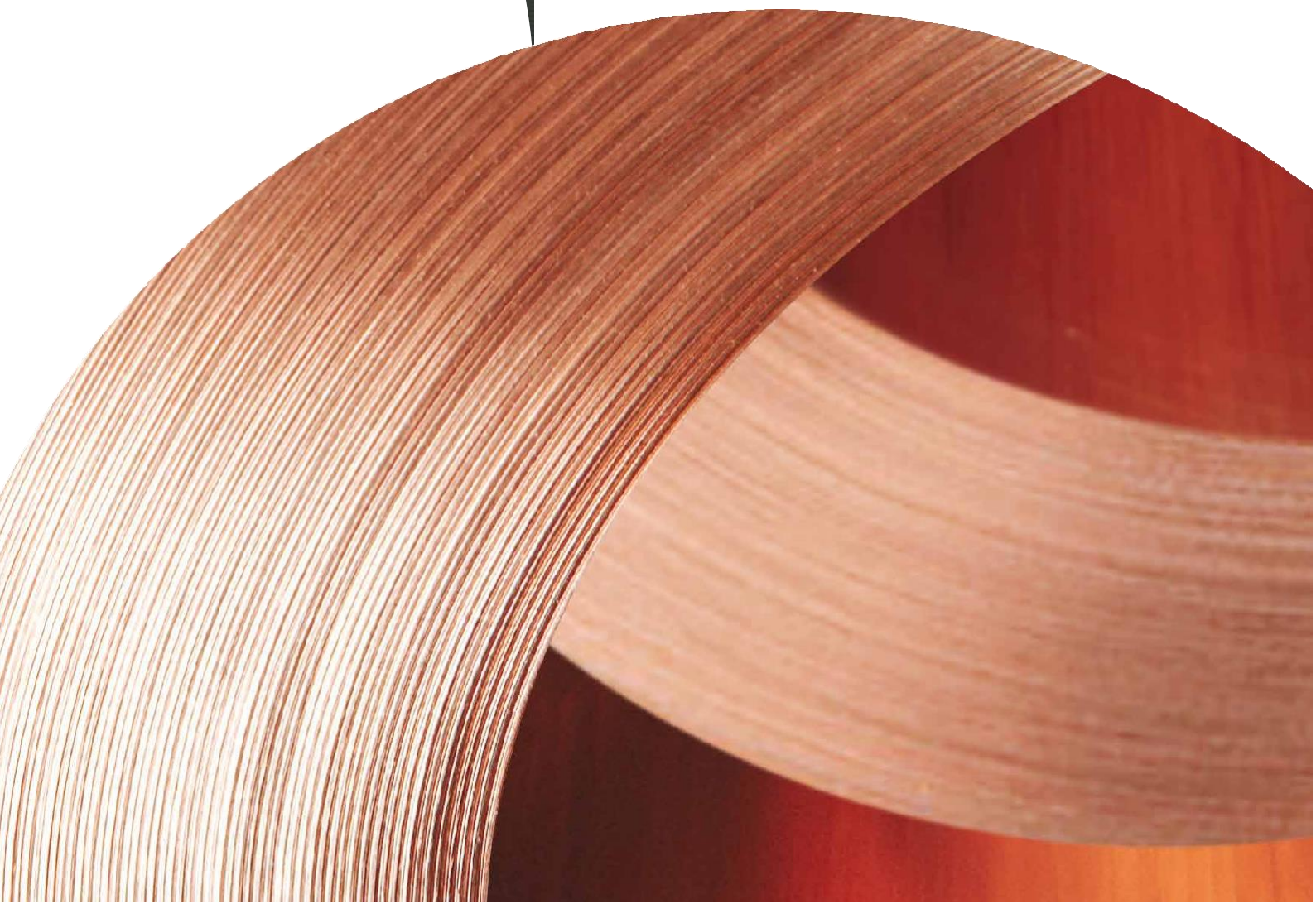


Code ofconduct

English edition

KME



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Introduction

KME Group

KME SE is one of the world's largest producers of copper and copper alloys products. Thanks to a worldwide distribution network, KME SE offers its customers in a wide range of industries innovative and smart product solutions tailored to their individual needs. The range of services offered by KME extends from rolling, pressing and extrusion of semi-finished products to the design, mechanical manufacturing production and complete service of special plants.

The Code of Conduct

In view of the commitment to conduct activities with integrity and responsibility towards its stakeholders, with this Code of Conduct ("**Code**") KME SE and its subsidiaries worldwide intend to promote ethical behaviour, ensure compliance with all laws and regulations applicable to their activities and commit to uphold and apply fundamental principles in the field of sustainable development, human rights, labour standards, environmental protection.

The Code consists of four sections:

- **Introduction**: defines the purpose of the Code, the scope, the addressees and the main regulatory references;
- **Ethical Code**: states the mission, vision and values of KME;
- **Code of Conduct**: specifies the rules and standards of transversal behavior and relationships with different stakeholders;
- **Implementation, monitoring and updating**: defines the procedures for the dissemination and updating of the Code, specifies the procedures for reporting unfair behaviour and for managing infringements and explains the applicable disciplinary system.

