with respect in the workplace.
Respect is essential for a harmonious working environment in which the rights and dignity of employees are guaranteed, without any intimidation, discrimination or coercion.
AS METAL COM applies a ZERO harassment policy.

Actions needed:

- **Maintaining a working environment where the personal dignity of each individual is respected;**
- **Sexual harassment or any form of discrimination or harassment on the basis of race, ethnic origin, gender, nationality, social origin, religious or political belief, disability or on the basis of any personal characteristic protected by law is prohibited;**
- **Do not use or condone the use of inappropriate language in the workplace, including profanity, profanity, vulgarity or verbal abuse;**
- **Do not engage in workplace coercion or intimidation; managers should not permit such behavior;**
- **Do not work with companies or organizations that use forced labor or child labor.**

Compliance with labor legislation

" AS METAL COM is committed to preventing modern forms of slavery "

Actions Need

- **The use of child labour that is not in compliance with the national legislation as well as forced or compulsory labour is prohibited in AS METAL COM.**
- **Implementation of measures to prevent the risk of human trafficking or modern slavery, including the entire supply chain;**

- **Qualifications, competences and performance, and experience are the guiding principles for recruitment, training, salary setting and promotion;**
- **AS METAL COM believes that diversity of any form is an important key factor for progress and development;**
- **AS METAL COM protects the rights of its employees to join or not to join a trade union or, if there is no organised trade union, the committee of employee representatives, without fear of intimidation or reprisals or any kind of harassment;**
- **AS METAL COM is committed to complying with all applicable laws regarding working hours, pay and benefits.**

The right to privacy and protection of personal data



" AS METAL COM is committed to protecting everyone's personal data stakeholders and, in particular, its employees and business partners "

The right to privacy is a fundamental value for AS METAL COM.

Our organisation has implemented the provisions of Regulation (EU) 2016/679, which is the basis of the legislation on the processing of personal data and the protection of such data. AS METAL COM has established an internal Privacy and Security Policy for the processing of personal data and has developed all the necessary procedures regulating this national and international requirement.

"Personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity.

"Processing" means any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

AS METAL COM ensures that your personal data are :

- **processed legally and correctly;**
- **collected for legitimate purposes;**
- **adequate, relevant and limited to what is necessary;**
- **accurate and, where necessary, updated;**
- **kept as long as necessary for the purposes intended;**

- processed in a manner that ensures adequate security, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage.

Protection of confidential information



" Confidential information is a valuable asset that must be protected "

Confidential information refers to all commercially sensitive information that is generally not known outside AS METAL COM, and may include:

- **technical information about the company's products and processes ;**
- **customer lists, purchase prices and other contractual conditions;**
- **price and cost strategies, etc. ;**
- **internal financial reports ;**
- **staff information ;**
- **information on company strategy ;**
- **information on the company's research projects ;**
- **all other confidential information obtained by employees, during the course of their activity, on behalf of AS METAL COM.**

Please keep in mind that confidential information is, in equal measure, information about all our partners, obtained in the course of professional activity at AS METAL COM. This information must not be used, in any form whatsoever, for personal purposes or for any other purposes beyond the scope of our responsibilities at AS METAL COM.

A competitor could take advantage of such information if it is inadvertently or inadvertently communicated.

We must all be careful not to disclose, accidentally or intentionally, such information to unauthorised persons, either inside or outside AS METAL COM.

Actions needed

- **Do not discuss topics related to AS METAL COM that contain confidential information in places where it might be overheard;**
- **Do not disclose or use any confidential information about AS METAL COM for personal benefit or advantage;**
- **Discuss with the DIRECTOR GENERAL or your manager all offers of confidential information that you have not requested but have come into possession of, in order to assess whether or not they can be accepted (which may have been obtained unlawfully);**
- **Do not leave documents containing confidential information in public places where they could be read or discovered, including - but not limited to - public transport, taxis, hotel rooms, restaurants;**

- Access confidential information on your laptop only when you are in a private place and/or you are sure others cannot see it;
- Do not disclose confidential information in public;
- When you become aware that persons outside of AS METAL COM have obtained confidential information, you are invited to immediately inform the company management.

