

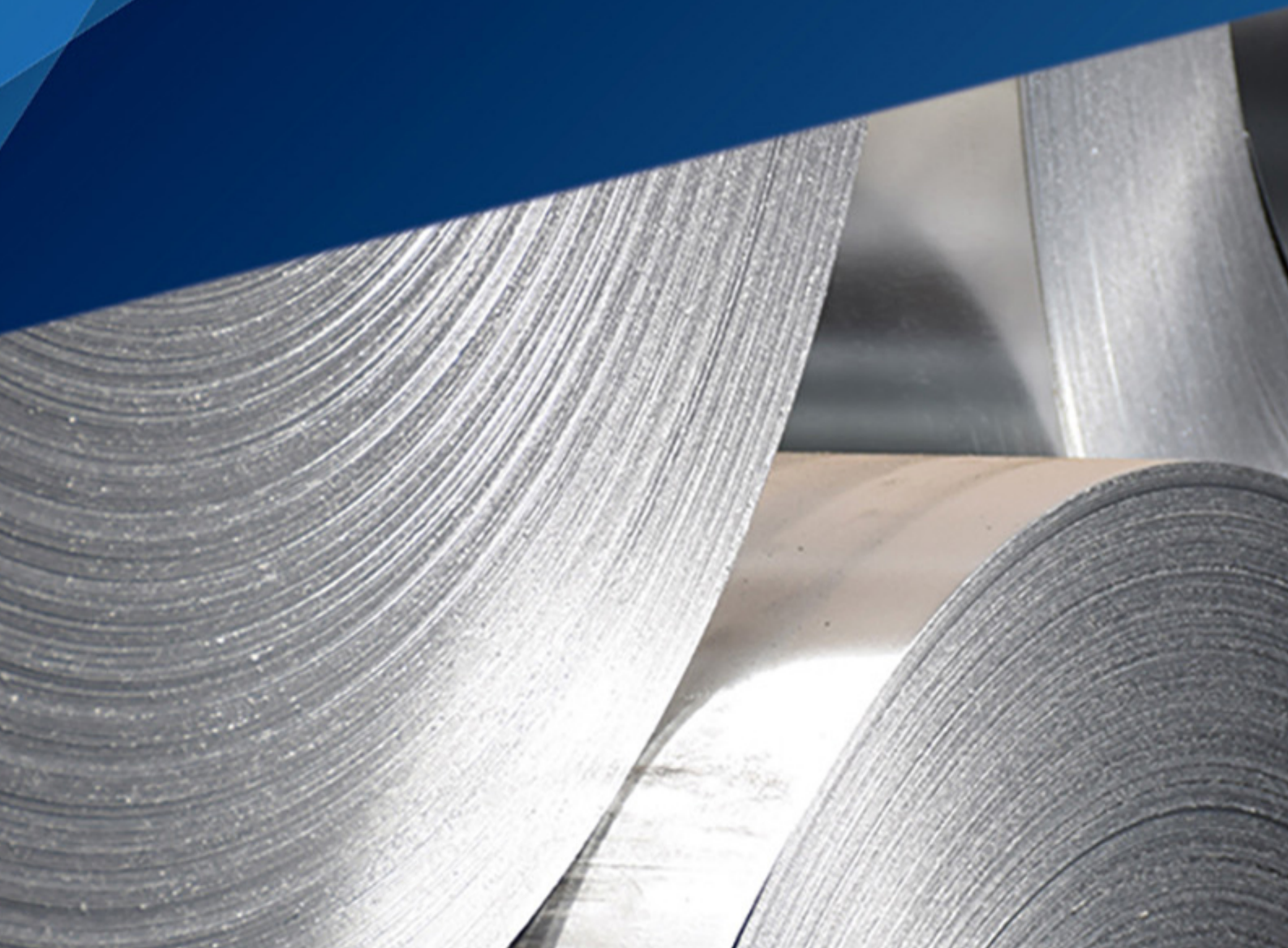


LIBERTY



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LIBERTY MAGONA
libertysteelgroup.com/it/



Guiding Principles

Liberty Magona (from now on also the Company) combines a strong business and financial discipline with the commitment to operate according to ethical, environmental and governance principles that meet the highest international standards. In order to define, with clarity and transparency, the values that inspire the Liberty Magona to achieve its objectives and the ethical and operational principles to be applied in conducting its business, the Code of Ethics (the "Code") has been prepared.

