



Integrity in Action, Excellence in Results



# MESSAGE FROM OUR CEO

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Over the years, Sipema SRL has always aimed to ensure the highest quality in its products and services, upholding the core values of integrity, innovation and social responsibility. Today, with our commitment to continuous improvement, we wish to strengthen and clarify the principles that guide our every action.

Our purpose is simple but powerful: “Through excellence in our manufacturing processes, we help build a safer and more sustainable future for the people and communities we serve.” Our values, which reflect our corporate culture, are at the core of every decision and activity: “We innovate with quality, collaborate for success, operate responsibly, respect the environment and value people.”

The employees of Sipema SRL are the beating heart of our company. Each of us is a living representation of Sipema's values, and each of our actions has a direct impact on our reputation and credibility.

Our Code of Ethics establishes guidelines for our behavior and reflects our commitment to integrity, responsibility and ethics in all areas of the company, in accordance with laws, regulations and company policies.

It is our common duty to know, apply and abide by the rules that define our behavior. If you notice behavior that does not comply with our Code of Ethics, please report it. Your report will always be treated with the utmost confidentiality and, most importantly, will be protected from any form of retaliation as long as it is made in good faith.

All of us, as members of Sipema SRL, must set an example in every action we take. We are the custodians of our corporate reputation, and every step we take must be in line with our principles of quality, safety, sustainability and integrity.

With our commitment, we will continue to pursue our strategic plan and transform Sipema SRL into a leading metal construction company, contributing to a better future for all.

Compliance is not an option, it is an imperative. Every action we take must be done with integrity. I count on each of you to apply the Code of Ethics every day with the utmost commitment.

Thank you.



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# 01 INTRODUCTION

## WHY DO WE HAVE A CODE OF CONDUCT?

We have a Code of Conduct because it represents the fundamental principles on which Sipema SRL bases all its operations. It provides clear guidelines for ethical and responsible behavior to ensure that every decision and action is in line with the company values of integrity, transparency and accountability. A well-defined Code of Conduct helps protect our reputation, maintain the trust of our customers and stakeholders, and foster a respectful and safe work environment.



## WHAT ARE OUR RESPONSIBILITIES?

Our responsibilities are multifaceted and go beyond mere compliance with laws. Each member of Sipema SRL is expected to:

- Operate with integrity: make ethical and transparent decisions in every situation.
- Ensure quality and safety: offer products and services that meet the highest standards of quality and safety.
- Respect the environment and the community: adopt sustainability practices and act in a socially responsible manner.
- Promote mutual respect: work in an environment of collaboration and inclusiveness.
- Reporting violations: doing your part to report behavior that does not comply with the Code, helping to maintain a safe and healthy work environment.



## WHAT IS THE RELATIONSHIP BETWEEN THE CODE AND THE REGULATIONS?

The Code of Conduct of Sipema SRL is in line with applicable regulations, local and international laws. It is committed to ensuring that all business operations are conducted in compliance with applicable legal rules and regulations, including those related to occupational safety, personal data protection, health and the environment. In addition, the Code reflects best practices in business ethics and social responsibility, going beyond mere compliance with laws.

As a socially responsible company, Sipema SRL is committed to promoting practices that protect the environment and the community. We adhere to the principles of Corporate Social Responsibility (CSR), and strive to reduce the environmental impact of our activities through:

- The adoption of eco-friendly production practices.
- The reduction of waste and harmful emissions.
- The support of social initiatives in our local community.



## HOW IS THE CODE ENFORCED?

The Code of Conduct is applied by all employees and collaborators of Sipema SRL. Enforcement takes place through:

- Ongoing training: all employees are trained on the Code and company policies to ensure that they are well informed on how to behave in line with company principles.
- Monitoring: periodic checks are conducted to verify compliance with the Code and identify any areas for improvement.
- Individual accountability: each employee is personally responsible for complying with the Code and reporting any violations.



