



Standard
of Business
Conduct



This is an English courtesy translation of the original documentation prepared in Italian language. Please consider that only the original version in Italian language has legal value (*)



STANDARD OF BUSINESS CONDUCT

WE WORK ON THE ESSENCE, SYNTHESIZING TO CREATE VALUE. A WAY OF BEING, BEFORE WORKING.

A VISION BUILT OVER TIME FROM GENERATION TO GENERATION, A COMBINATION OF PASSION AND EXPERTISE. WE ARE AN EXPRESSION OF THE LAND THAT HAS SHAPED US AND GROWS HEALTHY WITH US, IN A MUTUAL EXCHANGE THAT ENRICHES AND DEFINES US BOTH.

THIS IS WHERE WE LEARNED TO RECONCILE SEEMINGLY CONFLICTING ELEMENTS. SILENT BUT PRESENT. AGILE BUT STRUCTURED. LOCAL BUT GLOBAL. LARGE BUT SMALL.

WE DO NOT SIMPLY INHERIT KNOWLEDGE FROM OUR FATHERS BUT PRESERVE AND INNOVATE IT FOR OUR CHILDREN. WE GUARD THE FUTURE.

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INTRODUCTION

As a leading manufacturer of active ingredients for drugs, our mission is to improve people's quality of life through innovation, research and development of safe and effective pharmaceutical components. Our dedication to the health and well-being of patients is at the core of all our business activities and decisions.

We are aware that our success depends not only on the quality of our products, but also on the quality of our actions. Therefore, we are committed to always operating in compliance with the highest laws, regulations and ethical standards, ensuring that all our activities are conducted with the utmost integrity and transparency.

This document called "**Standard of Business Conduct**" contains the fundamental policies that must be applied to all operational entities of F.I.S. Fabbrica Italiana Sintetici S.p.A. (hereinafter "F.I.S." or the "Company" or "Company").

It is a manifestation of our commitment to operate with integrity, transparency and accountability in every aspect of our work. It establishes the principles and core values that guide the behavior of all our employees, suppliers, contractors, consultants and business partners. We firmly believe that adherence to these ethical standards is essential to maintaining the trust of our customers, partners, shareholders and the community at large.

Through the adoption of this Standard of Business Conduct, we are committed to promoting a corporate culture based on mutual respect, social responsibility and sustainability. Each member of our organization is called upon to respect and promote these principles, thereby contributing to the achievement of our common goals and the maintenance of our reputation for excellence and reliability in the field of active pharmaceutical ingredient manufacturing.

In addition, the high quality and reputation for honesty and fairness of the entire staff of F.I.S. has always been an integral part of the company's cultural heritage and represents the most relevant strength of our Company. The expertise and professional commitment of our staff

have in fact enabled our company to remain consistently competitive over time. The Company's very image and reputation depend closely on understanding and scrupulously adhering to these policies.

The **addressees** of this Standard of Business Conduct are all those involved in the activities of F.I.S. and its subsidiaries (hereinafter also the "Group"): the Directors, employees, managers, collaborators, consultants, business partners and suppliers, and all those who operate - both domestically and in other states - in the name and on behalf of the Group. The policies referred to therein apply peremptorily to all employees, whatever department they work in and regardless of the level of responsibility occupied.

F.I.S.'S CONTRIBUTION TO SUSTAINABLE DEVELOPMENT GOALS

The United Nations 2030 Agenda for Sustainable Development, unveiled in September 2015, identifies the 17 Sustainable Development Goals (“SDGs”) that represent common sustainable development goals on today’s complex societal challenges. These goals are an important reference for the international community and for F.I.S. in conducting its business and are incorporated into our Standard of Business Conduct.

In particular, F.I.S. has therefore decided to adhere to and support Goals 3, 4, 5, 6, 7, 8, 9, 12 and 13, which are considered closest to the company’s business and values, as well as being in line with stakeholder expectations.

Finally, F.I.S. believes that SDG goal 3 (ensuring health and well-being for all and all ages) is structural and foundational for the company: in fact, this goal has always been pursued with dedication, ensuring continuity and quality in the supply of active ingredients for the global pharmaceutical industry.







VALUES AND GUIDING PRINCIPLES

F.I.S. is a brand that operates through its *modus operandi*, work attitude and attention to its surroundings. The founding pillars are extreme quality, agility, safety and sustainability.

It is a company with a holistic vision geared toward improving the entire ecosystem, looking to the future without ever distorting itself. F.I.S. is aimed at developing and producing, with efficiency, quality, safety, agility and in a sustainable way, active pharmaceutical ingredients, the essence of healing effects for people.

The values that guide F.I.S.'s choices are:
entrepreneurial wisdom, resourcefulness, authority,
integrity, responsibility, credibility, trust
concreteness, passion, humility.

In particular, F.I.S. is committed to promoting, cultivating and disseminating among all members of the Group - and any other third parties interacting with F.I.S. - respect for the following principles:

- **Integrity and Transparency:** all our operations must be conducted with honesty and transparency. We are committed to providing accurate and complete information about all our products and services, ensuring that communications are clear and truthful.
- **Legality:** all our activities must be conducted in compliance with applicable laws and regulations, including international, national and local laws and regulations. This includes, but is not limited to, regulations on drug safety, data protection, fair competition, and prevention of corruption.

- **Quality and Safety:** the quality and safety of our products are our priority. We are committed to following best manufacturing practices and complying with international quality standards, such as Good Manufacturing Practices (GMP).
- **Respect for Human Rights:** we promote and respect human rights in all our operations. We strongly oppose any form of forced labor, child exploitation and discrimination.
- **Social and Environmental Responsibility:** we are aware of our social and environmental impact. We are committed to operating sustainably, minimizing the environmental impact of our activities and contributing positively to the communities in which we operate.
- **Confidentiality and Data Protection:** we strictly protect the confidentiality of sensitive information, including personal data of patients and employees, in accordance with international data protection regulations, such as the GDPR.
- **Conflicts of Interest:** we avoid situations that may create conflicts of interest. Business decisions must be made in the best interests of society and our stakeholders.

For each party we deal with, we promote peculiar rules of conduct in order to ensure the best results.

Shareholders

We intend to optimize the return on investment made by our shareholders. Through profitable and responsible conduct of business activities, we intend to repay our shareholders with outstanding results.

