

HEXPOL GARLASCO S.R.L.

CODE OF ETHICS

**pursuant to Legislative Decree
231/2001
and subsequent amendments and
additions**

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16/12/2024	0	First draft

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1 INTRODUCTION

1.1 DEFINITIONS

CODE OF ETHICS (or CODE): this Code in its current version and any annexes

COMPANY: HEXPOL Garlasco S.r.l, with registered office in via Borgo San Siro 66, 27026 – Garlasco (PV)

MODEL 231 (OR MODEL): Organisation, Management and Control Model adopted by the Company, i.e. a structured and organic system of principles, internal rules, operating procedures and control activities, aimed at preventing conduct that could potentially constitute offences under Legislative Decree 231/2001

RECIPIENTS: the persons to whom the provisions of the Code apply, including the management, administration and control bodies, persons who also perform de facto functions of representation, administration or management of the company, employees, collaborators, as well as those who have various relationships with the Company (e.g. customers, business *partners*) and individuals not linked to the Company by corporate or employment ties, who act, internally or externally, on behalf of or in favour of the Company (e.g. suppliers of goods, works and services, including intellectual services, consultants and *outsourcers* under service contracts).

EMPLOYEES: individuals who have an employment relationship with the Company, including fixed-term workers, those with insertion or apprenticeship contracts or part-time contracts, as well as workers on secondment or under quasi-subordinate employment contracts (temporary agency work).

COLLABORATORS: individuals who have with the Company: (i) project-based employment relationships; (ii) relationships that take the form of coordinated and continuous work, mainly personal, of a non-subordinate nature; (iii) occasional collaboration relationships.

SUPERVISORY BODY (SB): Body appointed pursuant to Article 6 of Legislative Decree 231/2001, with the task of supervising the functioning and observance of Model 231 and ensuring its updating.

REPORT: written or oral communication (addressed to the Report Manager) of information on violations (committed or alleged) of this Code, of the Model adopted by the Company pursuant to Legislative Decree 231/2001 and/or of internal procedures.

REPORTER: natural person who makes the Report regarding violations acquired in the context of their work or in the context of collaborative or business relationships with the Company, including collaborators, interns, temporary workers, consultants, suppliers, as well as all Recipients of this Code (e.g. customers, any business *partners*).

REPORTED person: person mentioned in the Report, understood as the person to whom the violation is attributed or as the person involved in the reported violation.

1.2 PURPOSE

has drawn up this Code in order to clearly and transparently define the set of values and principles that inspire it to achieve its business objectives.

This document illustrates the guidelines for conduct (rights, duties, responsibilities) adopted by the Company both within its organisation and externally, in its relations with institutions, suppliers and customers (hereinafter referred to as 'Stakeholders'), in order to protect the rights and legitimate interests of the parties concerned and to guarantee its reliability and reputation.

The Code of Ethics is a fundamental part of the Organisation, Management and Control Model *pursuant* to Legislative Decree 231/2001 (Model 231), with which the Company intends to ensure compliance with the rules of conduct in order to prevent the potential commission of the offences referred to in the aforementioned Decree.

The Company shall equip itself with the most appropriate tools to ensure that this Code is adequately disseminated and applied.

This Code shall come into force on the date of its approval by the Company's administrative body.

1.3 SCOPE OF OPERATIONS

HEXPOL Garlasco S.r.l. is active in the production of additives and pigments in masterbatches for colouring thermoplastics and rubbers, additives and colour bases for silicone; it is a point of reference for rubber and plastic processors, distinguishing itself for excellence in service, expertise, product quality and research.

The company is part of the Hexpol Group, *a top player* in the global rubber and plastics industry.

The company is certified to UNI EN ISO 9001:2015 and UNI EN ISO 14001:2015.

The provisions of the Code of Ethics supplement current national legislation, with particular reference to the principles and duties of fairness, diligence and good faith, to which all Recipients must comply in the performance of their duties.

Under no circumstances does the claim to act in the interests of the Company justify the adoption of conduct that conflicts with the regulations or with the principles and rules of conduct set out herein and/or with internal rules and procedures.

1.4 VISION AND MISSION

The Company aims to be a business that is:

- a benchmark in its market sector;
- responsive to customer needs;
- able to adapt to market changes,

and able to promote profitable and sustainable growth in accordance with the ethical principles set out

below.

The Company intends to implement a business strategy that integrates economic and financial balance with the needs and expectations of its stakeholders.

The Company's activities and processes are based on principles of transparency and traceability of decisions. To this end, all operations are adequately documented so that it is always possible to identify the actions taken at the various stages of the processes, the persons responsible for them and the reasons for them, as evidence of the decision-making, authorisation and procedural process.

1.5 RECIPIENTS

All those who operate, directly or indirectly, at any level and in any capacity, within the scope of the Company's operations are required to comply with this Code. In particular, the contents of this Code apply, without exception, to directors, members of supervisory bodies, employees, collaborators, public bodies with which the Company has relations, as well as to all those who work, or are required to work, either under a contract or other legal agreement, or de facto, to achieve the objectives of HEXPOL Garlasco S.r.l.

Therefore, all persons who, although not belonging to the Company, operate on behalf of or in the interest of the Company, as well as those who are in any capacity collaborators or contractual counterparties of the Company, are also recipients of this Code.

All Recipients are required to:

- be familiar with this Code;
- actively contribute to its implementation;
- report any shortcomings;
- observe and enforce, within the scope of their duties and responsibilities, the general principles and rules of conduct that derive from them.

