ALUPHOENIX®

High Quality Aluminium Alloys

3ª Edition-Index

ALUPHOENIX®
High Quality Aluminium Alloys

Ethics is what it becomes what it becomes
(Soren Kirkegaard)

Aluphoenix Srl I Ethics code
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1. NATURE AND OBJECTIVES OF THE CODE OF ETHICS

Since 2009, Aluphoenix S. r. l. is an Italian company in the world of aluminium alloys for foundries located in the Veneto region. The organization has immediately demonstrated that it is able to grow and be competitive by facing the dynamics of the market, basing its business vision on the quality of the product and service offered and making its own the interests of internal and external stakeholders such as: the internal and external social and environmental context to the company, the internal environment of the company which is intended to be enhancing, motivating and stimulating.

This Code of Ethics makes explicit and clear the company's vision and culture, with the aim of improving internal relations between colleagues, those with external parties such as customers, suppliers, media and authorities. Nevertheless, it pays close attention to the environment, indicating the ways adopted to minimise the impact of the Company's activities on the external environment and the ways to constantly improve the internal environment.

The Management of Aluphoenix requires all parties to adopt an attitude that respects the fundamental principles of honesty, integrity, morality, fairness, transparency, objectivity and respect for the individual personality in order to pursue the objectives of the company and the relationships between the parties themselves.

The rights and duties contained in this document are communicated to all internal parties as defined by a special training procedure, while the display is also permitted to interested parties and external parties.

This Code of Ethics complies with the principles described in Legislative Decree 231/2001 and subsequent amendments.

2. RECIPIENTS OF THE ETHIC CODE, AREA OF APPLICATION AND UPDATE

Aluphoenix requires that all interested internal stakeholders know and apply this Code of Ethics in the performance of their duties.

It also recognizes them, the right/duty to request clarification and/or report the need for updating or/and adjustment of the same.

The Company, in compliance with this code, undertakes to provide specific training activities to its internal and external collaborators, to determine and communicate corporate objectives and commitments of social and environmental responsibility, to evaluate projects, investments for the development of the company and for the management of the company's operations.

This document is distributed to:

- Consultants;

- Supplier;
- Partner;
- Agents;
- Any other person doing business to and on behalf of Aluphoenix;

The Company requires that, in carrying out its activities in relation to or on behalf of Aluphoenix, this Code of Ethics be respected in all its parts.

It will be the task of the specific internal contacts to take care of the distribution of the document, to take action for the respect of the same and to report any violations to the superiors.

Any party is required to contact the company's internal contacts, if clarification is needed, to make reports that conflict with the principles and normative references of the Code and to cooperate with the structures and functions responsible for verification and control.

Aluphoenix undertakes to:

- Spreading the Code of Ethics to all interested parties by providing its update;
- Organising training and awareness-raising activities on the issues addressed in this Code;
- Carry out the necessary verifications after any news of possible violations and assess the application of appropriate sanctions in case the violations are proven;
- Ensure that no one can suffer retaliation of any kind for having provided, in good faith, news of possible violations of the Code of Ethics, guaranteeing, however, the right to confidentiality of the identity of the reporter.

This Code of Ethics will be available and freely downloadable from the website www.aluphoenix.com.

3. ETHICAL PRINCIPLES

The paragraphs of this Code of Ethics referring to Aluphoenix' internal and external operations, behaviour and relationships are inspired by the following ethical values and principles:

- Legality, honesty and fairness: the pursuit of corporate interests cannot justify improper conduct. The organization operates in compliance with applicable laws, regulations, internal rules and procedures and with this Code and undertakes, within the framework of its business organization, the dissemination and verification of knowledge of the same.
- Integrity: in dealings with external and internal parties, Aluphoenix undertakes to act in a correct and transparent manner, avoiding misleading information and conduct that would take undue advantage of weak or unfamiliar positions of third parties;

- Loyalty and good faith: the relations with external and internal parties to the company must be marked by the maintenance of agreements, even verbal, promises, pacts, the enhancement of the company's assets and the pursuit of conduct in good faith in every decision;
- Transparency: information that is disseminated by the organisation must be complete, transparent, comprehensible, accurate and must respect the principles of equality and contemporaneity of management and communication;
- Impartiality: in relations with internal and external parties, Aluphoenix avoids any form of favouritism based on characteristics of age, sex, state of health, race, nationality, political opinions, religious belief, social and personal condition;

4. RESPECT AND ASSESSMENT OF HUMAN RESOURCES

Aluphoenix has always based its development on the human capital present in the company to achieve its business objectives. For this reason, it is in the interest of the organization to protect, enhance and improve the skills and competences of each individual employee and collaborator by committing to offer the same opportunities for professional development within their competences, based on meritocratic and non-discriminatory criteria.

