

CODE OF ETHICS

Premise

This document represents the ethical identity of Amenduni Steel, a company operating in the production and commercialization of steel pipes and establishes the fundamental principles that guide every aspect of its operations and relationships with its partners and stakeholders.

1) Purpose and Values: The Core of Amenduni Steel's Philosophy

This Code stems from Amenduni Steel Group's deep awareness of its role and impact in the industrial sector in which it operates and encompasses the core values that the Company is committed to promoting: legality, responsibility, safety and sustainability, environmental protection, and personal data protection are the main pillars upon which Amenduni Steel builds its success and that of its stakeholders.

In particular, central importance is placed on the safety and well-being of workers. This demonstrates a forward-looking vision of a solid company oriented towards the future, which cannot exist without a safe working environment. Every individual must feel valued and protected.

Amenduni Steel is committed to going beyond mere regulatory compliance, aiming to create an ecosystem of trust and respect. In this regard, since 2015 the Group companies have obtained UNI EN ISO 9001:2015 certification; in 2023, the Gender Equality Certification UNI/PdR 125:2022 was added; and in 2025, ISO 14001:2015 Environmental Management Systems certification was achieved.

2) Scope of Application: Who Is Involved and Why

It is essential to understand that adherence to this Code is a fundamental contractual condition. It is not a recommendation, but an essential requirement for establishing—and especially maintaining—any contractual and commercial relationship with Amenduni Steel.

Who are the recipients? The Code is binding on a wide range of parties: directors, employees, collaborators, suppliers, subcontractors, and all direct or indirect business partners. Each party is required not only to comply with but also to enforce these principles, becoming an active part of this process. Any violation will be pursued and may result in significant consequences, including termination of the relationship, demonstrating the strictness of this commitment. Its validity extends both in Italy and abroad.

3) General Principles: A Guide to Excellence

Legality, Transparency and Integrity:

Any Supplier wishing to collaborate and operate with Amenduni Steel must comply with the United Nations Universal Declaration of Human Rights and all applicable national and international laws governing key areas such as labor, safety, environment, and competition, with the understanding that integrity and fairness are the foundation of every interaction with our Group.

Respect for People and Human Rights: Amenduni Steel prohibits all forms of discrimination, violence, or harassment, promoting diversity, inclusion, and equal opportunities for all. Child labor and forced labor are strictly prohibited, as are unacceptable practices such as modern slavery and human trafficking. Working conditions must be fair, ensuring regular contracts, wages, and working hours in compliance with the law, as well as respect for freedom of association. The presence of whistleblowing procedures clearly demonstrates the company's intention to foster an environment in which concerns can be expressed freely and safely.

Health and Safety at Work: The protection of workers is an absolute priority. Amenduni Steel ensures a safe workplace from a health and safety perspective through careful risk assessment, continuous training, provision of adequate Personal Protective Equipment (PPE) and Collective (CPE), and the preparation of the emergency plan. The same commitment is required of its Suppliers.

Environmental Protection and Sustainability: Amenduni Steel is aware of the environmental impact of its industry and seeks partners who share its commitment to significantly reducing it. This translates into responsible management of waste, emissions, and hazardous substances, promoting energy efficiency and the use of "green" materials to prevent pollution. In this context, the Amenduni Steel Group has obtained Environmental Product Declarations (EPD) for its products. These certifications, based on Life Cycle Assessment (LCA) studies, analyze resource consumption and environmental impacts throughout the entire product life cycle. EPD is a key tool for sharing quantified and verified environmental information, providing details on environmental impacts related to raw materials, production, and end-of-life of each individual product.

Business Ethics and Competition: Fair competition is essential. Anti-competitive practices, price-fixing agreements, or unlawful exchanges of information are strictly prohibited. Regarding anti-corruption, the policy is one of "zero tolerance": no disproportionate gifts or benefits, whether offered or received, will be accepted. Transparency and integrity must be evident in every transaction.

Traceability and Responsible Sourcing: In the context of international trade, compliance with import/export regulations and sanctions is essential. A crucial aspect is the origin of raw materials, requiring compliance with European regulations to ensure that minerals and metals from conflict areas or unethical sources are not used. The aim is to promote responsible supply chains.

Data Protection and Confidentiality: Confidentiality is mandatory. Partners and suppliers are required to protect personal data and confidential information acquired during the business relationship, even after its termination. Disclosure to third parties is allowed only with written authorization, ensuring the protection of sensitive information.

4) Implementation of Principles: Monitoring and Sanctions

Amenduni Steel verifies compliance with the Code also through audits and inspections of its Suppliers, who are required to actively and transparently cooperate by promptly reporting any potential contractual violations. This proactive approach to control is an indicator of seriousness and commitment.

It is also important to emphasize the presence, in contracts entered into by Amenduni Steel Group companies with their Suppliers and/or business partners, of an express termination clause in the event of serious and repeated violations of the principles set out in this Code of Ethics. The consequences may be severe, ranging from termination of the relationship to compensation for damages, underlining that ethics is an integral part of contractual value.

With regard to Group employees, any violation of the Code of Ethics constitutes a serious breach, with sanctions applied, depending on the severity, in accordance with the applicable National Collective Labor Agreement (CCNL).

For the anonymous reporting of any violations, including cases of potential corruption, discrimination, or similar irregularities, Amenduni Steel has adopted a dedicated channel, which can be easily accessed via the link www.amendunitubi.it

5) A Joint Commitment

This Code is widely disseminated through publication on the Amenduni Steel website or through appropriate communication methods, becoming the expression of a shared commitment with all collaborators, partners, and suppliers.

The Supplier declares that it has fully read and agrees to comply with all the contents at every stage of the relationship with Amenduni Steel. This seals a partnership based on trust, integrity, and mutual responsibility.

Amenduni Steel relies on partners who understand and adopt these values, contributing together to building a more ethical, safe, and sustainable future for all.

AMENDUNI STEEL

Mr. President

Michele Amenduni