Ethics Reporting and Whistleblowing Procedure



"AS METAL COM encourages employees and business partners to report, in good faith, any concerns related to unethical behaviour, corruption, conflicts of interest, fraud or violations of this Code of Conduct and Ethics."

Reports may be submitted through the following channels:

- **Direct manager;**
- **To company Management;**
- **Via internal communication channels designated for ethical concerns.**

All reports are treated confidentially and assessed impartially.
AS METAL COM strictly prohibits any form of retaliation against individuals who report concerns in good faith or participate in investigations.
Investigations are conducted in line with internal procedures, and appropriate corrective or disciplinary measures are taken where necessary.

Relations with government authorities

"Contact AS METAL COM management in case a government authority requests information"

In dealings with government authorities, all AS METAL COM employees are expected to behave to the highest moral and ethical standards. We must also act in accordance with applicable laws and regulations.

We must respond to any legal request from government authorities.

If a governmental authority requests information or access to files, its request must first be analysed by the Management of the company. If a representative of the governmental body has a search warrant, you should contact Management without delay.

Communication with investors and media



"Only specially designated persons may speak on behalf of AS METAL COM"

Actions needed

- **Any request from the media, governmental authority or professional organisation must be forwarded to the AS METAL COM.**
- **Any communication on behalf of the company is forbidden without the prior consent of AS METAL COM.**

Preventing corruption



"AS METAL COM applies a zero tolerance policy against corruption"

This policy applies:

- **For each of our transactions, regardless of local custom and practice;**
- **For each employee**

It is important to understand how to recognise situations that may signal corrupt practices Forms of "corruption" can take various forms, such as: giving and taking bribes, facilitating payments, trading in influence, etc.

Bribery may consist of soliciting or accepting, directly or indirectly, offers, promises, promises, gifts, bribes, facilitation payments, invitations, services or any other benefit, for oneself or for someone else, to perform or omit to perform an activity within the scope of your duties or function, thereby involving a breach of legal, contractual or professional rules.

Trafficking in influence - a corruption offence consisting in receiving or demanding money or other benefits, or accepting promises or gifts, directly or indirectly, for oneself or for another person, committed by a person who has influence or gives the impression of having influence over an official or an employee, in order to induce him to do or not to do an act falling within his official duties.

Any employee who engages in or assists in committing acts of corruption may be subject to disciplinary sanctions in accordance with the Internal Regulations of AS METAL COM.

These acts of corruption may expose AS METAL COM to commercial risks or financial and/or administrative or criminal sanctions, which may be extremely damaging to the image and reputation of our company.

Actions needed:
The following acts are strictly forbidden in AS METAL COM. For example:

- **Giving and taking bribes ;**
- **Soliciting, accepting, proposing, offering, offering or promising a financial advantage either directly or indirectly from/to an official or private person in order to obtain or maintain a business relationship or any advantage;**
- **Making payments to facilitate services; etc.**

Gifts



"150 Euro is the maximum value of a gift you can accept or give"

Gifts and invitations should be limited and should not be given or received if they are offered for commercial advantage. Without the prior written consent of the Company's Management, you may not accept or give gifts with a value in excess of €150 from any customer or supplier (or from any potential customer or potential supplier) of the Company.

Actions needed:

- **Gifts should not exceed 150 euro and should be given at appropriate times, such as end-of-year celebrations or symbolic gifts at the end of a collaboration, important transactions, etc.**

Donations or sponsorship

Donations and sponsorship can sometimes be used to create an improper commercial advantage and may therefore be considered as direct or indirect bribery. For this reason, donations and sponsorship are subject to strict rules within AS METAL COM.
Donations can be made to charitable organisations that carry out educational, cultural or social activities.
In some situations, AS METAL COM may sponsor events or activities organised by third parties in exchange for providing visibility for AS METAL COM.