The organization, in full transparency and in compliance with company laws and regulations, undertakes through the functions of reference to prohibit any type of discrimination of political, trade union, religious, ethnic-racial and sex, ensuring selection, recruitment, remuneration and training activities on the basis of merit, competence and professionalism. It is committed to ensuring a work environment free from prejudices, from intimidating, hostile, isolation of undue interference or conditioning or sexual harassment between colleagues. It stimulates loyalty, fairness, respect and trust in relationships between colleagues. Offers appropriate working conditions from the point of view of safety and health.

The organization promotes the development of every single resource in order to create a widespread leadership following the principles of knowing how to be, knowing and knowing how to do, personal growth is encouraged which translates into organic company growth.

The organization is careful to the needs and requirements of each individual employee, also meeting personal needs.

There is a policy of rewarding overall and business performance and recognising the contribution of individuals.

The organization encourages open and honest communication in the workplace, where workers can talk to their managers about ideas, concerns or problems and work together for the continuous improvement of working conditions.

Aluphoenix has activated appropriate channels to report illegal conduct or violation of the organizational and management model, suitable to guarantee the confidentiality of the reporting person.

5. PROTECTION OF PRIVACY

In compliance with the privacy policy, Aluphoenix only requires the information necessary for business activities, ensuring the confidentiality of personal data and the management of sensitive information of employees, internal collaborators, external parts that interact with the company.

Specific information system procedures shall therefore be established, monitored and updated.

The main reference information can be identified in:

- Confidential information concerning internal or third-party staff
- Private or confidential or strictly confidential information, the voluntary or unintentional disclosure of which could cause damage to Aluphoenix in terms of image, economic damage, competitive position, relationships with third parties, foreclosure of future possibilities.

Aluphoenix takes all appropriate measures to try to protect employees from unauthorized access, use, destruction, modification or disclosure of their data and personal information.

Aluphoenix has drafted and made available on the website www.aluphoenix.com its privacy policy.

6. SUSTAINABILITY AND HUMAN RIGHTS

6.1 HUMAN RIGHTS

The ethical principles of the Aluphoenix management system are based on the Universal Declaration of Human Rights, the ILO documents, UNO guiding principles on business and human rights and respect for national laws to prevent human rights violations and to enhance and protect all personnel who fall under the control and influence of the organization.

Aluphoenix strives to maintain and improve systems and processes, to identify and prevent human rights abuses within the supply chain, to establish a climate of mutual harmony from the organizational point of view and to maintain optimal relationships between staff and company, encouraging the active participation of staff with a view to continuous improvement in business processes.

The organization undertakes to involve suppliers, customers and all those directly and indirectly involved in the activity, in the ethical path undertaken, in order to consider them as partners on issues of social responsibility.

6.2 CHILD LABOUR

In compliance with ethical concepts against the labour and exploitation of children under the age of 16, Aluphoenix does not use child labour. The social commitment of Aluphoenix is therefore also expressed in the continuous support of organizations active at national and international level, in various areas such as: disability, exploitation of children, situations of social distress.

6.3 FORCED LABOUR, HUMAN TRAFFICKING AND FREEDOM OF MOVEMENT

Aluphoenix adopts voluntary employment contracts and abstains from any form of forced or compulsory labour.

All the employees of the organization are free to conclude at any time the relationship of collaboration with the company, in compliance with the modalities and the times previewed from the reference CCNL, or from specific agreements between the parts.

6.4 FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

Aluphoenix promotes the right of all workers to be free to join legal unions and other organizations of their choice, and the right to collective bargaining to defend their mutual interests, In accordance with local laws. The organisation shall not apply any discriminatory policy with regard to membership of trade unions and activities in areas such as recruitment, promotion, transfer or dismissal. Aluphoenix also facilitates the organisation and execution of trade union meetings during working hours at the request of trade union associations.

6.5 WORKING TIME AND SALARY

Aluphoenix operates in full compliance with applicable laws on working time and wages, including those relating to the existing CCNL minimum wage. Overtime is carried out on a strictly voluntary basis.

6.6 PROMOTING DIVERSITY AND INCLUSION

Aluphoenix supports and promotes and sustains beneficial initiatives for diversity. The organization is committed to promoting gender equality, in relation to the characteristic of its production process.