## WHEN IS IT NECESSARY TO REPORT A CODE VIOLATION AND WHAT HAPPENS NEXT?

A violation of the Code must be reported whenever behavior is suspected that does not meet integrity, safety, ethical or legal standards. This includes corrupt practices, discrimination, violation of privacy, or any other action that may compromise corporate values. The report must be made promptly, using official company channels, so that it can be investigated appropriately. After the report is made, Sipema SRL will ensure that each case is investigated seriously and transparently, taking corrective or disciplinary measures, if necessary, to ensure that the situation does not recur.



## HOW ARE CHANGES MADE TO THE CODE?

The Code of Conduct is periodically revisited to ensure that it remains up-to-date with respect to legal regulations, business needs, and industry best practices. Amendments may be made by the corporate ethics committee, which evaluates any necessary changes based on the changing regulatory environment, marketplace, and business practices. Any changes will be communicated to all employees to ensure that they are aware of the new guidelines and can apply them properly.

02

# PROTECTING OUR PEOPLE

At Sipema SRL, our people are at the center of everything we do. The company understands that an inclusive, safe and respectful work environment is essential to ensure the well-being and productivity of all our employees. For this reason, we are committed to protecting diversity and promoting work practices that respect the dignity of every individual. We work to create an environment where every employee can feel valued and have equal opportunities for growth.



PROTECT DIVERSITY AND  
ENSURE A FAIR AND INCLUSIVE  
WORK ENVIRONMENT



ENSURING HEALTH AND  
SAFETY

## PROTECT DIVERSITY AND ENSURE A FAIR AND INCLUSIVE WORK ENVIRONMENT

Sipema SRL is strongly committed to ensuring an inclusive work environment where diversity is not only respected but also celebrated. We understand that differences in culture, gender, ethnicity, and experience enrich our work environment and help improve our performance.

To this end, we adopt active policies to:

- Promote gender equality and ensure that men and women have equal opportunities.
- Enhance individual skills and prevent any form of discrimination by making room for all talents regardless of their origin.
- Raise awareness and train employees on issues of inclusiveness and mutual respect, thus creating a corporate culture that fosters collaboration, empathy and respect.

Diversity is not only a value that Sipema SRL recognizes, but it is a strategic factor that helps us address global challenges, better understand our customers, and create innovative solutions.





## ENSURING HEALTH AND SAFETY

The health and safety of our employees is a top priority at Sipema SRL. Every activity we undertake is designed with the goal of protecting the well-being of our people, whether they work directly in the field or in the office. We want to make sure that every employee goes home at the end of the day safely.

To achieve this goal, Sipema SRL:

- Takes strict measures to ensure safety at work, in accordance with current health and safety regulations. Every area of our company is continuously monitored to prevent accidents and reduce risks.
- Provides ongoing training on safety and welfare issues so that every employee knows and applies the correct procedures to protect themselves and their colleagues.
- We invest in safe technologies and practices, using appropriate tools to reduce risks, such as personal protective equipment and emergency management protocols.

Sipema SRL is also committed to creating a healthy work environment, promoting mental health prevention and treatment through psychological support for employees and initiatives to improve overall well-being.

These actions not only protect health and safety, but also create a positive and productive work environment where all employees can reach their potential without worry.

## 03 BUSINESS CONDUCT

At Sipema SRL, business conduct is based on values of integrity, responsibility and sustainability. Our every action, decision and interaction with customers, suppliers and partners is geared toward ensuring that we operate in full compliance with laws, human rights and with a positive impact on our environment and community. Our company recognizes that sustainability and ethics are not only core values, but are also the best way to build a prosperous and lasting future.



CONDUCTING BUSINESS IN A  
SUSTAINABLE WAY



RESPECTING LEGALITY



RESPECT FOR HUMAN RIGHTS

# CONDUCTING BUSINESS IN A SUSTAINABLE WAY

Sipema SRL is committed to conducting business in a sustainable way, taking into consideration environmental, social and economic aspects at every stage of our production process. Sustainability is a principle that guides our decisions, from the suppliers we work with to the choice of materials and the way we produce them. This commitment allows us not only to comply with environmental regulations, but also to contribute positively to the community and the environment in which we operate.