Customers



At the same time, sustained success depends on our ability to consistently meet the expectations and needs of our customers. We will, therefore, strive to be innovative and responsive to changes and needs, while maintaining a constant supply of products and services with high added value and competitive prices.

Staff



The high quality of our staff is our most important competitive advantage. To capitalize on this value, we will continue to recruit and retain motivated, qualified, high-quality staff through a training and development process that maximizes opportunities for individual growth. In addition, we want to maintain an absolutely safe working environment enriched by multicultural diversity and characterized by a process of transparent communication, trust and mutual loyalty.

Community



We want to be responsible citizens in all the communities in which we operate around the world. We intend to maintain high standards of ethical behavior, strictly observe laws and regulations, and respect local and national cultures. We intend to ensure safe and environmentally conscious operational activities.

Maintaining a leading position in the market requires a continuous critical review of our business activities and processes followed from a financial, operational, technological, and human resource management perspective. The market in which we operate requires both the ability to anticipate and respond promptly to change, and a business strategy focused on the long term. We are committed, therefore, to the pursuit of continuous improvement in our efficiency and productivity through learning, sharing and applying best operating practices. We will continue to seek and choose the most profitable investment opportunities and maintain technological leadership.

Achieving our goals will depend on our ability to implement our business strategies while adhering to these guiding principles and standards of ethical behavior that are the very foundation of our culture.

HOW TO BEHAVE

The F.I.S. Standard of Business Conduct cannot provide specific recommendations for every situation.

If there is uncertainty or doubt in making a decision, some questions should be asked:

- Is the action I am taking lawful?
- Am I observing the values and principles of the Standard of Business Conduct?
- Is my behavior in line with company procedures?
- Am I behaving correctly?
- Would I be comfortable if my actions were made public knowledge?

If the answer to even one of these questions is “No,” or if we have a doubt about the legitimacy of our action or the application of a Standard of Business Conduct principle, policy or standard of conduct, we need to stop and seek advice through the most appropriate corporate channel.

Expressing doubts and asking questions helps to handle situations correctly and solve any problems. The Company encourages its employees to ask questions, express concerns and make appropriate suggestions regarding how the Company’s business is conducted. F.I.S. expects employees to promptly report any suspected violations of law, company policies, and internal control systems so that management can take appropriate corrective action.

The Company will promptly verify reports of suspected violations of laws, policies and control procedures and ensure full compliance.

Who to contact:

It should be noted that the Group has, to this end, equipped itself with a system for handling reports, including anonymous reports (so-called “whistleblowing”), which complies with national regulations and the best standards on the protection of whistleblowers, designed, among other things, to guarantee, by means of computer methods, the confidentiality of the identity of the whistleblower.

Specifically, the Group has activated the following reporting channels:

- dedicated internet portal: accessible from the F.I.S. website: www.fisvi.com - Ethics & Compliance section, whistleblowing link;
- regular mail: F.I.S. - Fabbrica Italiana Sintetici S.p.A. Viale Milano no. 26, 36075; Montecchio Maggiore (VI) - Marking on the outside of the envelope: “RESERVED FOR INTERNAL AUDIT.”
- direct meeting: at the request of the reporter, a direct meeting with Internal Audit and/or, where appropriate, a different member of the Reporting Committee will be arranged in a reasonable time;
- dedicated Hotline/system of recorded messaging available by accessing the website’s IT platform.

Further information on the reporting channels adopted by the Group can be found in the F.I.S. Whistleblowing Policy (PA. 1002), published on the company intranet as well as by accessing in the portal dedicated to whistleblowing reporting that can be reached from the F.I.S. website: www.fisvi.com > About Us > Ethics & Compliance > whistleblowing link.

Doubts, questions, and suggestions regarding the application of the Standard of Business Conduct or conduct in relation to specific cases may also be addressed:

- to the direct superior;
- depending on the topic or issue, to one of the dedicated departments listed in Annex I to this Standard.



ADOPTION, IMPLEMENTATION AND UPDATING

This Standard of Business Conduct was adopted by the Boards of Directors of F.I.S. and each of the Group companies on December 19th, 2024. The policies and procedures referred to therein are designed to ensure the highest level of protection of the Group's core principles and values.

The Standard of Business Conduct will be subject periodically, subject to approval by the same bodies, to revisions and possible updates to ensure its compliance with any substantial changes in the applicable legal and regulatory framework. These updates aim to keep F.I.S. policies aligned with best practices and ensure that they continue to reflect the highest ethical standards.

The Standard is published on F.I.S.'s corporate website and adequate information and training is given to all its Recipients, including business partners and suppliers.

No one in the Group has the authority to waive or approve exceptions from core policies. Any behavior contrary to the principles and policies referred to within the Standard may result in appropriate disciplinary action, up to and including dismissal or termination of the relevant business relationship.

SUPPLY CHAIN, DUE DILIGENCE AND AUDIT

Our Standard of Business Conduct is aligned with and incorporates the principles, recommendations and provisions set forth by the best applicable international standards, including the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights, and the Core Conventions of the International Labor Organization (ILO).

F.I.S. moves in a commodities market with global reach and is responsible for verifying the quality and sustainability of its suppliers and supply channels (supply chain). This includes seeking to prevent and mitigate potential negative impacts on people, communities, human rights and the environment related to F.I.S. not only through the Group's direct activities but also through its own business dealings and implementing mechanisms for consultation and cooperation with its partners and stakeholders.

For our Group, respect for human rights and the protection of children's rights in particular is an inescapable and non-negotiable principle to be upheld with the utmost commitment and by providing the best possible resources.

We do not tolerate either the use of child or forced labor or the exploitation of girls and boys in any business activities and along the supply chain.

The Group is therefore committed to implementing due diligence measures, audits and controls in its supply chain in order to ascertain its business partners' compliance with the principles set forth in this Standard of Business Conduct, as well as to identify, assess and anticipate risks and opportunities for improvement.



FUNDAMENTAL POLICIES

BUSINESS ETHICS



The Company has long followed the policy of ensuring compliance with every law and regulation applicable to its activities.