In certain key areas, the provisions of this Code are complemented by overarching Group policies, which all employees and collaborators are required to comply with in the same way as other working instructions and corporate directives.

Although the Code is not a comprehensive document and cannot foresee all possible situations and circumstances, conduct contrary to ethics of any kind, even if not expressly regulated in this document, as well as violations of the law, are obviously not allowed under any circumstances.

In case of any discrepancies between the English version and any other translation of the Code, the English version shall prevail.

Addressees and scope

The provisions of this Code apply, without exception, to all employees, members of corporate bodies and collaborators of the Group companies as well as to anyone who, wheter directly or indirectly, permanently or temporarily, establishes relationships or contributes to the achievement of its objectives (hereinafter "**Addressees**").

The Addressees are required to align their behavior to the principles of this Code and adequately inform third parties about the obligations imposed by this Code, require compliance with and take appropriate action in the event of a breach of the rules of conduct defined therein.

Major regulatory references

The main guidelines at international level on human rights, corporate social responsibility and corporate governance that inspire this Code are as follow:

- the Universal Declaration of Human Rights of the United Nations;
- the Convention on the Rights of the Child of the United Nations;
- the Convention on the Elimination of All Forms of Discrimination against Women of the United Nations;
- Principles of the UN Global Compact;
- the 8 Fundamental Conventions of the ILO (International Labour Organization);
- the Guidelines for Multinational Enterprises of the OECD (Organisation for Economic Cooperation and Development);
- the Charter of Fundamental Rights of the European Union;
- the Convention against Corruption of the United Nations.

Ethical Code

Mission

KME offers its customers products of high quality, safety and durability.

The Group operates with a focus on customer needs and responsibility towards the environment and people, with the aim of consolidating its growth by focusing on innovation, competitiveness and sustainable development.

Vision

KME is the European leader in the copper laminates sector, recognized for the quality of its products, the excellence of the service offered to customers and the sustainability of its business model.

Values

Sustainable innovation

KME has adopted the concept of sustainable innovation, based on a revisiting of the concept of economic development, as a basic principle for the Group's growth: for a long time, sustainability and innovation were opposing concepts and this is because much of the technological innovations had a negative impact on the natural environment and the well-being of society. Today, however, innovation can and must be decisive in improving the environment in which we live, and is at the service of the needs of sustainability. Innovation and sustainability, together, become the key elements on which the competitiveness of companies is played.

Protection and respect of the individual

KME is committed to protecting the freedoms and rights of human resources, promoting a climate of collaboration and mutual respect, both among its people and with regard to external stakeholders. The Group is committed to countering all forms of discrimination, also valuing the differences of origin, nationality, religion, ideology, sex, age, appearance and physical characteristics, sexual orientation and belonging to protected categories.

Social Responsibility

The person, their needs and the community in which we operate are at the heart of our approach. Valuing in all phases of his working life is part of the sensitivity and experience of the Group, which has always been committed to creating shared value in the communities in which he operates.

KME has always been committed to the development of concrete initiatives of Social Responsibility, for the Group the protection of the person also consists in pursuing social projects in support of employees, families of employees, of the community that hosts the production sites and stakeholders outside the KME context, reached by the Dynamo System, a success story in the third sector, conceived and promoted by the Group over 15 years ago.

Integrity, honesty and transparency

KME requests that the Addressees of this Code act with honesty, grounding their actions on principles of integrity and transparency. It embraces adherence to the laws and regulations of the countries it operates in, along with its own organizational and governance framework, as fundamental principles guiding its operations and business conduct.

Code of Conduct

Ethics and integrity

Countering corruption and bribery

We are aware of the negative effects of corruption practices on the development of the areas where we operate. Aligned with the provisions of the Convention against Corruption of the United Nations, we are firmly committed to fostering values of integrity, loyalty, equity, and transparency among our employees, collaborators, and stakeholders. This commitment is realized through the adoption of top-tier anti-corruption standards and best practices.

We abstain from entering into any business relationships that contravene prevailing laws or breach company regulations concerning the giving or acceptance of funds or other benefits, while being aware that it may lead to potential loss of business opportunities.

The possibility of increased profits, of any amount, can never serve as a justification for providing inducements, pledges, contributions, presents, or any form of advantages, whether direct or indirect, to any individual, to encourage him to abuse or, because it has abused its alleged or actual influence in order to obtain recognition, employment, contracts or other favourable decisions from a public authority. Furthermore, the engagement in illicit commercial practices or the payment of "facilitation payments" with the intention of expediting routine administrative processes is strictly prohibited.

These principles apply without exception at all levels in KME, in all business relations and across every country globally.

Conduct guidelines

- Recognize that you are bound by various countries' anti-corruption laws and refrain from engaging in any inappropriate conduct, even superficially.
- Refrain from making or accepting unauthorized payments (including "facilitation payments") or other advantages from or to third parties.
- Pay attention to excessively elevated service fees in relation to the services received.
- Ensure that thorough due diligence are conducted on third parties with whom you have business relations.
- Should you encounter inquiries or doubts related to potential bribery or corruption incidents, including instances where third parties seek to exert undue influence for personal gain, reach out to the Compliance Office for guidance.
- Report to your superior and/or to your KME internal contact any suspicion of business relationships that may hide the criminal origins of money, or of assets resulting in the proceeds of a crime.

