

GIMET BRASS S.R.L.

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Regulations on whistleblowing

MOD-REG-WB1

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Revisions

Revision number	Date	Review Description
00	06/12/2023	First draft following the publication in the Official Gazette of the text of Legislative Decree 24/2023
01	22/01/2024	Revisions and additions before approval by the Board of Directors

Approval

Date

Signature

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1. Object

This document describes the methods of transmission and management of reports as part of the GIMET BRASS S.R.L. relating to the violation of Union law and national regulatory provisions for the protection of reporting persons pursuant to Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 (hereinafter the "Directive") and Legislative Decree No. 24 of 10 March 2023 (hereinafter "Legislative Decree No. 24/2023").

1.1. Purpose of the document

The purpose of this document is to regulate the correct management of reports, making the information necessary for the parties involved.

2. Subject of the reports

<i>Number of employees</i>	<i>With Organizational and Management Model Legislative Decree no. 231/01</i>	<i>Subject of the report</i>
<i>with 50 or more</i>	No	European and national offences (see infra-points a) and b) (art. 3, para. 2, lett. a), Legislative Decree no. 24/2023)

More specifically, the violations indicated in the table above may concern:

- Violations of specific national regulations on administrative, accounting, civil or criminal offences;
- offences falling within the scope of European Union acts relating to the following areas: public procurement; financial services, products and markets and the prevention of money laundering and terrorist financing; product safety and compliance; transport safety;



environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; protection of privacy and protection of personal data and security of network and information systems;

- acts or omissions concerning the internal market (e.g. infringements of competition and state aid);
- acts or conduct which frustrate the object or purpose of the provisions contained in Union acts.

2.1. Limitations of the reporting perimeter

There are limitations on the scope of application of the objective scope of the reports.

It should be remembered, first of all, that reports based on unfounded suspicions or rumors relating to personal facts that do not constitute an offence are excluded from the scope of these Regulations.

This is because it is necessary both to take into account the interest of third parties covered by the information reported in the report, and to prevent the Company from carrying out internal inspection activities that risk being of little use and in any case expensive.

The scope of this document also does NOT include:

- disputes, claims or requests related to a personal interest, which relate exclusively to one's individual employment relationships or inherent to one's employment relationships with hierarchically superior figures;
- to reports of violations that are already compulsorily regulated by European Union or national acts concerning financial services, products and markets and prevention of money laundering and terrorist financing, transport security and environmental protection or by national acts that constitute implementation of European Union acts in the same areas

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(details of the regulations are contained in the annex to Legislative Decree no. 24/2023, Part II);

- reports of breaches of national security, as well as procurement related to defence or national security aspects, unless such aspects fall within the relevant secondary legislation of the European Union.

A further limitation of the scope of application concerns specific national or on the following measures:

- classified information;
- Legal and medical professional secrecy
- secrecy of court deliberations;
- criminal procedure.

3. Definitions

Whistleblower, whistleblower or whistleblower	<i>The natural person who reports or publicly disseminates information about violations acquired in the context of his or her work context, in the performance of current or past work or professional activities, through which the person has acquired information about violations and in the context of which he or she may be at risk of retaliation.</i>
Signalling	<i>Written or oral communication, made in the manner described in these Regulations, containing information, including well-founded suspicions, concerning violations committed or which, on the basis of concrete elements, could be committed in the organization with which the reporting person has a legal relationship, or any other element concerning conduct aimed at concealing such violations.</i>

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Platform	<i>IT system that represents the tool for receiving and managing Reports, with technical characteristics suitable for protecting the confidentiality of the identity of the Whistleblower (and also of the reported person) adopted by the company GIMET BRASS S.R.L.</i>
Person involved (Reported)	<i>The natural or legal person named in the internal or external report or public disclosure as a person to whom the violation is attributed or as a person otherwise involved in the violation reported or publicly disclosed.</i>
Facilitator	<i>The natural person who assists a reporting person in the reporting process, operating within the same work context and whose assistance must be kept confidential.</i>
A.N.A.C.	<i>National Anti-Corruption Authority. The national authority designated by the Italian State to receive external reports and to respond to the reporting person.</i>

4. Reference standards

- ⇒ *Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law;*
- ⇒ *EU Regulation 679/2016 on privacy and subsequent provisions (GDPR) and national privacy regulations*
- ⇒ *Legislative Decree no. 24/2023 on "Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and laying down provisions on the protection of persons who report breaches of national law";*
- ⇒ *ANAC Whistleblowing Guidelines: Guidelines approved by ANAC with Resolution no. 311 of 12 July 2023 on the protection of persons who report breaches of Union law and the*

protection of persons who report breaches of national regulatory provisions. Procedures for the submission and management of external reports.

