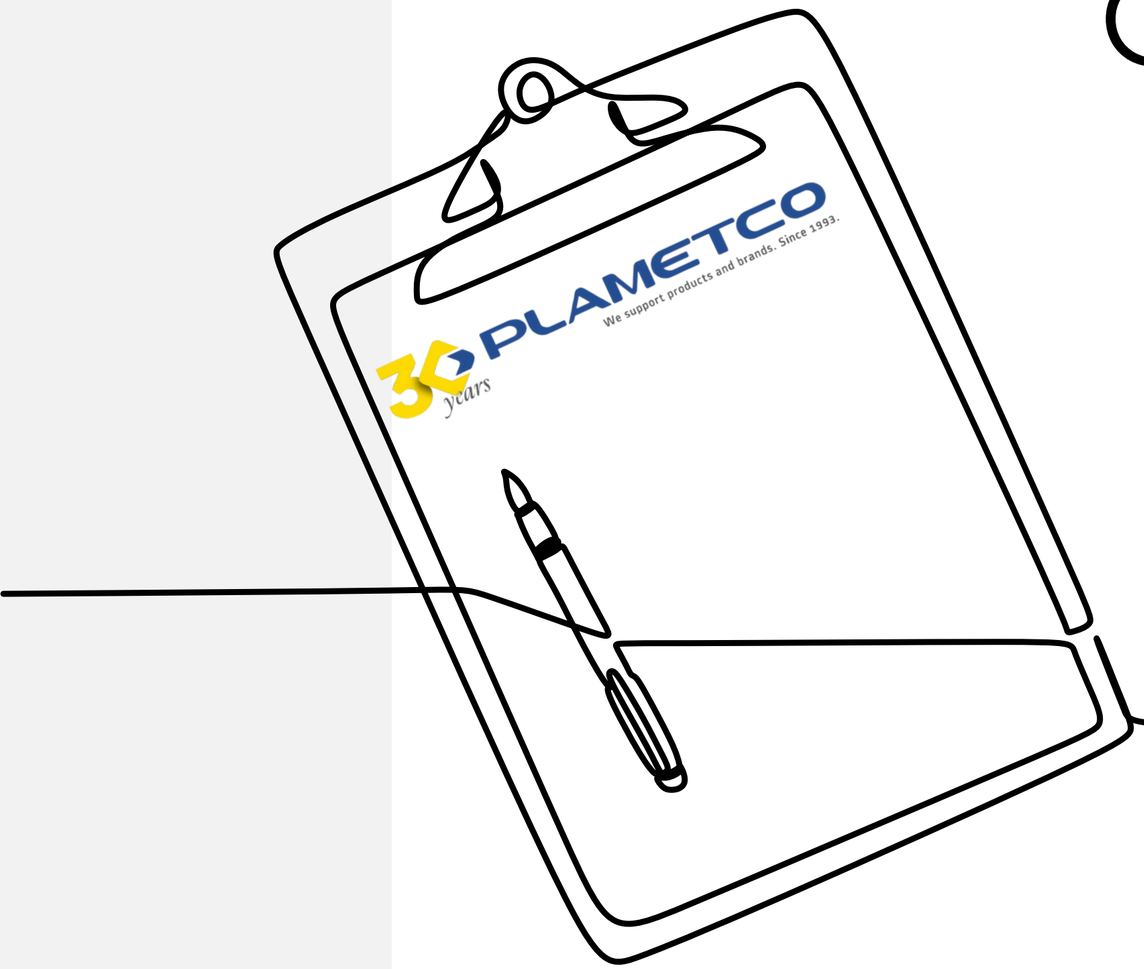


Code of Sustainable Conduct

SC PLAMETCO SRL

JULY 2024

30 years PLAMETCO

We support products and brands. Since 1993.

“We have already accomplished 30 years of rich and exciting experience, which is only the basis for further success. We aim to become the preferred choice for our clients, a place to joyfully work for our employees and a trustworthy partner for local stakeholders. To do so, we adopt this Code of Sustainable Conduct as a commitment to integrating sustainability and ethical principles in all activities, to do our best to protect the environment, cultivate a healthy and equitable working environment, to maintain the highest standards of integrity, and to build trust and respect-based relationships with our stakeholders.”

Cristi Cîda - Director

Table of Contents

I. Why a Code of Sustainable Conduct?

II. The Scope of the Code and the Values of Plametco

III. Environmental and people protection

- Observing the legislation and the standards
- Other commitments

  Energy consumption and Greenhouse Gas Emissions (GHG)

  Pollution.

  Water

  Toxic materials and waste

IV. Respect for people

- Working conditions
- Human rights
- Prohibited child labor, forced labor and human trafficking
- Diversity, Equity and Inclusion