Liberty Magona requires all activities to ensure ethical and professional integrity, correct behaviour and full compliance with the laws and regulations of all the countries in which the Company operates and in accordance with the principles of honesty, reliability, impartiality, loyalty, transparency, propriety and good faith of its Employees and Collaborators.

Liberty Magona respect fundamental human rights, universally recognized, operating within the framework of the UN Universal Declaration of Human Rights, the UN Guiding Principles for Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. To this end, Liberty Magona undertakes to combat abuse in terms of working hours, child labour exploitation, workplace conditions, forced and mandatory labour, harassment and all kinds of discrimination, in addition to protecting health, safety and equal treatment.

Aware of the negative impact of corruption — as an obstacle to the development and fulfillment of a sustainable environment, in terms of economic and social sustainability — Liberty Magona is firmly committed to combating and preventing corrupt practices in the conduct of its business. Liberty Magona is also aware that compliance with anti-corruption regulations in the countries in which the Company operates is more than just a statutory or legal requirement, but plays a key role in the Company's culture in doing business. The belief that actions are implemented to the benefit of the Company does not justify the adoption of behaviour in breach of the above principles.

I. Introduction to the Code of Ethics

1.1. Scope of application and Persons to whom the Code applies

The Code of Ethics applies to the Company, in whatever country and at all levels of the organisation, whilst taking into account cultural, social and economic differences. In the event of a misalignment between the principles contained in the Code of Ethics and local law, the more restrictive provisions shall be applied. In order to facilitate compliance with the Code, Liberty Magona is committed to providing adequate means of information, communication, prevention and control.

The Code applies to the following persons in fulfilling their duties and responsibilities: the Company Management, the Board of Statutory Auditors and other Supervisory Bodies, employees of the Company, independent contractors (such as consultants, representatives, brokers, agents, etc.), business partners and any party engaging commercial relations with Liberty Magona.

The principles set out in the Code of Ethics represent the shared basis and the essential, binding standards that must govern, in compliance with their functions and responsibilities, all Persons in carrying out their duties. The Code of Ethics has to be considered mandatory and essential an essential part of the obligations of Liberty Magona personnel. Breach of the provisions of the Code of Ethics may result in the consistent, impartial and uniform application of disciplinary action, based on the seriousness of the breach and in accordance with the relevant statutory requirements.

In the case of independent consultants and third parties, compliance with the Code of Ethics constitutes the essential basis for entering and/or continuing with any form of professional relations or partnership with Liberty Magona.

1.2. Obligations of employees

Each employee has the obligation to:

- refrain from behaviours contrary to the provisions of the Code;
- report to the Company any information regarding breaches of the Code;
- cooperate with Internal Control structures in charge of investigating any breaches;
- avoid taking initiatives that may be contrary to the provisions of the Code.

1.3 Reporting procedure

In order to facilitate the reporting of alleged breaches of the Code, by anyone who has information on such breaches, the Company has put in place a specific email address to receive such reports: comunicazionecodiceetico@libertysteelgroup.com.

2. Ethical Principles

The competitiveness of Liberty Magona is intrinsically linked to the efficiency of the persons and systems that are suitable for effectively achieving the Company's business objectives. The primary objective of Liberty Magona and those who lead it is to propose and implement projects, initiatives and investments aimed at preserving and increasing the value of the Company.