- ⇒ *Regulation for the management of external reports and for the exercise of ANAC's sanctioning power: Regulation adopted by ANAC with resolution no. 301 of 12 July 2023.*

Ordinary general regulations of application

- ✚ Existing national collective labour agreements applicable to staff and any equivalent local legislation
- ✚ Criminal Code and Code of Criminal Procedure
- ✚ Civil Code and Code of Civil Procedure

5. Reporting parties and other recipients of protection measures

The Whistleblowing Regulation distinguishes two categories of subjects to whom the guarantees and protection measures must be applied, such as:

- i. the whistleblower (or whistleblower, in the strict sense), i.e. the natural person who carries out the reporting and public disclosure of information on violations;
- ii. the other subjects who, although they have not directly made the report, are still considered worthy of protection.

All subjects included in categories i) and ii) are protected by the provisions of these Regulations.

The protections provided therein must also be applied in the case of anonymous reporting, if the name of the whistleblower is subsequently identified.

5.1. Whistleblowers

The subjects who belong to the category of whistleblowers who can make a Report pursuant to these Regulations include:

- a) Employees, including workers who perform:

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- part-time, intermittent, fixed-term, administration, apprenticeship, ancillary work (whose employment relationship is governed by Legislative Decree no. 81/2015);
- occasional services (pursuant to Article 54-bis of Legislative Decree No. 50/2017, converted by Law No. 96/2017);

b) the self-employed

- with a work contract (art. 2222 of the Italian Civil Code);
- with a collaboration relationship (referred to in Article 409 of the Code of Civil Procedure), such as agency, commercial representation and other collaboration relationships that take the form of a continuous and coordinated provision of work, mainly personal, even if not of a subordinate nature;
- with a collaboration relationship that takes the form of exclusively personal, continuous work services and whose methods of execution are organized by the client;

c) collaborators who carry out their work for entities that supply goods or services or who carry out works in favour of the Company;

d) freelancers and consultants who work for the Company;

e) volunteers and trainees, paid and unpaid, who work for the Company;

f) the shareholder and persons with administrative, managerial, control, supervisory or representative functions, even if these functions are exercised on a purely de facto basis at the Company (e.g. members of the Board of Directors).

Other recipients of protection measures

With respect to the other subjects subject to protection measures, the following are also protected by the Whistleblowing Regulation and deserving of protection:



- a. facilitators;
- b. third parties connected with the reporting persons and who could risk retaliation in a work context, such as colleagues or relatives of the reporting persons.

6. Reporting channels and reporting methods

For the purposes of the application of these Whistleblowing Regulations, reports can be communicated through separate channels (to be used under the conditions that will be specified below) as listed below:

- internal channel a GIMET BRASS S.R.L.;
- external channel, established and managed by the competent National Authority

The possibility of making complaints to the Judicial and Accounting Authority always remains unaffected.

Details of the procedures for communicating a report are provided below, in relation to the reporting channel that will be used by the whistleblower.

7. Internal reporting: the process defined by GIMET BRASS S.R.L.

7.1.1. Process support tools: the IT platform provided

GIMET BRASS S.R.L. has chosen to adopt a Platform for the reception and management of reports that is able to guarantee, with IT methods and data encryption techniques, the confidentiality of the identity of the whistleblower, the content of the report and the related documentation.

This Platform can be reached at the following link: <https://gimetbrass.whistleblowing.net>

The Platform allows reports to be collected in written form, always guaranteeing the anonymity of the whistleblower and provides the possibility for the person in charge of the reporting system to dialogue with the person. Reporting following receipt of the Report and during internal investigations (even if the same wishes to remain anonymous). Every communication with the person. Reporting



must take place within the Platform in order to securely store the data relating to each Report. To this end, the Manager designated for the management of reports is provided with a unique credential for access to the Platform that he is required NOT to disclose to third parties, except for any subjects who are part of the internal operating structure. Any internal report must be archived and stored on the Platform. This Platform therefore acts as a *Book-Register* of the information received and of the internal searches to which such information has given rise.

7.1.2. Content, form and characteristics of the report

Whistleblowing can be reported if the following conditions are met:

- when there is information, including well-founded suspicions, concerning violations committed or which, on the basis of concrete elements, may be committed of national or European Union regulatory provisions that harm the public interest or the integrity of the Company, as well as concerning conduct aimed at concealing such violations and
- such information is learned, or suspicions have arisen, in the context of the work context.