Impartiality and conflict of interests

We identify and proactively address scenarios involving conflicts of interest that have the potential to undermine the interests of our stakeholders or the Group, to the detriment of other entities.

Such conflicts of interest may arise during a business relationship with our competitors or customers, or through engagement in supplementary activities that could impede our employees and collaborators from effectively discharging their duties.

Depending on the relevance of the potential conflicts, we institute appropriate management protocols, which might involve enhanced authorization procedures or restrictions in cases where the risk is particularly is most significant.

Conduct guidelines

- Promote exclusively the business interests of KME and assess whether a situation could potentially lead to a conflict of interest, whether real or even potential.
- If you plan to request a supply or establish business relations with an individual or entity that already has an existing connection with KME, and if you hold a position capable of influencing said supply or business relation with KME, seek approval from your line manager before finalizing the contract with the concerned party.
- Always seek prior authorization for any extraneous position or role outside the Group.
- When entering into a new working relationship or collaboration, disclose any pre-existing positions before formalizing the contractual relationship with KME.
- Promptly report any potential conflicts of interest that might conceivably impact the execution of your duties or obligations.

Gifts and other benefits

Even when the exchange of gifts and benefits among trade partners is a customary practice, it may involve the risk of generating conflicts of interest and, in some instances, may cast doubts on integrity.

During our interactions with suppliers, customers and business partners, including public authorities, we offer and accept gifts and other reasonable and proportionate benefits int the context of regular business relationships. However, accepting gifts and benefits is expressly forbidden if their potential impact might compromise the impartiality of judgment and actions of those involved, whether in actuality or simply in the perceptions of others.

KME considers that the acceptance of gifts and other benefits is eligible if the material value (excluding cash and vouchers) is limited. In the case of gifts and other benefits of large amounts, which cannot be refused or returned, for example because in the specific situation this would be rude, they should be used in other ways, for example through an internal lottery or by allocating them to a charity.

Conduct guidelines

- Consider whether it is appropriate and proportionate to offer or accept gifts, entertainment or hospitality within the context of your existing relationships and consult the Compliance Office in case of doubts.
- Remember that gifts, entertainment and hospitality offered to government or public officials carry a heightened risk of corruption and therefore require prior consultation with the Compliance Office.
- Avoid offering gifts, entertainment and hospitality in order to gain a business advantage.

Fair competition

We recognise the fundamental importance of a competitive market and are committed to upholding fair competition rules by complying with the provisions of competition and anti-trust legislation within the regions and jurisdictions in which we do business.

We abstain from engaging in conduct or forming agreements with other companies that could potentially undermine the competitive landscape among various participants in the relevant market. Similarly, we avoid any practices (such as forming cartels, dividing markets, limiting production or sales, or entering into conditional agreements, etc.) that would amount to violations of competition laws.

Conduct guidelines

- Assess who KME's competitors are and who they might be.
- Avoid disclosing confidential information to competitors, either directly or indirectly, pertaining to prices, costs, discounts, supply terms, territories, production, sales volumes, proposals, customers and suppliers, profits, profit margins, production details, market and distribution strategies or any similar information, even if such information is publicly available, without first consulting the Compliance Office.
- Abstain from entering into agreements with competitors aimed at limiting competition, restricting relations with suppliers, initiating fictitious bids for the purpose of acquiring or partitioning customers, markets, territories or production plans.
- Refrain from influencing resale prices for customers or pressuring them to restrict the export or import of goods procured from KME.
- Seek prior authorization from the Compliance Office prior to joining industry associations or participating in meetings where discussions of competitive nature could arise.
- Avoid denigrating a competitor or its products or services.
- Offer maximum cooperation to the competition authorities.

Combating money laundering and terrorist financing

Money laundering involves the manipulation of the proceeds of criminal to create an appearance of legality. Money laundering can enable the perpetration of additional crimes, such as fraud and terrorism; moreover, it inflicts a detrimental impact on the global economy and stands as an illegal practice.

At KME, we adhere to the anti-money laundering and counter-terrorism financing protocols delineated in international regulations and relevant national legislations.

Therefore, we refrain from entering in any business relationship that may hide the illicit origins of money or assets generated from criminal activities.

We implement controls and monitoring measures aimed at detecting and investigating suspicious activities, in order to avoid sustaining relationships with suppliers and customers engaged in illicit commercial activities.

Conduct guidelines

- Gather necessary information and documents concerning potential customers, suppliers, agents and business partners, in order to exclude their engagement in illegal activities.
- Report any suspicious activity (attempts to make large payment in cash, payments by someone who is not a party to the contract, requests to pay more than provided for in the contract, payments made in currencies other those specified in the contract, etc.) to your line manager or to the Compliance Office for the necessary control activities.

International trade compliance

The economic or trade sanctions imposed by the European Union, the United States and the United Nations, or other countries, represent a complex and far-reaching matter that undergoes continuous change. These sanctions may concern the nature and intended use of traded goods, the country of origin or destination, the involved parties' identity and the currency utilized in financial transactions.