Table of contents

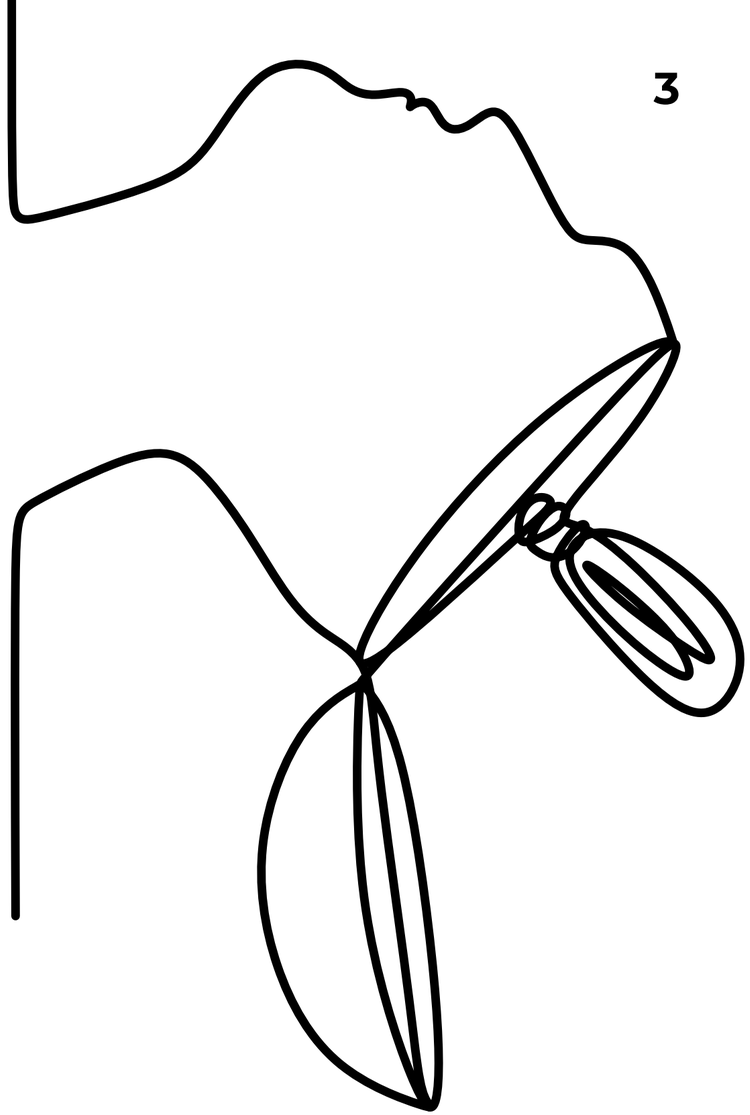
V. ETHICS

- Anti-competitive practices
- Corruption
- Protection of internal intelligence
- Data protection
- Conflict of interest

VI. Relations with Stakeholders

- Clients
- Suppliers
- Local Communities
- Local Authorities

VII. Breaching the Code of Sustainable Conduct



Foreword

PLAMETCO is a business family that prioritises reputation and sustainability over time. We have already been active for 30 years, during which we became a reputable company in the metal products market, serving globally known brands at local and international levels. Adopting sustainable behaviour enables our interest in continuity and success based on values and responsibility towards the environment, clients, suppliers, employees, collaborators, local communities, and, last but not least, the law.

Success is not possible, if not in the long term, and we need a solid reputation to which we all must contribute.

Thus, at the beginning of 2024, we committed to implementing a Sustainability process integrated into the company's overall management activity, which should be based on a Code of Sustainable Conduct.

By this Code of Sustainable Conduct, we express our firm and transparent commitment to a sustainable business model and the expectations from our employees and partners in our relationships.

Why a Code of Sustainable Conduct

We live in a continuously changing world where environmental, social, and economic challenges become increasingly strident. Adopting a Code of Sustainable Conduct is not only an option but a need.
Sustainability-related reporting evolved significantly at the global level, starting from voluntary initiatives to reputable standards such as GRI (Global Reporting Initiative), CSRD (Corporate Sustainability Reporting Directive), and ISSB (International Sustainability Standards Board).
International efforts such as the UN Global Compact call for companies to align their strategies with the universal principles of human rights, environment, and anti-corruption.

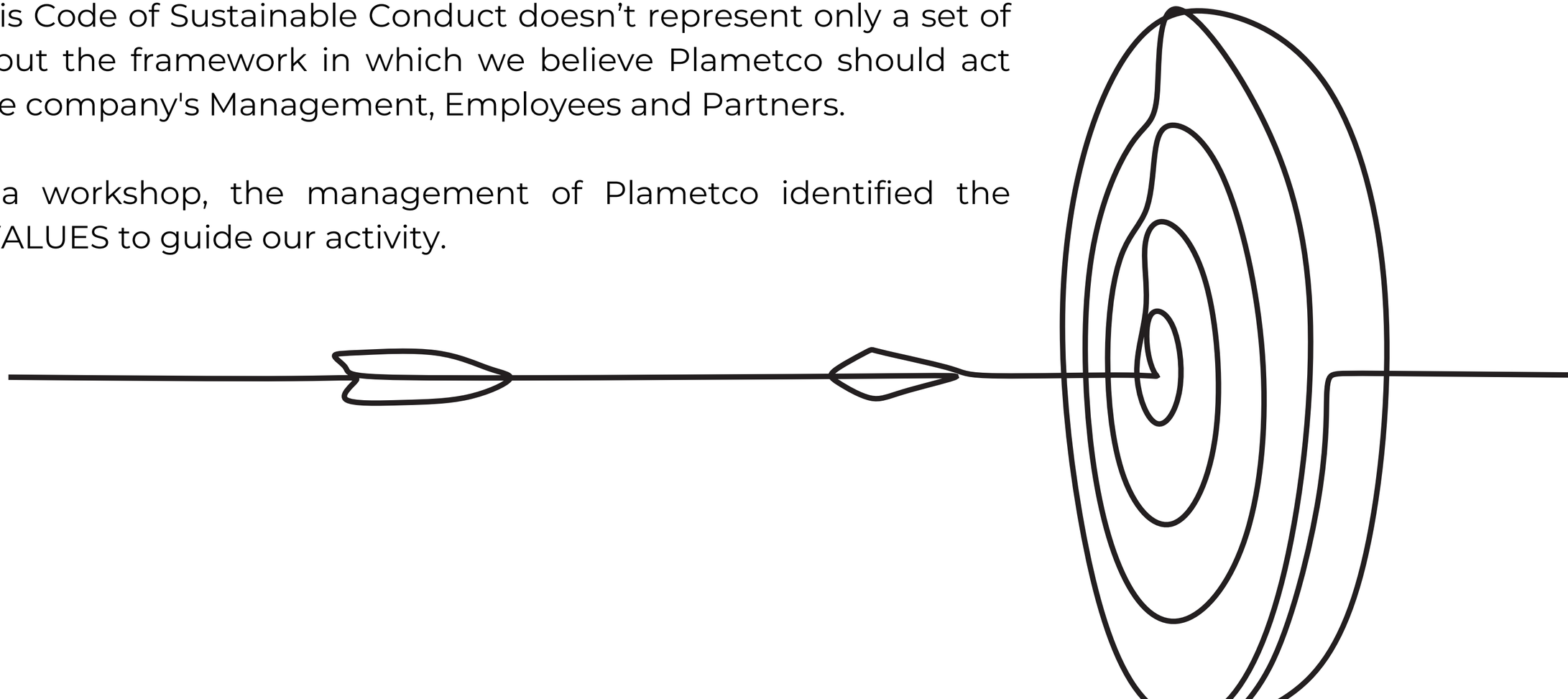
While Plametco may not have any reporting obligation on sustainability, it's crucial to implement a dedicated process. This process will be led by a cross-functional team under the direct supervision of the Company Director. The Director will be responsible for drafting, implementing, and updating the Code of Sustainable Conduct, conducting ESG double materiality assessments, and ensuring transparency towards interested parties.

