Human Rights Policy

English version

Contents

1. Who is it for? 3
2. Introduction 3
3. Human Rights: a universal concept 3
4. Human Rights Policy 4
5. Respect, Equality and Freedom - the key words 4
6. The main Human Rights covered by the Policy 4
7. The implementation and monitoring process 5
8. The Whistleblowing system 6
9. Awareness initiatives 6
10. Approvals, Review and Updates 6
11. Regulatory framework 7

1. Who is it for?

This Human Rights Policy (also, the "**Policy**") applies to the companies operating within the RadiciGroup Engineered Materials business (the "**Companies**").

The Policy is primarily directed at:

- the **members of the Corporate Governance Bodies of the Companies**;
- **all Individuals who work with the Companies**, either **internally or externally**, as **part of the value chain**. This includes Employees, Consultants, Intermediaries, Business Partners, Agents, Suppliers, Contractors, Subcontractors, Customers and any other parties who engage with the Companies.

The Companies require that the **conduct of their Stakeholders – especially their Employees** – aligns with the guidelines set out in this Policy. The Companies commit to **actively spreading awareness of the Policy**, **ensuring it is understood**, and **overseeing** its proper **implementation**.

2. Introduction

The Companies have **local roots**, while simultaneously operating within a **multinational context**. Consequently, the Companies are committed to ensuring that their values of **respect** and **transparency** are **shared** in **every part of the world** where their operations extend.
With this document, the Companies aim to **formally acknowledge and convey to their Stakeholders** their dedication to **upholding Human Rights** – a commitment that already underpins their operations.
Through this Policy, the Companies also aim to achieve **enduring growth in partnership with their Stakeholders**, furtherly fostering a sustainability culture that will steer their future direction.

3. Human Rights: a universal concept

On 10 December 1948, the United Nations General Assembly adopted the **Universal Declaration of Human Rights**, the most significant international document on the matter, which asserts that:

"All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood." (art. 1)

All individuals should have the ability to exercise the rights set forth in the Declaration without facing discrimination, as **these rights are universal, indivisible, interdependent, and interconnected.**
Over time, all the rights set out in the Declaration have been incorporated into legally binding international treaties, which most states have joined.

4. Human Rights Policy

This Policy serves as the **official document through which the Companies formalise and communicate their commitment to respecting and safeguarding Human Rights**, as set out in the Universal Declaration of Human Rights, the main international standards and guidelines, along with national and international legislation on the subject. The Companies also support and promote the Ten Principles of the United Nations Global Compact and seek to integrate them into their strategy, culture and day-to-day operations.
This **legislation framework and principles are permanently adopted** by the Companies for the **prevention, detection and countering of potential violations of laws** and regulatory requirements related to Human Rights within their operations.

5. Respect, Equality and Freedom - the key words

Respect, Equality and Freedom are the terms that a sample of Employees identified as **key concepts** in the first Human Rights survey ever conducted by the Companies. These values guided the drafting of the first Human Rights Policy and will continue to inspire their activities as they embark on this new chapter of their journey. The Companies aim to proactively and continuously promote the principles of equality and freedom that underpin the Universal Declaration, also in line with the aspirations expressed by Employees in the survey.
To achieve this, the Companies commit to progressively evaluating the **real and potential impacts** of their operations on Human Rights by adopting a **Human Rights Due Diligence approach** aimed at identifying, assessing, preventing and mitigating actual and potential adverse human rights impacts arising from their operations, business relationships and value chain. This approach is risk-based and proportionate and may include the assessment of risks connected with specific countries, sectors, products, raw materials, and value chain partners.
The Companies require all value-chain partners — especially Suppliers, Contractors, Subcontractors, and Consultants — **to align with the Human Rights principles set forth in the Supplier Principles and the Supplier Code of Conduct (SCoC).** The Supplier Principles and Supplier Code of Conduct are publicly accessible on the website www.radicigroup.com. Formal commitment to the SCoC is a material and binding condition of doing business with the Companies.
Value chain partners are also expected **to provide, upon reasonable request, accurate information and supporting documentation necessary to assess human rights** risks and, where appropriate, to support the traceability of relevant raw materials, products/services and production locations.