7. DUTIES OF EMPLOYEES

The company requires collaborators and employees to:

- Avoiding non-compliance or apparently non-compliance with ethical principles (Para.3)
- Maintaining transparent and morally sound conduct
- Carrying out his duties with honesty and good faith
- Respect the dignity of colleagues and their privacy
- Repudiation of all forms of discrimination
- Avoiding annoying or offensive behaviour

- Making the most of the work by taking on the responsibilities of the job
- Respect the principle of collaboration during group activities
- Carry out with diligence the training and updating activities proposed and identified by appropriate business procedures.

The organisation shall ensure that records of the training provided are kept as described in internal procedures. In addition, a copy of the documentation relating to the individual training provided is available between the records of the SGQ.

8. COORPORATE GOVERNANCE

8.1 COMPLIANCE WITH LAWS AND REGULATIONS

All activities carried out by Aluphoenix and its parties are based on full compliance with the applicable legal provisions. The variability of the same is considered by the organization which will implement and adopt the changes demonstrating responsibility, professionalism and integrity.

Any non-compliance by an employee inside or outside the company is prohibited by the company and, may stimulate legal and/ or media actions by this to defend its integrity and public image.

8.2 CORRECTNESS AND TRANSPARENCY OF THE MANAGEMENT

In full compliance with the principles of this Code of Ethics and the regulatory aspects of the law, Aluphoenix makes its communications safeguarding its social assets, protecting shareholders, creditors, investors and any other stakeholders. In fact, in the absence of formal authorisation of the bodies or functions in charge, it is prohibited any management, administration and exercise of power of representation, management or expenditure.

8.3 CONFLICTS OF INTERESTS

It is considered the basis for the collaboration with Aluphoenix, the execution of activities for the sole benefit of the company. Top Manager, employees and collaborators must refrain from situations of actual or potential private interest which are contrary to the company's interest and which do not guarantee an impartial judgement or conduct.

8.4 PREVENTING THE FENCING, LAUNDERING AND USE OF MONEY, GOODS OR UTILITIES OF UNLEGAL PROVENIENCE

In accordance with the legal regulations issued by the competent authorities, Aluphoenix undertakes to identify and prevent any illegal or criminal money laundering activity. Staff shall avoid any involvement in such activities and shall, prior to establishing any type of business relationship, be required to carry out prior checks on

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commercial counterparties, consultants and suppliers in order to verify their moral integrity, respectability and legitimacy of their business.

Every employee and internal collaborator are bound to the respect of the business procedures and the enforced norms in matter.

8.5 PREVENTING THE CORRUPTION

Aluphoenix adopts maximum transparency in the management of commercial relations with public and private entities. It is therefore planned for employees or those working on behalf of the organization, to act in accordance with the rules on anti-corruption, refraining from actions such as gifts, promises of sums of money or benefits of any kind intended for representatives of parties outside the company with a view to favouritism for Aluphoenix.

From this point of view, the organisation has decided to actively engage in preventing and fighting all possible forms of corruption in all areas of business and in the supply chain where possible. In order to actively monitor compliance with its commitment, the organization has adopted an organizational model ex d.lgs. 231/2001 and s.m.e. delegating the above activities to the appropriate Supervisory Body. The organisation shall ensure that all employees have received adequate information and training on anti-corruption policy in order to carry out their activities in complete transparency. Aluphoenix has activated appropriate channels to report illegal conduct or violation of the organizational and management model, suitable to guarantee the confidentiality of the reporting.

8.6 RELATION WITH CUSTOMER

Aluphoenix' customer orientation determines the relationships that managers and employees need to maintain. It is forbidden to promote the interests of Aluphoenix through promise or payment of money or assets to any person. It is therefore necessary to ensure respect for the principles of transparency and fairness, respect for laws and independence towards all internal and external conditions.

The organisation shall be committed to:

- Adopt and comply with specific internal procedures;
- Ensuring the satisfaction of contracts by providing the best quality standard and operating with courtesy and efficiency
- Provide customers with accurate, complete, clear and truthful information about the products or services offered, such as to enable the counterparty to make an informed choice;
- Do not communicate in any way that may be misleading.

8.7 RELATION WITH SUPPLIER

The selection phase and the subsequent relationships with suppliers, collaborators and consultants are carried out by the Aluphoenix function managers in charge, based on the principles of transparency, loyalty, integrity, confidentiality, diligence, professionalism, impartiality, equal opportunities and objectivity of judgment.