Our policy is not limited to that. Even where the law was permissive, our Company adopts the principle of the highest integrity. While we recognize that customs, traditions and usages may vary from place to place, we believe that honesty does not lend itself to criticism in any type of culture. Suspicion of dishonest behavior results in negative and reprehensible judgments for the entire organization. The Company believes that enjoying—with good reason—a reputation for irreproachability represents, in itself, an asset of inestimable value.

F.I.S. is interested not only in the achievement of results, but also in the manner and means by which they are achieved.

This principle must be understood by all employees, who are expected to behave with loyalty and fairness in dealings internally, with suppliers, with customers and with competitors.

The Company requires all its personnel, at all levels, to behave honestly and in accordance with company policies and accounting and control procedures. Should an employee fail to behave properly, that is, concealing information from Management or supervisory bodies, or violating the provisions of the law or the Organization, Management and Control Model adopted by the Company, other employees would be misled to mistakenly consider such an attitude as a sign that company policies and regulations can be ignored where they create difficulties. Such situations can induce corruption and ethical decay.

Our business management system bases its proper functioning on honesty, truthful accounting and administrative records, transparent proposals for expenditures, investments and economic evaluations of projects.

It has been - and continues to be - the Company's policy to ensure full, fair, accurate, timely and transparent transcription of the Company's activities in official reports and books and records, as well as in public communications.

Each employee is, in addition, responsible for reporting to higher levels of Management the most significant information so that it comes to the attention of Senior Management.

DISCLOSURE OF INFORMATION

We are committed to disclosing true, regular, timely, reliable, clear, complete, and accurate information to our employees, customers, and investors in accordance with applicable disclosure requirements and best practices. In particular, we believe in the importance of:

- ensure that all information disclosed is verified and from reliable sources;
- disclose only accurate and truthful information, avoiding the dissemination of false or misleading data;
- present information in a clear and understandable way; always indicate the sources of disclosed information whenever possible;
- do not disclose confidential or sensitive information without explicit authorization.

Group internal policies:

- **Market Abuse Regulation**
- **Guidelines No. LG-M-R&S-001 - Regulations for handling confidential information pertaining to Industrial and Intellectual Property or otherwise critical**
- **P.A. 1001_EN - FIS Social Media Policy**
- **P.A. 1013_EN - Policy on company email use - Netiquette**

PREVENTION OF INSIDER TRADING

We also strictly prohibit the abuse of insider information to engage in securities trading. In particular, each employee, collaborator or partner who has access to insider information is called upon to refrain from disclosing such information in order to obtain personal benefits or for third parties. Indeed, insider trading is strictly prohibited not only in Italy and Europe, as enshrined in the European Market Abuse Directive, but also in the other jurisdictions in which FIS operates: (i) in the United States, the Securities Exchange Act, (ii) in China, the Securities Laws, and (iii) in Japan, the Financial Instruments and Exchange Act regulate insider trading and impose severe penalties for anyone who uses inside information for market transactions. Specifically:

- it is prohibited to use non-public and material information (inside information) to engage in securities trading for personal benefit or on behalf of third parties;
- it is prohibited to disclose inside information to unauthorized persons, including friends, family members or colleagues, who might use it for trading;
- it is incumbent to maintain the confidentiality of insider information and take appropriate measures to protect it from unauthorized access;
- you should share privileged information only with authorized persons and only to the extent necessary to perform your job functions;
- it is incumbent to promptly report any suspicious behavior or violation of policies related to insider trading to the appropriate authorities within the organization.

Group internal policies:

- **Procedure for the management and handling of insider information;**
- **Internal Dealing Procedure.**

PRIVACY PROTECTION

We protect the privacy of our employees by refraining from conducting any investigation of personal (and non-personal) information that is not strictly related to the performance of company duties and activities, and always within the limits of what is provided for by current regulations, starting from the hiring process until the end of the employment relationship.

In particular, we ensure respect for the rights of access, rectification, deletion, and portability of personal data, and likewise the right to receive fair and transparent information, and we do not process personal data through automated decision-making systems. In addition, at the beginning of any new data processing and whenever possible, we ensure the possibility to object to the processing itself.

We ensure that all personal data are processed under the principles of lawfulness, fairness and transparency and the principles of purpose limitation, minimization, accuracy, storage limitation, integrity, confidentiality and accountability.

Personal data shall be processed only by authorized individuals and any data processors and to the extent permitted, for the clear, reasonable purpose and in accordance with applicable policies and procedures and the notice that is made available to data subjects; personal data shall be processed and retained only as long as necessary to carry out the processing activities.

In particular:

- a) we only collect personal data that are strictly necessary to achieve the specific and legitimate purposes of the organization;
- b) we use personal information only for the purposes for which it was collected stated within the policy;
- c) we clearly inform data subjects about how we collect, use, store and share their personal data;

- d) we obtain explicit consent from data subjects, when required, before collecting or processing their personal data;
- e) we take appropriate technical and organizational measures to protect personal data from unauthorized access, loss, destruction, or improper disclosure;
- f) we restrict access to personal data only to authorized personnel who need it to carry out their job functions and to data processors, who are bound by confidentiality in all cases;
- g) we maintain the confidentiality of personal data and do not disclose personal data to unauthorized third parties in the absence of a valid legal basis.

Group internal policies:

- **Privacy Manual**
- **Policy on Governance & Accountability**
- **Data Retention Policy**
- **General Procedure No. PGE-M-EN-010 - Data Breach Procedure**
- **LG_M_IT 003 Policy IT Tools**
- **LG_M_IT_004 Credential management authorization profiles for authorized persons**
- **Procedure for handling requests from interested parties.**

CONFLICT OF INTEREST

All F.I.S. employees are called to work in the interest of F.I.S. and to be faithful to its values.

In fact, it is the policy of the Company that all personnel avoid any situation of conflict, whether actual or apparent, between personal interests and those of the Company.

A conflict of interest may arise when any employee engages in activities or otherwise has a personal interest that conflicts with the interests of the Company and the Company's expectation of effective and fair job performance.