Establishing a commercial relationship with a country, entity or individual that is high-risk or under sanctions can lead to serious legal consequences, including the payment of fines, detainment or export bans. Furthermore, failure to comply with these requirements may significantly damage KME's reputation.

As a result, our commitment is to ensure unwavering adherence to all international trade regulations, particularly the pertinent import and export control laws.

Conduct guidelines

- Understand that countries have the authority to implement controls on goods developed or produced within their borders, regardless of where these items are subsequently distributed or sold.
- Recognize that certain transactions may be subject to regulations in multiple countries.
- Recognize that many countries have additional restrictions on products and associated technical data designed, modified, generated or adapted for military, defense or space applications.
- Before starting or proceeding with a transaction involving counterparties or countries at risk, it is always necessary to seek for clarification regarding relevant legislation by reaching out to the Compliance Office.

Tax compliance

We are committed to respecting tax laws across all jurisdictions where we operate and we adopt a zero tolerance approach to tax evasion. Our commitment is rooted in upholding the principles of truthfulness and correctness in all documents indicating economic, capital and financial values.

For this purpose, we implement an internal system to measure and control tax risk. This involves implementing operational strategies that designate specific roles and responsibilities concerning tax compliance, even when these responsibilities are delegated to consultants or external tax firms.
All persons responsible for creating statutory financial statements, reports or other forms of corporate communications must exercise care to verify the precision of the data and the information that will then be received for the drafting of the aforementioned documents.

We also adopt accounting and administrative procedures and manuals designed to facilitate simple and prompt oversight of adherence to relevant accounting principles.

The employees and collaborators responsible for the transmission of documents and information, during inspections by the competent tax authorities, must act transparently and fairly. Their conduct should exhibit a spirit of utmost cooperation and readiness, without obstructing the authorities' functions.

Finally, we commit to implementing appropriate measures to ensure that our business partners, including individuals or organizations performing services on behalf of KME, understand and adhere to our policies regarding tax evasion.

Conduct guidelines

- Act responsibly in all aspects of tax compliance, adhering to relevant regulations.
- Avoid any involvement in activities that could facilitate tax evasion.

Supply chain sustainability

We pay great attention to the sustainability of our supply chain, endorsing the ethical sourcing of all minerals and metals, and we do not accept supply chains that contribute directly or indirectly to conflicts or serious human rights violations.

For this reason, we act as far as possible to ensure that our business partners shall make a binding commitment to:

- comply with all legal regulations of the applicable legal system, in particular (but not exclusively) the provisions of the applicable competition law, anti-money laundering legislation trade restrictions, data protection, working hours, minimum wage and environment;
- actively ensure respect for fundamental rights. This includes respecting and promoting of equal opportunities and equal treatment of all employees, as well as respect for dignity, privacy, prohibiting forced labour, torture, sexual harassment, as well as recognizing the right to form employee organisations;
- respect the prohibition of child labour, i.e. not employing persons who have not reached the minimum age established by ILO Convention ILO 138;
- take measures to ensure the health and safety of employees and consequently train employees in order to reduce the risk of occupational diseases and accidents;
- comply with the applicable provisions of environmental legislation as well as international standards relating to this matter;
- comply with the laws and regulations in force regarding the direct and indirect supply of critical metals and minerals from conflict zones;
- take appropriate measures to avoid the use of raw materials that directly or indirectly finance armed groups that violate human rights;
- not advise, tolerate or participate (whether directly or indirectly, actively or passively) in any action that may lead to bribery and/or corruption;
- comply with applicable anti-money laundering legislation and international standards;
- respect the property (including intellectual property) of third parties and adopt appropriate IT security measures;
- promote compliance in their supply chain with the above principles.

Health, safety and environment

Occupational health and safety

In conducting our operations, we are committed to protecting the mental and physical integrity of our employees, consultants, collaborators and all those we engage with; our commitment entails enabling them to carry out their activities within work environments suitable for safeguarding their health and safety, in accordance with prevailing laws and regulations. To achieve this objective, we promote responsible and safe behaviour and adopt all the safety protocols required by technological evolution to ensure a safe and healthy workplace.

We firmly believe in fostering a culture of accident prevention and risk awareness among our workers, actively promoting this culture through the provision of comprehensive information and training materials.

All Addressees of this Code are expected to act responsibly and adhere to the preventive measures established for safeguarding of health and safety, which are conveyed through specific guidelines, instructions as well as training and information resources.

Environmental protection

We are aware of the impact of our activities on the economic and social development and quality of life of the host communities and the territories where we operate.

For this reason, we seek to meticulously adhere to all applicable environmental regulations, ensuring the preservation of the surrounding ecosystem and actively contributing to the sustainable development of the territory.

From this standpoint, we recognise and address environmental challenges, advocating for resources efficiency, heightened environmental efficacy, and accident prevention; this commitment drive us to establish processes and systems for monitoring, managing and reporting our environmental achievements, alongside developing programmes for environmental protection and remediation.