Violation of the principles and provisions of the Code may constitute, for employees, a disciplinary offence pursuant to Article 2104 of the Civil Code and grounds for termination of the relationship for any other person who has dealings with the Company, resulting in both circumstances in compensation for damages arising therefrom.

No corporate body is authorised to grant derogations and/or exemptions from the application of this Code. Similarly, no corporate body may, or may consider itself authorised to, authorise or endorse the performance of unlawful acts contrary to mandatory rules (legal and/or regulatory).

1.6 ADOPTION AND DISSEMINATION OF THE CODE



This Code is adopted by resolution of the Company's administrative body and is disseminated within and outside the organisation.

The Company:

- promotes, through continuous and effective actions, awareness and compliance with the Code at all organisational levels;
- verifies compliance with the Code through appropriate documentation and sanctions violations.

1.7 REVISION AND UPDATING OF THE CODE

The Company monitors the maintenance of the functional requirements of this Code over time, updating it when necessary to make corrections, adjustments, changes and/or additions (for example, in the event of significant violations of the provisions contained therein, changes in the organisational structure or regulatory changes).

Any amendments, additions and updates to the Code will be communicated to those required to apply it (the Recipients), using any means necessary for this purpose.

2 L AND GENERAL PRINCIPLES

Below are the general principles on which the Company bases its strategy and corporate culture and which must guide the conduct of all Recipients of this Code.

2.1 Legality

The Company recognises compliance with the law and regulations in force as an essential principle.

The Company does not enter into or continue contractual relationships with those who do not comply with or do not intend to align themselves with this principle.

2.2 Diligence, honesty and fairness

Company representatives, employees, consultants and collaborators are required not to establish any privileged relationship with third parties as a result of external solicitations aimed at obtaining improper advantages. They are prohibited from taking unfair advantage of another person – whether natural or legal – through manipulation, concealment, unlawful use of confidential information, misrepresentation of material facts or any other unfair practice.

The Recipients of this Code are prohibited from any form of incitement, promise, giving, offering, of money or other benefits, direct or indirect, of any kind to companies, public bodies or private individuals, with the aim of receiving an advantage of any kind for the Company and/or for themselves and/or for third parties, regardless of whether such an act is actually carried out.

Recipients are therefore required not to accept donations, favours or benefits of any kind (except for items of modest value, if not intended to influence the recipient). In turn, they must not make donations of money or goods to third parties or offer illegal benefits or favours of any kind in connection with the activity performed for the benefit of the Company (except for items of modest value or commercial courtesy gifts authorised by the Company).

If gifts, gratuities, benefits or acts of courtesy or hospitality are offered or promised to employees, consultants or collaborators of the Company, they must inform their manager and the relevant corporate bodies without delay in order to assess the corrective and preventive actions to be taken (e.g. return of the gift/gratuity, termination of relations with the other party).

No compromise is permitted between personal interests and the interests that one is called upon to look after by virtue of one's professional activity, both within the Company and in relations with third parties.

2.3 Transparency

The Company is committed to promoting, in every area and at every level of the company, the clear,

complete and up-to-date circulation of information.

2.4 *ity and non-discrimination*

The Company's activities are based on the utmost impartiality towards all its stakeholders (suppliers, customers, employees, collaborators, bodies and institutions).

In the selection and management of personnel, compliance with the criteria of impartiality and merit is guaranteed in the selection, remuneration, training and career progression phases.

In the selection and management of suppliers/consultants, the Company avoids and rejects any discrimination based on age, gender, sexual orientation, health status, political and trade union opinions, religion, culture and nationality of its stakeholders.

2.5 *Combating corruption*

The Company rejects any form of active or passive corruption: it respects and requires compliance with current legislation on the prevention and combating of corruption by all persons acting in its name and on its behalf. The Company prohibits conduct, unlawful favours, direct or indirect solicitations that may constitute corruption, attempted corruption or inducement to corruption, and complies with the necessary prevention measures, without prejudice to the obligation to report such conduct to the judicial authorities.

The Company undertakes to adopt and implement conduct protocols that reduce the commission of acts of corruption as much as possible. In particular, in business relationships, HEXPOL Garlasco S.r.l. verifies, in advance, the available information on its commercial counterparts (suppliers, customers and consultants) in order to ascertain their respectability, integrity and the legitimacy of their activities.

To this end, the Company:

- operates in such a way as to avoid any involvement in transactions that are likely, even potentially, to facilitate the receiving and laundering of money or other assets derived from illegal or criminal activities, acting in full compliance with anti-money laundering legislation;
- pays remuneration commensurate exclusively with the contractually agreed service;
- does not make payments to parties other than the contractual counterparty, nor in a third country other than that of the parties or of performance of the contract;
- does not make cash payments in violation of the law and internal procedures;
- ensures adequate information and continuous training programmes for its employees on issues relating to the Code of Ethics;
- prohibits payments and/or other gifts to public officials. In particular:
 - o in relation to any relationship with the public administration, it is not permitted to offer,

directly or indirectly, money, gifts or other benefits (including job opportunities) in order to obtain more favourable treatment;

- when any relationship with the public administration is in progress, it is not permitted in any way to improperly influence the decisions of the other party or to solicit confidential information.

2.6 Protection of company information and personal data

HEXPOL Garlasco S.r.l. ensures the protection and confidentiality of the information in its possession, in accordance with the law protecting the confidentiality of personal and sensitive data.

Company representatives, employees, consultants/collaborators, in their respective areas of competence, must comply with company policies on information security, including electronic information, to ensure its integrity, confidentiality and availability.