By way of example, each employee is required to avoid conflicts of interest in exercising his or her relationships with suppliers, customers and competitors. In this regard, all our employees are required to:

- a) refrain from using, on one's own behalf, any opportunities arising from the misuse of company property or the exploitation of one's work responsibility;
- b) refrain from trading securities on the basis of confidential information learned in the course of their work activities and from competing with the Company;
- c) ensure clarity and transparency in case of conflict of interest between one's personal situation and F.I.S. or one of their representatives. It is essential to declare any potential conflict of interest promptly to one's supervisor or the head of one's Function, providing all the information necessary for an accurate assessment;
- d) refrain from simultaneously operating a business that competes with F.I.S. This includes refraining from initiating, owning, or participating in any form in a business that may compete directly or indirectly with the activities of F.I.S. This includes refraining from initiating, owning, or participating in any form in a business that may compete directly or indirectly with the activities of F.I.S.;

- e) avoid offering favorable business terms to companies in which you have a personal or direct interest. It is important to make sure that all business decisions are made on the basis of objective criteria and in the sole interest of F.I.S., with no outside influences from personal interests;
- f) refrain from favoring close friends or relatives in business decisions unless the person in question is the most qualified candidate for the job. In such cases, you must inform your supervisor or Human Resources department in writing of the relationship, thus ensuring transparency and impartiality in decision-making;
- g) refrain from accepting gifts or samples of products of value above the limits established internally for the business area. If offers of gifts or samples are received that exceed these limits, written permission must be obtained from the appropriate manager before accepting them, to avoid any perception of favoritism or conflict of interest.

INCOMPATIBILITY BETWEEN OFFICES

It is the policy of the Company to limit instances of its employees holding the position of Board member in for-profit organizations not part of the F.I.S. group and not to allow its employees to accept such a position if it would result in a conflict of interest or would interfere with the optimal performance of their duties.

Employees should not, in principle, hold directorships or equivalent positions in for-profit organizations that are not part of the F.I.S. Group, or companies directly or indirectly controlled, controlling, affiliated or subject to the same control as F.I.S.

However, exceptions to this general rule might be conceivable in some special circumstances where, for example, the interests of the Company justify it, the employee wishes to hold a social position in a family business, or where definite plans exist for the employee to leave the Company.

In such extraordinary circumstances, in order to authorize an F.I.S. Employee in Italy to hold any of the above positions, appropriate verification by Internal Audit, Legal and HR will be required.

An Employee in the position of Board Member or equivalent in for-profit organizations not belonging to the F.I.S. Group or companies directly or indirectly controlled, controlling, associated or subject to the same control of F.I.S. S.p.A. must act in such office exclusively in the interest of such organization and under no circumstances and in no capacity may he or she act as a representative or proxy of F.I.S., of which he or she is an Employee.

By way of example: no Employee may serve as a Board Member in any company or otherwise have managerial or advisory functions for companies, organizations or persons who have or seek to have business relations with companies in the F.I.S. Group, except where Management is aware of and has consented to the same.

Group internal policies:

- **P.A. 1006_EN – Policy on Conflict of Interest (COI) and Directorships**
- **P.A. 1003_EN - Policy on Gifts, Hospitality and Entertainment**
- **P.A. 1012_EN - Guidelines on Interactions with Public Officials**
- **P.A. 1015_EN - Anti-corruption Policy**



POLICY ON CORRUPTION

It is the policy of the Company to prohibit its directors, officers and staff and third parties acting on its behalf from offering or performing, directly or indirectly, acts of bribery to public employees, public officials or government agents, employees or agents of other companies, or individuals who have business dealings with the Company.

For the purposes of this policy, an act of bribery is defined as any sum of money, goods, services or other things of value offered or delivered with the intent to obtain an improper advantage for the Company.

Any form of bribery or trafficking in illicit influence is not tolerated by the Company, which is committed to imposing severe sanctions whenever such an act occurs. In this regard, every financial transaction must be recorded in a transparent and detailed manner, and likewise, internal accounts must be kept in a transparent and reliable manner at all times.

In addition, it is prohibited to:

- a) receive any form of gift, directly or indirectly, in order to unduly favor the interests of any Group company or its representative, subject to the thresholds provided for and accepted under the Company's internal policies;
- b) make or authorize promises or concessions of goods, money or advantages of any kind, including any illicit facilitation, in favor of alleged or actual representatives of Public Administrations or their family members, aimed at obtaining favorable treatment or that may affect their third-party status and independence with respect to the Company or any Group Company;
- c) use any kind of grant, financing or soft loan obtained from public agencies for a purpose other than the intended purpose;
- d) provide untrue statements, data or documents to public bodies in order to obtain any form of advantage for the Company, other Group company or its representatives.

Group internal policies:

- **P.A. 1006_EN - Policy on Conflict of Interest (COI) and Directorships**
- **P.A. 1003_EN - Policy on Gifts, Hospitality and Entertainment**
- **P.A. 1012_EN - Guidelines on Interactions with Public Officials**
- **P.A. 1015_EN - Anti-corruption Policy**

GIFTS, FREE SERVICES AND SIMILAR BENEFITS

It is the Company's policy to base its business decisions on purely commercial criteria. This policy is intended to safeguard corporate interests while maintaining constructive relations with Organizations and individuals who have or aspire to have a business relationship with the Company.

In different cultures, such business relationships might include gifts or entertainment events.

Directors, executives, staff and third parties acting in the interest of the company who should, in the course of their duties, find themselves giving or receiving gifts or entertainment events to or from third parties, are required to carefully evaluate and use the utmost common sense in each specific case, bearing in mind all the parameters of reference, including the type of the gift or entertainment, its purpose, its appearance, the positions of responsibility of the persons giving or receiving the gifts or entertainment themselves, the relative business context, reciprocity and any local regulations and social customs relating to the matter in question. In particular:

- gifts and entertainment events should not be aimed at creating an unfair advantage for the Company;
- any expenditure on gifts and entertainment events of any kind made on behalf of the Company must be accurately reflected in the Company's accounting records;
- require prior permission for any hospitality or entertainment of an unusual nature, such as events lasting more than one day, free overnight stays, or out-of-town travel;
- giving or accepting hospitality or entertainment in cash or equivalent means (e.g., gift vouchers), regardless of value, is not permitted;
- accepting hospitality and entertainment involving competing vendors as a counterpart is not permitted

Group internal policies:

- **P.A. 1006_EN - Policy on Conflict of Interest (COI) and Directorships**
- **P.A. 1003_EN - Policy on Gifts, Hospitality and Entertainment**
- **P.A. 1012_EN - Guidelines on Interactions with Public Officials**
- **P.A. 1015_EN - Anti-corruption Policy**

POLITICAL ACTIVITIES

It is the Company's policy not to make contributions to political parties, candidates and representatives.