In achieving its objectives, the Company's conduct is based on the following principles:

- Legality and compliance: observance of all the statutory and regulatory requirements in force in the countries in which Liberty Magona operates;
- Integrity: in terms of fairness, honesty, loyalty and good faith in both internal and external relations. The rejection of illegal or unfair conduct and of any form of corruption in order to achieve personal or business objectives;
- Equality: equal dignity and impartial treatment of all persons involved in each activity; no form of discrimination is accepted;
- Promotion of people: guaranteeing equal career opportunities;
- Health and safety: respect of physical integrity, of the rights and dignity of workers in the workplace;
- Transparency and professionalism: commitment to diligently carry out duties and responsibilities, with clarity and adequate to the nature of such duties and responsibilities;
- Competition: respect for the rules and principles designed to safeguard competition and the promotion of fair competition in and for the market;
- Confidentiality: protect the privacy and confidentiality of any information acquired in the course of work;
- Protection of the environment and respect for the communities in which it operates.

3. Relations with third parties

In general, it is forbidden any conduct by an employee or anyone acting on behalf of Liberty Magona addressed to third parties (Public Officials or private persons). Such actions include the offer, or simply the promise, request, payment or acceptance, directly or indirectly, of money or other utilities, with the aim of gaining or maintaining an undue advantage inherent to the company's business. Furthermore, it is not allowed to make payments in cash or in any non-traceable form, or payments into numbered bank accounts, or any undue transfer of money to persons without entitlement.

3.1 Gifts, hospitality and entertainment expenses

It is expressly prohibited, in respect of relations with third parties, to offer money, gifts or benefits of any type in order to gain an undue advantage. Any offer of gifts, hospitality or entertainment to public officials or private persons must under all circumstances:

- comply with applicable statutory, regulations and procedures;
- be in line with normal commercial practices, of modest value and such as not to give the counterparty, external or impartial third party, the impression that their purpose is to gain undue advantages or exercise undue influence over the counterparty's activities and/or decisions;
- not take the form of a payment in cash.

In addition, no employee of Liberty Magona is permitted to accept any form of conditioning or corrupt practice from third parties outside the Company in relation to decisions and/or the performance of activities pertaining to their work. In particular, in the event of receipt of gifts or any other form of benefit that do not comply with the above principles, the employee must refuse such gift or other form of benefit and inform his/her Superior and the Ethics Officer, who will report the occurrence to the Supervisory Board.

3.2. Relations with the Public Administration and/ or related to Public nature relationships

Liberty Magona's relations with the representatives of Public Administration must be based on the strictest compliance with statutory and regulatory requirements and may not, in any manner, compromise the Company's integrity and reputation. The assumption of obligations and the management of any kind of with the Public Administration and/ or Bodies having public relevance is exclusively reserved to the appointed and authorised corporate officers and departments. In the relations with the Public Administration, the Company shall not seek to influence, in an improper manner, the decisions of the institution involved. In any event, in the course of business negotiations or of a relationship, including those of commercial nature, the Liberty Magona undertakes to:

- to refrain from offering job and/or commercial opportunities to public officials involved in negotiations or relationships;
- not offer gifts, directly or via third parties, unless they are in line with normal commercial practices, of modest value and, in any event, such as not give the counterparty, an external or impartial third party, the impression that their purpose is to gain undue advantages or exercise undue influence over the counterparty's activities and/ or decisions; such gifts, moreover, have to be appropriately authorised and documented;
- refrain from soliciting or obtaining confidential information which compromises the integrity or the reputation of the Company.

Finally, Liberty Magona expressly prohibits any form of payment or other benefit given — directly or indirectly — to Public Officials, Public Service Officers, in order to speed up, facilitate or simply ensure the performance of a routine bureaucratic process or any other legal and legitimate process as part of the official's existing duties.

3.3. Relations with Regulatory Bodies

Liberty Magona undertakes to comply, fully and scrupulously, with the rules issued by Regulatory Bodies charged with controlling the compliance with the law in the sectors connected with such activity. The Company's employees must comply with any request from such Regulatory Bodies in respect of the performance of their duties.

3.4. Relations with contractors

Each employee, in relation to his/her duties towards contractors, will ensure:

- to adequately inform them about dispositions of the present Code;
- the respect of the Code's dispositions when implementing any activity and when requesting that such dispositions are respected by those having contracting causes;
- the adoption of initiatives provided for in case of non-compliance with the obligations to conform to the Code's disposition;
- the scrupulous compliance with internal procedures relating to the management of relationships with contractors (consultants, representatives, brokers, agents, etc.);
- an accurate selection of qualified and of good reputation persons;
- to expressly insert, in all contractual agreements, the obligation to comply with the Principles of the Code.