Conduct guidelines

- Understand the impact of your work on the environment (e.g. emissions, water, waste, nature, noise) and try to minimise this impact as much as possible.
- Identify any environmental hazards during the course of your work and ensure that appropriate action is taken to prevent or mitigate the identified risks.
- Report any accidents or potential accidents that have or may have an impact on the environment.
- Do not perform work without the necessary licenses or environmental permits.
- Do not carry out work that may affect protected areas, species or habitats without prior consultation with the relevant Corporate Functions.

Human rights

Respect for human rights and prohibition of child labour

We have a fundamental commitment to the respect of human dignity and we pursue this commitment by ensuring the complete adherence to all fundamental rights outlined by the International Labour Organization (ILO) regulations and the OECD Guidelines for Multinational Enterprises. In particular, we ensure compliance with prohibitions on trafficking in human beings, we make certain to abide by stipulations regarding the maximum allowable working hours, and we adhere to laws concerning minimum wages, maternal protection, holidays, and rest intervals. Furthermore, we actively acknowledge and support our employees' right to freely associate without favouring or discriminating against members of worker or trade union organizations.

We provide an assurance against forced or compulsory labor and child labor, categorically prohibiting the employment of individuals below the age of 15. This prohibition remains in place, except in cases explicitly provided for by the International Labor Organization Convention No. 138 of June 26, 1973, concerning the Minimum Age for Admission to Employment.

We avoid using or hiring security forces in situations where the absence of proper guidance or oversight could lead to the potential for torture, cruel, inhumane, or degrading treatment, harm to life or physical well-being, or restrictions on the freedom of association and union.

We promote a secure and healthful work environment; therefore, our employees and collaborators are strictly prohibited from engaging in the use, presence, or distribution of unauthorized, illegal drugs, and alcoholic substances while on the job.

We are steadfast in identifying, evaluating, and mitigating potential adverse impacts on human rights that we may or may contribute to in relation to our operations. This dedication extends to our suppliers and third parties acting on our behalf, whom we demand to share the same commitment. We ensure this through ongoing due diligence and by formulating and implementing protocols to manage local grievances and enact effective corrective measures.

Conduct guidelines

- Comply with local legal requirements in relation to all types of employment arrangements, including but not limited to permanent, short-term, casual or agency employees and workers.
- Avoid supporting the charging of any fees or costs for recruitment of cross-border migrant workers.
- Do no use, benefit from or permit to be used, forced or compulsory or trafficked labour.
- Promote the principles of respecting human rights and seek to further raise awareness of modern slavery and human trafficking risks throughout suppliers and third parties.

Respect for host communities

We are dedicated to making a lasting and positive contribution to the countries where we operate. This commitment involves respecting established land use as well as any associated rights within local communities affected by our activities. Working constructively with these local communities– in which many of our employees and collaborators may also live - is a priority for us and is based on our values of care and respect.

We seek to create and maintain open and mutually beneficial relationships, by understanding and maximising the positive influence we can have on the development of local and regional contexts as well as refraining from unlawful evictions as well as the unlawful deprivation of land, forests or waters, the use of which secures the livelihood of a person. Our commitment also entails devising strategies to avoid adverse consequences, or in situations where complete prevention is not feasible, to mitigate them effectively.

Conduct guidelines

- Recognize and respect the cultures and heritage of the host communities.
- Refrain from making commitments to host communities without the proper authority.
- Promptly report complaints from host communities to the Compliance Office in order to respond to them according to KME policies and guidelines.

Fair treatment and culture of inclusion

We promote equal opportunities in the treatment of our employees and collaborators.

Inclusivity serves as the foundational cornerstone for creating a psychologically secure workplace, where everyone has equal chances to increase their potential and has the freedom to ask questions and propose ideas.

Diversity is an essential value of our commitment to cultivating a culture that respects the uniqueness and valuable contribution of each employee and collaborator. Every form of diversity – be it nationality, culture, ethnicity, religion or professional background - is considered a benefit to our success.

We promote gender diversity in key roles and gender equality across the Group in general. We commit ourselves to removing any obstacles, even those of a cultural nature, which may undermine the possibility of confrontation and professional growth of women on an equal footing with men.

Personnel management, including recruitment, assessment, career advancement, remuneration or dismissals, must be carried out without any form of discrimination.
Our employees and collaborators are assessed according to their skills, abilities and performance and never according to their personal conditions or inclinations.

Conduct guidelines

- Ensure equal opportunities and define economic treatment in a fair and equitable manner.
- Recognise and be sensitive to behaviours that might be acceptable to some cultures, backgrounds or perspectives but not to others and adjust such conduct as may be reasonable and/or necessary.
- Make appropriate, reasonable adjustments as necessary to support those who need it (e.g. adjustments of working arrangements for those with a disability, for those with caring responsibilities etc.).
- Promote the fair treatment of candidates during the selection process, consistently evaluating them based on objectively defined skills and competencies.

Zero tolerance towards harassment and discrimination

Our aim is to ensure that everyone is treated with care and respect and that no behavior is adopted within the workplace that could result in or contribute to harm to personal safety.

Therefore, we reject any form of uncivilized and inhuman behaviour, including sexual harassment, sexual abuse, mental or physical coercion or verbal mistreatment.

