

## ITALMATCH GROUP

### WHISTLEBLOWING GLOBAL POLICY



### Introduction

Italmatch Group considers the respect of the laws where it operates as well as the respect of 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 of applicable laws, Italmatch Group policies and procedures and unethical behaviours. Please consult Italmatch Group Code of Ethics and Italmatch Group Global Policies for the description of the values and principles embraced by Italmatch Group and the most relevant compliance areas.

This Policy is made available to all the concerned parties through its release on Italmatch official website [www.Italmatch.com](http://www.Italmatch.com) and distributed to Italmatch Group also through the Group internal channels.

### Definitions

Definitions in this Policy will have the following meaning:

- i. **Italmatch Group or Group:** Italmatch Chemicals Spa and its Subsidiaries, where subsidiaries mean the companies directly or indirectly controlled by Italmatch Chemicals Spa and where control means the direct or indirect ownership of more than 50% of the capital or voting rights or the legal power to direct or cause the direction of the general management and policies whether through the ownership of voting capital, by contract or otherwise.
- ii. **Whistleblower:** natural person who presents Whistleblowing Report in the context of his/her working activity.
- iii. **Whistleblowing Report or Report:** communication from the Whistleblower containing substantiated information on unlawful and unethical conducts and based on information as much as possible precise and consistent related to breaches of Italmatch Group Code of Ethics, the compliance models, applicable laws and regulations which came to his/her knowledge in the context of the working activity and submitted through the Reporting Channels.
- iv. **Reporting Channels:** channels identified in Chapter 5 for transmitting the Report.

### 1. Whistleblowing Scope

This Whistleblowing Global Policy (hereinafter "Policy") constitutes the reference document for Italmatch Group regulating the procedure to submit, process and investigate the so-called Whistleblowing Report.

Since Italmatch Group operates in different jurisdictions having different local law provisions, the Policy is willing to provide a common procedure addressing whistleblowing and it will be considered in addition to the policies and the procedures 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 as well as different measurements may be applied on local basis. This Policy establishes the procedure to report acts or omissions that, on the basis of reasonable grounds, consist or may consist of,

- (i) a violation of Italmatch Group Code of Ethics and values and principles embraced;
- (ii) a violation of the organizational and management model and related procedures within the Group;

- (iii) a violation of Italmatch Group policies including, among others, Italmatch Group Global Policies;
- (iv) a violation of laws and Authorities' provision as applicable in the interested jurisdiction (including but not limited to, the Italian Legislative Decree 231/01 crimes etc etc.)

that may cause any type of harm (economic, to safety of workers, environmental, or merely reputational) to the Group.

## 2. Whistleblowing Report

Italmatch Group processes every Whistleblowing Report sent and signed by the Whistleblower and falling within the Scope above defined.

Italmatch Group reserves the right to process Reports sent by anonymous Whistleblowers whether the specific circumstances of the case allow it: more in particular, 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 below, to verify their reliability and are as much detailed as possible.

Generic and unfounded Reports will not allow proper and efficient investigations and may be dismissed.

The Whistleblowing 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, should include:

- i. clear and complete description of the facts reported and, if known, the place and period/time of the event;
- ii. Group company involved;
- iii. if known, physical (name and job position or information and personal details 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;
- vii. any other information that may provide further evidence of the existence of the reported facts.

## 3. Confidentiality and not retaliation

Italmatch Group guarantees the confidentiality on facts indicated in the Whistleblowing Report, on the data identifying the Whistleblower and/or any reported person.

The notification and disclosure of the Report by the Group is allowed to the people involved in the investigation phase, including but not limited to the Whistleblowing Team, external consultants, corporate functions, Public Authority where necessary based on applicable law, Supervisory Board within its area of competence.

People that receive a Whistleblowing Report and/or are involved, in their capacity and functions, in the investigation process are required to guarantee confidentiality of the persons and acts reported and to safeguard the identity and integrity of the persons mentioned in the Report and are specifically appointed pursuant to the applicable legislation.

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 measures against those who violate the measures that protect the good faith Whistleblower. For sake of clarity the above provisions, do not affect different terms and conditions, if any, included in applicable laws on

whistleblowing on local basis: as an example, Whistleblowing Report involving purely personal objectives or related to the personal employment relationship may be excluded, by law, from applicability of whistleblowing and from the related guarantee of confidentiality.

#### 4. Whistleblower

According to the above definition, Whistleblower identifies a natural person who present Whistleblowing Report in the context of his/her work activity.

Italmatch Group people (intern and employees, directors, executives, members of the corporate structures), third parties (suppliers of products or services, consultants, individuals acting on behalf of the organization, collaborators, shareholders) must activate this Policy when they discover or otherwise become aware of unlawful and unethical acts or omissions within the Whistleblowing Scope.

The Whistleblower will have to report as much detailed as possible 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 and the Report cannot be used by the Whistleblower simply as a means to pursue personal objectives.

This Policy does not limit Whistleblower to submit the report to the competent Authority and/or to activate other reporting channels in compliance with the terms and conditions of the applicable laws.

#### 5. Reporting Channels

The Whistleblowing Report must be in English or in local language and must be sent to the following Reporting Channels, remaining the choice at the sole discretion of the Whistleblower:

- Via e-mail, to the following dedicated email address: [ethics@italmatch.com](mailto:ethics@italmatch.com)
- Via the specific Ethics Line, available at [www.Italmatch.com](http://www.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](mailto: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 Compliance*

#### 6. Whistleblowing Report assessment and investigation process

Italmatch Group dedicated Whistleblowing Team, as cross-functional internal body composed of at least 2 (two) members specifically appointed and trained, shall process and assess the Report received in order to verify the information included and to take the most appropriate measures.

The Whistleblowing Team, once received the Report, is in charge to send to the Whistleblower acknowledgment of receipt of the Report within 7 (seven) working days.

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. During the assessment on the Report received, the Whistleblower may be contacted to request any additional information that may be required. The communication between the Whistleblowing Team and the Whistleblower takes place in totally confidential and protected mode. Once the assessment has been completed, the dedicated Whistleblowing Team will prepare a written summary on the investigations carried out and the evidence considered, providing also formal feedback to the Whistleblower on the follow-up to the Report.

Based on the results and if the specific circumstances required, it may 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. 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.

If at the conclusion of the investigation, Whistleblowing Team 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.

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 Whistleblowing Team will file the Report together with the reasons why this conclusion was taken.

### 7. Illicit Whistleblowing Report

If the Whistleblowing Report is raised in good faith when the Whistleblower believes it to be true and within the Scope above defined, but the related investigations prove it to be unfounded, no action will be taken.

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.

### 8. Processing on personal data

Personal data (including but not limited to name and surname, 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, only limited to the data strictly necessary for verifying the validity of the Report and to carry on the assessment.

Personal data may be disclosed to the Group corporate functions and external consultants duly appointed being competent during the investigation process, to the Supervisory Board within its area of competence, 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.

### 9. Going Forward

This Policy, approved by the Board of Directors of Italmatch Chemicals S.p.A., consolidates our commitments and clarifies our processes and procedures.

We regularly evaluate and review the best tools to strengthen our approach. Believing in an integrated approach, we work through external initiatives and partnerships to address shared challenges under the most ethical and compliance behaviors.

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, regulatory changes and/or accommodate organization changes within the Group.

