

ITALMATCH GROUP CONFLICT MINERALS GLOBAL POLICY

1. INTRODUCTION

Italmatch Group recognizes as a fundamental principle in conducting its business activity, compliance with laws and the highest ethical standards applicable in the countries in which it operates.

Italmatch Group is committed to create and deliver products and services of quality, continuously driving them to sustainability, through social responsibility, environmental and human rights protection in our business operations, to enable the Group and our Group customers to meet expectations and needs of the global society.

In recent years, significant attention has been given to **Conflict Minerals** (as defined below) and the extensive human rights concerns deriving from mining and trading these resources originated in conflicts-affected areas where profits from mining operations often become a source of financing rebel groups and/or are associated with human rights violations.

Conflict Minerals or 3TG Minerals refer to the four minerals, mentioned in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and in the European Union (EU) Conflict Minerals Regulation (2017/821) (**Conflict Minerals Laws**): tin, tungsten, tantalum, and gold (3TGs), and their refined metals derivatives ("**Conflict Minerals**").

Conflict Minerals are used across a wide spectrum of industries for various product applications including, among others, industrial equipment, IT tools and chemical applications.

The Dodd-Frank Act created requirements for Conflict Minerals sourced from the Democratic Republic of the Congo (DRC) and its adjoining countries, while the EU Regulation defines supply chain due diligence for EU importers of Conflict Minerals from conflict-affected and high-risk areas (a non-exhaustive list of which can be found at the following link: [CAHRAs](#)) spanning the globe, witnessing weak or non-existent governance and security as well as widespread and systematic violations of international law, including human rights abuses.

Ensuring the principles of sustainable business activity within our Group and in our supply chain is fundamental to us. We adopted this Italmatch Group Conflict Minerals Global Policy ("**Conflict Minerals Policy**" or "**Policy**") to serve as reference for Italmatch Chemicals S.p.A. and its affiliates (collectively "**Italmatch Group**" or the "**Group**") and for all of Italmatch Group suppliers for conflict-sensitive sourcing practices and for promoting business awareness, taking into consideration the Conflict Minerals Laws and the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals](#).

We believe in informed processes, with economic operators diligently monitoring and administering their purchases and sales, with a view to ensure that they do not contribute to conflicts or the adverse impacts thereof. We are committed to sourcing materials from suppliers that share our values including responsible sourcing regarding the Conflict Minerals.

Our Group will not start or continue any relationship with those who will not comply with these principles.

2. RESPONSIBLE GLOBAL SUPPLY CHAIN

Recognising our responsibility to respect human rights and not contribute to conflicts in line with Italmatch Code of Ethics and Italmatch Human Rights Global Policy and being informed about the significant adverse impacts associated with extracting, handling and trading Conflict Minerals from conflict-affected and high-risk areas, we embrace the main OECD DD Guidelines principles for a responsible global supply chain of Conflict Minerals:

- we commit to comply with United Nations Guiding Principles on Business and Human Rights and we commit to refrain from any action which contributes to the financing of conflicts and human

rights abuses and, where applicable, we commit to comply with domestic laws implementing such resolutions in the countries in which we operate;

- we will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of Conflict Minerals;
- we agree to eliminate direct or indirect support to public or private security forces who: illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or Conflict Minerals at point of access to mine sites, along transportation routes or at points where such minerals are traded; illegally tax or extort intermediaries, export companies or international traders;
- regarding bribery and fraudulent misrepresentation of the origin of Conflict Minerals, we will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of such minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of Conflict Mineral extraction, trade, handling, transport and export;
- we will support efforts to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of Conflict Minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where Conflict Minerals are traded by upstream suppliers.

In case we identify a reasonable risk described above in our supply chain, we will immediately take appropriate actions to prevent or mitigate such risks. In accordance with OECD DD Guidelines, planned actions may result in a decision to continue trade throughout the course of risk mitigation efforts, temporarily suspend trade while pursuing ongoing risk mitigation, or disengage with a supplier either after failed attempts at mitigation or where the Group deems mitigation not feasible or the risks unacceptable.

3. EXPECTATIONS FROM SUPPLIERS

The international supply chain for Conflict Minerals is complex and the tracing of them is challenging. The Conflict Minerals Laws distinguish between “upstream” (companies operating in the minerals supply chain from the mine to smelters/refiners inclusive) and “downstream” (companies from smelters/refiners to retailers) with downstream companies operating beyond the metal stage, while do not have obligations under the Laws, are expected to have a transparent due diligence process in their supply chain.

Italmatch Group manufacturing plants, operating at downstream level, do not import Conflict Minerals directly from smelters/refiners but they may purchase from its suppliers raw materials, metals that may contain 3TG Minerals. Therefore, Italmatch Group must rely upon its suppliers to identify the sources of Conflict Minerals and to declare that supplier products do not contain 3TG Minerals that directly or indirectly finance or benefit armed groups from the affected countries ([CAHRAs](#)).

We recognize the importance of due diligence of our suppliers and the selection of our direct suppliers is made on the basis of a transparent and objective assessment of corporate sustainability performance, covering different areas, among others, human rights and conflict minerals in collaboration with third operators specialized in sustainable procurement, through appropriate surveys. Suppliers with whom the Group operates and will operate shall, among others, ensure they identify Conflict Minerals in their manufacturing process, have policies addressing issues related to Conflict Minerals, implement actions to assess and mitigate Conflict Minerals risks in their supply chain and are able to provide the Conflict Minerals source information as requested by Italmatch Group.

4. GOING FORWARD

This Policy consolidates our commitments and strengthens our processes. Its principles are implemented across our operations and value chain.

We regularly evaluate and review the best tools to strengthen our approach to addressing Conflict Minerals sourcing. Believing in an integrated approach, we work through external initiatives and partnerships to address shared challenges. We reserve the right to amend this Policy at any time and in line with Conflict Minerals Laws modifications.