Within the context of working relationships or collaborations both within the Group and in dealings with external partners, everyone is expected to avoid any form of direct or indirect discrimination based on factors such as race, origin, nationality, religion, ideology, gender, age, physical attributes, or sexual orientation. Aligned with our zero tolerance approach towards bullying, harassment, and stalking, we are committed to providing support to anyone, irrespective of gender and sexual orientation, who has experienced or witnessed violence or abuse.

Conduct guidelines

- Refuse any form of discrimination and harassment against other employees or any other person in relation to KME, based on gender, nationality, health status, disability, age and identity.

Protection of personal data and privacy

We protect the privacy of our employees and collaborators in accordance with prevailing regulations, committing not to share or disseminate their pertinent personal data without the prior consent of the individual involved, except where legal obligations apply.

Likewise, our employees and collaborators are mandated to treat any personal data obtained and handled during their relationship with KME as strictly confidential. Consequently, this data must be adequately protected and should not be used for purposes not related to their professional duties; there is a strict prohibition against communicating or disseminating this data, both internally and externally, unless in compliance with existing laws and company procedures.

Conduct guidelines

- Collect, process and delete personal data in line with the most stringent data protection standards and in complete alignment with the guidelines defined by KME.

Company assets

Information security

We assure the confidentiality and security of the information in our possession, in accordance with legal regulations; all our employees and collaborators are obliged not to use confidential and/or classified information without prior authorization or for purposes not related to their designated activities or responsibilities.

We ensure a heightened level of security in the selection and use of our information technology systems, intended for the processing of confidential and/or classified information; this includes implementing the necessary security measures imposed by prevailing laws.

Among the various types of information and data subject that are bound by confidentiality obligation, and that are restricted from being shared or disclosed to external parties, as illustrative but not exhaustive examples: matrics related to business performance; corporate agreements; contracts with suppliers and third parties; financial transactions; confidential business ownership documents, information protected by professional confidentiality, proprietary product knowledge, legal and administrative proceedings involving KME, details about institutional activities, customer lists, pricing information, as well as insights concerning the internal structure and management of tangible and intangible assets of KME.

Conduct guidelines

- Prevent the loss or misuse of KME's information and data.
- Ensure that KME complies with its regulatory and contractual obligations relating to the security of information, in particular with regard to confidential and classified information.
- Guarantee that solely authorised individuals have access to KME's information.
- Assess the risks and benefits associated with sharing information and data with third parties and exercise oversight over their management.

Accuracy of data, information and records

We have a duty to document and archive administrative, economic and financial data and information; furthermore, we are obligated to ensure the transparency of all communications or reports required by law and intended for shareholders or the public.

Individuals entrusted with keeping books, registers, and accounting records are compelled to make each entry with accuracy, completeness, truthfulness and transparency; moreover, they are to facilitate any audits conducted by relevant parties, including external entities responsible for this task. The criteria for recording and reporting should align, ensuring a coherent basis for the evaluation and management of KME's activities and for identifying those accountable for authorising, executing and recording them.

Every file and document must be managed in a manner that enable seamless handover to a colleague at any given time.

Conduct guidelines

- In fulfilling KME's entrusted responsibilities, adhere to both the legal regulations and KME's accounting, reporting and control protocols.
- Ensure that all business transactions are duly authorised and accurately recorded in KME's official records.
- Before reporting administrative and financial information, ensure you acquire all necessary authorisations and maintain proper documentation.
- Adhere to KME's guidelines for document retention and securely preserve all records, including those in digital format.
- Refrain form destroying relevant documentation linked to ongoing or impending legal proceedings.
- Facilitate corporate oversight entities and any duly authorised personnel's access to documentation within their purview, providing them with accurate and complete information.

Protection and proper use of company assets

All our employees and collaborators are responsible for the safekeeping of corporate assets, like equipments, structures, vehicles, financial assets as well as technological assets such as computers, smartphones, software and any information technology systems with storage capabilities.
These assets are exclusively designated for business-related activities and must be protected against theft, loss, misuse, unauthorised access or disposal.

Occasional personal use of KME's business assets is acceptable under reasonable circumstances, provided it does not violate our policies on assets and information tools utilization, and does not compromise KME's interests or impede work's performance.

The use of business assets by external parties is generally acceptable in situations where there is transparent and proper underlying business purpose for, or clear public benefit from the use of the asset.

Conduct guidelines

- Treat KME's assets as its own.
- Prevent non-authorized personnel from accessing KME's facilities, information, data or other assets.
- Ensure the proper storage of valuable information.
- Avoid using corporate resources and business assets for personal gain.
- Physically safeguard information and hardware against loss, theft, unauthorized access or damage.
- Report any discovered or suspected security issues to the IT Department.

Protection of business secrets and intellectual property

Our intellectual property, that encompasses trademarks, patents, copyrights, designs, technical and commercial know-how, gives us competitive advantage, ensuring the protection of inventions, production processes, proprietary information and various other resources.
Recognizing its important significance to the company, we fortify our intellectual property against unauthorized access by third parties by employing necessary security measures.

Likewise, in the execution of our operations, we avoid any situations that could lead to third parties' copyright or industrial property rights conflicts or infringements, unequivocally denouncing any possible form of infringement or misuse of instruments or signs of authentication, certification or recognition, trademarks, distinctive signs, patents, designs or models. We urge all those who work in the interests of KME to adhere to prevailing regulations for their protection.