In order to guarantee the protection of personal data, the Company undertakes to process such data in compliance with the relevant regulations with regard to the following criteria: transparency towards the subjects to whom the data refer, lawfulness and fairness of processing, relevance of processing to the stated and pursued purposes, guarantee of security of the data processed (also with reference to the data contained in the Reports sent to the Report Manager, which must be processed in compliance with Legislative Decree 24/2023).

The Company's employees, collaborators/consultants must not use confidential information, learned in the course of their work or assignment, for purposes unrelated to the performance of such work; they are required to maintain the utmost confidentiality regarding documents that may reveal commercial information and/or corporate transactions learned in the course of their duties.

Such information, acquired or processed in the performance of their duties, belongs to the Company; it must therefore be stored and protected in an appropriate manner with respect to third parties who are not directly concerned and may only be used, communicated or disclosed in full compliance with the obligations of diligence and loyalty arising from regulations and employment, work or service contracts.

Confidential information includes, but is not limited to: commercial information; research and development programmes and related results, including partial results; agreements and contracts with third parties; pending disputes; cost, pricing, *marketing* and service strategies; access codes or personal *passwords*.

In the context of product research and development activities, the Company complies with industrial property protection regulations.

2.7 Prevention of conflicts of interest

Recipients must avoid situations and/or activities that could lead, even potentially, to conflicts of interest with the Company, which could interfere with their ability to make impartial decisions.

This rule cannot be circumvented, even through third parties acting on behalf of the Company.

In cases where a conflict of interest may exist on the part of an employee, the employee is required to contact their line manager and the relevant corporate bodies without delay so that the potentially conflicting activity can be assessed and, if necessary, authorised.

In cases of violation, the Company will take all appropriate measures to end the conflict of interest, reserving the right to act in its own defence.

This is without prejudice to the regulations governing conflicts of interest of members of corporate bodies in accordance with the law.

2.8 Loyalty and honesty in internal and external relations

The Company requires fairness in relations with superiors, colleagues, subordinates, external collaborators, as well as with all external counterparties (e.g. suppliers, customers); the pursuit of personal goals that conflict with the objectives pursued by the Company is prohibited.

Furthermore, HEXPOL Garlasco S.r.l. undertakes to:

- not exploiting the ignorance or incapacity (even if only temporary) of the other party;
- prevent anyone acting in its name and on its behalf from attempting to take advantage of contractual loopholes or unforeseen events of various kinds, exploiting the position of dependence or weakness in which the other party finds itself.

2.9 Respect for free competition

The Company observes the principles and rules of free competition and the relevant legislation in force, in the knowledge that virtuous competition is a healthy incentive for innovation and development and protects the interests of consumers and the community.

Agreements between companies and, in any case, all situations that may have a distorting effect on competition, in particular agreements containing exclusivity clauses, price fixing restrictions and territorial restrictions, are subject to *antitrust* regulations.

2.10 Protection of individual personality

HEXPOL Garlasco S.r.l. ensures, in every area of its activity (evaluation, selection, recruitment of personnel - including the management of salaries, holidays, rest periods and leave, and the evaluation/incentive system; assignment of freelance work; selection and management of suppliers; management of works and services contracts) the protection of the inviolable rights of the individual and human dignity, promotes respect for physical and moral integrity, and prevents and removes any form of

violence, abuse or coercion.

Sexual harassment or intimidating and hostile behaviour in internal and external working relationships is not permitted.

Requests or threats aimed at inducing people to act against the law and/or this Code or to adopt behaviour that is detrimental to the moral and personal beliefs and preferences of each individual are not tolerated.

The Company supports and respects human rights in accordance with the UN Universal Declaration of Human Rights. The use of forced labour and child labour is prohibited, even indirectly through the use of external companies.

2.11 IT security

The Company guarantees the adoption of adequate security systems in order to identify threats and risks and to protect data from possible attacks and breaches (internal and external) to the network or IT systems.

The Company undertakes to strengthen security *standards*, define internal regulations and monitor their implementation, as well as to promote knowledge and awareness of the issue within its organisation.

The use of company IT systems or *social networks* in violation of applicable laws and/or in a manner that may offend the freedom, integrity and dignity of individuals is prohibited; unauthorised intrusion into or damage to IT systems is also prohibited, in accordance with applicable regulations and the company's security policies.

2.12 Traceability of information

Every company operation must be correctly recorded, authorised, verifiable, legitimate, consistent and appropriate.

As evidence of the decision-making, authorisation and execution of operations, adequate documentary support (including electronic) is provided to guarantee the traceability of the reasons for the operation and the individuals/company functions that carried it out, recorded it and verified it.

2.13 Respect for the environment

The Company promotes environmental protection in compliance with the provisions of current legislation applicable to the company's operations, implementing preventive measures to avoid or at least minimise environmental impact.

In particular:

- it monitors developments in environmental legislation;

- monitors its environmental performance in order to evaluate and control it;
- promotes training and the sharing of environmental principles among all employees.

2.14 Respect for health and safety at work

HEXPOL Garlasco S.r.l. undertakes to adopt the necessary measures to ensure the highest possible level of health and safety protection in the workplace (both for its own employees and for employees of external companies working on the Company's sites), monitoring the application of these measures.

In particular, the Company:

- aims to eliminate risks and, where this is not possible, to reduce them to a minimum;
- assesses risks that cannot be eliminated in order to adopt appropriate and adequate preventive measures;
- monitors safety levels over time;
- provides adequate instructions to workers and promotes training and the sharing of principles in the field of health and safety at work among all those working at the company.

3 RELATIONS WITH EMPLOYEES AND S/COLLABORATORS

An 'employee' and/or 'collaborator' is defined as anyone who has a working relationship with the Company aimed at achieving the company's objectives.