The main actions that Sipema SRL takes to ensure sustainable business conduct include:

- Reducing environmental impact: we use technologies and production processes that minimize the use of natural resources and reduce waste. We promote the use of environmentally friendly materials and implement recycling and recovery practices.
- Energy efficiency: we invest in renewable energy and optimize energy use within our facilities, thus contributing to the fight against climate change.
- Social responsibility: we support local and community initiatives, promoting the well-being of the people who work with us and in the communities where we operate.

With our commitment to sustainability, Sipema SRL not only aligns with industry best practices, but also sets an example of responsibility and innovation.

ISO and other regulatory certifications are a tangible sign of how Sipema SRL conducts its business in a sustainable manner, meeting international standards for quality and safety in its production processes. Sipema SRL is committed to maintaining the highest standards of quality and safety in its production processes. The certifications obtained demonstrate our commitment to continuous improvement and compliance with industry regulations:

- ISO 9001:2015 (Quality Management)
- ISO 14001:2015 (Environmental management system)
- ISO 45001 (Occupational health and safety)
- TISAX level 2 (Information security in the automotive industry)
- EN ISO 3834-2 (Quality requirements for welding)
- EN 1090-1 and 1090-2 (Production control and structural steel components)
- TUV WHG (Water Protection)



Compliance with the law is the basis of every activity at Sipema SRL. We firmly believe that integrity and legality should guide our every business decision and operation. We act in accordance with all applicable local, national and international regulations, and we are committed to ensuring that every employee, collaborator and partner complies with laws and regulations.

To ensure compliance:

- We rigorously monitor and enforce all tax, occupational safety, data protection and international trade regulations.
- We promote a culture of compliance: through ongoing training, we make our employees aware of legal and regulatory issues to avoid any behavior that may violate the law.
- We manage all business operations with transparency and are committed to a policy of total non-tolerance of corruption, money laundering and any other illegal activity.

In this way, Sipema SRL ensures that every aspect of its operations is conducted in full compliance with laws and ethical principles, reinforcing the trust that customers and partners place in us.

# RESPECTING LEGALITY



## ▶ ANTI-LAUNDERING

Sipema SRL categorically prohibits any form of money laundering and any initiative that could finance or facilitate criminal activities of any kind. The company is committed to implementing strict procedures to monitor and verify financial transactions and business partners in order to prevent involvement in illicit transactions. In case of suspicions about transactions or conduct that might violate anti-money laundering laws, Sipema SRL will take all necessary measures to investigate and resolve the situation. Every employee is required to promptly report any suspicious behavior.

## ▶ COMPETITION

Sipema SRL recognizes the importance of operating in a competitive marketplace and is committed to full compliance with all local, national and international competition regulations. The company prohibits any anti-competitive practices that may distort or alter the market and harm consumers or competitors. Members of our workforce are called upon to ensure that business practices are in full compliance with applicable competition laws and to avoid any behavior that may amount to a violation of relevant regulations.



### ▶ BRIBERY AMONG PRIVATE INDIVIDUALS

Sipema SRL strongly prohibits bribery between private parties. This includes receiving or offering gifts, invitations, benefits or payments between private parties that may unduly influence the judgment or conduct of another party. Every employee and business partner must act in a transparent manner, avoiding any conflict of interest. Any gifts or invitations must be appropriate and reasonable, so as not to compromise the impartiality of business decisions or adversely affect the reputation of Sipema SRL.

### ▶ COLLABORATION WITH PUBLIC AUTHORITIES

Sipema SRL is committed to providing truthful and accurate information to public authorities and to cooperating fully with requests that may come from them. Each employee must be prepared to retain and provide information necessary for ongoing or foreseeable government investigations or legal proceedings, while complying with privacy and data protection regulations.