6. The main Human Rights covered by the Policy

While fully acknowledging the **significance of all Human Rights in their broadest sense**, as established in the Universal Declaration of Human Rights, **special attention is given, both internally and externally to the Companies**, to:

- the firm **rejection of all forms of forced labour**, including modern slavery, human trafficking and forced child labour, and the commitment to prevent the manufacture, sourcing or supply of products made, in whole or in part, with forced labour.
- the **scrupulous respect of employment contracts** and the **freedom of association** of Workers;
- **Health and Safety** in the workplace;
- **Work-life balance**;
- the **right to a fair and decent wage**, commensurate with the quality and quantity of work performed, aligned with the **principles of living wage**;
- the development of an **open, transparent and continuous dialogue** between the **Companies and their Employees**;
- **the respect for all types of diversity and opinion**, in order to cooperate for an increasingly inclusive environment;
- a working environment **free from harassment and discriminatory practices**;
- **training** and the development of the **individual skills of people**;
- **privacy, personal data and the responsible use of digital technologies**, recognizing their relevance to the protection of fundamental human rights;
- **local communities** in the countries where the Companies operate, with activities **to support and uphold such communities**.

7. The implementation and monitoring process

To bring the principles of this Policy to life, the Companies commit to monitoring and reporting on a set of performance indicators:

- **Business Integrity and Human Rights Awareness**
  Implement Business Integrity training for all Employees and Sustainable Procurement training for active purchasing and sourcing professionals, and annually monitor training coverage across the respective target populations.
- **Supply Chain Alignment**
  Expand the Supplier Code of Conduct (SCoC) sign-off rate among Class A strategic suppliers, in line with the Companies' procurement targets.
- **Diversity, Equity and Inclusion**
  Monitor and promote diversity across the workforce and further strengthen the approach to pay equity assessment across the Companies.
- **Workplace Health and Safety**
  Continuously improve workplace safety performance through the monitoring and reduction of occupational injury rates across operations, in line with the Companies' HS targets.
- **Living Wage Commitment**
  Complete and deliver a comprehensive Living Wage benchmarking study report to the Sustainability Council to reach fair and decent wage levels across the Companies' global workforce.

If necessary, the Companies will adopt **appropriate corrective and/or remediation measures to support the continuous improvement of their Human Rights performance.**

8. The Whistleblowing system

To actively **foster a culture of legality and uphold Human Rights**, the Companies **provide an externally hosted Whistleblowing system** and associated reporting portal. This secure resource is accessible to Employees, Customers, Suppliers, Business Partners, Consultants, and Collaborators.
For comprehensive guidance on filing reports, confidentiality guarantees, and the Companies' strict non-retaliation protections, please refer directly to the standalone Whistleblower Policy available publicly on the website www.radicigroup.com and to the related Whistleblowing Portal https://radicigroup.integrityline.com
Appropriate, independent investigations are carried out by the Whistleblowing Committee to determine the validity of all received reports.

9. Awareness initiatives

Special attention is given to fostering the **integration of Human Rights into everyday activities**. The Companies are committed to strengthening awareness and understanding of Human Rights through dedicated **training and communication initiatives.**
These include promoting this Human Rights Policy across all levels of the organisation and using the most appropriate channels to share information and maintain effective stakeholder dialogue, with the Companies' respective websites serving as a primary communication platform.

10. Approvals, Review and Updates

In addition to the approval by Board of Directors of the RadiciGroup Engineered Materials parent company, the Policy will be submitted for approval to the companies operating within the Specialty Chemicals business (the "**SC Companies**"), being it understood that, provided that the Policy is approved by the Board of Directors of the Specialty Chemicals parent company overseeing the SC Companies, such SC Companies will be considered as "**Companies**" pursuant to the Policy.

This Policy, while upholding the core principles, will be **reviewed and revised, updated, or amended as required**, for example, in the event of a **substantial change in the Companies' structure, regulatory developments**, to evaluate the present state of the art of operations, or **to implement any new initiatives**.
This Policy, together with any subsequent updates, shall be subject to **review, amendment, approval and implementation** by:
(i) the Board of Directors of the RadiciGroup Engineered Materials parent company, with respect to Companies other than the SC Companies; and
(ii) the Board of Directors of the Specialty Chemicals parent company, with respect to SC Companies.

11. Regulatory framework

- Universal Declaration of Human Rights (UDHR)
- Declaration of the International Labour Organization (ILO)
- OECD Guidelines for Multinational Enterprises
- United Nations Global Compact – Ten Principles
- United Nations Sustainable Development Goals
- United Nations Guiding Principles on Business and Human Rights
- Regulation (EU) 2024/3015 on prohibiting products made with forced labour on the Union market
- ISO 26000 (Guide to Social Responsibility)



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