Therefore, this Code of Sustainable Conduct represents an essential step in a more significant process of continuous transformation.

The Scope of the Code and the Values of Plametco

We strongly believe that the long-term success of our business depends on adopting sustainable conduct based on ethics, responsibility, and respect. This Code of Sustainable Conduct doesn’t represent only a set of principles but the framework in which we believe Plametco should act through the company's Management, Employees and Partners.

Following a workshop, the management of Plametco identified the following VALUES to guide our activity.



Values

Trust

is the core of any relationship. Therefore, we commit to building only transparency, honesty, and seriousness-based relationships. We intend to be honest and accountable in any action we take by creating an environment where each promise is kept and each commitment is fulfilled. Our trust in the future is fed by respect for people and the planet

Teamwork

It’s the only development path. We strongly believe in collective and diversity-related power. Our team's voice is heard, and any perspective is evaluated. Collaboration is not only a working method but the basis of our success. As a cohesive force, we find innovative and sustainable solutions, coping with challenges with creativity and empathy. In an inclusive and respectful environment, we support each other and celebrate any success, considering the common interest and the planet.

Development

is the engine of life quality improvement and is based on the evolution of our people and communities. Through investment in education and innovation, we dream of a better future for all of us. We wish that each step we take is conscious and respectful of natural resources and current and future generations.

Clients’ satisfaction

is at the heart of any action. We offer products of the highest possible quality that observe the principles and commitments of this Code. We pay attention to our clients' needs and wishes, transforming their feedback into opportunities for improvement. We improve our performance through our clients.

Creativity

is the flame to ignite the change. We encourage every curious mind to dream and to create new solutions for environmental challenges. We are open to innovation and support bold ideas that could transform the world into a better place. Through the power of imagination, we find new and sustainable ways to reach our goals and protect the environment.

Environmental and people protection

Observing the legislation and the standards.

In our activity, we commit to responsibly managing natural resources and minimizing the negative impact on the environment and people by adopting sustainable and innovative practices. For this reason, we have obtained the SR ISO14001:2015—Environmental Management Systems standard certification from Lloyd's Register Romania and SR ISO 45001:2018—Occupational Health and Safety Systems.

We observe all Romanian legal provisions and continuously work to implement additional measures to protect people and the environment.

Furthermore, our teams are informed in real time about changes in environmental law so that they can effectively adapt to working processes.

All of Plametco's working and production premises must observe national law and ISO standards regarding the management of toxic and/or hazardous materials and waste. The Company's management ensures that such standards are accessible to each employee through policies, procedures, instructions, training, and information.

Our products are designed to have a minimum environmental impact during their long life cycle. We use recycled materials and design products that are easy to dismantle and recycle at the end of their life.

Plametco takes all necessary measures to avoid or mitigate risks related to its employees' physical and mental health.

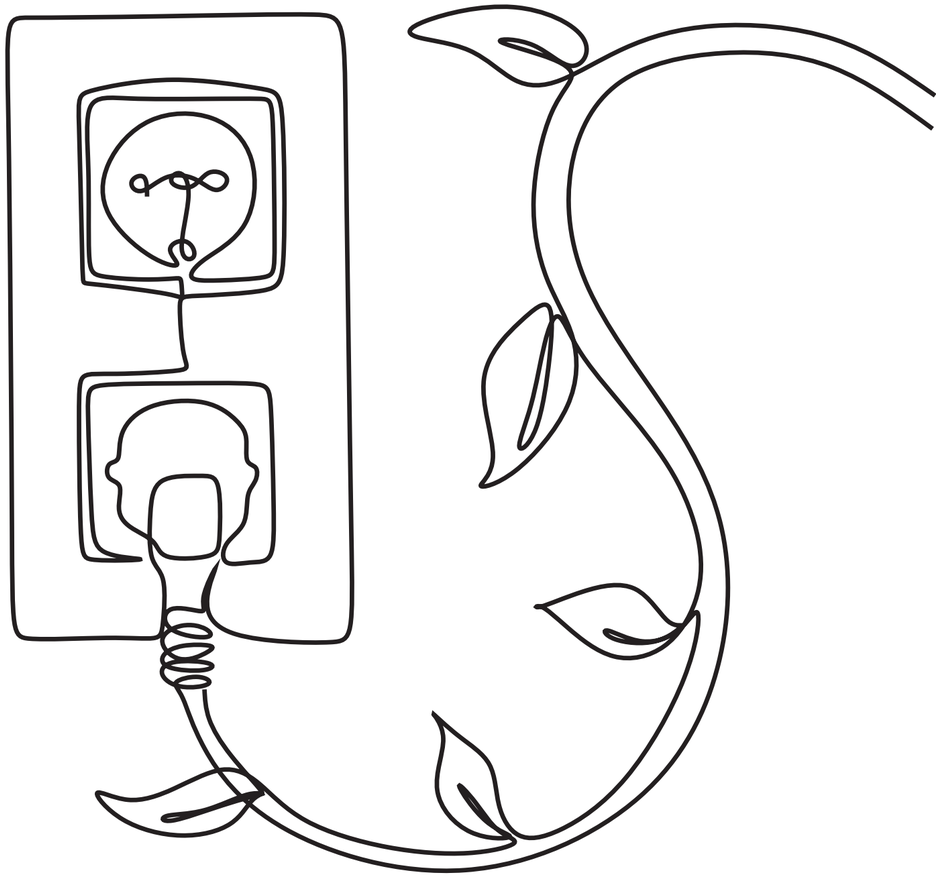
To this end, Plametco’s expectation is that any employee, partner and management team member:

- Observe the health and safety standards and norms
- Actively participate in the prevention of accidents and the transmission of infectious diseases
- To attend the relevant training and awareness programmes.