The company has determined its willingness to establish relationships only with entities that, after appropriate verification by the organization, are considered to enjoy a good reputation, are engaged in lawful activities and with a Code of Ethics that ensures compliance with the law and transparency during all interactions with Aluphoenix.

Purchasing processes must be geared to the pursuit of the highest competitive advantage while maintaining full compliance with the mandatory standards and ensuring compliance with the principles mentioned above.

As for the above:

- Supplies of goods and services are properly formalised and documented;
- The facilitation of Aluphoenix interest through the promise or payment of sums of money is prohibited;
- it is not in the Company's interest to engage in procurement activities with parties that do not respect fundamental human rights, international conventions and applicable standards;
- it is also not in the Company's interest to maintain commercial relations with suppliers for whom there is the possibility of exploitation of child labour.

The Organization requires its suppliers to refrain from behaviours capable of compromising the image of the Company, and not to pursue personal gain by proposing or accepting particular advantages or conveniences in the phases of procurement.

The violation of the principles of legality, fairness, transparency, confidentiality and respect for the dignity of the person can be considered as serious breaches of contractual obligations that prefigure a unilateral resolution for just cause by Aluphoenix and the promotion of legal and/or media redress of the resultant objective and image damages.

8.8 PROTECTION OF FAIR COMPETITION

The organisation, in full compliance with the mandatory standards, undertakes to:

- Do not use names and distinctive signs to create confusion with names and identifying symbols lawfully used by other companies;
- Do not use any means of creating confusion with the products and activities of a competitor;
- Use illicit means to obtain information relevant to competition;

8.9 RELATION WITH EXTERNAL STAFF

Aluphoenix employs external professionals for specific activities related to the company.

The selection of the skills happens under conditions in absolute impartiality, autonomy, independence and on the base of purely professional criteria and competence.

External collaborators, consultants and agents are expected to comply with the rules and principles set forth in this Code of Ethics, which will be provided to them directly by the company at the beginning of the professional relationship. Failure to comply with these requirements can be considered a serious breach of the duties of fairness and good faith and therefore lead to the unilateral contractual termination for just cause by Aluphoenix S.r.l.

The organisation shall assess the involvement of external actors for the execution of its activities, on the basis of:

- Adequate qualifications;
- The reputation of
- Economic convenience;

requiring the application of the contractual conditions laid down.

8.10 GIFTS, BENEFITS AND PROMISES OF FAVORS

In order not to compromise the image of Aluphoenix, it is forbidden for all internal parts to grant or accept directly or indirectly, gifts or other utilities from customers, suppliers, agents or other parties. It is made except for symbolic gifts (small promotional items, usual or seasonal gifts of modest value, such as flowers, boxes of chocolates, bottles of wine or fruit baskets) that do not create conditions of obligation able to influence the impartiality and integrity of decision for parties and Christmas present.

The acceptance of gifts in violation of above can be considered reason of conclusion of business relations with the company.

8.11 PARTICIPATION IN TENDER AND REPORTS WITH COMMITTEES

Participation in activities of "competitive comparison" involves the assessment of the adequacy and executability of the required services in compliance with regulatory, technical and economic requirements or in unfavourable cases, the reporting of anomalies found.

Aluphoenix ensures diligent and professional conduct by providing clear, accurate and truthful indications during commercial negotiations and by taking on contractual obligations and commitment in their fulfilment.

The origin, provenance and specifications of the upstream products are guaranteed.

8.12 RELATIONS WITH MEANS OF COMMUNICATION

Aluphoenix ensures maximum transparency in external communications, and maintains collaborative relations with the media and media through its reference functions.

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9. USE OF THE COMPANY ASSETS

Aluphoenix's corporate assets consist of tangible assets such as: plant, machinery, equipment, buildings, goods, computer hardware and intangible assets such as: process and product know-how, business ideas and strategies, computer data, software, human capital (knowledge of the staff).

The organization, in the interest of preserving and protecting its assets, assigns to the recipient of the use of the property granted, the responsibilities for control and care of the assets entrusted.

The company adopts behaviour described in safety procedures and monitors situations that could cause a loss of company assets.

9.1 MANAGEMENT AND USE OF INFORMATION SYSTEMS

Aluphoenix integrates in its processes the use of hardware and software for the management of information also developed internally.

It considers software systems as well as information through these processed, essential to its competitive advantage.

In order to avoid actions that aim to commit or lead to commit crimes, damage or alter data and information systems, access to computer and network resources is prohibited to all unauthorised workers and collaborators. It is also prohibited to install unlicensed software components and to use unlicensed material or in the absence of specific permissions by the responsible corporate managers.

