



Re: Adoption of Organization, Management and Control Model pursuant to Italian Legislative Decree 231/2001 and subsequent amendments

Dear Sirs,

In application of the Legislative Decree in question (the "**Decree**") concerning the administrative liability of legal entities, Steel Color S.p.A. adopted on 6th of August, 2020 the Organization, Management and Control Model pursuant to Legislative Decree 231/2001 (hereafter the "**Model**"); in the same session, the Company's Code of Ethics was also adopted.

This Model (the General Part and Disciplinary System) and the Code of Ethics are available for consultation in the updated version on the company's website: www.steelcolor.it and these also apply in the context of the relationships held by Steel Color S.p.A. with external parties.

The adopted model has the intention of formalizing those principles, rules and procedures aimed at preventing illegal behavior by internal and external parties (the "**Recipients**") in the performance of their respective activities.

Steel Color S.p.A. requires Recipients to comply with the aforementioned legislation and to conform their behaviors to the precepts set out in the Model.

Addressees of this letter are invited to consult the documents since they supplement the management of the relations between the company and the Recipients.

Failure to comply with the provisions of the Model and the Code of Ethics in the context of activities and relationships with the Company may be a source of liability, both of a contractual and non-contractual nature.

The General Part of the Model, in addition to the description of the contents of the Decree, refers to the types of offence that determine the administrative liability of an entity, the possible sanctions and conditions for the exemption of liability, as well as the organizational structure of the Company and the activities carried out for the construction, dissemination and updating of the Model. The Special Part, on the other hand, consists of a set of decision protocols i.e. a set of rules and principles for control and behavior deemed suitable for governing the areas for which a risk of potential commission of offences has been identified, a prerequisite of administrative liability ex legislative decree. 231/2001.

The rules of the Model integrate those of the Code of Ethics, containing the ethical and deontological principles that it recognizes as its own in performance of the activity and which constitute the standard of behavior by which employees and all those who collaborate in various ways with Steel Color S.p.A. must be inspired.

Finally, we inform you that Steel Color S.p.A. has appointed its supervisory body (ODV), which you can contact at: odv.231@steelcolor.it

Kind regards.



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