Reports relating exclusively to:

- to disputes, claims or requests related to a personal interest of the whistleblower;
- the individual employment relationships or collaboration of the whistleblower with the Company, or with hierarchically superior figures;
- aspects of the private life of the reported person, without any direct or indirect connection with the business and/or professional activity.

In addition, reports are not allowed:

- specious, defamatory, slanderous or aimed exclusively at damaging the reported;

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- relating to violations that the whistleblower knows to be unfounded.

The internal report must be addressed exclusively to the Reporting Manager

and can be carried out, preferably, in written form, using the computer methods described, and at the end of the entry of the report, the Platform will generate a KEY CODE (16-character code). It is therefore recommended that the Whistleblower periodically view the platform, as communications and requests for document integration, deemed necessary in order to proceed, will be communicated through the same.

It should be noted that, in the absence of the KEY CODE, it will not be possible to access the report and in case of additions it will be necessary to enter a new report.).

It should therefore be remembered that it is burden of the whistleblower to take adequate care of it. If the code is lost, it becomes a charge of the whistleblower to the Manager in charge of the Reports, communicating any useful information regarding the report for which he has lost the code. If it is not possible to proceed with the report in writing, the internal report may also take place orally, at the request of the Whistleblower, through a direct meeting set within a reasonable time and at the premises of the GIMET BRASS S.R.L. identified by it. This request must be made through the Platform itself.

In this case, the Manager in charge of the Reports will guide the Whistleblower in filling out the report on the Platform, in order to adequately manage it. Alternatively, subject to the consent of the Whistleblower, the documentation of the report will be guaranteed to be the Whistleblower.

Under no circumstances, those who provide support to the Whistleblower will NOT be able to keep the numerical code of the report generated by the Platform, which will remain at the exclusive disposal of the Whistleblower.

Please note that the Internal Reporting must have as its object one of the objective areas



as reported in paragraph 7.2.2 above.

The Report must be complete and exhaustive to allow the verification of its validity by the Report Manager. The Whistleblower, therefore, even more so if he wished to maintain his anonymity, would be required to provide all the available and useful elements to allow the Report Manager to proceed with the due and appropriate checks and verifications to verify the validity of the facts covered by the Report, such as, by way of example:

- the circumstances of time and place in which the facts covered by the report were committed;
- a clear and complete description of the facts covered by the report;
- the personal details or other elements that allow the identification of the person(s) who carried out the reported facts (e.g. qualification, place of employment in which he carries out the activity);
- any other information that can provide useful feedback on the existence of the reported facts
- the indication of any other subjects who can report on the facts subject to reporting;
- any documents supporting the report.

The requirements described above do not necessarily have to be complied with at the same time, in consideration of the fact that the person. Reporting may not be in the full availability of all the information requested at the time of sending the report, but it must be possible to reconstructed in the preliminary phase.

The personal reasons or psychological status of the Whistleblower are not relevant for the purposes of taking charge of the Report.

If the report is presented to a different party From Responsible/Reporting Manager, as identified and authorised by the GIMET BRASS S.R.L., where the whistleblower expressly declares that he/she



wishes to benefit from whistleblowing protections or this intention can be inferred from the report, the report is considered a "whistleblowing report" and must be transmitted, within seven days of its receipt, giving simultaneous notice of the transmission to the reporting person. Otherwise, if the whistleblower does not expressly declare that he or she wishes to benefit from the protections, or if this intention cannot be inferred from the report, such a report is considered as an ordinary report.

7.1.3. Recipients of internal reporting

In order to ensure impartial handling of Reports, GIMET BRASS S.R.L. appointed the Head of the internal system for reporting violations, responsible for receiving reports and proceeding with the verification of their content.

This Manager coincides with the Manager Responsible for the Reports, subject and therefore, carries out both the TAKING CHARGE PHASE and the ASSESSMENT PHASE, as illustrated in the following paragraph.

7.1.4. The phases of reporting management

As part of the management of the internal reporting channel, the Whistleblowing Manager, who is entrusted with the management of the internal reporting channel, is responsible for the

TAKING CHARGE of the report and carries out the following activities:

- Within 7 days of receipt, it issues the Whistleblower with confirmation of receipt of the report through the Platform;
- Maintains discussions with the person. Whistleblower, who may be requested, if necessary, to supplement the report;
- By diligently following up on the reports received, promptly initiating the preliminary analysis of the Report in order to verify its compliance with the applicable rules and with these Regulations, in particular by assessing the admissibility and validity of the complaint.