HEXPOL Garlasco S.r.l. guarantees a working environment in which everyone can collaborate by expressing their professional skills. Human resources are an indispensable element for the existence of the Company and a significant factor in competing successfully in the market.

The honesty, loyalty, professionalism and reliability of our staff are among the key conditions for achieving the company's objectives and represent the characteristics that HEXPOL Garlasco S.r.l. requires of its directors, employees and collaborators in various capacities.

The management of employment and collaboration relationships is based on respect for workers' rights and the full enhancement of their relationship with a view to promoting their professional development and growth, adopting objective and predefined evaluation criteria.

All employees and collaborators are required to act loyally in order to comply with the obligations assumed in the employment contract and with the formal assignment of the provision of services, in compliance with the provisions of this Code of Ethics, ensuring the performance of their duties and compliance with the commitments made to the Company.

3.1 Selection of personnel

The assessment and selection of personnel are based on fairness and transparency, in accordance with equal opportunity, combining the needs of the Company with the professional profiles, ambitions and expectations of the candidates.



The Company combats all forms of favouritism in the personnel selection process by using objective and meritocratic criteria.

Personnel are hired with regular employment contracts and no form of irregular work is tolerated. Decisions regarding personnel selection must be justified and properly formalised.

Upon entering into an employment relationship, each employee receives accurate and clear information regarding the tasks to be performed, roles, responsibilities, rights and duties of the parties, regulatory and remuneration elements, and the rules and procedures to be adopted in order to avoid possible health risks associated with the work activity.

3.2 Personnel

HEXPOL Garlasco S.r.l. protects and values its human resources, paying particular attention to compliance with regulations protecting the mental, physical and moral integrity of workers.

The Company is committed to ensuring the necessary conditions for the professional growth of each person, promoting the necessary training for professional development and any initiative aimed at pursuing this goal. No worker may be obliged to perform tasks, services or favours that are not required under their employment contract and role/function within the Company.

HEXPOL Garlasco S.r.l. promotes worker participation by providing tools to gather workers' opinions and suggestions, ensuring their widest possible participation.

The Company combats incidents of *mobbing*, *stalking*, psychological violence and any behaviour that is discriminatory or harmful to personal dignity, both inside and outside the company premises.

Relations between employees must be based on loyalty, fairness and mutual respect, in accordance with the values of civil coexistence and personal freedom.

In the management of hierarchical relationships, respect for personal dignity is ensured: any abuse of authority is prohibited, and authority must be exercised in accordance with the principles of fairness and correctness.

Without prejudice to compliance with mandatory regulations, rules and trade union agreements, the remuneration system, at all levels, both in terms of cash and any *benefits*, is based on predetermined and known criteria.

Remuneration is determined solely on the basis of objective assessments relating to educational background, specific professional skills, experience acquired, proven merit and the achievement of assigned objectives.

The following are expressly prohibited: (i) increases in remuneration, (ii) other benefits, or (iii) career advancement in return for activities that do not comply with the law, this Code, and/or the internal procedures and rules adopted by the Company.

3.3 Health and safety at work

HEXPOL Garlasco S.r.l. is committed to providing its staff and collaborators with a healthy, safe working environment that respects the dignity of workers, in compliance with health and safety regulations in order to prevent accidents and illnesses.

Safety in the workplace is ensured by strictly implementing the provisions of the law in force and actively promoting a culture of safety through specific training programmes.

The Company disseminates and consolidates a culture of safety among all Recipients, aimed at increasing their sensitivity and awareness of possible risks at work, as well as promoting responsible and respectful behaviour and conduct towards their own and others' safety.

To this end, the Company:

- identifies the specific figures *pursuant to* Legislative Decree 81/2008;
- updates the Risk Assessment Document whenever necessary, for example following the identification of new risks or changes in the activities carried out or in the company organisation;
- manages training, information and communication on health and safety at work in line with the risk assessment carried out and in relation to the worker's qualification;
- prepares and archives the relevant documentation on health and safety at work required by Legislative Decree 81/2008;
- manages any non-compliance, preventive and corrective actions in such a way as to ensure traceability;
- ensures the safety of plant and equipment;
- manages emergencies and first aid situations;
- assesses and manages the risks associated with the use of materials and substances;
- assesses and manages the risks associated with the performance of contracted work;
- manages health surveillance activities in compliance with the provisions of Legislative Decree 81/2008.

Similarly, workers must ensure compliance with the following rules:

- adopt safe behaviour at work, i.e. operate in compliance with company regulations and procedures, instructions and prevention rules adopted;
- avoid behaviour that is dangerous to themselves and others;
- immediately report to their superiors any anomalies, critical issues or other dangerous situations that come to their attention during their work;
- immediately report any failure by others to comply with safety procedures in the performance

of their duties, for the sole purpose of protecting their own safety and that of their colleagues;

- respect the tasks and responsibilities assigned;
- cooperate fully with the activities or instructions of the RSPP (Prevention and Protection Service Manager);
- participate attentively in the training activities organised;
- collaborate, with responsible behaviour and in compliance with company rules, in the management of any emergency situations;
- undergo the required health surveillance.

Collaborators/suppliers/contractors must also ensure compliance with the following rules:

- adopt safe behaviour during their activities, i.e. operate in compliance with company regulations, instructions received and prevention measures adopted;
- comply with the contractual conditions governing the relationship between the parties;
- in the case of procurement, works or supply contracts, comply with the prevention guidelines resulting from cooperation and coordination between the parties.