The Company believes that voting, informing oneself about political affairs, serving on elective bodies, and campaigning at the local and national levels are rights of the utmost importance to citizens in a democracy. Employees engaged in political activities will do so on their own and not as representatives of the Company.

Legitimate political activities carried out by employees will have no bearing on their own development in the Company, job stability or career opportunities.

Any dealings with trade unions or political parties on behalf of the Company shall be guided by the principles of fairness and transparency. In particular, for example:

- For the purposes of organizational transparency, it is recommended that the Management be notified in advance of any applications at the municipalities where F.I.S. holds its production sites or offices, in order to allow for a timely assessment with reference to potential incompatibilities arising from the job role held at F.I.S. and, consequently, the adoption of precautionary measures of an organizational nature.
- Employees engaged in political activities will do so in their own right and not as representatives of F.I.S.; under no circumstances and in no capacity may they act as representatives or proxies of F.I.S., whose employees they are.

Legitimate political activities carried out by employees will have no bearing on their own development at F.I.S., job stability and/or career opportunities.

The Company respects the right of all personnel to form and join unions and representative organizations of their choice, as well as to be represented, initiated and participate in collective bargaining. F.I.S. protects workers from any act of discrimination tending to violate trade union freedom and ensures freedom of association without pressure, retaliation or discrimination, in jobs or in the path of growth in the organization.

Group internal policies:

- **P.A. 1006_EN: Policy on Conflict of Interest (COI) and Directorships**

INTERNATIONAL ACTIVITIES

It is the policy of the Company to comply fully with all relevant regulations and to conduct corporate affairs in accordance with the highest standards of ethics.

International activities and transactions are governed by the regulations of the countries where they are actually conducted but, in some cases, regulations of third countries (such as the United States) or supranational organizations (such as the European Union or the UN) that regulate international activities conducted by multinational companies may also apply.

Accordingly, employees conducting international operations on behalf of the Company must comply with the guidance provided by F.I.S. and, in case of doubt, consult with F.I.S.'s Legal Department to ensure that they are aware of and comply with any applicable laws or regulations.

RESTRICTIVE MEASURES, TRADE SANCTIONS AND EXPORT CONTROLS

The UN, the United States of America, the European Union, and some countries adopt restrictive measures that affect certain individuals, companies, or the export and import activities of certain goods and services, and which may indirectly restrict or impact the business operations of F.I.S. and the Group.

Such measures or sanctions may include bans on doing business with certain persons or companies, the freezing of funds and assets linked to such persons or bans or restrictions on the import or export of products, including some of the Group's products, from or to certain countries or geographical areas.

The Group prepares and disseminates measures and policies for tracking and monitoring restrictive measures taken internationally and domestically. It remains the responsibility of

any recipient of this Standard who is involved in international operations to adhere to these measures and policies and to contact the F.I.S. Legal Department in case of any enforcement concerns.

Group internal policies:

- **P.A. 1012_EN - Guidelines on Interactions with Public Officials**
- **P.A. 1015_EN - Anti-corruption Policy**

FREE COMPETITION

It is the policy of the Company that all its personnel, in the performance of their respective duties, comply with the regulations protecting competition, the Italian State, the European Union and the United States of America, the latter to the extent applicable to its activities.

No employee should ever assume that he or she can ignore these regulations believing that it is in the best interest of the Company.

It is recognized that, at times, justifiable doubts may arise about the correct interpretation of the law. In such a case, employees should seek advice from the Legal Department through the appropriate channels.

Group internal policies:

- **P.A. 1011_EN - Policy on Trade Associations, Industry Groups and Conferences (TAIG);**
- **P.A. 1017_EN- Antitrust and Fair Competition Policy.**



PERSONAL HEALTH AND SAFETY POLICY



The Company operates with the intention of ensuring that every activity is carried out safely, meaning Safety and Security.

F.I.S. complies with the highest international health and safety standards, specific laws and regulations of the countries in which it operates.

The Company aims for continuous improvement by holding all levels of the company accountable to ensure management based on the principles of precaution, prevention, protection and risk management.

It is, in fact, Company policy:

- identify and assess health risks- related to its operations-that could potentially affect its employees and contractors or the community;
- implement programs and appropriate protective measures to control such risks, including appropriate surveillance of potentially exposed employees;
- adequately disseminate, to potentially exposed persons or groups and to the scientific community, knowledge about health risks derived from its occupational medicine programs and related studies;
- evaluate - at the time of hiring - and subsequently, in compliance with current regulations, the compatibility of employees' physical condition with the performance of their duties in order to prevent risks to themselves and others;
- ensure or make available the necessary health services for the initial treatment of occupational diseases or any injuries occurring to employees and for the management of any health emergencies;
- comply with all applicable laws and regulations and, where laws and regulations do not exist, adhere to responsibly identified standards;

- collaborate with government agencies and other institutions to develop laws, regulations and standards based on sound scientific principles and risk assessment;
- promote and support research to expand knowledge of the effects of business operations on health;
- conduct appropriate reviews and evaluations of its operations to quantify progress made and promote compliance with this policy;
- provide preventive medicine programs that enable employees, on a voluntary basis, to improve their well-being, work ability and personal safety. Such programs supplement, but do not interfere with, the employee's responsibility to provide for his or her own medical care or with the relationship the employee has with his or her primary care physician. Any information gathered in the implementation of such programs will be protected by professional secrecy, unless specifically requested by the employee or in the circumstances specifically provided for by law.

Each F.I.S. site has adopted appropriate procedures on occupational health and safety.

Group internal policies:

- **Integrated Quality Policy**
- **Model 231**
- **P.A. 1010_EN – Guidelines for managing accident insurance and administration**

ENVIRONMENTAL POLICY



It is the policy of the Company to conduct its activities in a manner compatible with the balance between the environmental and economic needs of the communities in which it operates.

The Company undertakes, in all its activities, continuous and incremental efforts in environmental protection.

