



**ANTI-CORRUPTION
POLICY OF
THE DANIELI GROUP**

INDEX

3	1. INTRODUCTION	6	5.2 GENERAL SAFEGUARDS
4	2. PURPOSE	7	5.3 INTERNAL REGULATIONS
	3. ADDRESSEES AND OBJECTIVES	8	6. AWARENESS
	4. DEFINITIONS		7. TRAINING
5	5. DANIELI GROUP'S ANTI-CORRUPTION POLICY	9	8. SANCTIONS
	5.1 PRINCIPLES AND VALUES		9. REPORTS

ANTI-CORRUPTION POLICY OF THE DANIELI GROUP

Approved by the Board of Directors of Danieli & C. Officine Meccaniche S.p.A. on May 17, 2023.

1.

INTRODUCTION

Well aware of the consequences bribery and corruption have in the global marketplace, the Danieli Group hereby intends to make known its ongoing commitment to achieving its business goals without engaging in any practice aimed at obtaining any illegal or illegitimate advantage and/or benefit.

Consistent with what is stated in its Code of Ethics, the Danieli Group also undertakes to comply with the laws in force in the countries where it carries on business as well as with the ethical principles in the conduct of business commonly recognized in its industry and ensure compliance within its organization.

As evidence of its proactive commitment to combating corruption, since 2014, the Group has been a member of Metal Technology Initiative (MTI), a collective action that brings together leading companies in the metallurgical industry for the purpose of fostering the development of joint anti-corruption actions in the countries where they do business.

2.

PURPOSE

The purpose of this document is to define a system of principles, values and safeguards intended to provide guidelines and disseminate the Danieli Group's anti-corruption culture.

3.

ADDRESSEES AND OBJECTIVES

This Policy is addressed to directors, members of Boards of Statutory Auditors and Supervisory Boards, employees of all Danieli Group companies, as well as collaborators, suppliers, subcontractors and consultants who have any kind of relations with the Group.

Each Addressee is expected to:

- know the contents of this Policy;
- comply with the provisions of this Policy, the Danieli Group's code of Ethics and other relevant internal rules;
- in case of doubts about the application or interpretation of this Policy, please contact the Compliance & Internal Audit department by writing to compliance@danieli.com;
- participate in training programmes relating to this Policy when required.

4.

DEFINITIONS

For the purposes of this Policy, bribery is defined as any agreement that has as its object:

- promising, offering, or giving a third party (public or private sector) an illegal advantage in order for him to perform or refrain from performing an act ("active bribery");
- asking for or accepting from a third party (public or private entity) an illegal advantage to perform or refrain from performing an act ("passive bribery").

The object of the unlawful agreement may be a sum of money or even obtaining the hiring of a relative, a trip, a season ticket to a stadium, etc.

The Danieli Group also considers the so-called "kickback," a forbidden practice, meaning the return of a portion of the consideration of a transaction to the person who played an active role in its conclusion through his or her decision-making power.

The Danieli Group considers any agreement to illegally influence the will of others to be a forbidden practice, regardless of whether or not such conduct constitutes a wrongdoing in the place where it is carried out.

5.

DANIELI GROUP'S ANTI-CORRUPTION POLICY

5.1

PRINCIPLES AND VALUES

Developing an anti-corruption culture is a shared responsibility that involves everyone at any level belonging to the Danieli Group. It is for this reason that the Board of the parent company Danieli & C. Officine Meccaniche S.p.A. has decided to formalize an anti-corruption policy based on the following principles and values:

Impartiality

Anyone who performs his or her services on behalf of the Danieli Group must behave objectively and impartially in relations with third parties (customers, suppliers, public officials, etc.), and not conduct himself or herself in a way that could unduly influence the will of others. Likewise, Addressees must avoid becoming involved in situations in which they risk exposing themselves to the influence of third parties.

Transparency

Addressees are required to act in a transparent manner by avoiding any situation and/or action that can lead to a conflict of interest between their personal interest and that of the Danieli Group. Anyone who is in a potential conflict of interest situation or has relations with third parties (public or private sector) required to make decisions that concern the Danieli Group, must give prompt notice in accordance with the procedures in force.

See it, say it

The anti-corruption culture aims to develop awareness in all Addressees to notice situations or behaviours that are more likely to involve the risk of corruption. It is everyone's responsibility to counter such risks by being constantly alert and reporting risky situations through the Ethics and Integrity Line, the Danieli Group's whistleblowing platform.

Honesty

The duties of Addressees do not stop at compliance with the above principles. In all circumstances they must behave in a cooperative, diligent and correct manner, refraining from conduct that, in substance, is aimed at circumventing the purpose of this Policy.