When undertaking research and development activities, our employees and collaborators are required to maintain accurate records of these activities and must ensure the protection of any information during interactions with business partners.

All intellectual property rights related to creations or projects conceived by employees in the course of their work are the property of KME.

Conduct guidelines

- Recognize that outcomes arising from scientific research and technical development efforts conducted while employed at KME are valuable assets of the company and are the exclusive property of KME.
- Be mindful that for certain inventions the Compliance Office may request the acquisition of intellectual property rights, such as patents, or may decide to protect something such as trade secrets.
- Consider improvements to existing processes, procedures, products and activities as confidential information.
- Respect third-party intellectual property rights.
- Comply with all internal rules and contact your line manager or the Legal Office if in doubt.
  Report any suspected misuse of KME's intellectual property.

Communication and external relations

Relations with public authorities

Our relations with local, national or international institutions are characterized by the highest level of transparency and equity, strictly abiding by applicable laws and regulations.

We commit to refraining from offering monetary funds or other utilities, directly or indirectly through intermediaries, to public officials with the intent to influence their actions in the performance of their duties.

These obligations cannot be evaded by employing alternative forms of contributions, such as sponsorship, assignments, counsel, advertising, etc., that share the same purposes as those prohibited above.

To ensure utmost clarity in relations with public and governmental entities, and to safeguard the collective interests of KME, these relations will be overseen solely by individuals who are not in situations of conflict of interest with the representatives from these authorities.

To avoid any potential perception of KME exercising improper influence over governmental decision-making, we do not support and do not provide financial for political purposes to any political party, group or individual.

Conduct guidelines

- Be sincere, accurate and cooperative when dealing with public officials.
- Prior to participating in any commercial activity involving a political party, secure authorization from the Legal Department.
- Refrain from obstructing the lawful acquisition of information, data, statements, or recordings by public officials.
- Avoid utilising KME funds or personal funds on behalf of KME to contribute to political parties, back political campaigns, support political parties, political candidates or any associated organizations.

Relations with suppliers, business partners and customers

We require our suppliers of goods and services and our business partners to uphold ethics, commercial integrity and legality, with particular reference to laws safeguarding occupational health and safety, environmental preservation, fair competition and market fairness, and regulations against money laundering and organised crime, as outlined in this Code. The alignment of ethical values stands as a crucial prerequisite for establishing and maintening business relationships, as our reputation and our financial performance could be damaged by the actions of suppliers and business partners. In certain circumstances, KME may even be held responsible for their actions.

When entering into contracts with suppliers, utmost clarity in relations is essential, in order to avoid committing to contractual obligations that could result in forms of interdependence, whenever feasible.

We manage our relations with our customers according to the principles of extensive collaboration, accessibility, professionalism, and transparency. These principles establish the groundwork for a solid and enduring bond of mutual trust.

We are committed to ensuring highest standards of quality and safety for our products through periodic evaluations of their perceived quality and complete compliance (in terms of origin, quality, and quantity).

Finally, we are dedicated to consistently addressing customer suggestions and grievances, employing effective and timely communication channels.

Conduct guidelines

- Ensure that no eligible company is excluded from KME's procurement opportunities.
- Evaluate supplier proposals based on criteria such as quality and dependability of the service and cost-effectiveness.
- Solicit the collaboration of the suppliers to consistently meet quality and delivery requirements, in alignment with the mutually agreed-upon guidelines.
- Maintain an open dialogue with suppliers, in line with good business practices.
- Avoid involvements in contests, competitions or promotional initiatives organized by suppliers.
- Comply with the Group procurement and supplier management procedures.
- Refrain from associating with entities involved in illegal activities and those lacking the essential traits of commercial reliability.
- Avoid establishing financial and commercial relations with entities that, even indirectly, hinder human development and infringe upon fundamental human rights.
- Adhere meticulously to the minimal prerequisites set forth for selecting supplier of goods and/or services that KME intends to procure.
- When assessing the commercial and professional reliability of suppliers and business partners, ensure that all necessary information is sought and obtained.

Combating insider dealing

We understand the importance of protecting our Group, stakeholders and financial markets from the improper use of inside information and pay close attention to compliance with applicable laws and regulations on market abuse along with the interpretative guidelines issued by the competent European and national authorities.

We do not make decisions about when to buy, sell or trade shares or securities of KME - or third parties with whom we do business - when we hold inside information, and we do not disclose or give insider advice to anyone.

Conduct guidelines

- Understand that inside information may include non-published information concerning new products or services, proposals for extraordinary transactions (mergers, disposals and acquisitions), financial information, acquisition or loss of important suppliers or customers.
- If you have access to confidential business information (i.e., information that is not publicly disclosed, it is accurate and could have a significant impact on the share price when made available)is prohibited to use them to invest in shares or securities or to advise others to do so.
- Not to participate in transactions aimed at fictitiously altering the market value of assets or liabilities with the aim of receiving revenues or profits, or avoiding losses.
- Report any doubts about the conduct to the Compliance Office.

