

SUPPLIER CODE OF CONDUCT

Dear Supplier,

Italmatch is fully committed to adopting a corporate policy that harmonizes economic, social and environmental objectives in a context of sustainability and the creation of value shared by employees, shareholders, suppliers, the community and any third parties in general with whom the Company interacts.

Italmatch is committed to collaborating with its Suppliers with a view to constantly improving the ethical and sustainability principles and values in which we believe, and which are identified in this Supplier Code of Conduct. Through this Code of Conduct, Italmatch works with the intent to promote lasting relationships with its various business partners, to create a fair, sustainable and transparent supply chain. We believe that partnerships and collaboration with our Suppliers are a mutually beneficial way to ensure that responsible procurement issues are applied throughout the supply chain.

All Suppliers who intend to supply goods, works and services to Italmatch Group companies are required to share and operate in compliance with the principles and ethical and sustainability values that are identified in this Code of Conduct; this document is also distributed through publication on the Company's corporate website, is an integral part of Italmatch contracts as well as the periodic evaluation of the Supplier, and a prerequisite for all collaborations in addition to the legal requirements and contractual commitments undertaken towards the Company.

In the event of a serious or repeated breach of this Code, Italmatch, at its sole discretion, reserves the right to suspend existing contractual relations with the Supplier, until the corrective actions are implemented, or unilaterally to terminate the contractual relationship.



**Italmatch Chemicals S.p.A.
Group Procurement Director & Sales Management**

As Supplier to Italmatch we hereby confirm that we have carefully read and understood the present Code of Conduct and related principles and we commit to adhere to them.

Date _____

Authorized Signature _____

Name and Surname _____

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FOREWORD

Italmatch Chemicals S.p.A. and its Subsidiaries¹ (hereinafter also referred to as 'Italmatch', 'Group' or 'Company') are fully committed to adopting a corporate policy that harmonises economic, social and environmental objectives in a context of sustainability and the creation of value shared by employees, shareholders, suppliers, the community and any third parties in general with whom the Company interacts. In its own supply chains, Italmatch operates with the intention of fostering lasting relationships with its various business partners, in order to create a fair, sustainable and transparent supply chain.

All those who intend to supply goods, work and services to Group companies must not only meet the quality, price and reliability requirements, but also comply with the principles and values of ethics and sustainability that are identified in this document: this supplier code of conduct (hereinafter referred to as the **"Code"**), distributed through publication on the Company's corporate website, is an integral part of Italmatch contracts, as well as being a prerequisite for all collaborations, in addition to the legal requirements and contractual commitments accepted with the Company.

1. SCOPE AND RECIPIENTS

This Code applies to Italmatch's business partners and, therefore, to suppliers of goods and/or services, contractors, subcontractors and their parent companies or subsidiaries (hereinafter referred to as **"Suppliers"** or **"Recipients"**).

Compliance of the Recipients with the principles of this Code, as amended and/or updated from time to time, shall be considered an essential part of the contractual agreements in place with the Group, for the entire duration of the business relationship. The Recipients are required to inform their employees, collaborators and suppliers of the principles set out in this Code and to share and describe them, verifying and ensuring compliance with them on their respective supply chains.

Recipients are required to adopt an effective management system that enables them to act in accordance with the principles identified in this Code, promoting responsible behaviour on their supply chain. Italmatch requires that Recipients adopt internal procedures to facilitate the reporting of conduct that is contrary to the ethical principles and/or against the law and regulations applicable in the countries in which they operate.

The Recipients are also obliged to inform Italmatch if they breach the requirements of this Code, within the scope of their business relations under the existing contract with the Company, and undertake to cooperate with the Company to ensure that their procedures are in line with the principles set out herein.

¹ "Subsidiaries" are all the companies and/or entities directly or indirectly controlled by Italmatch Chemicals S.p.A., where "control" means the direct or indirect ownership of at least 50% of the capital or voting rights.