5.2

GENERAL SAFEGUARDS

In order to combat corruption, in the preparation of internal rules (including internal regulations) governing business processes and in particular in the sensitive areas identified above, the Danieli Group implements the following general safeguards where necessary:

Segregation of duties	Consistent with the business organization where necessary, processes should be divided into several steps by assigning each of them to different people (so-called “segregation of duties”) in order to minimize the risk of error or wrongdoing.
Powers of attorney and proxies	Signatory powers, whether powers of attorney or internal proxies, must be assigned consistently with the company organization, formalized clearly and respected.
Due diligence	It is appropriate to conduct due diligence, by applying a risk-based approach, on companies and/or entities one intends to engage in certain business relationships with (supply contracts, agency, brokerage, business consulting, joint ventures, M&A transactions, etc.) in order to mitigate the risk that the Group becomes connected with persons engaged in corrupt practices.
Formalization and storage	Formalization, keeping records and hard copy and/or computer storage of the main steps of business processes must be ensured so that they can be reviewed later if necessary.
Traceability of financial flows	As a rule, financial inflows and outflows should be handled with traceable instruments. Every transaction must be justified, properly authorized, promptly recorded and classified. Reimbursement of any expenses incurred by employees, suppliers or collaborators that have not been authorized in advance may be made only where they are relevant, recorded and justified.

5.3

INTERNAL REGULATIONS

In addition to the principles and values and the general safeguards described above, the Danieli Group's anti-corruption Policy is also based on the internal regulations issued by the Parent Company Danieli & C. Officine Meccaniche S.p.A. and the other companies belonging to the Group, all Addressees are required to comply with, insofar as they are applicable.

In particular, they contain important anti-corruption provisions:

- a. the Code of Ethics of the Danieli Group;
- b. the Code of Conduct for Suppliers;
- c. the Organisational, Management and Control Model pursuant to Legislative Decree 231/01, where applicable;
- d. specific guidelines and procedures.

The parent company has undertaken a project to adopt specific compliance safeguards aimed at mitigating the risk of corruption in certain areas. This project also involves associated companies; if necessary, the parent company, Danieli & C., issues guidelines through which it requires Group companies to adopt the same safeguards by certain deadlines set from time to time.

The areas mostly monitored are:

- Supplier onboarding process
- Personnel selection and hiring process
- Relations with public, supervisory and control authorities
- Relations with private certification bodies
- Business activities carried out through agents or intermediaries
- Conflict of interest
- Gifts and hospitality
- Donations and sponsorships

pag. 8^a Table of anti-corruption processes and safeguards.

Table of anti-corruption processes and safeguards.

Processes	Safeguards											
	Segregation of duties	Due diligence	Formalization and traceability	Ban on hiring former civil servants	Ban on hiring anyone as a favour	Traceability of financial flows	Periodic campaign for collection of conflict of interest statement	Ban on accepting gifts	Ban on giving gifts to civil servants	Maximum value thresholds	Internal proxies	Ban on making donations to persons belonging to the public administration
Supplier onboarding process	✓	✓	✓									
Personnel selection and hiring process	✓		✓	✓	✓							
Relations with public, supervisory and control authorities	✓		✓									
Relations with private certification bodies	✓		✓			✓						
Business activities carried out through agents or intermediaries	✓	✓	✓			✓						
Conflict of interest							✓					
Gifts and hospitality	✓	✓	✓			✓		✓	✓	✓	✓	
Donations and sponsorships	✓	✓	✓			✓					✓	✓

6. AWARENESS

All internal regulations referred to herein are available to the Recipients, according to the different confidentiality profiles, through the Danieli Group's online document repository. Recipients are required to read them.

7. TRAINING

The Group Compliance & Internal Audit Department is responsible for promoting awareness of this anti-corruption Policy through appropriate training programmes.

8.

SANCTIONS

Anyone who violates this Policy and/or related internal regulations will be subject to disciplinary actions, including possible dismissal, in the form and manner provided by applicable law.

For persons with whom there are contracts of a nature other than an employer - employee relationship (business partners, consultants, third parties, etc.), the sanctions and the manner in which they are applied, including termination of the relationship, are implemented in compliance with legal obligations and specific contractual conditions.

The Danieli Group also reserves the right to take any other legal action necessary to protect its interests and reputation.

9.

REPORTS

Anyone who becomes aware of violations or deviations from this Policy is required to promptly report it through ***Ethics and Integrity Line***, the Danieli Group's whistleblowing platform that can be found at ethics.danieli.com[†].



DANIELI THE RELIABLE
AND INNOVATIVE PARTNER
IN THE METALS INDUSTRY

DANIELI HEADQUARTERS

Via Nazionale, 41
33042 Buttrio (UD) Italy
Tel (39) 0432.1958111
www.danieli.com

DANIELI