

PERSONAL RESPONSIBILITY POLICY

Anti-Corruption

Simec success is based neither on unethical nor unfair nor illegal behaviour.

Simec Group rejects corruption as a means of conducting its business.

Employees must never offer, give or promise any kind of payment that is or could be interpreted as bribes: doing so could not only damage Simec reputation but also cause legal consequences.

It is, therefore, not permitted under any circumstances to bribe or even attempt to bribe public officials or public service officers, as well as private individuals.

In particular, no one may offer, promise or give money or other advantages to obtain undue benefits for Simec Group or himself.

In addition, no one may demand money or other advantages to perform undue services.

No attempt to influence anyone improperly will be tolerated.

Conflicts of Interest

Employees must keep away and report any situation that might create a conflict between the company's interests and any personal interest.

Employees are responsible for:

- Avoiding situations that may result in or appear to result in a conflict of interest
- Avoiding any improper influence depending on personal financial considerations or relationship to customers, competitors and suppliers
- Avoiding to take decisions when a conflict or the appearance of a conflict arises
- Reporting conflicts of interest when they arise

Disciplinary Sanctions

Violation of the Policy by employees will result in disciplinary measures being taken.

Simec Group will also ensure its full cooperation with the competent Authorities.

Any violation will be prosecuted with the application of appropriate and proportionate disciplinary sanctions, also taking into account the possible criminal relevance of the conduct put in place.