Actions needed:

- **Donations should be made without the expectation or intention of closing a deal;**
- **Sponsorship activities must be part of a marketing strategy and are subject to the approval of the AS METAL COM Management;**
- **Personal contributions must comply with applicable legislation and must not be associated with AS METAL COM;**

Conflicts of interest



"Conflict of interest or the mere perception of a conflict of interest should be avoided"

Conflict of interest may arise when an employee's personal (private) interest interferes, or appears to interfere, with the interests of the company as a whole. Employees should avoid any private interest that influences their ability to act in the best interests of the Company or makes it difficult for them to perform their work objectively and effectively.

Identifying potential conflicts of interest may not always be clear. Here are some situations that may represent cases of conflicts of interest:

- **any personal interest which would be in competition with the interests of AS METAL COM;**

AS METAL COM requires its employees to disclose any situations that could reasonably be expected to give rise to a conflict of interest.

Competition



"AS METAL COM will not tolerate any competition law offences."

Actions needed :

Never enter into an agreement or tacit understanding with our competitors and avoid discussing issues relating to matters such as:

- **the price and conditions of sale practised by AS METAL COM or one of its competitors;**
- **production costs or profits realised by AS METAL COM or any of its competitors;**
- **the productivity or production capacity of AS METAL COM or any of its competitors;**
- **the customers of AS METAL COM or any of its competitors or the geographical areas in which AS METAL COM or any of its competitors operates;**
- **confidential information about AS METAL COM business or competitors;**
- **the types or volumes of aluminium alloys that AS METAL COM sells.**

International trade



"Our policy involves compliance with all applicable export, import and transaction laws in all countries in which AS METAL COM operates "

Actions needed :

- **Not to conduct business in jurisdictions or with companies ~~or persons~~ subject to embargo, sanctions or comprehensive trade restrictions, unless the company's management has reviewed the situation;**
- **Let's respect the rules applicable to cross-border trade.**

Keeping the right evidence and managing the obvious



" All financial transactions must be properly recorded "

We record all the information when we have new projects, when we punch in our working hours, or when we sign contracts with suppliers. When these records are accurate, we can make informed decisions about how to carry out our business operations, manage risks and plan for the future. Our records also help AS METAL COM to fulfil its external obligations, such as financial data reporting, occupational health and safety reporting, reports required by authorities, documents subject to litigation and other requirements. The integrity of the records kept and archived is extremely important because it helps us to comply with national financial reporting regulations, safety reporting regulations or other very important reporting regulations.

Actions needed:

- **Let's keep complete, accurate, timely records;**
- **Maintain records in accordance with company standards, policies, applicable laws and regulations;**
- **Do not misuse, intentionally conceal, alter, falsify, falsify or omit information for the personal gain or benefit of others;**
- **Report fraud issues.**

Use of goods - property of a company

" Do not misuse the property of AS METAL COM "

Actions needed:

It is forbidden:

- **To obtain or misappropriate property belonging to AS METAL COM for personal use or benefit;**

A limited use of communication tools for personal use or benefit, such as e-mail, telephone or internet, is permitted, provided that such use is appropriate, does not entail excessive costs and does not interfere with professional responsibilities.

- **Not to transform or destroy AS METAL property without prior authorisation from the management;**
- **Any suspected abuse or theft by employees and/or collaborators must be reported to the management.**

Policy on retaliation



“AS METAL COM strictly prohibits any retaliation against an employee who, in good faith, seeks help or reports a known or suspected violation of this Code.”

At AS METAL COM, we are committed to protecting individuals who report or participate in an investigation in good faith.
"Good faith" refers to honestly providing all the information you have when making a report or participating in an investigation. It does not matter if you realise later that you were wrong or that the incident reported was not, in fact, a breach of the code. Reprisals, harassment and retaliation of any kind are not permitted at AS METAL COM. In addition, no employee will be adversely affected if he or she refuses to carry out an instruction that he or she believes to be fraudulent or in violation of laws or regulations, the Code or any other standard. If you become aware of or suspect that retaliatory acts have occurred or are occurring, report the situation to Management.

