

**CODE OF CONDUCT AND ETHICS**  
**of RULMENTI S.A. Barlad**

## I. PREAMBLE

**Rulmenti S.A. Barlad** - hereinafter referred to as the "Company" - undertakes to ensure that the business is continuously conducted in accordance with the ethical, professional and legal standards applicable to the business environment in which the Company is developing its activity.

The company expects that all employees:

- to adhere to this code in their professional and personal conduct;
- to treat their collaborators with respect, courtesy, honesty and fairness;
- to respect the diversity of values, beliefs, cultures and religions;
- to appreciate the contribution of the people they work with and to have a cooperative and transparent approach;
- not to aggress, intimidate, harass or discriminate their collaborators.

## II. PURPOSE

This code has been elaborated in order to:

- promote and maintain the employee's confidence in the professionalism and integrity of the company,
  - ensure that all employees adhere to appropriate standards of conduct,
  - maintain and enhance the company's reputation,
- purpose being not limited to the above-mentioned issues.

The goal is to provide guidance to all the company's employees on their conduct when acting for and on behalf of the company.

The general principles, as outlined below, although not exhaustive, are intended to cover those situations that are most likely to be encountered by employees. If any employee is confronted with some circumstances that are not listed below, or in case of doubt, they should seek guidance from the direct manager or the Human Resources Department and act accordingly.

A breach of this code may result in disciplinary actions against the involved employees and/or any other legal action, as the case may be.

### III. SCOPE

This code applies to all the company's employees.

The company expects its managers to lead by example, to perform their duties in accordance with this code and to ensure that this code is communicated to all their subordinates.

If another business location or other region has policies, practices, laws or regulations more comprehensive than this code, then the employees of the company doing business in these areas must follow this code as a minimum and respect the specific policies, practices, laws or regulations of those regions/countries. Business units and locations are responsible for ensuring that the local specific policies and practices are known and respected consistently and in harmony with this code.

The reputation and credibility of the company are based on its full commitment to ethical business practices and also on the ethical conduct of its employees. In order to protect the reputation of the company, the employees must behave according to ethical standards and also be perceived to act ethically at all times. The compliance with all the company policies, laws and regulations is the minimum standard which all employees must adhere to at any time.





#### IV. GENERAL PRINCIPLES

The principles governing the professional conduct of the employees of RULMENTI SA Barlad are the following:

##### **Professionalism**

The personal and professional behaviour of the employees must comply with the standards, according to the expectations, including:

- assuming the professional standards in their field of work and interacting with other employees of the company;
- commitment to maintain the standards of integrity and honesty during their work;
- adhering to ethical and legal standards so as to maintain them in business;
- responsibility to assist the company in its efforts to create an open and mutually beneficial supportive environment;
- responsibility to share information and to provide voluntary assistance in promoting the goals and objectives of the company;
- responsibility to ensure that there are no misrepresentations of the facts. Whenever a misrepresentation caused by unclear communication has occurred, it must be corrected immediately.

##### **Conflict of interests**

Every employee is expected to avoid the situations where their financial or other personal interests or any other personal relations are or may be in conflict with the company's interests. As a consequence, the company expects its employees to act in the company's interest at any time.

The employees are advised not to engage in any other commercial or investment business that may conflict with their ability to perform their duties for the company.

The employees must also not engage in any other cultural, political, recreational or social activity that could conflict with the interests of the company and interfere with the fulfilment of their tasks.

The employees must not use any property, information or position of the company or any opportunity resulting from them for personal gains and/or to compete with the image of the company or to adversely affect it.

The employees should not engage in any business activity that might be detrimental to the company or might compete with its business activities.

If in any particular case the employee's personal interests conflict with those of the company, the employee must seek the advice of the direct manager or the superior management.

##### **Confidentiality and information**

After their employment with the company, the employees can be entrusted with confidential information about the company and/or its affiliates, customers and suppliers.

The employee has the obligation to keep the confidentiality of the information they have direct access to - through the nature of the job-related activities - or the information which have been communicated or fortuitously obtained during the work about and in connection with the company and to use them only for professional purposes and within the limits of their duties, attributions, responsibilities and competencies. The term information in this paragraph does not include the information about the company that is public in accordance with the legal provisions and internal regulations in force or that has been made public by the legal representatives of the company in the media or in public circumstances.

##### **Integrity of financial information**

The shareholders, the management team or other stakeholders must have complete and accurate financial information in order to make informed decisions.

The employees involved in accounting activities and/or other activities having a direct impact on the external financial statements and internal management reports are responsible for ensuring that all transactions are accurately and promptly recorded in the company's accounts and must report immediately any known