In addition, it is company policy:

- comply with applicable laws and regulations and, where laws and regulations did not exist, adhere to responsibly identified standards;
- encourage care and respect for the environment; emphasize each employee's responsibility for caring for the environment, and work to ensure that appropriate operating practices and staff training programs are implemented;
- collaborate with government agencies and industry organizations to facilitate the timely development of effective environmental laws and regulations based on sound scientific principles and sustainable development strategies;
- manage its operations with the aim of preventing accidents and controlling that emissions and waste are below known levels of harmfulness, directing the design, operation and maintenance of its facilities to this end;
- deal quickly and effectively with incidents that may occur in the course of its operations by cooperating with industry organizations and relevant government agencies;
- promote and support research to deepen understanding of the effects of its operations on the environment, to improve techniques for protecting it, and to further enhance its ability to make its operations and products environmentally friendly;

- communicate with the outside world regarding environmental issues and share their experiences in order to contribute to the improvement of the environmental performance of the industry;
- conduct appropriate reviews and evaluation of its operations in order to quantify progress and promote compliance with this policy.

Each F.I.S. site has adopted appropriate procedures on environmental protection.

Group internal policies:

- **Integrated Quality Policy**
- **Model 231**
- **P.A. 1010_EN – Guidelines for managing accident insurance and administration**

SAFETY

It is the Company's policy to conduct its activities by operating in a manner that safeguards the safety of its employees, third parties involved in its operations, and customers.

The Company will continue to make every effort to prevent accidents, injuries and occupational diseases through the active participation of every employee.

F.I.S. is committed to continuous efforts to identify, eliminate or control risk situations related to its activities.

It is, therefore, corporate policy:

- design and maintain plant and equipment, adopt prevention and control systems, provide training, and conduct its operations in such a way as to safeguard people and company equipment;
- respond quickly, effectively and diligently to emergencies or accidents that may occur during operations, cooperating with industry organizations and relevant government agencies;
- comply with applicable laws and regulations and, where laws and regulations do not exist, adhere to responsibly identified standards;
- collaborate with government agencies and industry organizations to responsibly develop standard laws and regulations based on sound scientific principles and risk assessment;
- promote and support research to expand knowledge of the effects, with regard to security, of its operations by promptly applying any significant new developments and making employees, contractors, government agencies, and anyone else who may be involved aware of them in appropriate ways;
- make its employees, contractors and third parties working on behalf of the Company as aware as possible of their roles and responsibilities in the field of occupational safety and encourage safe behavior outside the work environment as well;
- conduct appropriate reviews and evaluations of its operations to quantify progress made and promote compliance with this policy.

Each F.I.S. site has adopted appropriate safety procedures.

Group internal policies:

- **Integrated Quality Policy**
- **Model 231**
- **P.A. 1010_EN – Guidelines for managing accident insurance and administration.**

PRODUCT SAFETY



F.I.S. operates in domestic and international markets, inspiring business policies and strategic choices with best practices and the principle of professional loyalty to clients. The Company builds business relationships centered on customer needs, always putting the customer in a position to make free and informed choices.

It is Company policy:

- identify and manage the risks associated with its products and not produce or sell products where it is not possible, through appropriate operating procedures and practices, ensuring an adequate level of safety for people and the environment;
- state in detail the precautions to be taken in the handling, transportation, use, and disposal of the products and take reasonable steps to communicate the same to anyone concerned;
- comply with applicable laws and regulations and, where laws and regulations do not exist, adhere to responsibly identified standards;
- cooperate in appropriate ways with government agencies and other institutions to responsibly develop laws, regulations and standards based on sound scientific principles and risk assessment;
- ensure that, as part of product planning and development, appropriate priority is given to identifying and controlling potentially adverse health, safety and environmental effects;

- promote and support research to expand knowledge of the effects of products on health, safety and the environment, promptly applying any significant new developments and making employees, contractors, customers, the scientific community and government agencies aware of them in appropriate ways;
- conduct appropriate reviews and evaluations of its operations to quantify progress made and promote compliance with this policy

Each F.I.S. site has adopted appropriate product safety procedures in accordance with Good Manufacturing Practices (GMP).

Group internal policies:

- **Integrated Quality Policy**
- **Model 231**
- **P.A. 1010_EN – Guidelines for managing accident insurance and administration.**

CUSTOMER RELATIONS AND PRODUCT QUALITY

The 'Company, aware of its responsibilities to both customers and future consumers, is committed to understanding their needs and problems and deserving business relationships through effective response to their needs.

Specifically, it is corporate policy:

- to provide high-quality products that meet or exceed the specific requirements and needs of customers under all reasonable circumstances;
- provide services that reliably meet responsible standards of performance, efficiency, and courtesy;
- provide accurate and sufficient information about its products and services, including details of any warranties, so that the customer can make an informed purchase assessment;
- adhere to the utmost truthfulness in advertising and in all forms of communication. In addition, where our products are sold for consumption through third-party operators, such as brokers and/or agents, it is company policy to encourage such third parties to achieve standards similar to our own.

Each F.I.S. site has adopted appropriate product quality procedures in accordance with Good Manufacturing Practices (GMP).

Group internal policies:

- **Integrated Quality Policy**
- **Model 231**

EQUAL OPPORTUNITIES



It is the policy of F.I.S., in adherence to all existing laws and regulations, to provide equal employment opportunities to all individuals who meet the requirements of the duties to be performed. The Company intends to impartially implement personnel management policies, programs and procedures pertaining to all aspects of the employment relationship, such as selection and hiring, assignment of positions, promotions, transfers, terminations, salary policies, and training programs.

Supervisors are responsible for the implementation and administration of this policy designed to prevent all forms of unlawful discrimination in the work environment that is based on gender and sexual orientation, race, class, national origin, language, religion, political and philosophical views, political or trade union affiliation, health, disability, and age status, and for the identification and resolution of any problems in this regard.

It is, moreover, corporate policy:

- develop, consistent with the provisions of current regulations, forms of organization of work performance such as to allow a balance between the business and family needs of employees;
- fostering working relationships in the company that are respectful of the principles set forth in the policy on workplace behavior;
- provide adequate workstations that enable people with disabilities to perform the essential functions involved in their jobs;
- promote equal employment opportunities between men and women including through the adoption of training and development programs that facilitate their equal representation in the organization;

- emphasize Management's responsibility for such matters at all levels of the organization;
- Individuals who believe they have observed or have been subjected to discriminatory acts are encouraged to report the facts to their supervisor, higher level management, the designated contact at Human Resources, or send a whistleblowing report through official channels;
- No one shall be subjected to undue pressure, intimidation, discrimination or reprisal for exercising any of the prerogatives covered by this policy and existing regulations.