4 L MANAGEMENT OF THE COMPANY

4.1 Compliance with internal financial procedures

With a view to planning and managing company activities aimed at efficiency, fairness, transparency in economic and financial management, quality and risk control, HEXPOL Garlasco S.r.l. adopts organisational and management measures suitable for preventing unlawful conduct or conduct contrary to the rules of this Code by any person acting on its behalf.

Company representatives (senior managers with administrative and control functions), employees, collaborators and external consultants must act in accordance with their respective authorisation profiles and keep all appropriate documentation to keep track of actions taken on behalf of the Company, through a filing system that complies with the requirements of truthfulness, accessibility and completeness.

Company representatives, employees, collaborators and consultants are required to strictly comply with all internal procedures and operating instructions, in line with the activities carried out, the duties performed and the tasks assigned.

4.2 Management of cash flows and cash

Within the scope of defined spending powers and in accordance with assigned responsibilities:

- it is forbidden to execute payment orders without specific authorisation;

- any transaction generating a cash flow must be traceable and transparent so that the related decision-making, authorisation and payment processes can be verified;
- All payment orders must be supported by adequate documentation, which must be archived in such a way as to allow subsequent verification.

The use of cash beyond the limits set by current regulations is prohibited for any collection, payment, transfer of funds, use or other utilisation of financial resources.

Only traceable payment methods are permitted; the use of cash is permitted on a residual basis for postal expenses, revenue stamps, registration taxes, or where necessary due to the nature and/or small amount of the supply or amount (retaining proof of the expense incurred). Such expenses are adequately accounted for; cash balances are periodically reconciled with accounting records, ensuring that the checks carried out are documented.

4.3 *nd accounting management*

In accounting management activities, directors, employees, consultants and collaborators must act in accordance with the principles of truthfulness, accuracy, completeness, transparency and traceability, in order to enable the preparation of a reliable and accurate picture of the Company's economic, equity and financial situation.

Directors, employees, consultants and collaborators must refrain from any conduct, whether active or passive, that directly or indirectly violates regulatory principles and/or internal procedures relating to the preparation of company documents and their accounting representation.

In particular, they shall cooperate to ensure that every operation and transaction is duly authorised and verified, as well as promptly and correctly recorded in accordance with the criteria laid down by law and applicable accounting standards.

In order to ensure maximum transparency, access to administrative documents is guaranteed to anyone who is entitled to it in accordance with the procedures laid down by current legislation.

Each accounting entry must be supported by complete, clear and valid documentation, avoiding any form of omission, falsification and/or irregularity, also for the purpose of allowing analysis and verification.

The documentation must also make it possible to identify the persons involved in the definition, implementation and control of the transaction, as well as the methods followed and the criteria adopted in the assessments.

In the case of assets or economic items based on valuations and estimates, the related entry must be based on criteria of reasonableness and prudence.

4.4 Tax management

The Company complies with current tax legislation in order to ensure the correct determination and payment of taxes, duties and contributions.

In dealings with the tax authorities, it is forbidden to present incomplete, false or altered documents and data, to omit required information or documents, to engage in deceptive conduct or to provide incorrect data or alter the data entered.

Communications and declarations to be sent to the tax authorities must be based on the principles of correctness, consistency, completeness and compliance with the provisions of the law on taxes and duties; every operation or transaction must be authorised, verifiable, legitimate, consistent and appropriate.

4.5 Relations with and supervisory bodies

Requests for compliance and documentation must be processed promptly, with clear assumption of responsibility for the truthfulness, completeness and accuracy of the information provided.

The requested data and documents must be made available in a timely and comprehensive manner.

The information provided must be accurate, complete, faithful and truthful, avoiding, and in any case reporting in the appropriate form and manner, any situations of conflict of interest.

4.6 Product research and development activities

The Company manages the activities in question in compliance with applicable regulations, promoting training, information and awareness programmes for staff (particularly in the commercial and research and development areas), so that they acquire the main concepts relating to the offence of corruption between private individuals (e.g. legal provisions, penalties, examples of unlawful conduct that is 'at risk of becoming a criminal offence').

In managing relations with individuals belonging to third-party companies:

- any request for money or gifts that is not justified by normal courtesy, received from individuals belonging to other companies is promptly reported to superiors and the Supervisory Body, which determine the actions to be taken (e.g. suspension of relations with the counterparty);
- any situation of conflict of interest, even potential, must be promptly reported to superiors, providing evidence of the measures taken.

4.7 Management of relations with related parties

HEXPOL Garlasco S.r.l.:

- avoids behaviour which, even if adopted in its own exclusive interest, is detrimental to the

integrity or image of related parties;

- promotes communication between related parties, encouraging and utilising available synergies;
- ensures that the circulation of information between related parties takes place in accordance with the principles of truthfulness, fairness, correctness, completeness, clarity, transparency and prudence, while respecting the autonomy of each company and its specific areas of activity.

4.8 Use of company equipment, devices and facilities

The Company's assets consist of physical assets, such as equipment, plant, property, computers, printers and intangible assets such as, for example, confidential information, *know-how* and technical knowledge.

The use of these assets must be exclusively for the performance of company activities and for the purposes authorised by the company departments concerned.

Any exceptions are permitted only if duly authorised by senior management.

It is strictly forbidden to misuse or damage company assets and resources or to allow others to do so.

The use of company assets must always comply with the law, this Code and internal regulations and must be carried out in accordance with the principles of functionality and efficiency.

Company employees and collaborators are required to correctly apply security provisions to protect *hardware* devices from unauthorised access, which could seriously infringe on personal data protection rights.

Audiovisual, electronic or photographic recordings or reproductions of company documents are permitted only for purposes directly related to the performance of the assigned task or function, and provided that they do not conflict with the interests of the Company.