This TAKING CHARGE PHASE can be concluded alternatively:

- a. – with the archiving of the report that does not fall within the objective scope of these Regulations and if the conditions for prosecution are lacking;
- b. With the opening of the PRELIMINARY INVESTIGATION and the beginning of the EVALUATION PHASE, aimed at taking any appropriate action to assess the existence of the reported facts.

The recipient guarantees the correct conduct of the investigation through:

- ⇒ the collection of documents and information;
- ⇒ the involvement of external parties (in the event that it is necessary to make use of the technical assistance of third-party professionals) or other corporate functions, which have the obligation to collaborate with the reporting manager;
- ⇒ the hearing of any other internal/external parties, where necessary.

The investigation is carried out in accordance with the following principles:

- the necessary measures are taken to prevent the identification of the whistleblower and the persons involved;
- Audits are conducted by trained people and activities are tracked and filed correctly.
- all parties involved in the assessment maintain the confidentiality of the information received, unless otherwise provided for by law;
- the audits are carried out by ensuring that appropriate measures are taken for the collection, use, disclosure and storage of personal information and by ensuring that the needs of the investigation are balanced with that of privacy protection;
- appropriate measures are guaranteed to manage any conflicts of interest if the report concerns the recipient.



The Manager, if the report is addressed to the former, is responsible for the EVALUATION PHASE

In the case of external instructors, where in order to follow up on the report it is necessary to share information relating to the report that is suitable for revealing the identity of the Whistleblower, the Manager, before proceeding with the sharing of such information, will collect consent from the Whistleblower to reveal his or her identity in the manner indicated to maintain the right to confidentiality.

The EVALUATION PHASE represents the set of activities aimed at verifying the content of reports, in which the utmost confidentiality must be guaranteed regarding the identity of the Whistleblower and the subject of the report.

This phase has the main purpose of verifying the veracity of the information under investigation and formalizing the facts ascertained, through internal verification activities with the use of objective investigative techniques and the support of the competent and interested company structures with respect to the content of the Report.

If hearings of the Whistleblower (or other interested parties, witnesses or experts) are necessary, the information collected and/or the documents delivered must be archived and stored exclusively on the Platform for the purpose of traceability of the operations carried out.

The internal EVALUATION PHASE will have to conclude with a judgment on the admissibility of the signalling; alternatively:

- with the filing of the inadmissible report that is unfounded, it was not possible to ascertain the facts or for other reasons;
- by communicating the outcome of the internal investigation to the company representatives, by transmitting a summary report of the actions carried out and the information taken, in the



event that the report is well-founded and the facts reported therein are ascertained. In this Report, the following will be acknowledged:

- of the evidence collected;
- the information obtained;
- of the ascertained facts;
- the actions taken for the investigation;
- any mitigating and/or corrective actions

Following the transmission of the Report, the following may be defined and undertaken by the GIMET BRASS S.R.L. mitigating and/or corrective actions.

During the ASSESSMENT PHASE, the Whistleblowing Manager will continue to maintain relations with the Whistleblower, informing him/her of the progress of the investigation, at least with reference to the main decision-making junctions. In order to ensure maximum transparency in the management of the report, the Whistleblower will always be able to access the Platform and know the processing status of the report, using the numerical code that is generated by the Platform at the end of the entry of the report and entering it in the appropriate space made available when entering the internal online channel.

Within three months from the date of the acknowledgement of receipt, the Whistleblower Responsible for Reports must provide feedback to the Whistleblower, informing him/her of the follow-up that is given or intends to be given to the report. In any case, once the investigation has been completed, the Manager in Charge of Reports will notify the Whistleblower of the final outcome of the reporting procedure, which will allow the report to be closed on the Platform, for the purpose of the correct storage of the documentation.

7.2. External signalling: the ANAC channel



If specific conditions are met, the Whistleblower may make a report through a external channel.

External reporting can be made when one of the following conditions is met:

- the internal channel, although mandatory, is not active or does not comply with the provisions of the law;
- the Whistleblower has already made an internal report and the same has not been followed up;
- the Whistleblower has reasonable grounds to believe that the Organization would not effectively follow up on the internal report or sees a concrete risk of retaliation in the event of an internal report;
- the person. The Whistleblower has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

The use of external reporting is, therefore, residual compared to internal reporting.

It is the responsibility of the reporting person to assess the recurrence of one of the situations listed above

before proceeding to make an external report.

External reports are made by the Whistleblower directly to the National Anti-Tax Authority.