3.5. Relations with customers and suppliers

As a result of the rules designed to safeguard the competition and the market, the Company's employees must:

- comply with the provisions of the Code;
- scrupulously comply with internal procedures relating to the management of relations with customers;
- supply precise, true and exhaustive information on the products and services offered by Liberty Magona, so that the customer may make informed decisions;
- supply high-quality products and services that meet the reasonable expectations of the customer and protect the customer's safety and integrity;
- provide correct information in advertising and commercial communications and, in general, in any other form of communication.

In entering into procurement contracts and, in general, agreements for the supply of goods and services, employees and independent contractors are under the obligation to comply with the provisions of the Code and with internal procedures. In any event, selection must be made observing the principles of transparency, traceability, openness, free competition, non-discrimination, equal treatment and rotation and based on objective criteria linked to competitiveness and the quality of the products and services required. In particular, employees and independent contractors must:

- scrupulously comply with statutory requirements in the countries in which Liberty Magona operates and with internal procedures governing the selection and management of relations with suppliers;

- apply objective and transparent selection criteria in selecting potential suppliers meeting all the necessary requirements;
- obtain the cooperation of suppliers in ensuring customer satisfaction in terms of quality, cost and delivery times;
- comply with the applicable statutory and contractual requirements in respect of supplier relations;
- comply with the principles of propriety and good faith in correspondence and other communications with suppliers, in line with the most rigorous commercial practices.

3.6. Relations with political and Trade Union organisations

Liberty Magona does not provide any form of financing, either directly or indirectly, to political parties, movements, committees or political and Trade Union organisations, nor their representatives or candidates.

3.7. Relations with the media

Liberty Magona's relations with the mass media are the sole responsibility of the relevant departments and must be conducted in accordance with the Company's communication policy. Therefore, the employees must not provide information to the media representatives without obtaining authorisation from the relevant departments. In any event, information and communications for external publication must be accurate, true, complete, transparent, and consistent and homogeneous. Employees' participation, in the name of Liberty Magona or as representatives thereof, in any form of committee or association, whether these concern trade, scientific or cultural nature, must be regularly authorised by Liberty Magona, in accordance with internal procedures. Employees invited, in the name of the Company or as representatives thereof, to take part in meetings, congresses or seminars, or to write articles, theses or publications in general are required to obtain prior authorisation from the relevant departments in charge of texts, reports or any other documents prepared for such purposes.

3.8. Non-profit initiatives

Liberty Magona promotes non-profit activities as a sign of its undertaking to participate in community programs of ethical, legal and social significance to the communities in which it operates. In conformity with their duties, the Company's employees must actively participate in defining the Company's individual initiatives, in line and in accordance with the Company's stated policies, and implement them transparently and honestly.

3.9 Conflict of interest

Liberty Magona recognises that all employees have individual interests and encourages its development. Nonetheless, when carrying out their duties, employees must avoid any activities that are in conflict with the Company's interests. If a conflict of interests occurs, the employees must immediately report it to the relevant departments and refrain from any activity linked to the situation, causing the conflict.

By way of example, but not limited thereto, the following constitute a conflict of interest:

- the evident or concealed interest of the employees or of members of his/her family in the activities of suppliers, customers or competitors;

- the exploitation of the employee's position within the Company for the achievement of personal interests that are in contrast with those of the Company;
- the use of information obtained in the performance of work-related activities for one's own advantage or for the advantage of third parties and in any case in conflict with the interests of the Company;
- the performance of work-related activities (in physical or intellectual form) for customers, suppliers, competitors and/or third parties in contrast with the interests of the Company;
- the conclusion, execution or commencement of negotiations and/or contracts referable to Liberty Magona, in which the counterparties are family members or business partners of the employee, or legal entities of which he/she is the owner or in which he/she has, in any case, an interest.