In any case, employees and collaborators may not use IT and network resources, programmes and equipment for purposes unrelated to the company or contrary to the law (), this Code and company regulations on the use of IT tools (e-mail, the internet network provided by the Company, fixed and mobile telephone equipment supplied, etc.).

The reproduction, distribution or modification of *copyrighted* material without the consent of the copyright holder is prohibited.

4.9 Environmental protection

The Company is committed to contributing to the sustainable development of the territory by identifying and monitoring relevant environmental aspects in relation to the activities carried out and the context

of reference, in compliance with current legislation.

In order to continuously improve the Company's performance in relation to the environmental impact of its activities, the Company undertakes to:

- define, through an integrated quality, safety and environmental policy, specific objectives and improvement programmes aimed at minimising significant environmental impacts;
- promote environmental awareness and training activities within the company.

5 RELATIONS WITH EXTERNAL PARTIES

5.1 Relations with the Public Administration

Relations with the Public Administration must be based on maximum clarity, transparency and collaboration, in full compliance with the provisions of this Code, internal operating procedures, the law and the highest moral and professional *standards*.

Relations with Public Administrations may only be maintained by company departments expressly and formally delegated to do so.

In relations with public officials, public service employees, judicial authorities and the Public Administration in general, authorised persons are required to adhere to the highest standards of fairness and integrity, refraining from any form of pressure, whether explicit or veiled, aimed at obtaining any undue advantage for themselves or for the Company.

During inspections and/or audits, HEXPOL Garlasco S.r.l. ensures maximum availability and cooperation, as well as the complete production of data and documentation in accordance with the principles of transparency, completeness and fairness.

The Company strictly prohibits, without exception or derogation, any behaviour that could be interpreted as a promise or offer of money, goods or other benefits aimed at promoting its own interests or those of the Company and/or obtaining advantages to the detriment of public administrations. To this end, anyone operating in the name, on behalf or in the interests of the Company is strictly prohibited from offering, directly or through intermediaries, sums of money and/or goods in kind and/or other benefits or advantages, facilities or services of any kind aimed at influencing the activities or decisions of public officials or public service employees, or civil servants in general, or at compensating them for an act contrary to or (even) in accordance with their official duties.

Any conduct that an impartial third party observer would consider to be aimed at improperly influencing a decision or activity is also prohibited.

These requirements cannot be circumvented by resorting to different forms of contributions (e.g.

disguised assignments, consultancies, etc.) that pursue the same unlawful purposes mentioned above.

If the Company appoints a third party to represent it in dealings with the Public Administration, the third party is subject to the application of this Code, as well as to the directives given when the appointment was made.

It is also forbidden to induce in any way persons who may be called upon to make statements before the judicial authorities to make untruthful statements or to exercise their right to remain silent.

5.1.1 Request for public funds and their management

In the process of obtaining public funds (e.g. grants, loans, subsidies) and in their use, HEXPOL Garlasco S.r.l. undertakes to act in a correct and transparent manner, in compliance with the law, the rules of this Code of Ethics and internal procedures.

It is therefore forbidden for company representatives, employees and consultants/collaborators of the Company to:

- use the funds received for purposes other than those for which they were obtained;
- submitting false statements or documents certifying untrue information or omitting required information in order to obtain funds unduly;
- promising/giving a public official sums of money and/or other undue benefits in exchange for an act of his office necessary to obtain funds for the Company;
- misleading the State or any public body by means of deception or fraud in order to obtain funds;
- altering in any way the functioning of a computer/telematic system or interfering with data/information/programmes in order to obtain funds or increase the amount of funds already obtained.

5.1.2 Participation in legal proceedings

The management of legal proceedings in which the Company is a party must be carried out in compliance with the law, the rules of this Code of Ethics and internal procedures.

In particular, it is forbidden for Company representatives, employees, consultants and collaborators to:

- promising/giving a public official sums of money not due or other benefits in exchange for an act of their office in order to obtain an advantage for the Company;
- promising/giving a public official, for themselves or for a third party, a sum of money or other benefit in order to cause them to omit/delay an act of their office or to perform an act contrary to their official duties in order to obtain an advantage for the Company in legal proceedings;
- misleading, by deception or trickery, the State or any public body in order to obtain an

advantage for the company in legal proceedings;

- altering in any way the functioning of a computer/telematic system or interfering with data/information/programmes in order to obtain an advantage for the company in legal proceedings.

5.2 Relations with political organisations and trade union ons

HEXPOL Garlasco S.r.l. does not favour or discriminate against any political or trade union organisation.

The Company does not make any form of direct or indirect contributions or funding to political parties, movements, committees and organisations, trade unions, their representatives and candidates; it refrains from behaviour aimed at exerting direct or indirect pressure on politicians and does not make contributions to organisations with which there may be a conflict of interest.

5.3 Economic relations with associations, contributions and sponsorships

The Company may also cooperate financially with non-political associations for specific projects with objectives that are consistent with the Company's mission and with a clear and documented allocation of resources.

The Company may agree to requests for contributions limited to proposals from entities and associations that are declaredly non-profit-making and have regular statutes and articles of association, and which are of high cultural and scientific value or charitable in nature.

In any case, when choosing which proposals to accept, the Company pays particular attention to any possible conflicts of interest of a personal or corporate nature.

Sponsorships, contributions and donations to public/private entities are only permitted in cases where they constitute support or a response to the material or cultural needs of the community in which the Company operates, in accordance with the principles set out in this Code.

