

ITALMATCH GROUP

WHISTLEBLOWING GLOBAL POLICY

1. Introduction

Italmatch Group considers the respect of laws, Authorities' provisions and Italmatch Group Code of Ethics and compliance models as compulsory and essential to Italmatch current business interests and future business opportunities.

Aiming to increase our positive and responsible social impact and to promote the highest ethical standards, Italmatch Group maintains a workplace opposing illegality and facilitating to report violations and potential violations of applicable laws, unethical behaviours and Italmatch Group policies and procedures. Please consult Italmatch Group Code of Ethics and Italmatch Group Global Policies for the description of the most relevant areas.

This Policy is distributed to Italmatch Group and made available to all the parties concerned through its release on Italmatch website.

2. Whistleblowing Policy

This Whistleblowing Global Policy (hereinafter "Policy") is applicable to, and constitutes the reference document for, Italmatch Chemicals S.p.A. and all its subsidiaries (collectively "Italmatch Group" or the "Group"), regulating the procedures according to which to submit, process and investigate the so called whistleblowing Reports (as defined below in Section 4).

Since Italmatch Group operates in different jurisdictions having different local law provisions this Policy is willing to provide a common procedure addressing whistleblowing and it will be considered in addition to the policies and procedure in place within the Group on local basis; more in particular, the Policy does not affect any specific local law on the same matter and, when required by local legislations, more stringent measurements will be added locally.

This Policy establishes the procedures to report an unlawful act or omission that, on the basis of reasonable grounds, constitutes or may constitute a violation of,

- (i) laws and Authorities' provisions,
- (ii) Italmatch Group Code of Ethics values and principles,
- (iii) Italmatch policies and procedures including, among others, Italmatch Group Global Policies, that may cause any type of harm (economic, to safety of workers, environmental, or merely reputational) to the Group, to its partners (customers, suppliers, agents, consultants...) and, more generally, to the stakeholders of Italmatch Group.

-> Reports signed and anonymous

Italmatch Group processes whistleblowing Reports sent and signed by the Whistleblower (as defined below in section 3) as well as Reports sent by anonymous Whistleblowers: Whistleblower has the option to remain anonymous and have no obligation to disclose his/her name.

Even if anonymous, the whistleblowing Report must be detailed providing the appropriate information as described and required in this Policy. Anonymous Reports will be processed and treated at par with those where identities are disclosed provided that they contain the information, set out in section 4) below to verify their reliability.

-> Confidentiality and not retaliation

Italmatch Group guarantees the confidentiality on facts indicated in the whistleblowing Report and on the data identifying the Whistleblower.

The notification of the Report is allowed to the people involved in the investigation phase. Italmatch Group people that receive a whistleblowing Report and/or are involved, in any capacity, in the

investigation process are required to guarantee confidentiality of the persons and facts reported and to safeguard the identity and integrity of the persons mentioned in the Report.

Italmatch Group also prohibits retaliatory or discriminatory acts and, on this regard, the Whistleblower may not be fired, threatened, harassed or discriminated against in any way for having made a whistleblowing Report in good faith. Italmatch Group people are prohibited from carrying out retaliatory or discriminatory acts towards the Whistleblower for reasons connected to the whistleblowing Report and the Group will take suitable disciplinary measurements against those who violate the measures that protect the Whistleblower.

3. Whistleblowers

Here below the elements according to which Italmatch Group processes the whistleblowing:

Italmatch Group people (directors, executives, members of the corporate structures and employees), third parties (business partners, customers, suppliers of products or services, consultants, individuals acting on behalf of the organization, collaborators) and stakeholders (all people having a legitimate interest in the corporate business such as shareholders, members of local communities in which Italmatch operates) (hereinafter "Whistleblower") must activate this Policy when they discover or otherwise become aware of unlawful acts or omissions,

- a) that constitute, or may constitute, a violation of laws, Authorities' provisions, values and principles included in Italmatch Group Code of Ethics, Italmatch Group policies and procedures,
- b) committed by person(s) who have relations with one or more Group companies in the course of their working activities,
- c) and that may cause any type of harm (economic, to safety of workers, environmental, or merely reputational) to the Group, to its partners (customers, suppliers, agents, consultants...) and, more generally, to the community in which Italmatch operates.

The Whistleblower will have to report the actions or omissions, events and circumstances that he/she believes, in good faith and on the basis of reasonable grounds, have caused the aforementioned violations.

Whistleblower must refrain from carrying out any independent analysis or investigations.

This Policy does not limit Whistleblower to submit the report to the competent Authority in compliance with the terms and conditions of the applicable laws.