Any employee, manager, supplier, or collaborator is bound by Plametco's commitments regarding protecting the environment and the health and safety of persons.

Any employee has the right and obligation to report any non-compliance noted regarding environmental health and safety protection and stop the production process when ecological damage and personal integrity are witnessed.

Other commitments



Energy consumption and Greenhouse Gas Emissions (GHG)

We are aware of the importance of reducing energy consumption and GHG emissions. We are using efficient technologies and renewable energy to reduce our carbon footprint.

We will optimise industrial processes and implement innovative solutions for saving energy, defining clear and measurable targets in this respect.

Pollution

We further commit to reducing all forms of pollution by implementing rigorous emissions control and water treatment practices.
We take measures to increase the air quality and to reduce the noise pollution to limit any possible discomfort for the employees and local community.

Water

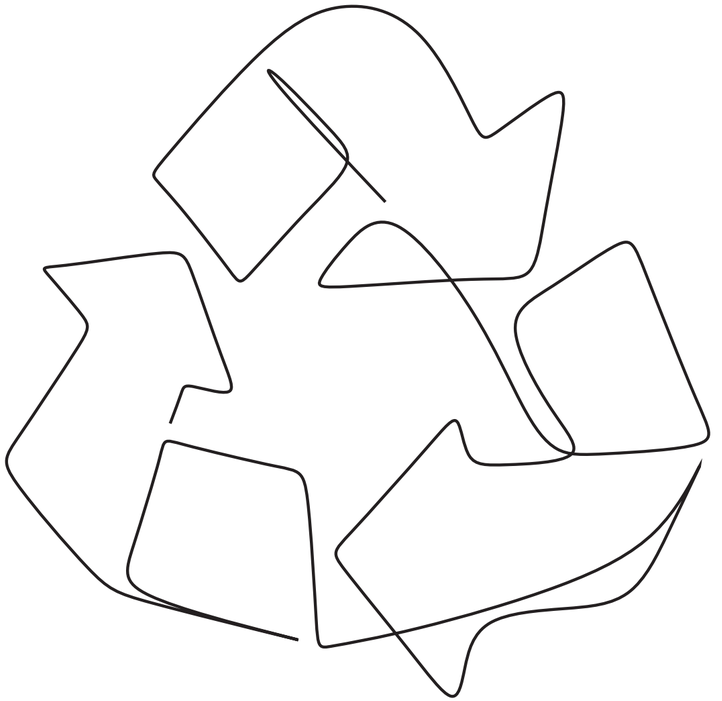
We acknowledge water as a vital and precious resource, so we are making all efforts to manage our consumption as responsibly as possible, monitor and minimise it, and protect its quality.

We are searching for and implementing new technologies for recycling and reusing water, and we ensure that all our operations observe environmental regulations for water pollution and conservation.

Toxic materials and waste

We reduce the use of toxic materials and manage waste responsibly. We prioritise recycling and reuse of materials, promote practices to reduce waste, and safely eliminate toxic materials. We do our best to minimise waste output and encourage the circular economy.

This Code of Conduct calls everybody to observe and actively contribute ideas and actions for environmental protection. We invite all our employees, collaborators, partners, clients and the local community to join our efforts and contribute to a greener and more sustainable future.



Respect for people

We expect each employee and entity to perform the activity openly and respectfully. We encourage teamwork, and both successes and failures are jointly endorsed. Our goal is to trust in other people's ideas and praise their contributions. Lack of respect, primarily expressed through abusive speech, improper gestures and racist, sexual-related and discriminatory remarks, is unacceptable

Working Conditions

Our employees are the heart of our organisation, and we firmly believe that a healthy working environment is essential for our long-term success.

We strictly respect all legal provisions regarding the working program, extra and/or atypical hours, the right to rest and the balance between private and professional life.

We offer equitable remuneration based on a salary defined according to the role and market conditions and a benefits package (e.g., medical insurance, bonuses for holidays, etc.).
Plametco is reviewing its Human Resources policy to improve its benefits policy, which should include a performance bonuses scheme based on individual and Company performance.
All the salary rights are paid in due time, together with the relevant taxes. Furthermore, we offer additional paid free days according to time spent in the Company and additional free days for nonsmokers to encourage a healthy lifestyle.

Human Rights: Our level of tolerance for breaches of Human Rights is ZERO.

Observing Human Rights is a fundamental principle of our activity. We promote the rights and dignity of all individuals according to the most important international conventions and principles. We are guided by the Universal Declaration of Human Rights, International Labour Organisation (ILO) Conventions and the UN Guiding Principles of Business and Human Rights.
We ensure all employees of Plametco understand and respect the human rights requirements through awareness campaigns and grievance mechanisms and all suppliers through self-evaluation and audit procedures and commitments to abide by the exact requirements.

