

## ITALMATCH GROUP

### HUMAN RIGHTS GLOBAL POLICY

#### Introduction

Italmatch Group considers the respect of human rights in all aspects of doing business. We have embedded human rights in Italmatch Group Code of Ethics according to which we oppose to all form of modern slavery and we intend to run our organization respecting the fundamental human rights in accordance with the international conventions and the laws of the countries in which we operate.

Italmatch Group approach is informed by the United Nations' Universal Declaration of Human Rights and the OECD Guidelines for Multinational Enterprises including the relevant international instruments and acknowledges the corporate responsibility towards the fundamental internationally recognised human rights such as, among others:

- no use of child labour
- no use of forced labour
- health and safety workplace
- freedom of association and the right to collective bargaining
- not tolerating discrimination
- compliance with applicable law and regulation on working hours
- compliance with applicable law and regulation on remuneration.

The respect of the aforementioned main principles and the refusal of any form of modern slavery and human trafficking is compulsory and essential to Italmatch current business interests and future business opportunities. Our Group will not start or continue any relationship with those who will not comply with these principles and values.

#### Our Policy

This Human Rights Global Policy ("Human Rights Policy" or "Policy") is applicable to Italmatch Chemicals S.p.A. and all subsidiaries (collectively "Italmatch Group" or the "Group").

Active on international level, Italmatch Group has a strong commitment to human rights, which is reflected in the core values of safety, care and respect, integrity and accountability of the Group. In our operations and business activity we respect, protect and promote human rights in the countries and communities where we operate complying with local legislations and regulations.

We promote respect for human rights, inter alia in labour conditions, women's rights and the right to water, through our collaborations and public policies. We also promote respect for the cultural and psycho-physical person conditions, providing a working environment that respects human dignity and safe and healthy workplaces. We prohibit discrimination as well as forced, trafficked and child labour, and we respect the right to freedom of association, collective bargaining and effective information and consultation procedures.

We aim at increasing our positive and responsible social impact and we expect that our partners share our business principles. Our contractors and suppliers are expected to conduct their activity in a manner that respects human rights as above described or through equivalent standards; on this regard, this Policy has been made available to all the parties through its release on Italmatch website.

## **Our Employees**

The relationships among the employees of Italmatch Group shall be based on principles of peaceful coexistence and mutual respect and shall be conducted with mutual respect for the rights and freedoms of others.

The Group guarantees the fundamental rights of employees, in accordance with the laws of the countries in which it operates, the agreements signed with third parties and in accordance with international conventions in the field of work organization.

In particular, the Group ensures compliance with the requirements of corporate social responsibility of standards that deal with the aforementioned several issues, such as zero tolerance of forced labour, promotion of health and safety workplaces, freedom of association and the right to collective bargaining, compliance with legislation in terms of working hours and remuneration and not tolerating discrimination, harassment or retaliation.

## **Equal opportunities**

We manage and grow responsible businesses where women participate on an equal basis, as we are aware that women are integral to our business. Women's rights and economic inclusion are our priorities.

We promote equal opportunities for women and men with special emphasis on equal criteria for selection, remuneration, and promotion, and equal application of those criteria, and prevent discrimination or dismissals on the grounds of marriage, pregnancy or parenthood.

## **Suppliers and commercial partners**

We recognize the importance of due diligence of our suppliers. Our procurement team aims to develop and strengthen relationships with the Group direct suppliers who are committed to respect the human rights values. We also recognize that each Italmatch supplier has its own supply chain and is responsible for ensuring compliance with laws and regulations protecting human rights.

The selection of our direct suppliers is made on the basis of a transparent and objective assessment of corporate sustainability performance, covering different themes of corporate social responsibility, among others, environment, ethics, labour and human rights, in collaboration with third operators supported by appropriate surveys and documentation.

Suppliers with whom the Group operates and will operate shall ensure operational standards compatible with the respect for human rights, workers and the environment. Suppliers must also share our commitments to ensure transparency, to remedy any shortcomings and to drive continuous improvement.

In our general conditions of sale and purchase and main contracts, our commercial partners are required to adhere to Italmatch principles and values in doing business as included in Italmatch Group Code of Ethics.

Our commercial partners and other third parties working for the Group operating in violation of human rights will be requested to develop corrective actions and, in addition, Italmatch is allowed to terminate the business relationship as well as taking any other legal and remedial actions available under applicable laws.

## **Our impact and monitoring**

We continue to strengthen our commitment for human rights to identify risk of actual and potential human rights issues in our supply chain and in our business.

We promote actions to manage and address human rights risks and impacts through dialogue and collaboration.

We implement ways to remediate, cease or prevent adverse human rights impacts of our activities, and to mitigate any remaining impact to the greatest extent possible.

The Group enforces whistle-blower policies prohibiting retaliation against any employee who reports any wrongdoing, or concerns on any adverse human rights impacts of Italmatch Group's activities, to the compliance officer competent for the relevant jurisdiction or Legal Department, in order to conduct the most appropriate due diligence activities and evaluate appropriate remedial actions.

We are committed to continue increasing the capacity of our management to effectively identify and respond to human rights concerns.

## **Going Forward**

This Human Rights Policy Statement consolidates our commitments and clarifies our processes and procedures. Its principles are implemented across our operations and value chain.

We regularly evaluate and review the best tools to strengthen our approach to addressing human rights. Believing in an integrated approach to human rights, we work through external initiatives and partnerships, such as NGOs, trade unions, suppliers and business partners to address shared challenges.