

LEONIX FASTENERS SRL

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CODE OF CONDUCT

Introduction

No document will ever be able to predict and address all possible situations; our ethical standards are based on respect for the intention and content of the Code of Conduct. Essentially, employees are required to avoid any action that is illegal or unethical, violates company policies, causes unauthorized financial burden or loss, or could harm the company's reputation.

Every employee is required to read and comply with this Code of Conduct.

Business leaders are also responsible for ensuring compliance with the Code within their processes, and are expected to meet its requirements in an exemplary manner.

Who must comply with the Code of Conduct

Every employee, manager, and corporate officer of the company.

Compliance with the Code of Conduct is a condition of employment, and violations may result in disciplinary actions against the offender.

Health, Safety, Protection, and Environment

We are committed to not harming people and safeguarding the environment.

We work to ensure the safety of our employees and suppliers by focusing on compliance and addressing situations that may lead to unsafe behaviors.

We continue to pursue Target Zero because we are confident we can operate without incidents.

In pursuit of this goal and to achieve excellence in health, safety, protection, and environmental matters, we will focus on people, processes, and technologies, where people are the first and most visible expression of safety-oriented leadership, processes represent an efficient management system, and technologies offer technical solutions.

Within the company, everyone is committed to:

- Protecting and not harming people
- Safeguarding the environment
- Complying with all health and safety laws and regulations
- Using energy and other resources efficiently in the provision of our products and services
- Respecting our colleagues and contributing to the community in which we operate
- Managing health, safety, and sustainability issues alongside any other critical business activities



People

Respect

We value the efforts of our employees.

We are committed to respecting their rights and treating each of them with dignity and consideration.

Our internal employment regulations aim to attract, retain, motivate, and train our staff while respecting their rights.

We are committed to offering training and personal and professional growth opportunities so employees can acquire the necessary skills for their roles and grow professionally while working with satisfaction.

We are committed to not employing child labor.

We recognize the freedom of association, allowing employees to build and join organizations of their choice without our authorization, and recognize collective bargaining where provided by local laws.

Diversity and Inclusion

Our company aims to acquire the necessary competencies to implement its strategy. This means we want to retain talent, increase innovation, and foster diversity of opinions and perspectives. By embracing diversity, we will be better able to understand our customers and find customized solutions to meet their needs.

We are committed to ensuring that current and future employees are treated fairly and with respect, in an environment where there is no room for any form of discrimination.

We are committed to ensuring that:

- All policies, practices, and procedures related to personnel, including hiring, promotion, incentives, working conditions, and performance management, are applied impartially, fairly, and objectively.
- All employees must have equal opportunities and the ability to grow and fully realize their potential.
- Respect must be a right, and for this purpose, we will establish an atmosphere of trust and respect based on honesty and transparency.

No form of discrimination based on age, disability, marital status, pregnancy, race, ethnicity, nationality, color, religion or belief, sex or gender reassignment, sexual orientation, education level, or any other status protected by current laws or regulations will be tolerated.

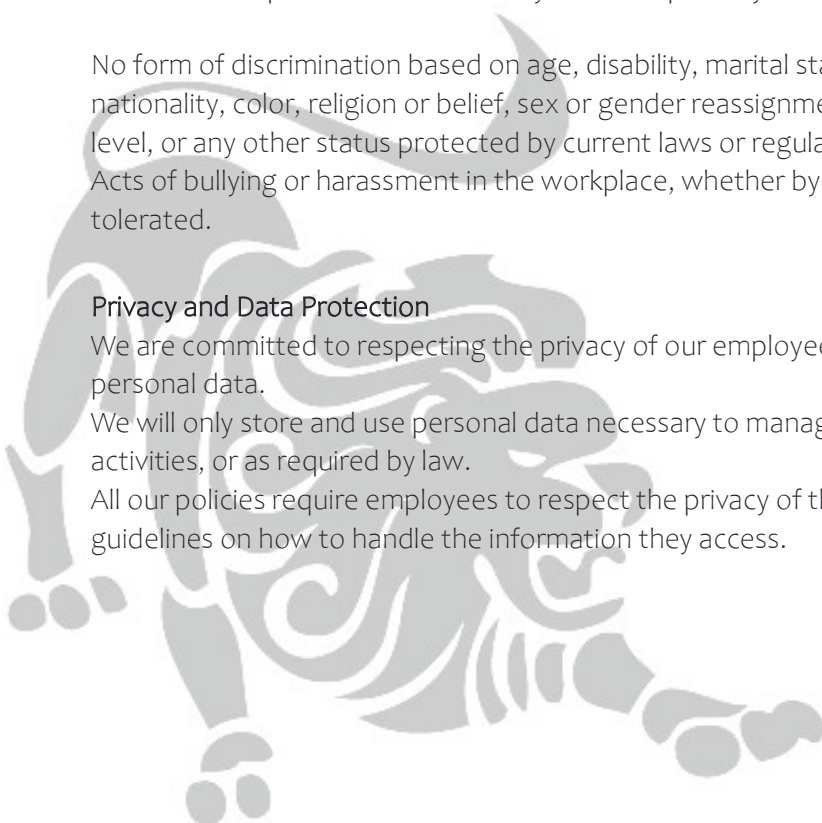
Acts of bullying or harassment in the workplace, whether by individuals or groups, will not be tolerated.

Privacy and Data Protection

We are committed to respecting the privacy of our employees and the confidentiality of their personal data.