Under no circumstances may a contribution or sponsorship be aimed at obtaining favourable treatment that is unlawful or inappropriate because it is contrary to the principles of this Code.

To ensure consistency in contributions and sponsorships, management must always be based on the following criteria:

- pursuit of institutional, cultural or social solidarity objectives;
- clear and documentable allocation of resources;
- properly documented authorisation and procedural *process*;
- congruity of the financial commitment with the service actually provided (with particular reference to sponsorships);

- compliance with applicable legal requirements.

5.4 Customer relations

A 'customer' of HEXPOL Garlasco S.r.l. is defined as anyone who uses the products or services offered by the Company.

The Company deals with customers with courtesy, competence and professionalism, refraining from any form of unfair or deceptive behaviour that could lead customers to rely on unfounded facts or circumstances.

HEXPOL Garlasco S.r.l. bases its relationship with customers on availability, respect and participation; it undertakes to inform customers in a transparent, timely and comprehensive manner about the characteristics, functions and costs of the products and services offered.

In the context of customer relations, the company's senior management, employees and collaborators are required to:

- offer high-quality products and services that meet customer expectations;
- develop and maintain favourable and lasting relationships;
- provide accurate, truthful and complete information in advertising, commercial or any other communications, so as to enable customers to make informed decisions;
- not denigrate competitors;
- not discriminate against customers or seek to unduly exploit positions of strength to their disadvantage;
- to respect contractual commitments and obligations.

The Company guarantees that customers' personal data will be processed in compliance with current legislation and the provisions of this Code; data and information are recorded and processed in a complete, timely manner and in accordance with the required confidentiality.

The Company favours the out-of-court settlement of any disputes by promoting conciliation procedures to prevent legal disputes between the company and the customer.

5.5 Relationships with suppliers and consultants

"Suppliers" are all those who, in various capacities, provide goods, services, performances and resources necessary and relevant to the performance of activities, contributing to the achievement of the Company's objectives.

HEXPOL Garlasco S.r.l. bases its relationships with its suppliers on loyalty, fairness, good faith and transparency, as well as on the pursuit of a fair competitive advantage, equal opportunities, impartiality, competence and recognition of professionalism.

Suppliers must be selected in a transparent manner, based on objective criteria of cost-effectiveness, opportunity and efficiency and on the basis of expressly defined and predetermined requirements, which take into account the ethical and behavioural aspects of the counterparty, the professionalism, competence, integrity and reliability of the supplier in relation to the nature of the goods and services requested.

The choice of suppliers on purely subjective and personal grounds or, in any case, on the basis of interests that conflict with those of the Company is precluded. Any form of dependence is also prohibited.

Suppliers, in addition to possessing (and maintaining for the entire duration of the contractual relationship) the requirements of integrity, professionalism and cost-effectiveness required for the subject matter of the relationship to be implemented, are required to comply with this Code.

Violation of the Code, as well as the submission of false or otherwise untruthful documents or statements, will result in the application of contractual penalties to the supplier, commensurate with the violation committed (e.g. financial penalty, suspension of the relationship).

The activities of suppliers and external consultants must comply with regulations on the employment of workers, social security, tax and insurance obligations, procedures to ensure health and safety in the workplace, and environmental integrity.

HEXPOL Garlasco S.r.l. undertakes not to enter into commercial relations with entities, companies or individuals in respect of whom, following checks and investigations and on the basis of established facts and/or other elements commonly considered reliable, it is ascertained or can reasonably be assumed that their entrepreneurial or professional unreliability, their involvement in illegal activities, the illegitimate origin of the financial resources used, or their failure to comply with applicable environmental and/or occupational health and safety regulations.

Employees shall not request or accept from suppliers, for themselves or others, gifts or other undue benefits that could compromise their impartiality of judgement. Gifts or acts of hospitality, granted or received, subject to notification to senior management, are permitted only if of negligible value and in any case limited to the scope of normal commercial courtesy.

The conditions under which the supply is actually provided must be those agreed in the contract.

5.6 Relations with the media

Relations with the *media* are limited exclusively to forms of communication aimed at representing the Company's activities or in response to specific requests.

Such communications must be truthful, clear and transparent; under no circumstances may they be ambiguous, manipulative or aimed at triggering collusive behaviour.

The information that HEXPOL Garlasco S.r.l. provides to *the media* must be accurate and consistent, disclosed only by persons formally authorised to do so and consistent with company policy.

5.7 Relations with certification bodies

Relations with the bodies responsible for issuing, renewing and maintaining certifications are based on the principles of legality, transparency and fair cooperation, in compliance with current legislation, the principles and rules established in this Code and in internal procedures.

Company representatives, employees, collaborators and consultants shall refrain from engaging in acts of corruption that could improperly influence the decisions of the body responsible for issuing/renewing certifications.

6 L INTERNAL CONTROL SYSTEM

The internal control system refers to the set of procedures and activities aimed at ensuring the effectiveness and efficiency of the company's operations, enabling adequate risk management and compliance with applicable laws and procedures.

The Company is committed to promoting, at all levels, a culture characterised by the existence and importance of controls and to fostering a mindset geared towards their implementation.

Compliance with the provisions of this Code is entrusted to the prudent, reasonable and careful supervision of each of the Recipients, within the scope of their respective roles and functions.

Anyone who becomes aware of violations (even if only alleged, provided there are reasonable grounds) of the principles of this Code and/or the procedures/operating instructions referred to in Model 231 adopted by the Company is required to report them to the Reporting Manager at in the manner described in paragraph 8 below.