Prohibited child labour

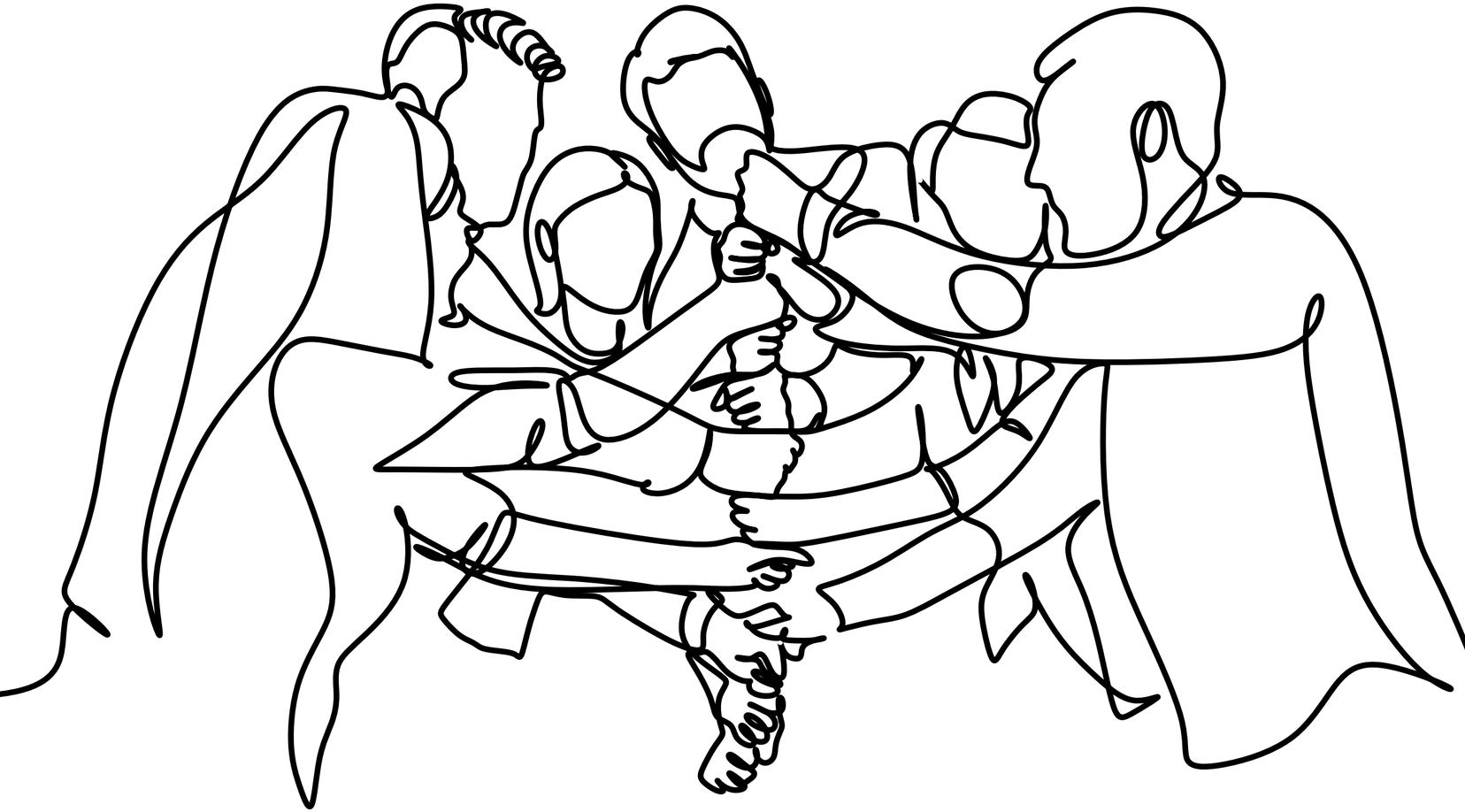
We are committed to preventing and eliminating child labour in all its forms. We ensure no minor is involved in activities that could jeopardise their health, safety, and healthy development. We abide by the ILO Convention no. 138 on the minimum age for employment and no. 182 on worst forms of child labour.
We strictly observe the legal provisions when employing persons below 18.

NO Forced Labor and Human Traffiking

All employment relationships are based on the employees' voluntary decisions and the execution of the work based on performance according to the job description.
It is strictly forbidden to withhold any identified documentation to keep and control employees.
Any form of „debt bondage” is forbidden; the employees should not by any circumstances be forced to work on account of any debt they might have against the company or any related person.
The employees enjoy the full right of free movement outside the working program.

We observe ILO conventions 29 and 105 regarding the abolition of forced labor, and we’re preparing a monitoring and reporting mechanism to enable the efficient identification and elimination of any possible case of forced labor within our activities and those of our partners.

We commit ourselves to prevent and combat human trafficking, ensuring that all employment is voluntary and legal and that all employees are treated with respect and dignity. We forbid any form of exploitation and abuse and we collaborate with authorities and relevant organizations to protect employees’ rights.



Diversity, Equity and Inclusion

For Plametco, diversity, equity, and inclusion have to be part of the company's DNA by promoting an environment where each team member has his or her voice and is respected and praised for his or her contribution to meeting the company's business objectives.

We condemn any form of direct or indirect discrimination against an employee based on criteria of sex and/or sexual orientation, age, nationality, ethnicity, political views, social origin, handicap, family situation or responsibility and religion. Undervaluing our colleagues are also against PLAMETCO SRL ethics.

Furthermore, we forbid any form of abuse and harassment. In this regard, we have adopted a guide for preventing and combating sexual and moral harassment at work, which is mandatory for all Plametco employees and collaborators. The guide not only condemns harassment and abuse but also introduces a mechanism to prevent and punish any possible harassment.

According to the Human Resources Policy, we want to build a culture of acceptance, equity and inclusion. We will continue implementing dedicated Diversity, Equity, and Inclusion measures at all company levels. This will further nurture loyalty, trust, solidarity, and respect for cultural differences in our activities.

Ethics

Integrity and ethical behavior are fundamental for our long-term success and for building trust with stakeholders, trust being our primary value. We commit to observing the highest ethical standards in all our activities, combating unfair, anticompetitive practices and corruption, and ensuring responsible data management.

In this sense, we have already adopted a policy on doing business and anti-corruption measures, which is strengthened by this Code.

Anti-competitive practices

We observe the laws and regulations, commit to doing business on fairgrounds and promote an equitable business environment. We take all measures to ensure our activities comply with legal and regulatory provisions. Company representatives must maintain good relationships with clients, suppliers, and competitors.