Group internal policies:

- **P.A. 1002_EN - FIS Whistleblowing Policy**
- **P.A. 1007_ITA - Policy on Talent Acquisition**
- **Model 231**

BEHAVIORS IN THE WORK ENVIRONMENT



It is the Company's policy to prohibit all forms of harassing behavior in all company workplaces. The goal of this policy is to foster a work environment that encourages mutual respect among employees and working relationships free of harassing and/or embarrassing behavior.

This policy expressly applies to any form of undue pressure and harassment by or against employees, contractors, suppliers or customers. In the context of this policy, harassment is defined as any inappropriate conduct that has the purpose or effect of:

- generate an intimidating, hostile or offensive work environment;
- unreasonably interfere with an individual's work performance;
- unjustifiably adversely affect an individual's professional growth and development;

Harassing behavior will not be tolerated. Forms of harassment include, but are not limited to, unwelcome verbal or physical approaches, any form of writing or publication as well as statements or comments of a sexual, racial or otherwise disparaging or discriminatory nature. All employees, including supervisors and managers, may be subject to disciplinary action if they violate this policy.

Individuals who believe they have been subjected to harassment should immediately report it to their direct supervisor, higher level management, the designated contact at Human Resources, or send a whistleblowing report through official channels. All reports will be promptly and thoroughly verified.

Any employee or supervisor who observes or becomes aware of conduct contrary to this policy should immediately inform their supervisor, higher level management or the Personnel Department or Internal Au-

dit. No employee should assume that the Company is otherwise aware of a situation in violation of this policy. All reports should be brought to the attention of Management or the Personnel Function so that appropriate corrective action can be taken.

No retaliation will be implemented against an employee for reporting possible acts of harassment. Employees may raise issues or report facts pertaining to this policy without fear of retaliation.

Clarification of what constitutes harassing behavior can be obtained from your supervisor, the Legal Department, or the Personnel Department.

Group internal policies:

- **P.A. 1002_EN - FIS Whistleblowing Policy**
- **P.A. 1007_ITA - Policy on Talent Acquisition**
- **P.A. 1014_EN - Policy on Short-Term Incentives - MBO Plan**
- **Model 231**

ALCOHOL & DRUG POLICY



It is the Company's Policy to strive to achieve and maintain a safe, healthy and productive work environment for all its employees. F.I.S. is aware that the abuse of alcohol, drugs, and other similar substances by employees can adversely affect their work performance and can have serious and harmful consequences for themselves, as well as for the safety, efficiency, and productivity of co-workers, plant and machinery, and the Company as a whole. The use of medication or the use, possession, distribution or sale of alcohol, drugs or illicit psychotropic substances, not prescribed by a doctor, on company premises is strictly prohibited and constitutes grounds for disciplinary action, up to and including where appropriate, dismissal.

Although this Policy explicitly refers to alcohol and illicit drugs or psychotropic substances, its application should also be understood to extend to inhalants, and all other forms of substance abuse.

As such, being unfit to perform one's job duties due to the misuse of such substances (medication, drugs or alcohol) is strictly prohibited and constitutes grounds for taking disciplinary action, up to and including, where appropriate, dismissal.

The Company is aware that addiction to alcohol and drugs or psychotropic substances is a treatable condition. Employees who suspect that they have a form of addiction to alcohol or drugs or psychotropic substances are encouraged to seek support, in order to promptly obtain appropriate medical treatment, before such addiction can lead to problems with safety, efficiency and productivity.

Human Resources-supported by HSE-is available on a voluntary and strictly confidential basis for advice and support. Those who decide to turn to such facilities in a timely manner will benefit from all the guarantees provided by current regulations, legal and contractual.

No employee with a possible addiction to alcohol or drugs or psychotropic substances-declared as part of a request for help and support to overcome that condition or involved in a recovery program-will be subject to disciplinary action for that reason. However, those for whom the habitual use or abuse of alcohol or illicit drugs or psychotropic substances is established shall not be allowed to hold “safety-critical” positions or assignments, as defined by the Company Management in line with the indications of the relevant regulations, as such positions and assignments may endanger the safety and security of other employees or third parties, surrounding communities, machinery and facilities, and the Company as a whole.

If an employee violates the provisions of the “Alcohol & Drug Policy,” he or she will be subject to appropriate disciplinary action in accordance with the provisions of the law. Such disciplinary action cannot be avoided or suspended by a request, made after the fact, for medical rehabilitation or supportive treatment to overcome any addiction.

The Company reserves the right, having completed the investigations required by law and within the limits provided for therein, to change, where possible, the duties assigned or to terminate the employment relationship for justified reasons in respect of those who have a form of addiction to alcohol and/or drugs and/or psychotropic substances and/or refuse the resulting medical rehabilitative treatment and/or do not respond adequately to the treatment itself and, as a result, are completely unfit for the work performance assigned to them, all as provided for in the relevant regulations, legal and contractual.

The Company reserves the right to conduct, without prior notice, checks on the presence, on company premises and/or offices, about the presence of drugs and alcohol.

In addition, the Company reserves the right, to the extent and in the manner permitted by law, to require an appropriate medical evaluation, or testing regarding possible alcohol or drug use, performed by an appropriate public medical facility, when there is reasonable doubt about alcohol and drug use and in any case of an accident occurring in the workplace.

F.I.S. reserves the right to conduct unannounced, to the extent and in the manner permitted by law, random testing for alcohol and drug use for employees who are assigned to a “safety critical position,” as defined by Corporate Management in line with the relevant regulations. A positive test result, or refusal to take the test, is grounds for disciplinary action, up to and including dismissal where appropriate.

The Company requires its Contractors of works and/or services to adopt an “Alcohol and Drugs Policy” similar to this policy, and the rules regarding controls contained in the preceding paragraphs as well as to timely verify compliance by its employees and auxiliaries. Personnel of Contractor companies must, therefore, comply with the regulations set forth in their company’s Policy. In the event of a violation, the Company reserves the right to report the circumstance to the Contractor’s contact person and, if necessary, request the Contractor to take appropriate measures against those responsible, also reserving the right, in the event, not to allow them further entry to its premises in the future.

