

## ANTI-CORRUPTION POLICY

Dufenco Travi e Profilati Group adopts a firm approach and absolute prohibition against any form of corruption.

This Anti-corruption Policy applies to all personnel of the various Dufenco Beam and Profile Group Companies who must meet the highest standards of fairness in behaviour and moral integrity. It is in fact the Group's express choice to observe all the laws, rules and regulations concerning the fight against corruption, in Italy and in all the countries in which the Group itself operates. The Dufenco Travi e Profilati Group is committed to conduct its commercial and business activities in such a way as not to be involved in any corruptive situation and not to facilitate or risk involvement in illegal situations: this is in relations with Public Entities and Private Entities. For the purpose of this Anti-corruption Policy, Public Entities means public officials and public service representatives or all entities operating within the framework of the Public Administration in Italy or in the countries with which the Group is operating. Private Entities means persons representing or acting in the interest of customers, suppliers, commercial partners or contractual counterparties in general and in any case individuals with whom the Group's staff is operating in the exercise of their work. In particular, it is absolutely forbidden:

- offer, promise, give, pay or authorize someone to give or pay, directly or indirectly, money or other economic advantage or utility or benefit of any kind to Public Entities or Private Entities;
- accept the request or authorize someone to accept or request, directly or indirectly, a payment or an economic advantage or other utility from Public Entities or Private Entities,

where the purpose is:

- to induce the other Party to perform its function incorrectly, whether public or private, in relation to the activity carried out by or for the Group or in order to reward an activity carried out towards the Group;
- influence the implementation of an act or its omission in the interest of the Group;
- to obtain, secure or maintain a certain business or an unfair or unjustified advantage in relation to the conduct of business.

It is also forbidden for all Addressees to receive or obtain the promise of money or other usefulness, for themselves or for others, to perform or omit acts in violation of their office obligations or fidelity obligations, also causing damage to the Dufenco Group Beams and Profiles. All the limitations described relate not only to cash payments but also to any indirect utility such as, for example: gifts; contributions to associations or sponsorships; commercial activities, jobs, professional or advisory positions; investment opportunities; confidential market or product information; discounts or deferred payment; courtesy charges to third parties such as hospitality, meals, transportation, entertainment.

The Board of Directors shall ensure that the Anti-corruption Policy is fully disseminated to the relevant staff, ensuring that it is understood and implemented at all levels; for this purpose, it shall be available on the Company information system and on the Company's website.

**DUFENCO TRAVI E PROFILATI S.p.A.**

Sede Legale e Amministrativa: Via Armando Diaz 248, 25010 San Zeno Naviglio (BS) – Italia. Tel +39 030 21691 Fax +39 030 2667598  
Iscritta presso Registro Imprese di Brescia 01711290062 | REA (BS) 368566 | C.F. 01711290062 | P.IVA 03386150175 | Cap. Soc. Euro 154.505.000,00 i.v.

Società a socio unico

Soggetta ad attività di direzione e di coordinamento di Dufenco Italia Holding Spa, con sede a San Zeno Naviglio (BS), Via Armando Diaz 248 | Cod. Fisc. 06081270636 - Iscritta al Registro delle Imprese di BS nr. 06081270636.  
Divisione Meccanica: Via Peruzzi 58, 52027 San Giovanni Valdarno (AR) – Italia. Tel +39 055 912451 Fax +39 055 943488 | Stabilimento: Via Zona Industriale, 98042 Pace del Mela (ME) – Italia Tel. +39 090 93386111 Fax +39 090 9384229

Azienda certificata ISO 9001:2015

San Zeno Naviglio, 04/02/2021

Il Legale Rappresentante  
**Franco Monteferrario**



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