### ▶ ANTI-CORRUPTION

Sipema SRL adopts a zero-tolerance policy toward corruption. It is strictly forbidden to offer, promise or give gifts, advantages or any other benefit to public officials, either directly or through intermediaries, in order to improperly influence their decisions. Corruption will not be tolerated in any form.

### ▶ LOBBYING AND POLITICAL CONTRIBUTIONS

Sipema SRL adheres to principles of transparency and legality in lobbying activities and interactions with public authorities. The company does not financially support political parties or candidates, and no company funds will be used for political purposes. Employees are free to participate in political activities in their personal capacity, but they may not act on behalf of Sipema SRL or give the appearance of doing so.

# RESPECT OF HUMAN RIGHTS

Respect for human rights is a core value for Sipema SRL. We are committed to ensuring that all our operations are conducted with respect for human dignity, promoting a work environment that is safe, fair and respectful of the rights of every individual.

Sipema SRL's main initiatives to respect and protect human rights include:

- Non-discrimination and equal opportunity: we ensure that all employees are treated fairly and have equal opportunities for growth, regardless of gender, ethnicity, sexual orientation or other personal characteristics.
- Fight against child and forced labor: Sipema SRL adopts strict practices to ensure that none of our suppliers or partners are involved in child or forced labor practices. Each of our contracts complies with international labor rights regulations.
- Support for diversity: we promote an inclusive work environment, where every individual has the opportunity to express themselves and grow professionally, without fear of discrimination.

Respect for human rights guides all our activities, from supplier selection to human resource management and interaction with local communities. Through our commitment in this area, Sipema SRL contributes to a more just and equitable future for all.

Sipema SRL is committed to conducting its business with a strong sense of responsibility, legality and respect for human rights. Our company recognizes that operating ethically and sustainably is not only the right thing to do, but also the key to ensuring healthy and lasting growth over time.



# HUMAN RIGHTS

## 04 EXTERNAL RELATIONS

At Sipema SRL, we believe that relationships with the outside world, including customers, suppliers, partners and local communities, should be based on principles of transparency, integrity and mutual respect. Our company is committed to maintaining a solid and respected reputation, taking special care to avoid conflicts of interest and promoting initiatives to support the communities in which we operate. These principles are essential to ensuring long-term, sustainable business and social relationships.



**AVOID CONFLICT OF  
INTEREST SITUATIONS**



**SUPPORTING THE COMMUNITIES  
IN WHICH WE OPERATE**

# AVOID CONFLICT OF INTEREST SITUATIONS

At Sipema SRL, we are committed to preventing and properly handling any situation that may give rise to conflicts of interest. Conflicts of interest can undermine the trust of our stakeholders and compromise impartiality in business decisions. Therefore, it is essential that every employee, manager and collaborator act in such a way as to avoid any situation that could influence his or her judgment or business decisions for personal benefit.

For this reason, at Sipema SRL:

- We recognize and identify conflicts of interest: a clear definition of conflict of interest is provided to all employees, along with guidelines on how to behave in case of situations that may give rise to conflicts.
- We maintain transparency in decisions: decisions regarding contracts, hires, partnerships or other corporate opportunities are made based on objective and documented criteria, without influence from personal interests.
- We encourage reporting: if an employee believes he or she is in a conflict of interest situation, he or she should promptly report it to his or her superiors or the company's ethics committee so that the situation can be handled appropriately.

In this way, Sipema SRL ensures that all our operations are conducted in an impartial manner, avoiding any damage to our reputation and relationships with our stakeholders.



# SUPPORTING THE COMMUNITIES IN WHICH WE OPERATE

Sipema SRL recognizes the importance of contributing positively to the communities in which we are present. We believe that a company should be an active and responsible part of society, and that our commitment to the community should not be limited to mere compliance with laws. We are committed to making a difference by promoting initiatives that improve people's lives and support social and environmental well-being.