PROTECTION OF CORPORATE ASSETS

Every employee has a duty to protect and use the Company's property in a manner consonant with the Company's interests. The assets to which the policy refers include both tangible and intangible assets, such as business information of a confidential nature and personal data that are subject to processing by the Company.

No employee may use or disclose at any time, whether during or after his or her employment with the Company, personal data and information of a confidential nature that relates to any Company processing and/or activities, unless he or she has received prior authorization to do so.

Examples of confidential information include unpublished data related to business plans, budget data, financial forecasts, breakthroughs in technology, bids, tender results, and data of a personal nature.

By way of example, each employee is required to:

- a) use corporate assets, including equipment, materials, financial resources, and intellectual property, exclusively for corporate purposes and not for personal purposes;
- b) take care of company assets, keeping them in good condition and promptly reporting any damage, malfunction or need for maintenance;
- c) protect the company's confidential and proprietary information by preventing unauthorized disclosure to third parties and using appropriate security measures to prevent unauthorized access.

PROTECTION OF CORPORATE INFORMATION ASSETS

Personnel, in the performance of their professional activities, must use computer or telematic tools and services in full compliance with the relevant regulations in force (and, particularly, with regard to computer torts, computer security, privacy and copyright) and internal procedures.

In particular, Personnel are prohibited from:

- (a) abusive access to a computer or telecommunications system;
- (b) unauthorized possession and unauthorized dissemination of access codes to computer or telematic systems;
- (c) dissemination of computer equipment, devices or programs aimed at damaging or disrupting a computer or telecommunications system;
- (d) the unlawful interception, impediment or interruption of computer or telematic communications;
- (e) damage to information, data and computer programs and computer or telematic systems.

Personnel may not load borrowed or unauthorized software onto company systems, just as they are prohibited from making unauthorized copies of programs, licensed, for personal, corporate or third-party use.

Personnel must use the computers and computer tools provided by the Company exclusively for business purposes; consequently, F.I.S. reserves the right to verify the contents of the computers as well as the proper use of the computer tools in accordance with company procedures.

Personnel are also required not to send threatening and insulting e-mail messages, not to resort to linguistic expressions that do not conform to the Company's style, or otherwise inappropriate language.

Group internal policies:

- **P.A. 1001_EN – F.I.S. Social Media Policy;**
- **P.A. 1004_ITA - Car Policy;**
- **P.A. 1009_EN - Travel Policy;**
- **P.A. 1013_EN - Policy on Company email use – Netiquette**
- **Market Abuse Regulation**
- **Guidelines No. LG-M-R&S-001 - Regulations for handling confidential information pertaining to Industrial and Intellectual Property or otherwise critical;**
- **Guidelines No. LG - M - IT - 003 - Policy IT Tools;**
- **Model 231.**

ANNEX I - WHO TO CONTACT

Signaling channels:

- **dedicated internet portal:** accessible from the F.I.S. website: www.fisvi.com - Ethics & Compliance section, whistleblowing link;
- **regular mail:** F.I.S. - Fabbrica Italiana Sintetici S.p.A. Viale Milano no. 26, 36075; Montecchio Maggiore (VI) - Marking on the outside of the envelope: "RESERVED FOR INTERNAL AUDIT."
- **direct meeting:** at the request of the reporter, a direct meeting with Internal Audit and/or, where appropriate, a different member of the Reporting Committee will be arranged in a reasonable time;
- **dedicated Hotline/system of recorded messaging** available by accessing the website's IT platform.

Further information on the reporting channels adopted by the Group can be found in the F.I.S. Whistleblowing Policy (**P.A. 1002**), published on the F.I.S. website.

Doubts, questions, and suggestions regarding the application of the Standard of Business Conduct or **conduct in relation** to specific cases may be addressed to the direct supervisor or one of the following contacts

| Issue | Contact |
|-----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| Alcohol, drugs or other prohibited substances | <ul style="list-style-type: none"> • Human Resources • Internal Audit |
| Conflict of Interests | <ul style="list-style-type: none"> • Legal Department • Human Resources • Supervisory Board • Internal Audit |
| Violation of company policies | <ul style="list-style-type: none"> • Legal Department • Human Resources • Supervisory Board • Internal Audit |
| Discrimination | <ul style="list-style-type: none"> • Legal Department • Human Resources • Supervisory Board • HSE |
| Violations of environmental laws, regulations, or permits | <ul style="list-style-type: none"> • Internal Audit • Legal Department • Supervisory Board |
| Accounting, financial, internal control system-related irregularities | <ul style="list-style-type: none"> • Internal Audit • Legal Department • Supervisory Board |
| Presence of offensive tools (e.g., weapons) | <ul style="list-style-type: none"> • Security - Plant Manager • Internal Audit |
| Fraud | <ul style="list-style-type: none"> • Legal Department • Human Resources • Supervisory Board • Internal Audit |

| Issue | Contact |
|---------------------------------------------------|-----------------------------|
| Harassment | • Legal Department |
| | • Human Resources |
| | • Supervisory Board |
| | • Internal Audit |
| Violations of laws and regulations | • Legal Department |
| | • Human Resources |
| | • Supervisory Board |
| | • Internal Audit |
| Misuse or misappropriation of corporate resources | • Legal Department |
| | • Human Resources |
| | • Supervisory Board |
| | • Internal Audit |
| Potentially illegal activities | • Legal Department |
| | • Human Resources |
| | • Supervisory Board |
| Security (Physical Security) of facilities | • Security - Plant Managers |
| Security (Physical Security) of individuals | • Security - Plant Managers |
| | • Internal Audit |
| Threats of retaliation | • Legal Department |
| | • Human Resources |
| | • Supervisory Board |
| | • Internal Audit |
| Threats of violence | • Legal Department |
| | • Human Resources |
| | • Supervisory Board |
| | • HSE |
| Unsafe Activities or Practices (Safety) | • Human Resources |
| | • Internal Audit |
| Inappropriate conduct in the workplace | • Legal Department |
| | • Human Resources |
| | • Supervisory Board |

Notes:

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