Supplier Code of Conduct

English version

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1. Who is it for?

This Supplier Code of Conduct (SCoC), applies to the **Suppliers of the companies operating within the RadiciGroup Engineered Materials business (the "Companies").**

2. Introduction

"Sustainability, like justice, is a value that is not built by purely individualistic market processes."
Herman Daly, 1986

- Sustainability is a key element of the Companies' values and is an integral part of their business strategy. It is a complex and ambitious goal that the Companies want to achieve with all its stakeholders, sharing problems and solutions as well as common growth processes and continuous improvement.
- The Companies' relationship with their suppliers, very important Stakeholders, is based on the principles of legality, transparency, responsibility, fairness, trust and cooperation.
- The Supplier Code of Conduct is designed for ever closer cooperation in order to strengthen these principles while building together a value chain focused not only on the quality of products or services, but also on the environment and social and working conditions where the supplied products or services are designed and manufactured.
- The Companies therefore invite all their Suppliers to share and implement the principles expressed both in this Supplier Code of Conduct and in the Code of Ethics which can be consulted on the corporate website
- (https://www.radicigroup.com). Compliance with the Code of Ethics, in particular, will be an increasingly important component in the selection and rating of suppliers.
- Where the Supplier is in possession of a Code of Ethics or Conduct similar to this, or a sustainability reporting system according to the GRI model or one of the main non-financial reporting systems, after appropriate assessment by the Companies, these documents may be accepted in lieu of this Supplier Code of Conduct.

3. Purpose

- Through this Supplier Code of Conduct (henceforth identified as "Code"), the Companies intend to share with their suppliers the building of a socially, environmentally and economically sustainable Value Chain.

4. General Conditions

- The Companies are committed to complying with the law in any place where they do business. Similarly, Suppliers shall commit to complying with all laws, regulations, contractual agreements, standards and generally recognized technical rules. They also commit to transmitting the principles set forth in this Code to their supply chain.

- Suppliers are invited to implement the necessary mechanisms to identify, determine and manage risks in all areas addressed by this Code and to comply with all applicable legal requirements.
- Suppliers are encouraged to continuously improve the suitability, adequacy and effectiveness of their sustainability policies through appropriate measures.
- They are also encouraged to maintain appropriate documented information demonstrating the sharing and implementation of the values expressed in this Code. Upon agreement with the Supplier, the Companies reserve the right to audit the implementation of the principles set out in the Code.
- Download the latest version of this Code at www.radicigroup.com

5. Ethics

5.1 Business integrity

- To meet their social responsibilities, Suppliers are required to conduct business in an ethical manner and act with integrity. Therefore, they are required to not practice or tolerate any form of corruption, extortion or embezzlement.
- Suppliers undertake not to offer or promise money or other illegal incentives to their business partners and not to accept any. Such behaviour, put in place by anyone, is considered as an act of corruption.
- Suppliers are requested not to offer the Companies' Employees gifts or other goods and utilities that are a direct consequence of their supplying relationship.

5.2 Unfair competition

- Suppliers are expected to conduct their business in line with the principles of fair competition and in compliance with all applicable anti-trust laws.
- For its part, the Companies will promote transparent and fair processes for the selection of suppliers. Suppliers will be evaluated and selected on the basis of competitive advantage, equal opportunities, economy, quality, environmental and social sustainability of the products/services offered and will be treated fairly. The Companies will also not disseminate misleading information about Suppliers and their products or services.

5.3 Intellectual property

- Suppliers undertake to protect and properly use confidential and sensitive information (e.g. prices, costs, product specifications or information subject to specific confidentiality agreements) of which they come into possession and to ensure that the Companies' intellectual property rights are protected.
- Suppliers are required to adopt, in areas under their responsibility, all measures necessary to make sure that the Companies' products, components, raw materials and related know-how do not leave the legal supply chain and their confidentiality is guaranteed.
- The Companies will consider all sensitive information obtained from Suppliers as absolutely confidential under all circumstances and will not share it with competitors.

6. Labour

6.1 Refusal of forced and child labour

- Suppliers undertake not to use forced or bonded labour.
- Suppliers shall not resort to any kind of child labour in their supply chain and/or business activities, in accordance with the fundamental International Labour Organization rules[1] and the principles of the United Nations Global Compact.

[1] *Minimum Age Convention no. 138 of 1973 - Convention on the Worst Forms of Child Labour no. 182 of 1999.*

6.2 Diversity and inclusion

- The equitable treatment of all Employees shall be one of the founding principles of the Supplier's company policy, committed to rejecting any form of discrimination with regard to race, nationality, sex, age, physical characteristics, social origin, disability and political or religious orientation, marital status, pregnancy, sexual orientation or any other unlawful criterion by applicable law.