4. Whistleblowing Report

The whistleblowing Report (hereinafter the "Report") shall include as much information and details as the Whistleblower can provide so as to enable the facts reported to be ascertained. The Report, at least, must include:

- i. description of the matter reported and the place and period of the event;
- ii. Group company involved;
- iii. physical (name and job position or information that enable the identification) or legal persons involved;
- iv. how the matter was discovered;
- v. documents that are related to the suspect violation;
- vi. any other persons who can attest to the event set forth in the Report/ may have information relevant to the matter.

The Report must be in English or in local language and must be sent to the following channels:

- Via e-mail, to the following address: etichs@italmatch.com
- Via e-mail, remaining possible to also send to the 231 Supervisory Board of Italmatch Chemicals S.p.A.: odv.italmatch@italmatch.com
- Via ordinary mail: Italmatch Chemicals S.p.A., Via Magazzini del Cotone n. 17, Modulo 4, 16128 Genova, kind attention of Ufficio Segnalazioni.

5. Whistleblowing Report assessment and investigation process

Italmatch Group dedicated Whistleblowing Team, as cross-functional internal body composed of at least 2 (two) members, shall process and assess the Report received in order to verify the information included and to take the most appropriate measures. The notification of the Report is also allowed to the 231 Supervisory Board of Italmatch Chemicals S.p.A. within its area of competence.

During the assessment the Whistleblowing Team may request assistance from the relevant Group functions (key managers of the related business unit, line positions responsible for carrying out checks) and it may also request the assistance of external consultants specialising in the area of the Report, provided their involvement is conducive to verifying the Report. During the assessment on the Report received, the Whistleblower may be contacted to request any additional information that may be required.

Once the assessment has been completed, the dedicated Team will prepare a written summary on the investigations carried out and the evidence considered.

Based on the results, it will then share the summary with the Group competent corporate functions and the key managers of the related business unit affected by its content so that they can evaluate and draw up intervention plans and decide what action to take to protect the Group.

More specifically, if, at the conclusion of the investigation, Italmatch Group determines that a violation has occurred, the Group will take effective remedial actions commensurate with the nature of the offence including the most appropriate legal remedies, measures of mitigations and sanctioning including, among others, the termination of employment relationship in the case of Italmatch Group employees responsible for violations.

On the same way, everyone working with or for Italmatch Group has a duty to cooperate in the investigation of reported violations. Failure to cooperate in an investigation or deliberately providing false information during an investigation can be the basis for legal measures and disciplinary actions including termination of employment for Italmatch Group employees.

Italmatch Group in any case will make all reasonable efforts to prevent further violations.

If the investigations conclude that there is insufficient evidence or that the events referred to in the Report are unproven, the dedicated Team will file the Report together with the reasons why this conclusion was taken.

6. Illicit Whistleblowing Report

No action will be taken if the Whistleblowing Report is raised in good faith when the Whistleblower believes it to be true, but the related investigations prove it to be unfounded.

If the outcome of the investigation process shows that the Report was made in bad faith, with serious negligence, based on opportunistic/egoistic ground, or for the purpose of causing damages to the parties mentioned in the whistleblowing Report, Italmatch Group reserves the right to take appropriate legal actions and disciplinary measures to protect its rights, image and reputation against anyone discrediting Italmatch Group or anyone working in Italmatch Group. Legal measures and disciplinary actions will be taken against such person and in case of Italmatch Group employees this may include termination of employment.

7. Processing on personal data

Personal data (such as health and sexual orientation, political opinions, religious and philosophical beliefs, racial and ethnic background, etc.) of Whistleblower and of any parties involved in the investigation process is treated in compliance with the provisions of current, applicable legislation regarding the protection of personal data for the sole purpose of performing the procedures set out in this Policy and only limited to the data strictly necessary for verifying the validity of the Report.

Personal data may be disclosed to the Group company corporate functions and external consultants duly appointed being competent in each instance during the investigation process as

well as, externally, to the judicial and/or competent Authorities to start the procedures necessary for guaranteeing proper legal and/or disciplinary actions. The Group adopts all necessary means to prevent accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data during the activities aimed at verifying the validity of the Report. The whistleblowing Report shall be preserved in both hard copy and digital format and for a period of time no longer than for the fulfillment of rights and obligations deriving from applicable law and to assert rights in court

8. Going Forward

Italmatch Group reserves the right to modify unilaterally this Policy at any time and without notice; amendments may be necessary, among others, for compliance reasons and/or accommodate organization changes within the Group.