Obligations of employees on conduct and ethics



Each employee has at least the following obligations in terms of behaviour and ethics:

- **the obligation to maintain and strengthen the company's trust in him/her;**
- **the obligation to respect and promote, in all circumstances, the image and prestige of the company AS METAL COM ;**
- **the obligation of fidelity, loyalty and confidentiality towards the company in the fulfilment of their duties both inside and outside the company, both during and outside working hours. This duty of loyalty includes, but is not limited to, at least the following:**
  - **the obligation to inform the company of any mistake or violation of any rules applicable in the company, committed by his own person;**
  - **the obligation to bring to the company's knowledge any mistake or violation of any rules applicable in the company committed by colleagues or any employee of the company;**

- **the obligation not to work with other companies competing with AS METAL COM;**
- **the obligation not to pursue and not to realise hidden income for oneself or for others during working hours and within the company;**
- **the obligation to keep confidential information and trade secrets confidential during employment with the company;**
- **the obligation to keep confidential information and trade secrets after termination of employment with the company.**
- **the obligation to promote in its activity a spirit of discipline and fairness, solicitude, respect and promptness in its relations with clients, prioritising these relations and firmly rejecting the engagement of the company in unfair competition or actions that contravene professional ethics.**
- **the obligation not to demand and not to receive from colleagues, subordinates, superiors or strangers material advantages for the exercise of his/her duties or favouring the performance of services that are not related to his/her duties;**
- **the obligation to have an appropriate behaviour towards colleagues and management;**
- **the obligation to respect the quality standards imposed by the technical documentation;**
- **the obligation to use the materials and equipment of the establishment only for activities related to the object of work or the employee's activity;**
- **the obligation not to "favour" clients and/or suppliers in the company's commercial relations with them.**

The list of obligations in the preceding paragraph is not limitative in nature, and shall be supplemented by any other obligations arising from any other regulations applicable to the company in these directions.

Prevention and Awareness



"AS METAL COM provides regular training and awareness activities on ethics, anti-corruption and the principles of the Code of Conduct and Ethics."

Ethics-related training is provided to employees as part of onboarding and through internal instructing sessions, enabling employees to recognise ethical risks and to act in accordance with company values and legal requirements.

Monitoring and Results



"AS METAL COM monitors compliance with its Code of Conduct and Ethics through internal controls and management oversight."

During the period 2023–2025, no confirmed cases of corruption, bribery or serious ethical violations were identified within the company.
Any reported concerns were assessed in accordance with internal procedures.

Our business partners



" The key to success: choosing a business partner "

AS METAL COM values the relations with all its business partners (customers, suppliers, collaborators, etc.) having a fair, open and transparent behaviour in its relations with them
We believe that behaving ethically and responsibly is simply the right thing to do and is good for business.

In turn, we expect our partners to share our commitment to ethical, safe and responsible business behaviour, to respect the principles in the field of :

Human and labour rights

- **Ban all forms of forced or compulsory labour / modern slavery.**
- **Ban the use of child labour;**
- **Ban human trafficking;**
- **Respecting the right of employees to freedom of association and collective bargaining, in accordance with the legislation in force;**
- **Promoting a diverse workforce and providing employment without discrimination, harassment or any other form of abuse;**
- **Treating employees fairly, including wages, working hours and benefits.**

Safety, health and environment

- **Sustainability;**
- **Safe and healthy workplaces;**

- **Minimising environmental impact;**
- **Safety, health and environment;**
- **Safety and conformity of products/services provided;**

Business integrity and legal requirements

- **No illegal bribery / kickbacks**
- **Avoid conflicts of interest**
- **Gifts and Entertainment:**
- **Fair competition**
- **Protect confidential information:**
- **Data confidentiality:**
- **Compliance with all other applicable laws in the supply of goods and services**

AS METAL COM communicates its ethical expectations to relevant business partners and expects compliance with the principles of this Code of Conduct and Ethics as a condition of collaboration.

GENERAL MANAGER,

Constantin APOSTOL



01.08.2025