Access to the computer goods is granted to the individual user through a personal password associated with a single identification code for which the user has full responsibility.

Stakeholders are also required to follow the specific business procedures adopted for the specific management of hardware and software systems.

9.2 INTELLECTUAL AND INDUSTRIAL PROPERTY MANAGEMENT

Aluphoenix protects its own industrial property and that of others, engaging all internal and external collaborators:

- In using exclusively creative ideas or elaborations of which it has exclusive property also through payment of fees or documented contracts to third parties;
- In using trademarks which are exclusively owned or for which it has legitimacy to use;
- Requiring its suppliers not to violate the rights of third parties with regard to the use of goods and their intended use.

Aluphoenix also prohibits activities of:

- infringement or alteration of patents, trademarks and distinctive signs;
- the use in any form or manner of patents of trade mark names and distinctive signs;
- marketing of services or products liable to mislead the buyer as to the origin, provenance or quality of the work or product.

9.3 USE OF COMPANY EQUIPMENT AND STRUCTURES

All collaborators, employees and other internal and external parties having direct interaction with Aluphoenix activities, are required to properly use the equipment, security devices, means of transport and other work equipment and to report immediately to the person in charge of the function, to his superior or as an alternative to the employer, any dangerous conditions, by direct use, in urgent cases, within the limits of their powers and possibilities.

In no case shall the use of the company's goods be permitted for purposes contrary to the rules of law, morality and the principles described in this Code.

All business assets comply with legal criteria and are used in the context of business activities, in accordance with current legislation.

10. USE AND DISCLOSURE OF INFORMATION

All the top managers, employees and collaborators are required, to keep scrupulously and with the utmost confidentiality the company information of any type learned in the exercise of their functions (personal employee data, organisational data, trade data, financial transactions, know-how, patents, plans, strategies and market analysis)

It is in the interest of Aluphoenix to ensure conditions of transparency and trust in the company's business vis-à-vis its stakeholders. For this purpose, the company communicates periodically and through means of rapid and wide dissemination as the website www.aluphoenix.com information about the performance of the business. Relations with third parties outside the company's activities and with the press are managed ensuring the confidentiality of strategic business information. In the absence of authorisation by the management bodies, the following shall be prohibited:

- any form of communication or dissemination of information concerning the company and the activity,
- any direct and indirect instrumentalization and use thereof.

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11. TRANSPARENCY IN ACCOUNTS

Aluphoenix develops all its commercial activities in full compliance with current regulations and contrasts all personal activities and actions, whether they are carried out by internal and external collaborators, the effects of which are likely to affect the company's activities and public image.

In order to ensure the transparency of its commercial activities, the organization strives to meet the legal obligations required for communication.

- The invoices reflect the commercial transactions that have taken place;
- The veracity and clarity of business records or company registers shall be ensured;
- Creation of funds or dedicated accounts for undocumented purposes is prohibited;
- It is forbidden to hinder the control activities of the parts authorized, inside and outside the company;
- Fraudulent conduct for the purpose of creating personal profit is prohibited;
- Prohibition of financial management by unauthorised personnel for this purpose po
- The documentation identifies the person who authorises the activities and provides a description of the characteristics and motivations associated with the operation;

Authorisations to perform particular activities shall be approved by persons specifically authorised by management. It facilitates the carrying out of control activities by ensuring the availability of authorised personnel for the management of specific documentation.

In order to avoid undue and similar payments, the organisation shall define the following documentation management criteria:

- Internal responsibilities for preparing and authorising transfers and payments are established and assigned
- Appropriate access keys are established to prepare and authorise transfers and payments
- All payments and transfers must be recorded accurately and in full in the appropriate registers;
- Payments should be made exclusively for contractually finalized activities;
- The creation of hidden, unregistered or assigned funds is prohibited;
- There must be no false, incomplete or misleading records;
- The use of funds for purposes outside the company is prohibited.

12. HEALTH AND SAFETY IN THE WORK

The application of the Integrated Management System of Aluphoenix, implies a control and compliance with the rules regarding the protection of the health of workers allowing the constant assessment and monitoring of the risks and associated criticalities.

With a view to a continuous development of operational skills, Aluphoenix also pursues the development of the skills of every worker, working in the field of health and safety, encouraging near miss reports for continuous improvement.

The protection of workers is expressed in the possibility in case of situations dangerous to their health, to promptly stop the activity and to warn their manager of the danger detected.