2. LABOUR AND HUMAN RIGHTS

Italmatch considers respect for human rights to be a necessary requirement for operating in its workplaces, through alignment with the international reference principles and standards² as well as compliance with the applicable national regulations in force, regarding health and safety, working conditions and remuneration, absence of discrimination and inclusiveness in the workplace.

Italmatch firmly believes that respect for human rights in all its forms is an indispensable prerogative for engaging in any business relationship.

a. DIVERSITY AND INCLUSION

Italmatch requires that Recipients do not discriminate in the recruitment process and in employment practices on the grounds of gender, age, ethnicity, nationality, religion, physical or mental disability, trade union membership, political affiliation or sexual orientation.

Workers must be treated with fairness, respect and dignity, ensuring access to training, career paths and, more generally, equal opportunities for all. Recipients are committed to valuing diversity and inclusion and condemning all forms of sexual, physical and psychological abuse, harassment, threats or inappropriate behaviour.

b. FORCED LABOUR AND CHILD LABOUR

Italmatch requires Recipients to be committed to protecting the right to employment and voluntary labour, repudiating any use of forced, bonded or involuntary labour by prisoners.

Italmatch requires the Recipients to undertake to prevent all forms of cruel, degrading and inhuman activities. Italmatch does not tolerate, and requires Recipients not to tolerate, any kind of child labour, guaranteeing compliance with local law.

c. SALARIES, BENEFITS AND WORKING HOURS

Italmatch requires the Recipients to comply with current regulations on working hours and salaries. Salaries, benefits and working conditions must aim to ensure an adequate standard of living for employees and their families. Working hours and rest periods must comply with the applicable regulations.

d. FREEDOM OF ASSOCIATION

Italmatch requires the Recipients to engage in an open and constructive dialogue with its employees and trade union representatives.

In accordance with local laws, the right of all workers to associate freely, join trade unions, have representatives, join company works councils and participate in collective bargaining must therefore be respected.

e. HEALTH AND SAFETY OF WORKERS

Italmatch requires the Recipients to comply with applicable laws and regulations on the health and safety of workers, hygiene at work and the prevention of accidents at work.

In order to guarantee the health and safety of all, the Recipients are required to work to create a work environment that is attentive to health and safety issues and to identify and assess risks in

² UN Universal Declaration of Human Rights, OECD Guidelines for Multinational Enterprises, Declaration on Fundamental Principles and Rights at Work issued by the International Labour Organisation (ILO) and the Ten Principles of the Global Compact.

advance, in order to prevent and manage them, also supported by the adoption of management systems certified according to recognised standards, aimed at minimising risks and removing the causes that may jeopardise the safety and health of their own personnel and third parties.

3. ENVIRONMENTAL PROTECTION AND RESPECT

Italmatch is aware of the importance of safeguarding the environment, in order not to compromise the needs of future generations, and it therefore makes the principles of environmental sustainability its own in its strategic choices and business processes. Italmatch expects all Recipients to comply with this approach, sharing principles and commitments on protection of the environment.

a. ENVIRONMENTAL COMPLIANCE: COMPLIANCE WITH LAWS AND REGULATIONS

Compliance with applicable laws and regulations, in the different communities in which you operate, is a prerequisite for any business relationship with Italmatch.

In this respect, Recipients are required to obtain the necessary environmental authorisations to carry out their activities, in accordance with the regulations in force. Regulatory compliance must also be maintained and updated over time.

b. RISK PREVENTION, ORGANISATION AND MANAGEMENT

Conservation of resources and protection of the climate must be pursued constantly through a preventive approach, aimed at a continuous search for innovation, best technologies, process and product quality.

Italmatch requires recipients to move towards an environmentally sustainable approach within their company organisation. Italmatch encourages Recipients to assess the extent of their own environmental impact, as well as that of the entire production chain, in order to be able to reduce its harmful effects and contribute, together with local communities, to the further reduction of the environmental footprint of all products, and promotes actions to decrease emissions (carbon footprint) and increase energy efficiency. All actions aimed at reducing primary consumption and recycling/reuse of materials and resources are encouraged.