7 SANCTIONING SYSTEM

Violation of the principles established in this Code and in the internal operating procedures/instructions compromises the relationship of trust between the Company and its directors, employees, consultants, collaborators in various capacities, customers, suppliers and business *partners*. Such violations will therefore be immediately and decisively pursued by HEXPOL Garlasco S.r.l. in a timely manner, through the adoption of appropriate and proportionate disciplinary measures. Both actual and attempted violations are taken into consideration, ensuring an appropriate scale of sanctions. Depending on the seriousness of the conduct, the Company will take the appropriate measures without delay, regardless of whether criminal proceedings are brought by the judicial authorities.

The following also determine the application of sanctions:

- failure to comply with measures aimed at protecting whistleblowers acting in good faith pursuant to Legislative Decree 24/2023;
- retaliation (even if only attempted or threatened) against the author of the Report;
- in general, failure to comply with the principles, measures and rules set out in Model 231 adopted by HEXPOL Garlasco S.r.l. with specific reference to the *whistleblowing* regulations referred to in Legislative Decree 24/2023;
- any form of abuse or misuse of the reporting channel adopted by the Company.

Without prejudice to the above, conduct in violation of the Code of Ethics constitutes, for employees, a breach of contractual obligations *pursuant* to Article 2104 of the Italian Civil Code or a disciplinary offence, with penalties applied according to the severity of the offence, as provided for in the relevant National Collective Labour Agreement (verbal reprimand, written reprimand, fine not exceeding three hours' pay, suspension from work and pay for up to a maximum of three working days, dismissal for just cause or justified reason).

For Recipients other than employees (e.g. collaborators, suppliers, consultants), the penalty for violations of this Code is provided for in the contractual instrument or in the resolution of the company bodies that regulate the relationship.

For all persons working on behalf of HEXPOL Garlasco S.r.l., acceptance of this Code or, in any case, adherence to the provisions and principles set out therein, is an essential element of the conclusion of contracts. For these reasons, any violations of specific provisions of the Code, depending on their severity, may justify the Company's withdrawal from existing contractual relationships and may also be identified *ex ante* as grounds for automatic termination of the contract.

In any case, the Company reserves the right to take any action it deems appropriate to obtain compensation for damage suffered as a result of conduct in violation of this Code.

8 REPORTS, REFERENCE BODIES AND CONTROL FUNCTIONS

The Company's administrative body appoints a Supervisory Body with independent powers of initiative and control, tasked with supervising the functioning of and compliance with this Code and the Model *pursuant to* Legislative Decree 231/2001, and with updating them.

Each Recipient is required to report, even anonymously, to the Reports Manager, identified in the SB, any violation - ascertained or even presumed, provided there are valid reasons - of this Code, of the Model adopted by the Company and/or of company operating procedures/instructions relevant for the purposes of 231.

The Company, in accordance with the rules contained in this Code and applicable laws and regulations, guarantees:

- maximum confidentiality regarding the facts reported, the identity of the person reported, the person making the report and any other person involved;
- the protection of the Whistleblower acting in good faith from retaliatory conduct (even if only attempted or threatened), directly or indirectly related to the Report;
- the protection of the person reported in bad faith (reports sent for the purpose of causing damage or otherwise prejudicing the company, as well as any other form of abuse of the reporting channel, are grounds for disciplinary action);
- impartiality, autonomy and independence of judgement: the Report Manager who receives, examines and evaluates Reports meets the requirements of autonomy, independence, competence and diligence required by current legislation.

The protections granted to the Whistleblower are extended to:

- facilitators (persons who assist Whistleblowers in the reporting process, operating within the same working environment);
- persons in the same working environment as the Whistleblower with a stable emotional or family relationship within the fourth degree;
- colleagues of the Whistleblower with whom they have a regular and ongoing relationship.

Reports must be submitted through the following channels:

- IT platform: accessible at the link <https://mesgoiridecolors.smartleaks.cloud> (internal and preferred channel, offering greater confidentiality);

The system allows reports to be sent without the need to register or provide personal details (it is not necessary to provide an email address or telephone number).

- Ordinary/registered mail to the Company's registered office at Via Borgo San Siro 66, 27026 Garlasco (PV) – for the attention of the "Report Manager".

In this case, the Report must be placed in two sealed envelopes, including: i) in the first envelope, the reporting person's identification details (if they wish to disclose their identity) and/or any contact details for the Reports Manager; ii) in the second envelope, the subject of the Report. Both envelopes must then be placed in a third envelope marked 'confidential to the Reports Manager - Whistleblowing' on the outside.

The whistleblower must provide clear and complete information to enable the necessary checks and investigations to be carried out to assess the validity of the report. Anonymous reports are permitted and considered admissible provided they are adequately documented and detailed, with a precise description of the facts and circumstances.

It is prohibited to:

- the use of offensive language;
- sending reports for purely defamatory or slanderous purposes;
- sending Reports with the sole purpose of damaging the Reported party, or which relate exclusively to aspects of private life or personal complaints.

The reporting party may also request a confidential meeting with the report manager, who will take minutes of the meeting after verification and confirmation by the reporting party.

Alleged retaliation (directly or indirectly related to the Report) must be communicated exclusively to ANAC via a dedicated portal. If the Authority ascertains the retaliatory nature of acts, measures, conduct or omissions, these shall be deemed null and void and an administrative fine shall be imposed.

The Reports Manager communicates the results of the assessments carried out to the Company's administrative body and proposes disciplinary sanctions to be imposed on those responsible. Similarly, if the Reports Manager ascertains that the Report, which has proved to be unfounded, was submitted with intent or gross negligence on the part of the Reporter, he or she shall ensure that the need to take appropriate disciplinary measures against the Reporter is assessed.