None of the employees or the company's representatives is allowed to discuss prices, costs, profits, marketing channels, clients, or other elements with the competition in a manner that distorts fair competition. It is forbidden to fix prices with competition and to make any hidden agreement on participation in a tender. Gathering intelligence through illegal means, espionage, corruption, or electronic crimes is also prohibited.

Corruption

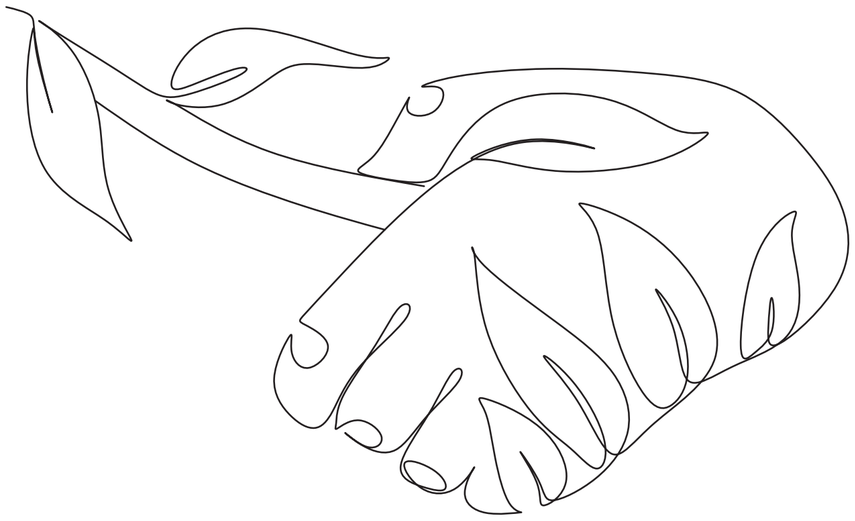
We firmly condemn any corruption form.

We commit to maintaining the highest standards of integrity and honesty in our business dealings. To influence a business decision, it is forbidden to offer, receive, or ask for a bribe or any undue benefit.

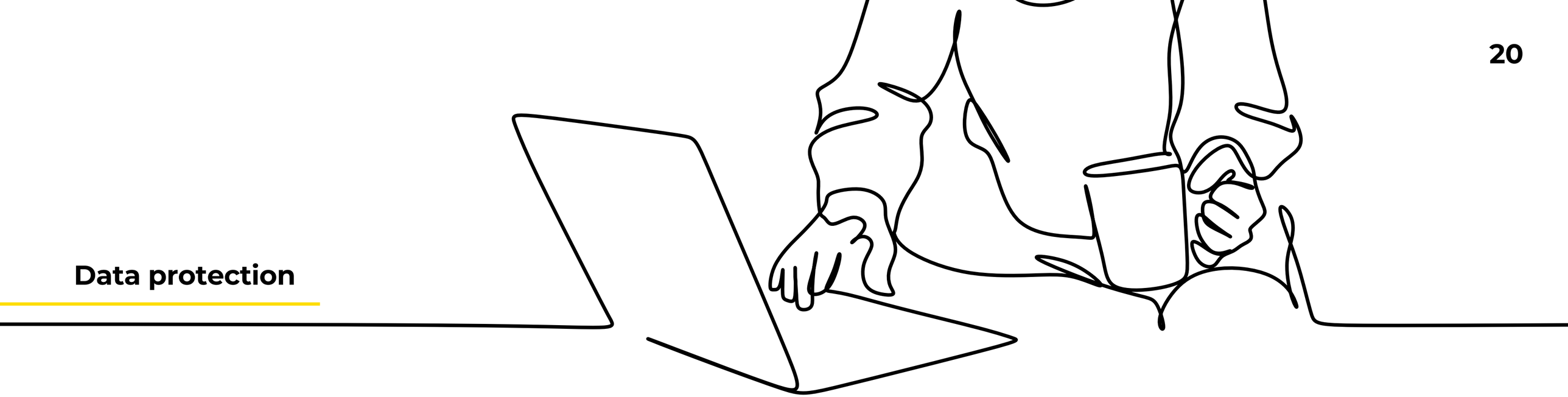
We organise employee training and awareness programs to raise awareness of the risks associated with corruption. We also implement a grievance mechanism that will allow the safe and confidential reporting and fair management of complaints related to possible corruption cases.

Protection of internal intelligence

All information related to company activity, such as business strategy, price formation, client and supplier lists, financial results before publication, contracts, know-how, and technological solutions, is the property of the firm and must be used only for company purposes. Any internal and external communication must be correct and authorised.



Data protection



Trust is the primordial value we base our relationships on. Therefore, we responsibly manage the data we collect, use, and store, and we obey all the laws and regulations for data protection and information confidentiality. We are implementing a procedure for data security to protect data against unauthorised use, loss and deterioration, and cybersecurity.