Within their own production processes, Recipients must prohibit the use of substances that are subject to specific national bans because they are harmful to people or the environment, and implement appropriate measures for the management, storage and transport of hazardous substances. Recipients must properly handle, store and dispose of materials, processing residues and waste in a safe and legally compliant manner. Recipients must provide safety information on the materials they supply and update the relevant supporting technical documentation (e.g. safety data sheets).

c. ENVIRONMENTAL RESPONSIBILITY: DEVELOPMENT OF ENVIRONMENTAL AWARENESS FOR ITS OWN STAFF

Italmatch is actively engaged in promoting greater environmental awareness, through training courses and dedicated campaigns, and expects its Recipients to make their employees aware of environmental responsibility and circular economy issues.

4. BUSINESS ETHICS AND INTEGRITY

Italmatch upholds principles of integrity, loyalty and professional propriety in conducting of its business. The Group is committed to producing and supplying products and/or services by operating on the market according to principles of fair competition and with respect for the legitimate interests of shareholders, employees, customers, business partners and the local and other communities in which the Company operates.

A corporate governance and risk management system based on compliance with applicable law and best practices is promoted. Within this context, the Company has adopted its own Code of Ethics and dedicated procedures and conducts specific training for its staff, as well as involving all stakeholders in the control of legality through the whistleblowing system.

The parent company Italmatch Chemicals S.p.A.:

- has developed and adopted the Organisation, Management and Control Model pursuant to Leg. 231/01 ("Model 231"), concerning the administrative liability of entities;
- has developed and adopted global policies in the main areas of compliance, valid at Group level and additional to the procedures already in place on a local basis;
- has made available to the Recipients and the community at large a special section of its corporate website, intended to publicise its operating values and compliance models on a general basis.

Adherence to the principles of this Code and compliance with the provisions of the Code of Ethics are binding requirements for entering into any business relationship with the Group.

a. ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING

Italmatch adopts and disseminates a specific anti-corruption and anti-money laundering policy aimed at its employees and business partners, which prohibits all types of corrupt practices, illegal favours, collusive behaviour, gifts, and offers of hospitality that are not in line with corporate guidelines.

The Recipients are bound not to practise or tolerate any kind of corruption: they undertake not to offer or promise, and to refrain from accepting or authorising, money, gifts or other benefits, with the aim, even implicit, of:

- inducing a public or private party to perform a function or activity associated with a business improperly,
- obtaining an undue benefit,
- more generally, breaking applicable laws.

Any such solicitation must be promptly reported to Italmatch through the channels indicated in the Whistleblowing Global Policy, available at www.italmatch.com

Italmatch also encourages the Recipients to adopt compliance programmes that reflect the commitments and principles laid down in its anti-corruption policy.

Likewise, no Recipient may take part in and must refrain from any activity that could be construed as related to money laundering, terrorism financing, exploitative groups, and must comply with applicable anti-money laundering legislation.

b. ANTITRUST, COMPLIANCE WITH COMPETITION AND MARKET RULES

Italmatch adopts and disseminates to its employees an antitrust policy aimed at compliance with the principles of protection of competition and prohibits any practice restricting competition.

The Recipients must conduct their activities in line with the principles of fair competition and applicable antitrust regulations, also avoiding agreements or understandings, price fixing, or other unfair business practices, which unlawfully restrict trade in the market or free competition.

The Recipients must take the necessary measures to conduct their activities in accordance with the applicable regulations on Economic Sanctions.

c. CONFLICTS OF INTEREST

Italmatch regards trust and transparency as necessary foundations for building good and solid business relationships between partners. In application of this principle, any situation that may constitute or cause a conflict of interest affecting the ability of Italmatch personnel to make valid, impartial and objective decisions must be promptly notified to the Company, so that its existence and seriousness may be assessed and the most appropriate measures taken.

d. DATA CONFIDENTIALITY, PROTECTION AND PRIVACY

Italmatch focuses attention on the proper management of information constituting corporate assets and requires all Recipients to comply with this approach.