To ensure the physical and moral integrity of all internal and external parts related to the company, technical and organizational interventions are implemented such as:

- Identification of OSH roles, involvement, commitment and training of staff;
- BAT application to reduce environmental impacts and risks to workers' health;
- Monitoring and updating of working methods;
- Assessment of the condition of premises, machinery, work equipment, PPE and CPD availability and condition;
- Assessing the impact of OSH in planning future activities

All workers may freely consult the RLS (Workers' Safety Representative) on ideas, concerns or problems relating to health and safety conditions. He will take care to bring them back to the RSPP or to the competent doctor.

Aluphoenix proposes an alternative channel to the reporting of illegal conduct or violation of the organization and management model, suitable to guarantee the confidentiality of the reporter.

A brochure is available in the company's premises where the behavioural and safety rules are reported to all personnel who access the company's appliances.

13. ENVIRONMENTAL PROTECTION

The technologies and plants used by Aluphoenix provide management, control and containment methods downstream of the process, of the effects of its business on environmental aspects, which goes far beyond the latest industry BAT requirements and European, national and local environmental standards.

All business processes that are potentially able to have a direct effect on one or more environmental aspects are managed in accordance with specific internal procedures, subjected to periodic analysis in view of continuous improvement. Aluphoenix is attentive to the preservation of biodiversity and, more widely, in reducing the environmental impact of its processes.

14. RELATIONS WITH LOCAL INSTITUTIONS, ASSOCIATIONS AND COMMUNITIES

Aluphoenix promotes constant dialogue with the institutions and with the organised expressions of the local community in which it is inserted.

Top Manager and all staff whose actions may be related to Aluphoenix, must maintain in relations with the Public Administration conduct characterized by fairness, transparency and traceability. is:

Aluphoenix expressly prohibits the following activities:

- obtaining preferential treatment through the granting of money, sponsorship, promises or liberalization;
- promise or grant gifts or gifts, of unimportant value, that is exceeding normal courtesy or commercial practices or in any case aimed at obtaining preferential treatment;
- promising or granting advantages of any other nature in order to influence the independence of judgment or to obtain any advantage;
- omitting or modifying information in order to induce the Public Administration to grant facilities or benefits of any kind to Aluphoenix
- allocate grants, grants, public funding to purposes other than those for which they were obtained;
- submit to requests or pressures from Public Officials and/or Public Service Officers.

With reference to any contacts or requests received from the Judicial Authority, Aluphoenix undertakes to provide maximum cooperation, making truthful and representative statements of the facts, refraining from any conduct that may cause hindrance, in full compliance with the law and in accordance with the principles of fairness, fairness and transparency.

14.1 DEVELOPMENT OF LOCAL COMMUNITIES

The commitment of Aluphoenix contributes to the development of the urban context in which it grows, through participation in activities oriented to the socio-economic development of the local community, forming and increasing its human capital, keeping active the typical modes of good commercial practice.

14.2 PROMOTION OF NON-PROFIT ACTIVITIES

Aluphoenix, develops and directs its activities with a view to sustainable development. The organisation therefore undertakes to support, participate in and promote local non-profit activities, as an expression of its corporate social responsibility.

Various social responsibility activities are promoted on the corporate website www.aluphoenix.com.

15. IMPLEMENTATION OF THE ETHICS CODE

15.1 RESPONSIBILITY FOR IMPLEMENTATION

Aluphoenix is committed to the implementation of the Code of Ethics in all its operations, providing suitable training for workers, who sign and adopt it.

The organization undertakes a periodic review of this Code of Ethics by assigning the activity of monitoring and reporting through the Supervisory Body pursuant to Legislative Decree 231/2001. The observance of the Code of Ethics is a reference to the rules of law, the respect of this must be considered for employees, essential and implicit in order to avoid the application of disciplinary sanctions provided for, as per contractual obligations, by the CCNL sector.

15.2 DISSEMINATION OF THE CODE OF ETHICS

The Code of Ethics is displayed on the company's corporate notice boards so that it can be consulted and used at any time, and published on the company's institutional website, to make it accessible to all stakeholders and to collect opinions and suggestions.

Aluphoenix is committed to spreading and promoting the culture and principles of the Code of Ethics through all available internal and external communication tools.

15.3 TRAINING ACTIVITIES

Aluphoenix periodically organizes training opportunities to promote knowledge and dissemination of the values and principles to which the Code of Ethics refers.

The code of ethics is part of the set of documentation that the company delivers to new employees and requires formal subscription.

Date 09/03/2023

Sign _____

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