Corruption (ANAC), through the channels set up for this purpose. These are:

- ⇒ IT platform, accessible at the following url:
<https://servizi.anticorruzione.it/segnalazioni/#/>
- ⇒ Oral reports
- ⇒ Direct meetings scheduled within a reasonable time



On the ANAC institutional website, by clicking on the link to the dedicated page, you can access the service dedicated to "whistleblowing" (<https://www.anticorruzione.it/-/whistleblowing>), where you will find clear and easily accessible information relating to the channel, the competent parties entrusted with the management of reports, as well as the procedures.

7.3. Public disclosure

Whistleblowers can make a public disclosure directly when:

- the reporting person has previously made an internal and external report or has made an external report directly and no feedback has been given within the established deadlines on the measures envisaged or adopted to follow up on the reports;
- the reporting person has reasonable grounds to believe that the breach may constitute an imminent or obvious danger to the public interest;
- the reporting person has reasonable grounds to believe that the external report may involve the risk of retaliation or may not be effectively followed up due to the specific circumstances of the specific case, such as those in which evidence may be concealed or destroyed or in which there is a well-founded fear that the person who received the report may be colluding with the offender or involved in the violation itself.



8. Ensuring and whistleblower protection measures

The entire process of receiving and managing Reports must guarantee the rights of the Whistleblower. To this end, in accordance with current legislation, GIMET BRASS S.R.L. not only has it provided for the right to send anonymous Reports, but it has also provided guarantees and measures for the protection of the Whistleblower, which will be applied if the following conditions are met:

- the violation falls within the objective scope of application of the legislation (which is detailed in paragraph 2);
- the violation concerns conduct, acts or omissions capable of harming or prejudicing the public interest or the integrity of the Company;
- there are well-founded reasons that lead the whistleblower to believe that the existence of

unlawful conduct or violation.

If it is not possible to meet these requirements, the report will be archived and the Whistleblower will be informed, as described in paragraph 7.1.4 above.

The protection measures referred to in these Regulations are not guaranteed when:

- the criminal liability of the person is ascertained, even with a non-final first instance judgment. Reporting for the crimes of defamation or slander;
- the civil liability of the person is ascertained. Reporter, for the same reason, in cases of wilful misconduct or gross negligence.

8.1. Right to privacy

The identity of the person. Reporting party and any other information from which this identity may be inferred, directly or indirectly, may not be revealed, without the express consent of the reporting person himself, to persons other than those competent to receive or follow up on reports, expressly

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authorized to process such data pursuant to Articles 29 and 32, paragraph 4, of Regulation (EU) 2016/679 and national legislation on the protection of personal data.

It should be noted that the protection of the confidentiality of the subject. Reporting is also insured in

jurisdictional and disciplinary field.

The disclosure of the person's identity. Whistleblower and any other information or element of the report from the disclosure of which the identity of the whistleblower can be deduced directly or indirectly is allowed only if this represents a necessary and proportionate obligation imposed by the law applicable in the country of reference, in the context of investigations by national authorities or judicial proceedings, also in order to safeguard the right of defense of the person concerned.

In any case, even where current legislation allows the possibility of revealing the identity of the Whistleblower, before the disclosure of such information, it is necessary to obtain his/her express consent and communicate in writing the reasons for the need to disclose his/her identity.

The Company is also required to protect the identity of the persons involved and the persons mentioned in the report until the conclusion of the proceedings initiated on the basis of the report in compliance with the same guarantees provided for the Reporting Person.

9. Sanctions

The GIMET BRASS S.R.L. reserves the right to take any initiatives, including in court, in full compliance with the provisions of the regulations in force and applicable. In particular, these Regulations do not affect the criminal, civil and disciplinary liability of the Whistleblower in the event of slanderous or defamatory reporting, in cases of wilful misconduct or gross negligence.

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It should be noted that the Company or the person who reveals or disseminates information on violations covered by the obligation of secrecy, or relating to the protection of copyright or the protection of personal data, or reveals or disseminates information on violations that offend the reputation of the person concerned, is not punishable, when both of the following conditions are met:

- at the time of disclosure or disclosure, there are reasonable grounds to believe that the information is necessary to detect the infringement
- the report was made in compliance with the conditions provided for by current legislation to benefit from the protections (well-founded reason to believe that the information on the violations was true and was among the violations that could be reported under the law. reports, internal and external, made in compliance with the methods and conditions dictated by law). In addition to the internal sanctions of the entity, in the cases expressly provided for by the legislation, ANAC may also apply any administrative fines to natural or legal persons, as provided for by current legislation and in compliance with its Regulations.

10. Adoption of the document

These Regulations are adopted by resolution of the Board of Directors of GIMET BRASS S.R.L., which may revise it if necessary, in the event of significant internal changes as well as new regulatory provisions.