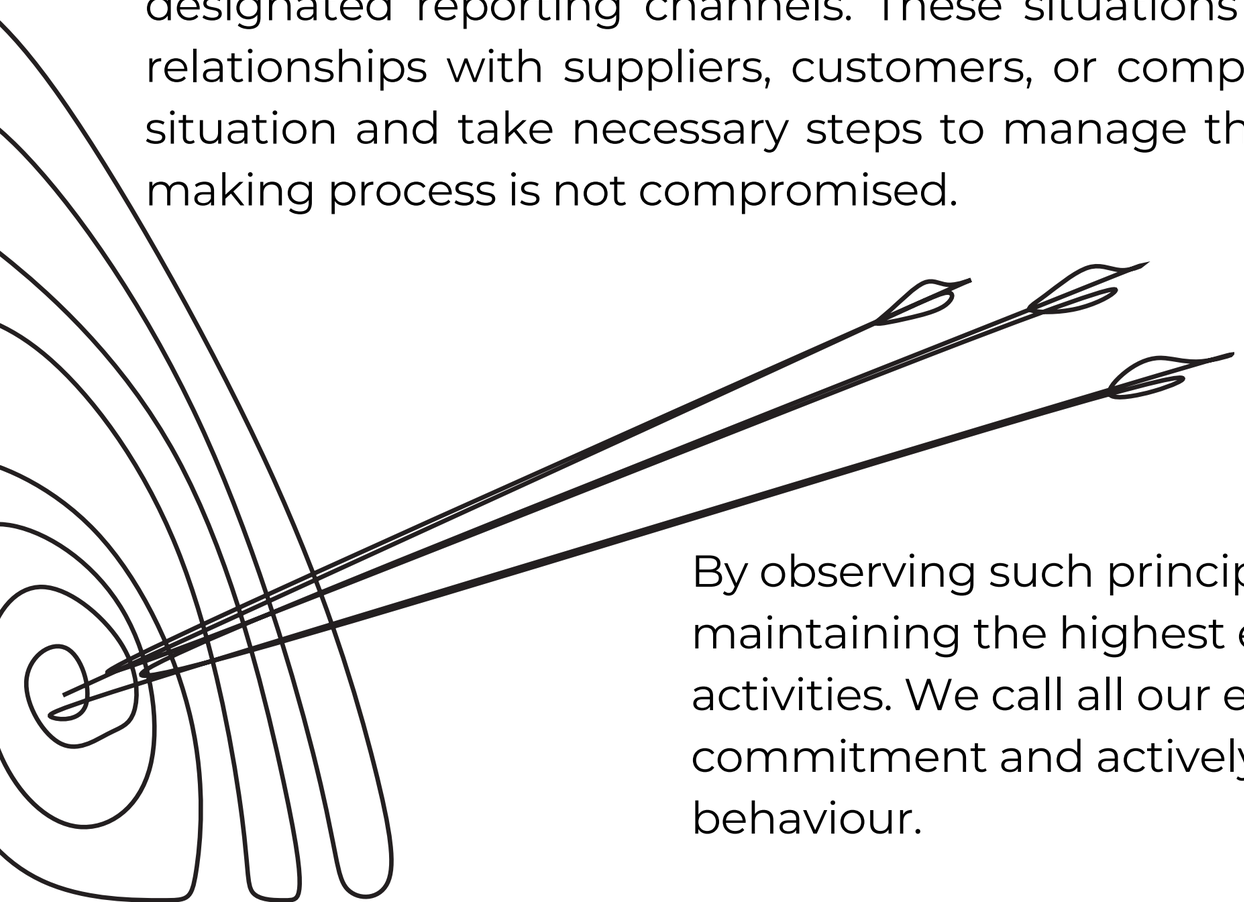
We apply all the laws and regulations relevant to data protection and have also adopted a GDPR policy.

We communicate clear confidentiality rules to our employees and clients. This ensures that data is managed with the utmost responsibility.

Conflict of interest

Our company's employees and partners must avoid any situation where personal interests could conflict with the company's interests. It is important that all business decisions are made objectively and in the best interest of the company without external influences.

Any potential conflict of interest must be immediately disclosed to a direct supervisor or through the designated reporting channels. These situations include, but are not limited to, personal or financial relationships with suppliers, customers, or competitors. Upon disclosure, the company will assess the situation and take necessary steps to manage the conflict, ensuring that the integrity of the decision-making process is not compromised.



By observing such principles and implementing such measures, we commit to maintaining the highest ethical and integrity-related standards in all our activities. We call all our employees, partners, and collaborators to join us in this commitment and actively contribute to promoting ethical and responsible behaviour.

Relations with Stakeholders

We build and maintain trustworthy and respectful relationships with all our stakeholders, acknowledging the importance of open collaboration and communication. This chapter explains our commitments towards suppliers, local communities, and authorities by promoting sustainable and responsible practices.

Clients

We commit to offering our clients not only the solutions they need based on technological innovation and adaptability but also a fair price reflecting the value of the products and responsibilities embedded.

By adopting a sustainable operational model, we also guarantee a resilient partnership that will contribute to our clients' long-term reputation.

Suppliers

We choose and audit our suppliers based on sustainability, ethics, and quality criteria. We ensure that our Suppliers meet our environmental, human rights, and working conditions standards.
We promote long-term partnerships with our Suppliers based on mutual trust and shared benefits. We collaborate closely to improve sustainability practices and to find new innovative solutions.

We communicate openly and transparently with our suppliers, making sure they are informed about our requirements and expectations. Our Suppliers are encouraged to report any problem or concern related to sustainability and compliance. We monitor our suppliers' performance to ensure they respect our standards and identify continuous improvement opportunities.

Local Communities

We commit to actively contributing to the development of the local communities where we operate. We invest in projects that encourage education, health, infrastructure, and general well-being.

We constantly dialogue with the local community to understand their needs and concerns.
We respect the culture, traditions, and environment of the local communities. We ensure that our activities do not harm local communities and that we contribute to the protection and conservation of local resources.

We encourage our employees to participate in voluntary activities and local initiatives and support those projects that contribute to the community's well-being.

Local Authorities

We pledge to observe all laws and regulations in our overall activity and to collaborate closely with the local authorities to ensure that our operations are compliant and responsible.

We maintain transparent and open relationships with the local authorities, reporting our activities, their impact, and the conformity measures we adopt clearly and comprehensively.

We support local authorities' initiatives and projects promoting sustainable development and community well-being. We collaborate to find efficient and sustainable solutions for local challenges.

We commit to paying all the due taxes and thus contribute to funding local public services and infrastructure. We do not support the black economy and ensure that all our transactions are transparent and compliant with fiscal legislation.

