

Organizational and Management Models (Legislative Decree 231)

Legislative Decree n. 231 of June 8, 2001, introduced into Italian law the administrative liability of companies for certain crimes committed in their interest or for their benefit by their administrators, employees, and/or representatives in general, along with related financial and prohibitive sanctions to be imposed on the companies themselves.

However, the Decree provides that companies may be exempted from this liability if they can demonstrate that they have:

- adopted and effectively implemented an Organizational and Management Model capable of reasonably preventing the commission of the crimes covered by the Decree;
- entrusted an oversight body, endowed with independent powers of initiative and control, with the task of supervising the functioning and compliance of the Model and ensuring its update.

In order to guarantee, to the maximum extent possible, the prevention of the commission of the crimes covered by the aforementioned Decree, SIDERFORGEROSSİ GROUP SPA has adopted its own Organizational and Management Model.

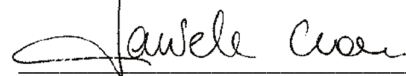
This Model has been periodically updated and integrated to reflect both regulatory developments in the area and organizational changes within the company. The “Model 231” is part of a broader corporate governance policy, focused on respecting ethical principles in business management, introduced with the adoption of the Ethical Code.

The Board of Directors of SIDERFORGEROSSİ GROUP SPA has entrusted the management of the Model to the Oversight Body, which is responsible, among other things, for collecting reports of possible violations of the provisions of the Model and/or the Ethical Code and clarifying any doubts in this regard.

The application of the rules of conduct and the respect for the prohibitions contained in Model 231 are ensured by specific control activities, as well as by the monitoring of the informational flows that the relevant functions are required to transmit to the Oversight Body.

Periodic specific training activities are planned for newly hired employees and for SIDERFORGEROSSİ GROUP SPA staff, with content focused on the 231 risks related to the company’s activities.

Chairman of the Board of Directors



Arsiero, Italy - March 25th, 2025

Siderforgerossi Group SpA

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