We will only store and use personal data necessary to manage their employment or for business activities, or as required by law.

All our policies require employees to respect the privacy of their colleagues and adhere to guidelines on how to handle the information they access.



Conflicts of Interest

The role of an employee in the company means that the company's interests come first.

A conflict of interest may arise if an employee's personal, social, financial, or political activities interfere, or could interfere, with their loyalty to the company.

It must be avoided in all its forms unless explicitly authorized, documented, and managed by the employee's supervisor.

Every employee is required to promptly and completely report to management any transaction with related third parties, if relevant.

Suppliers

We are committed to purchasing products and services from organizations that respect or are willing to respect the company's ethical principles. In particular, we do not intend to collaborate with organizations that exploit child labor or forced labor, that discriminate based on sex, ethnicity, nationality, religion, sexual orientation, marital status, age, or disability, and that do not support freedom of association or collective bargaining.

Privacy Protection

We are committed to respecting the privacy of our customers, suppliers, and other third parties, as well as complying with local laws and regulations in this regard.

Corruption

No form of corruption will be tolerated, and we are committed to ensuring compliance with anti-corruption laws and regulations in the countries where we operate.

We are committed to conducting our business in a way that avoids involvement in or facilitation of any form of corruption.

Employees must not engage in any form of corruption, whether directly or through third parties (e.g., agents or distributors).

We respect all applicable laws and regulations that prohibit corruption in the markets where we operate and ensure that our partners do the same.

We do not intend to make illicit payments to carry out our business activities.

Corporate Governance

It is crucial that all company documents (for internal and external use) are truthful, accurate, and complete.

Company documents must not be falsified in any way, contain inaccuracies, or be misleading due to omissions.

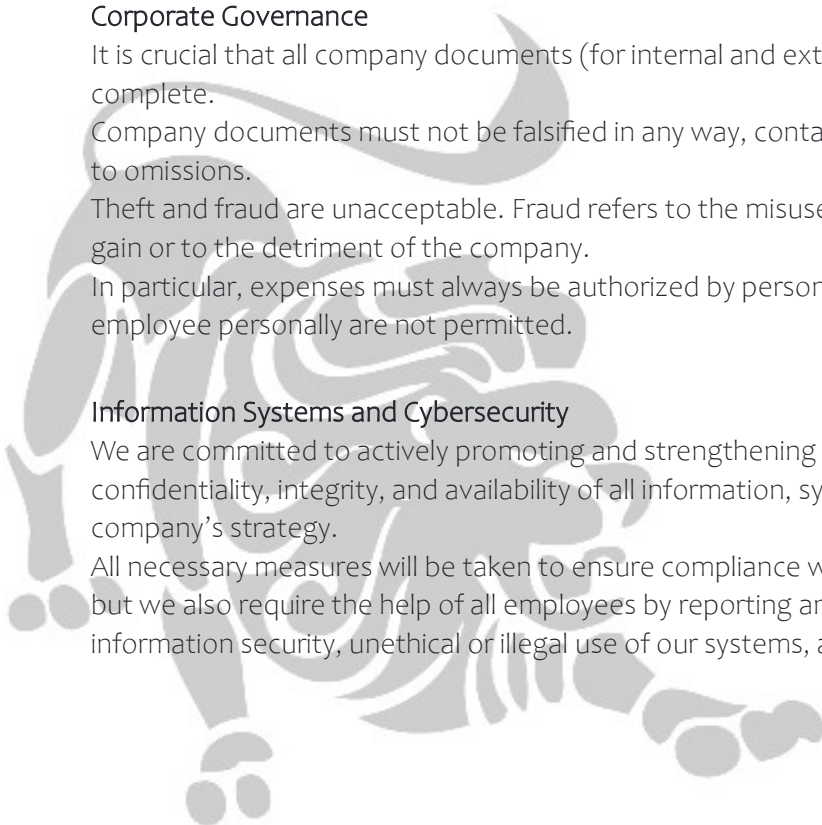
Theft and fraud are unacceptable. Fraud refers to the misuse of company resources for personal gain or to the detriment of the company.

In particular, expenses must always be authorized by personnel, and operations that benefit the employee personally are not permitted.

Information Systems and Cybersecurity

We are committed to actively promoting and strengthening information protection to ensure the confidentiality, integrity, and availability of all information, systems, and services supporting the company's strategy.

All necessary measures will be taken to ensure compliance with regulations and legal provisions, but we also require the help of all employees by reporting any actual or suspected violations of information security, unethical or illegal use of our systems, and fraudulent activities so



investigations can be conducted.

Information systems must not be used for illegal or fraudulent purposes, nor to access or disclose defamatory, offensive, racist, sexist, pornographic, or any other offensive material.

Finally,

The company implements a policy for reporting illicit conduct, similar to the current "whistleblowing" regulations.

This term refers to the legal institute of Anglo-Saxon origin that allows employees to report illegal or abusive conduct they become aware of through their work relationship. In other words, the employee becomes the guardian of transparency and proper functioning.

Often, it is only through the reporting of illicit acts that potential dangers, such as health risks or fraud, can be prevented, and those at risk can be informed before actual harm occurs.

If you are aware of any concerns, report them to your supervisor. If, for any reason, you feel unable to report the issue to your supervisor, approach human resources or a process manager who you think can listen to you and offer help.

Such information will be used with the utmost confidentiality and discretion, ensuring anonymity and legal protection if necessary.

LEONIX FASTENERS SRL

DATE: 08/05/2025

SIGNATURE:


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