6.3 Correct treatment and work schedule

- Suppliers undertake to ensure that there is no inhumane treatment of Employees in the workplace whatsoever and that they are not subjected to threats, harassment, sexual abuse, torture or corporal punishment, coercion or mental and/or physical abuse.
- Suppliers are required to ensure fair remuneration for their Employees, suitable for an adequate standard of living for them and their families. In any case, Suppliers shall guarantee their Employees' wages in accordance with the applicable laws in their respective countries.
- The Companies also invite Suppliers to offer their Employees adequate training and education opportunities.
- Suppliers are required to handle employment contracts in a legal and proper manner in observance of the pertinent labour laws.

6.4 Freedom of association

- Suppliers shall commit to having open and constructive dialogues with their employees and union representatives.
- In accordance with national and/or local laws, Suppliers shall respect the right of their Employees to associate freely, join trade unions, seek representation, join works councils and participate in collective bargaining.
- Suppliers shall not disfavour employees acting as workers' representatives.

7. Quality, health, safety and the environment

7.1 Quality requirements

- Suppliers undertake to comply with the qualitative and technical requirements generally accepted and agreed upon by contract so as to provide safe use goods and services that can adequately meet the Companies' needs.

7.2 Safety

- Suppliers undertake to comply with national regulations on quality, health, safety and the environment, as well as to obtain, maintain and update all necessary permits, licenses and registrations.
- Suppliers shall apply these best quality, health and safety practices over the entire supply chain and ensure the integrity of each shipment to the Companies from point of origin to destination, including all the intermediate stages.

7.3 Product safety

- As required by current legislation and the REACH Regulation, Suppliers shall make available the safety data sheets on all hazardous substances with all the pertinent and necessary information.

7.4 Workplace health and safety

- Suppliers undertake to protect their Employees from workplace hazards and strenuous tasks, as well as from the risks associated with facilities used by Employees.
- Suppliers will ensure appropriate actions (controls, procedures, preventive maintenance) to limit workplace health and safety risks. When hazards cannot be adequately monitored by such means, Suppliers undertake to provide their Employees with appropriate personal protective equipment.
- Hazardous materials safety information[2] - including on intermediate product compounds - will be available to educate, train and protect workers from risks.

[2] *In accordance with the GHS (Globally Harmonized System) of the UN.*

7.5 Process safety

- Suppliers are required to take action on all matters pertaining to the safety of production processes and issues regarding the product and their potential impact on the environment during all phases of the production process.

7.6 Handling emergencies, risk information and training

- Suppliers undertake to identify possible and potential workplace emergency situations, as well as to minimize the risk of their occurrence. They further undertake to make available safety information on the risks identified by training employees to ensure their adequate protection.

7.7 Protecting the environment and conserving resources

- Suppliers shall adopt systems to ensure that waste handling, movement, storage, recycling, reuse or management and the management of emissions to air and waste water are carried out safely and in compliance with the particular country's current legislation.
- Suppliers are also expected to use natural resources sparingly and reasonableness (e.g. water, energy sources, raw materials) in order to mitigate the impact of the processes on the planet's resources.
- Suppliers shall also endeavour to develop and use low environmental impact products and processes that reduce energy consumption and greenhouse gas emissions.

8. Company management systems

8.1 Legal requirements

- Suppliers shall respect the laws, regulations and contractual agreements currently in force as well as the generally recognized standards.

8.2 Transmitting sustainability criteria to the value chain

- Suppliers are encouraged to communicate the principles set forth in this Code to their value chain.

8.3 Risk management

- Suppliers are required to implement the necessary mechanisms to identify and manage risks in the areas dealt with by the present Code, while respecting the applicable legislative requirements.

8.4 Auditing

- Suppliers are encouraged to maintain appropriate documented information demonstrating the sharing and implementation of the values expressed in this Code. Based on a specific agreement with the Supplier, the Companies reserve the right to conduct audits.
- If the audit findings show that the Supplier does not respect the letter and spirit of this Code, the Companies reserve the right to undertake an appropriate improvement process together with the Supplier.

8.5 Continuous improvement

- Suppliers are invited to continuously improve their sustainability performance by implementing appropriate measures.

8.6 Reports for corrective action

- Suppliers may report violations of this Code or any conduct in contrast with the Code of Ethics by the Companies' employees in the ways described in the Whistleblowing Policy published on the corporate website www.radicigroup.com and may use the related Whistleblowing Portal https://radicigroup.integrityline.com

9. Approvals, Review and Updates

In addition to the approval by Board of Directors of the RadiciGroup Engineered Materials parent company, this Supplier Code of Conduct will be submitted for approval to the companies operating within the Specialty Chemicals business (the "SC Companies"), being it understood that, provided that this Code 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 Supplier Code of Conduct.

This Supplier Code of Conduct, while upholding its 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 Supplier Code of Conduct, 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.

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