The main ways in which Sipema SRL supports communities include:

- Corporate social responsibility (CSR) initiatives: Sipema SRL invests in social and environmental projects, such as volunteer activities, support for local organizations, and social inclusion initiatives. For example, we may contribute to educational or vocational training projects for young people in the communities where we operate.
- Environmental sustainability: in addition to reducing our environmental impact through responsible business practices, Sipema SRL also supports local environmental conservation projects by actively participating in initiatives to raise awareness of the importance of sustainability.
- Collaboration with local institutions: we work with local governments to promote the sustainable development of the areas where we have a presence, creating a synergy between business and community needs.

By supporting communities, Sipema SRL not only contributes to an improvement in local living conditions, but also strengthens ties with its stakeholders, creating a positive social and environmental impact. This commitment demonstrates our willingness to be a responsible and conscious actor, acting with a goal of inclusive and sustainable growth.



05

# MANAGING RESOURCES AND INFORMATION

At Sipema SRL, resource and information management is a crucial aspect of ensuring operational efficiency, data security, and transparency in our operations. Information is a key asset that must be treated with care and responsibility, as business decisions, daily operations and the relationship with our stakeholders depend on its quality and accuracy. Likewise, our tangible and intangible assets must be managed responsibly to protect the value of the company and optimize results.



COMMUNICATE EFFECTIVELY



PROTECTING OUR ASSETS AND  
INFORMATION



REGULARITY OF RECORDS



# COMMUNICATE EFFECTIVELY

Clear, accurate and timely communication is essential to ensure that all people within Sipema SRL have the information they need to do their job at their best. Good communication helps to coordinate activities, reduce misunderstandings and improve collaboration between departments and with external partners.

Sipema SRL is committed to:

- Facilitate internal communication among employees, ensuring that company information is disseminated efficiently and reaches all levels of the organization. We use digital and in-person communication tools to ensure a constant flow of information and feedback.
- Communicate clearly and transparently with our customers, suppliers and other external stakeholders. This includes timely updates about new products, changes to services or troubleshooting issues.
- Encourage an open and constructive dialogue, where each member of the company can express ideas and concerns in a constructive way, contributing to the continuous improvement of business processes.

Effective communication at Sipema SRL is the basis of our success, as it creates a cohesive and well-informed working environment and improves the satisfaction of our customers and partners.

# PROTECTING OUR ASSETS AND INFORMATION

The company assets, whether they are material or immaterial, represent a fundamental resource for the smooth operation of Sipema SRL. The protection of sensitive information and company data is vital, both to protect the competitiveness of the company and to ensure respect for privacy and security.

For this reason, Sipema SRL adopts the following practices:

- Corporate data protection: We are committed to safeguarding confidential information by protecting customer, employee and business operations data from unauthorized access. We use advanced security systems and constantly monitor our IT infrastructures.
- Safe management of company assets: we protect material resources, such as equipment and machinery, ensuring that they are used correctly and with maximum efficiency. Corporate resources are regularly monitored to prevent misuse or damage.
- Strict security policies: we implement internal policies for the processing and secure storage of sensitive information, in line with international data protection regulations (such as GDPR).

Protecting our assets and business information enables us to maintain competitiveness, respect privacy and ensure the long-term security of our assets.





# REGULARITY OF RECORDS

Accurate and regular management of company records is essential to ensure that Sipema SRL operates in a transparent, responsible and compliant manner. Accurate records enable us to properly monitor transactions and provide reliable information to external stakeholders, including auditors and tax authorities.

Sipema SRL is committed to:

- Maintain accurate and true records: all business transactions are recorded accurately and in a timely manner, so as to reflect the economic and financial reality of the company. All records relating to transactions shall be kept in a secure and organised manner.
- Compliance with tax and accounting regulations: we comply with all accounting and tax regulations, ensuring that all transactions are recorded in accordance with company laws and policies.
- Transparency in financial communications: our records are always available to internal and external auditors, ensuring maximum transparency and trust in the company's information.

The regularity of records is essential for the proper management of resources and to strengthen the confidence of our partners, customers and investors, allowing also to make more informed and responsible business decisions.



# THANK YOU

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