Confidential information belonging to the Company must not be communicated or disclosed without specific authorisation from Italmatch.

Recipients are required to use, for example, the confidential information, industrial and intellectual property, know-how and trade secrets of the Group in accordance with the commitments undertaken with the Company and exclusively for the purposes authorised by it and, in any case, to protect them appropriately.

The confidentiality obligation will remain in force even after the relationship with the Group has terminated, in accordance with the applicable regulations or as provided for by the parties.

The Recipients must also process personal data in compliance with data protection laws, including by adopting appropriate procedures and security measures. The personal data collected shall be used for legitimate, defined and appropriate purposes.

e. WHISTLEBLOWING AND REPORTING SYSTEM

Italmatch has adopted and implemented an ad hoc procedure for accepting and handling reports relevant under the law and/or relating to possible breaches of the Code of Ethics and/or the 231 Model, as well as appropriate tools to ensure confidentiality in communications and the protection of the reporter, prohibiting any type of retaliation and/or discrimination against them.

In compliance with the above procedure, the Recipients are required promptly to report any alleged or actual breaches of this Code through the channels indicated in the Whistleblowing Global Policy, available at www.italmatch.com. These include the e-mail address ethics@italmatch.com, which is active for the transmission of any reports.

5. COMPLIANCE WITH THE CODE AND MANAGEMENT OF CASES OF NON-COMPLIANCE

Through its publication on Italmatch's corporate website, this Code is distributed and made available to the Recipients and to the business operators in general with whom Italmatch has relations, so that each may read it. The Recipients are therefore made aware that maintaining and performing business relations with Italmatch means sharing and accepting the principles set out in this Code.

Italmatch reserves the right, directly or through appointed third parties, to request from Recipients all necessary documentation and to conduct independent audits at their facilities, premises, buildings and plants to verify compliance with the principles of the Code.

Should the results of these checks be unsatisfactory, Italmatch is willing to engage with the Recipients in its own process of identifying and adopting actions for improvement. In the event of failure to implement the corrective measures, and also of serious or systematic non-compliance with this Code, Italmatch, at its sole discretion, reserves the right to suspend existing contractual relations with the business partner, until the corrective actions are implemented, or unilaterally to terminate the contractual relationship.

The Recipients are responsible for monitoring compliance with this Code both internally and on the supply chain, promptly informing Italmatch of any relevant issues that are incompatible with or in breach of it.

6. COMMUNICATION, DISTRIBUTION AND UPDATING

This Code is validated by the 231 Supervisory Board and approved by the competent bodies of Italmatch Chemicals S.p.A.

Any requests for clarification regarding its interpretation may be sent to the e-mail address: ethics@italmatch.com.

Italmatch reserves the right to make changes to this Code at any time and for any reason, including to reflect in it factors drawn from the process of constant improvement, as well as following changes in the Group's compliance programme or based on regulatory updates.

This Supplier Code of Conduct has been translated into several languages for ease of reference, and is distributed, on a general basis, by making it available free of charge on the Italmatch corporate website. In the event of any discrepancy between the English version and any translated version, the English version shall prevail.

Supplier's Declaration

The Supplier:

- accepts and agrees to abide by the principles set out in this Code, which are an essential prerequisite for initiating and maintaining a business relationship with the Group;
- accepts and agrees to undergo any due diligence process, which may include questionnaires, self-certifications, online assessments, risk assessments, data collection, as well as the provision of certifications and/or documents of various kinds demonstrating compliance with the Italmatch Code of Ethics and this Code;
- accepts that Italmatch or a third party appointed by it may carry out announced/unannounced audits/inspections in accordance with the commitments, agreements or contracts entered into;
- will inform its employees, agents, subcontractors, suppliers, sub-suppliers and collaborators of the principles of this Code, to be understood as minimum standards, thus implementing a due diligence process along the entire supply chain.