



Antitrust & Fair Competition Policy



Antitrust Law consists of the set of European and national rules aimed at promoting and protecting free and balanced competition in the market.

Competition laws prohibit business practices that unfairly restrict or harm competition.

Zero Tolerance:

F.I.S. is committed to participating in fair competition and, therefore, will not enter into agreements or understandings, nor will it maintain conduct that unlawfully prevents or restricts competition, taking pride in competing solely on the basis of the quality of products and services offered.

F.I.S. Fabbrica Italiana Sintetici S.p.A. (hereinafter referred to as "F.I.S." or the "Company"), bases its success on abiding by **the rules and upholding a system of fair competition.**

F.I.S., aware of the negative effects that anti-competitive practices (antitrust) can have on economic and social development in the areas in which it operates, **is committed to preventing and counteracting the occurrence of anti-competitive behavior** in the performance of its activities on the basis of applicable national and international regulations.

The Policy stipulates that the conduct of F.I.S.'s business and corporate activities should be carried out within a framework of transparency, honesty, fairness, good faith, and in full compliance with the rules set to protect competition.

Recipients :

This document becomes an expression of these principles and values and **is addressed to members of corporate bodies, managers, employees, collaborators, who represent F.I.S. and its subsidiaries** (hereinafter referred to as the "Recipients") who are required to comply with applicable laws and regulations.

Sanctions :

Antitrust authorities closely supervise through **inspection activities** (dawn raids) and take **severe enforcement actions** (public enforcement) in case of non-compliance with competition regulations.

In the event of violation of these regulations there is, therefore, the risk of suffering particularly **significant penalties for the Company** (e.g., up to 10 percent of the company's turnover - understood as group turnover - according to European regulations) or **claims for compensation from those harmed by anticompetitive practices** (private enforcement).

Finally, in some cases and depending on the jurisdiction in which the anticompetitive offense occurs, the managers and/or employees who materially engaged in the illegal conduct are exposed to the application of **personal administrative and criminal penalties** themselves.

The F.I.S. policy regarding relations with competitors is clearly and unambiguously defined:

- **no antitrust sensitive information can be exchanged with competitors, regardless of context;**
- **no understanding (formal or informal) that may affect, by limiting it, the autonomous commercial strategy of F.I.S., may be concluded with competitors** (the possibilities expressly provided for in this Antitrust Policy) are, of course, excepted.

Should one come into contact with a competitor of F.I.S., the basic principles of antitrust law should be kept in mind.

Agreements restricting competition do not need to be in writing, as they can also be concluded orally or informally.

Discussing with competitors-or exchanging information regarding the following topics is prohibited:

- prices and other sales conditions (e.g., discounts, promotions, favorable economic conditions);
- production costs and, in general, other costs that F.I.S. bears;
- profit margins;
- purchase prices and other purchasing conditions agreed with suppliers;
- volumes and sales strategies;
- F.I.S. customers and suppliers;
- market breakdown at the product/service, customer or geographic levels;
- refusal to supply a given customer or to source from a particular supplier;
- new products or investments that F.I.S. wants to undertake in the future; and
- participation in a public or private bidding process.

Should a contestant establish a conversation related to any of the above issues, he or she is required to refuse to continue the conversation and notify the Legal Department immediately.



Each of us must make a personal commitment to comply with this Policy. F.I.S. applies a zero tolerance principle with reference to these issues.

If an employee believes that a rule is being violated or that any of the provisions of this Policy have not been complied with or are about to be violated, he or she should immediately inform his or her Manager and, if appropriate, use the alert system established by F.I.S. to receive reports from employees (whistleblowing).