4. Specific principles of conduct

4.1 Guiding principles for the protection of intellectual and industrial property

Liberty Magona is aware of the importance of intellectual and industrial property and, for this reason, respects and protects the content of all forms of its own and other's property rights, including copyrights, licenses, trademarks, etc. To this regard, it is prohibited to:

- use, for whatever reason, or make available to the public — without the right to do so — any protected intellectual property, or a part thereof, for whatever purpose and in whatever form;
- use, for whatever reason, equipment, products or components, or provide services with the aim of avoiding the technological measures adopted in order to protect intellectual property;
- illegally reproduce, copy or tamper with trademarks, logos, licenses, industrial designs or models belonging to third parties.

4.2 Guiding principles for IT matters

IT plays a key role in supporting the research into innovation and excellence in terms of the quality of the products and services provided to customers. With regard to use of its own computer system or of third-party information systems or of social networks, it is expressly prohibited to:

- falsify electronic documents;
- to illegally enter, damage a telematic system protected by security measures or to remain in such system against the express or tacit wishes of anyone having the right to exclude people;
- intercept, impede and interrupt IT or telematic communications.

4.3 Guiding principles for health, safety and environment

The Liberty Magona's activities must be conducted in accordance with international standards, laws and regulations of the countries in which the Company operates, in respect of the protection of the health and safety of workers, the environment and the communities affected by the Company's activities. The Liberty Magona's employees, in carrying out their duties, shall take an active part in risk prevention, environmental safeguard and the protection of health and safety, including the appropriate use of the Company's assets. In compliance with existing regulations relating to occupational prevention and protection, operations must comply with the appropriate safeguard of the environment and the energy efficiency, in order to reduce the

related impact on the environment.

5. Control and Corporate Governance

5.1. Accounting records

Every operation or transaction must be correctly recorded in the corporate accounting system in accordance with the criteria required by law and the relevant accounting standards, in addition to being authorised, verifiable, legitimate, coherent and consistent. In order for the accounts to meet the requirement for the records to be truthful, complete and transparent, transactions must be adequately and fully recorded in the Company's accounts, together with supporting documentation, in order to ensure:

- an accurate accounting recording;
- immediate determination of the nature of and the reasons for the transaction;
- an easy and formal reconstruction of the timing of the transaction;
- the verifiability of the decision-making, authorisation and implementation processes and the identification of the various levels of responsibility.

Each employee is, therefore, has the obligation to — for what concerns specific responsibilities — cooperate in such a way that any events relating to the Company's operations are recorded correctly and promptly in the accounts. Each accounting entry must reflect exactly the information in the supporting documentation. Therefore, each employee and independent contractor is required to ensure that all the supporting documentation is easily obtained and stored, in accordance with logical criteria. All Persons to whom the Code applies, being aware of any omissions, misstatements or negligence, in respect of the accounting records or supporting documentation, are required to promptly inform the relevant departments and/or the Supervisory Bodies.

5.2. Internal control and risk management system

The internal control and risk management system consists of all the instruments, rules, procedures and organisational structures designed to enable - via adequate identification, measurement, management and monitoring of the principal risks – a correct management of the Company, in a manner consistent and coherent with predefined business objectives. The system is designed to ensure protection of the Company's assets, the efficiency and effectiveness of business processes, the reliability of financial reporting, and compliance both with statutory and regulatory requirements and with the articles of association and internal procedures. Liberty Magona is responsible for ensuring that, at all levels, there is an internal culture of awareness of the existence of controls and of the need to perform such controls.

It is duty and responsibility of members of the Company's Management and the Boards of Auditors, of employees and independent contractors to take part in creating and implementing an effective corporate control system. The Internal Audit department (where applicable) and the independent auditors must have ready access to any data, documentation and information needed in order to perform their control and audit activities.

5.3. Anti-money laundering

Liberty Magona, in any way or under any circumstances, must not be implicated in cases of money laundering, originating from unlawful or criminal activities. Before establishing relations or signing contracts

with independent contractors or third parties, all employees must verify the reputation and good name of counterparties. Liberty Magona undertakes to comply with all the national and international rules and requirements regarding money laundering.