Transparency and accountability in external communication

At KME, we communicate in an open, transparent and responsible manner with all relevant stakeholders, all while respecting the boundaries of commercial confidentiality.
We recognize the significance of engaging with the media and external stakeholders, as well as delivering presentations and speeches. When managed and executed adeptly, these actions can safeguard and enhance our reputation.

It is imperative that any public actions or statements made by our employees and collaborators, including those communicated to the media or through social and professional networks, adhere to clarity, consistency, and originate from authorized personnel.

Even in informal contexts, internal communications must consistently maintain a professional tone.

Conduct guidelines

- Act professionally when representing KME and ensure that communications are professional, accurate and, if necessary, approved.
- Do not make statements that could have a negative impact on KME's reputation.
- Use social media respecting KME values, this Code and KME policies and guidelines.
- If you personally comment on issues directly related to KME, always use your real name, be transparent about your relationship with KME and make clear that your views are personal and are not expressed on behalf of KME.
- Do not release financial or new product or service information without prior approval.

Implementation, monitoring and updating

Dissemination and updating

This Code shall enter into force on the date of its approval by the Board of Directors of KME SE, that is, 08 April 2024. The Code of Conduct is available to all Addressees and is published on www.kme.com.

KME undertakes to disseminate this Code to its subsidiaries so that they, in their management autonomy, adopt behaviours that conform to the values, principles and norms identified in this Code.

The Group is committed to the dissemination of the Code, its periodical updating and the provision of every possible tool that promotes its full application.

Violations of the Code of Conduct

The violation of the rules of this Code affects the relationship of trust established with the Group and may lead to disciplinary, legal or criminal actions.

No Recipient who violates the principles and rules set out in this Code may justify his or her behaviour in acting in the interest of KME, as any breach inevitably has a detrimental effect on the Group.

The Code of Conduct, moreover, encourages and sensitizes the Recipients to proactively ask for clarification in case of doubts because, in case of violations of the law, the lack of knowledge of the rules does not constitute a defense against the possible consequences of violations of criminal, civil and labour law. In case of doubt, the Recipients can and should contact their hierarchical superior or internal manager.

Reporting violations of the Code of Conduct

Primarily, we expect our employees and collaborators to feel comfortable reporting any real or potential problems they think they have identified to their line manager. Typically, this is the most suitable way to solve problems quickly and effectively.

However, if you see actions or behaviors that appear to violate this Code or that you perceive as unlawful or illicit, you have the duty to report it. You are required to report any conducts or activities such as corruption, fraud, abuse of computer systems, violation of business processes and policies, harassment, conflicts of interest, threats to human health and safety, violations of human rights or significant environmental issues. The reports help us to prevent further incorrect behaviour and limit any detrimental repercussions for the Group.

In order to promote the reporting of any kind of inappropriate behaviour and consistent with regulatory requirements, we have implemented reporting channels enabling both internal and/or external parties to report acts or facts that may constitute a violation of national and/or European regulation . These reporting channels ensure the confidentiality of the personal data for the reporting person, the alleged wrongdoer and any other individuals referenced, while also safeguarding the reporting person against any form of retaliatory and/or discriminatory actions.

All reports and alleged misconducts may be submitted using the following channels:

KME Group Ombudsman

Dr. Carsten Thiel von Herff, LL.M.
Loebellstraße 4
33602 Bielefeld
Web platform for reporting: www.report-tvh.de
Email: ombudsman@thielvonherff.de
Telephone: +49 521 557 333 00
Mobile: +49 151 5823 0321

The Ombudsman acts as an independent lawyer and is not subject to any instructions from KME regarding the substantive handling of the case. The Ombudsman decides on the basis of his own due diligence whether and to what extent he may pass on a matter submitted to him to KME. The reporting person's identity is only disclosed to KME on the Whistleblower's express request and with their express consent.

Compliance Hotline (Italian Group Companies)

https://whistleblowersoftware.com/secure/kmeitalyspa
(**KME ITALY S.P.A.**)

https://whistleblowersoftware.com/secure/kmeitalia
(**KME S.R.L., KMETAL S.R.L., SERRAVALLE COPPER TUBES S.R.L., NATURAL CAPITAL ITALIA S.P.A. SB, IMMOBILIARE PICTEA S.R.L.**)

The Compliance Hotline allows to submit reports either in written form by inputting the relevant details, in oral form by recording a voice message, or to check the status and outcome of a report. Additionally, reporting person have the option to communicate anonymously with the KME Compliance Office. The KME Compliance Office utilizes the Compliance Hotline to review all received reports and conduct necessary verification procedures.

For further information, you can also contact the Compliance Office at compliance@kme.com at any time.

KME SE

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08 April 2024

Description of the KME Group

In this Code, the definitions "KME", "KME Group", "Group", "we", "us" and "our" are to be understood as referring to both KME SE and its subsidiaries and/or those working for these companies in general.
The use of these general terms in this context is for convenience only and in no way indicates the management, control and structure of the KME Group.
The companies controlled by KME SE and their management are responsible for their day-to-day operations, including, but not limited to, operational adaptation and implementation of the Group's policies, management, training and any local mechanism for complaints and disputes.