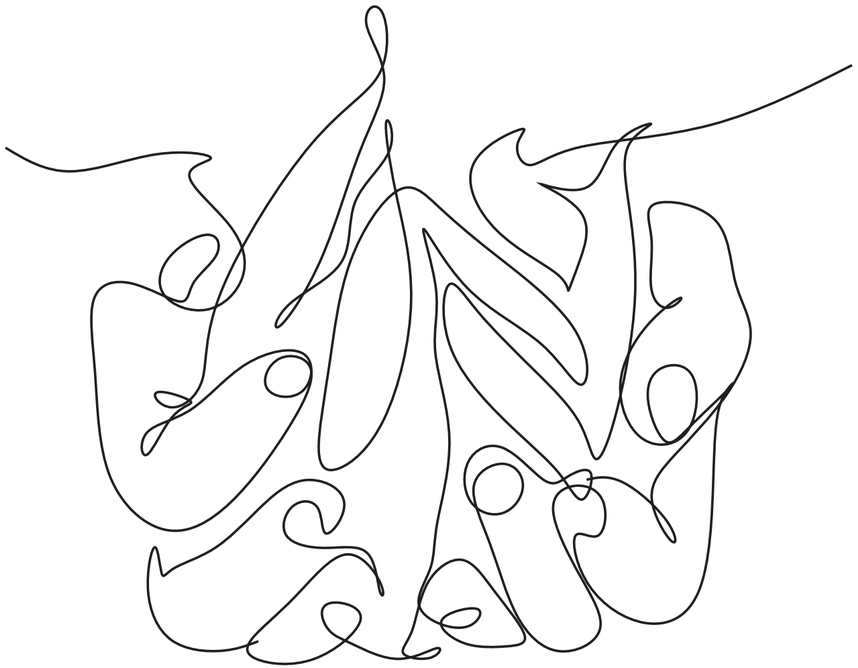
We want to build and maintain collaborative and trustful relations with all stakeholders by observing these principles and implementing such measures.

We invite our suppliers, local community and local authorities to join this commitment and actively contribute to promoting an ethical and responsible business environment.

Breaching the Code of Sustainable Conduct

The provisions of this Code of Sustainable Conduct are mandatory for all Plametco employees, irrespective of role and position, suppliers, and collaborators.

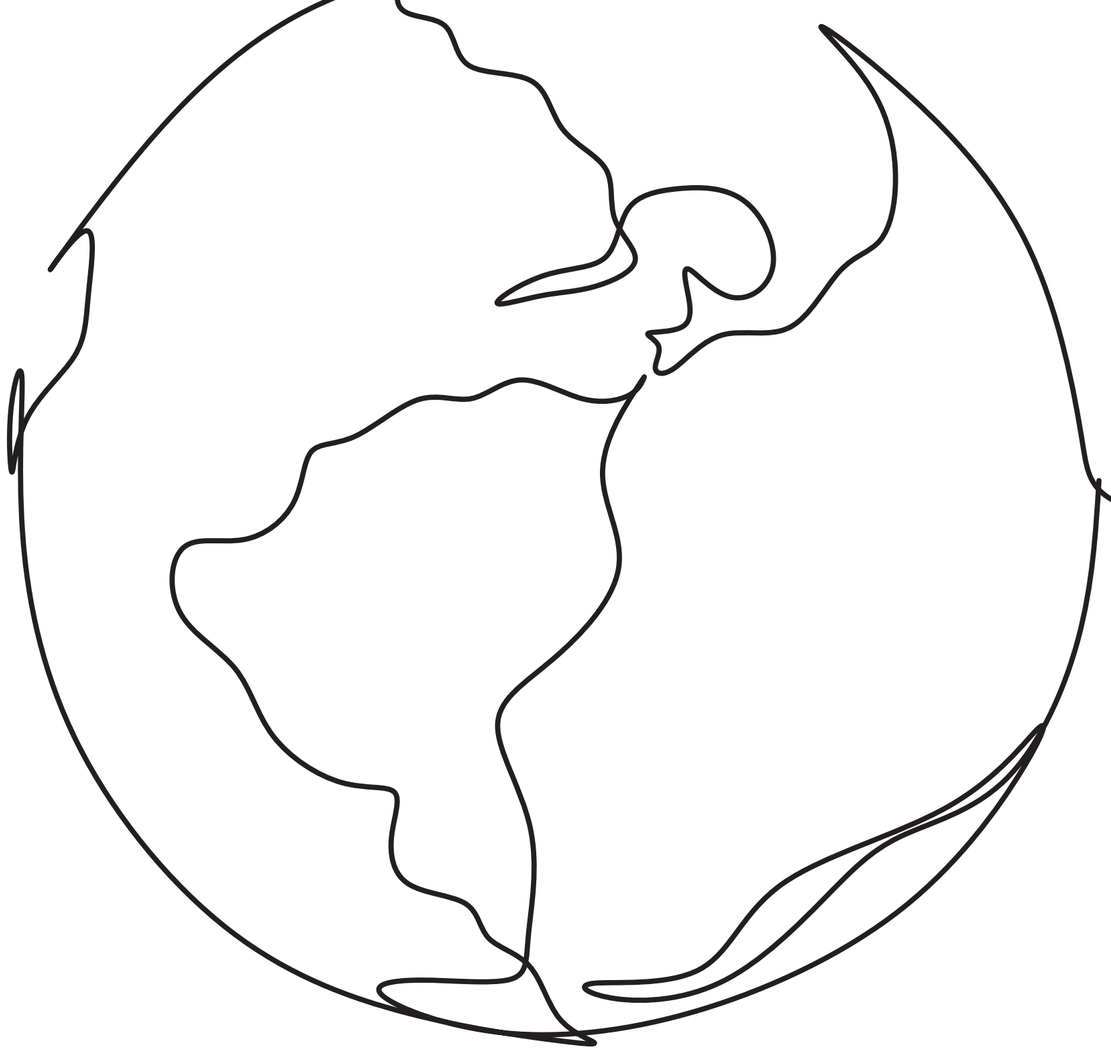
Breaching this Code is considered a disciplinary offence, and the offender may be subject to disciplinary liability or even labour contract closure, as the case may be.



In contractual relationships, Plametco has the right to cancel the contract by mere notification if the partner breaches any of the acknowledged provisions of this Code.

This Code of Sustainable Conduct is mandatory for Plametco’s success and reputation.

We thank you for your continuous commitment in promoting an ethical and responsible working environment.



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