6. Human Capital

People who carry out their responsibilities within the Company's activities are considered an indispensable element for the life and the future development of the Company itself. In order to enhance people's capabilities and in order to let anyone express his/her potential, the relevant departments must:

- apply a merit-based approach that takes into account professional expertise when taking decisions regarding our people;
- select, hire, train, pay and manage employees without any discrimination, treating all employees equally, independently from gender, age, nationality, religion, ethnicity, belief or sexual orientation;
- guarantee equal opportunities in all aspects of their employment with Liberty Magona, including, but not limited to, promotions, pay, refresher courses and training, etc.

Liberty Magona undertakes to implement ongoing training and awareness programmes, focusing on the contents of the Code. Liberty Magona recognises the freedom of association and collective bargaining. Liberty Magona undertakes to safeguard the mental and physical integrity of its people, respecting each person's distinct personality and ensuring that they suffer no distress or hardship.

Liberty Magona also supports welfare initiatives. In order to safeguard its image, Liberty Magona reserves the right to consider relevant any out-of-work behaviour considered offensive for its civil sensitivity and shall intervene to avoid behaviour of insulting or defamatory nature. Our people, therefore, are expected to work together to maintain a climate of mutual respect and to refrain from behaviour that may harm the dignity, honour and reputation of each person.

6.1. Harassment in the workplace

Liberty Magona demands that, in internal and external working relationships, no type of harassment takes place, including, for example, a working environment that is hostile towards single employees or groups of employees, or the unjustified interference with the work of other people or the creation of obstacles or impediments to other people's career prospects. Liberty Magona does not tolerate sexual harassment, including situations in which an employee's career prospects or other advantage are subject to the performance of sexual favours or any other behaviour of sexual nature or conduct based on gender, when this is unwanted by one of the parties and undermines his/her dignity.

6.2. Alcohol and substance abuse

Employees must refrain from performing their work under the influence of alcohol or drugs, or of similar substances that have the same effect, and from taking these substances when at work. It is considered as the above a permanent addiction to alcohol and/or drugs, which may affect the employee's ability to perform his/ her duties and disturb the normal performance.

7. Protection of privacy

7.1. Confidential information and protection of privacy

The Liberty Magona's activities entail the ongoing collection, storage, processing, communication and circulation of data, documents and information relating to negotiations, procedures, transactions and contracts to which the Company is a party. The Liberty Magona's databases may also contain personal data protected by the statutory provisions regarding privacy, such data cannot be rendered public and and, if published, may cause damage to the Company. Persons, to whom the Code applies, therefore, are required to safeguard the confidentiality of the information obtained. All the information and data obtained or processed by employees in carrying out their duties belong to Liberty Magona and may not be utilised, communicated or circulated without prior and specific authorisation of the company Management. Employees must:

- obtain and process only data necessary for and directly linked to their duties;
- store such data in order to avoid third parties from obtaining it;
- communicate and circulate the data according to the procedures established by the Company or subject to the prior authorisation of the person delegated to do so;
- determine the confidential nature of the information in accordance with the provisions of the procedures;
- ensure that there are no confidentiality obligations by virtue of relations of whatever nature with third parties.

For its part, Liberty Magona undertakes to protect the information and the data relating to Persons to whom the Code applies and to avoid any improper use of the data, in compliance with statutory requirements on data protection.

7.2. Information not in the public domain

Persons to whom the Code applies must comply with the national and international regulations relating to insider trading. No Person, therefore, may benefit, whether directly or indirectly, or of personal or financial nature, from using information protected by the above-mentioned regulations, if such information is not in the public domain. To this end, sensitive information is considered particularly relevant.

The communication to third parties of such information must be in compliance with the procedures established by Liberty Magona, exclusively by authorised individuals and, in any event, in compliance with the provisions in force and with the principles of fairness and contextualisation of the information.

8. Derogation to the present Code of ethics

The suspended application of any disposition in the present Code may be admitted only in presence of justified circumstances and authorized by the administrative body of the company. Derogations shall be promptly disclosed.



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