

HUMAN RIGHTS GLOBAL POLICY

INTRODUCTION

Italmatch Group considers the respect of human rights in all aspects of doing business. We have embedded the respect of human rights in Italmatch Group Code of Ethics according to which we oppose to all form of modern slavery, and we intend to run our organization embracing the fundamental human rights in accordance with the international conventions and observing the laws of the countries in which we operate.

Italmatch Group approach is informed by the United Nations' Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the Declaration on Fundamental Principles and Rights at Work issued by the International Labour Organization (ILO) and the Ten Principles of the United Nations Global Compact.

1. OUR POLICY

This Human Rights Global Policy ("Human Rights Policy" or "Policy") is applicable to Italmatch Chemicals S.p.A., all Italmatch Chemicals S.p.A. subsidiaries¹ (collectively "Italmatch Group" or the "Group") and to all of Italmatch Group officers, directors and employees and everyone acting as intermediary (among others, agents and distributors) and representative of Italmatch Group ("Group Representatives") as well as suppliers and commercial partners.

Active on international level, Italmatch Group has a strong commitment to human rights, which is reflected in the core values of safety, care and respect, integrity and accountability of the Group. In our operations and business activity we respect, protect and promote human rights in the countries and communities where we operate complying with local legislations and regulations.

Italmatch rejects all forms of modern slavery and human trafficking, both within its own operations and across its supply chain, through the implementation of specific policies, employee training, and targeted risk assessments.

We promote respect for human rights, inter alia in labour conditions, women's rights and the right to water, through our collaborations and public policies. We also promote respect for the cultural and psycho-physical person conditions, providing a working environment that respects human dignity and safe and healthy workplaces.

Within the above principle, the Group acknowledges the corporate responsibility towards the fundamental internationally recognised human rights such as, among others:

- no use of any type of illegal work or "off-the-books" work;
- no use of child labour;
- no use of forced labour or brutal work;
- no retainment of workers' identity documents or other personal documents as a means of control or coercion;
- healthy and safe workplaces;
- freedom of association and the right to collective bargaining;
- not tolerating discrimination;
- compliance with applicable law on data protection;
- compliance with applicable law and regulation on working hours and right to rest;

¹"subsidiaries" are all the companies and/or entities directly or indirectly controlled by Italmatch Chemicals S.p.A., where "control" means the direct or indirect ownership of at least 50% of the capital or voting rights.

- compliance with applicable law and regulation on remuneration.

We prohibit discrimination as well as illegal work, forced, trafficked and child labour, we respect the health and safety applicable rules and the right to freedom of association, collective bargaining and effective information and consultation procedures. We are aware of the importance of recognize adequate protection to personal data that are processed in the contest of the business activity, and we pay the utmost attention to the protection of personal data according to the applicable law where we operate.

The respect of the aforementioned main principles and, more in particular, the refusal of any form of modern slavery and human trafficking is compulsory and essential to Italmatch current business interests and future business opportunities. Our Group will not start or continue any relationship with those who will not comply with these principles and values.

We aim at increasing our positive and responsible social impact and we expect that our partners share our business principles; on this regard, this Policy has been made available to all the parties through its release on Italmatch Group official website.

2. OUR EMPLOYEES

The relationships among the employees of Italmatch Group shall be based on principles of peaceful coexistence, no discrimination, inclusion and shall be conducted with mutual respect for the rights and freedoms of others.

The Group guarantees the fundamental rights of employees, in accordance with the laws of the countries in which it operates, the agreements signed with third parties and in accordance with international conventions in the field of work organization.

In particular, the Group ensures compliance with the requirements of corporate social responsibility that deal with the aforementioned several standards such as zero tolerance of forced labour, promotion of health and safety workplaces, freedom of association and the right to collective bargaining, compliance with legislation in terms of working hours and remuneration and not tolerating discrimination, harassment or retaliation.

We promote the adequate living wages by guaranteeing that the minimum salary of employees cannot be lower than that set in the applicable laws on local level in force in the various countries where we operate.

We promote training and professional development and the recognition of results of work as fundamental principles on which to base its relationship with workers.

3. EQUAL OPPORTUNITIES AND DIVERSITY

Diversity is considered to be a cultural, human and professional opportunity, through dialogue and sharing of opinions, ideas and experiences.

Women's rights and employee's inclusion are our priorities.

We manage and grow responsible businesses where women participate on an equal basis as we are aware that women are integral to our business.

We promote equal opportunities for women and men with special emphasis on equal criteria for selection, remuneration, and promotion, and equal application of those criteria, and prevent discrimination or dismissals on the grounds of marriage, pregnancy or parenthood.

Equal opportunities are also promoted for all our employees in terms of on equal criteria for selection, remunerations criteria and promotions preventing discrimination in terms of political or trade union opinions, religion, race, nationality, age, sexual orientation, health status or in general, any intimate personal characteristics.

4. SUPPLIERS AND COMMERCIAL PARTNERS

We recognize the importance of due diligence of our suppliers. Our procurement team aims to develop and strengthen relationships with the Group direct suppliers who are committed to respect the human rights values. We also recognize that each Italmatch supplier has its own supply chain and is responsible for ensuring compliance with laws and regulations protecting human rights.

The selection of our direct suppliers is led, in addition to technical needs, by our Supplier Code of Conduct covering different themes of corporate social responsibility, among others, environment, health & safety and in general labour conditions, ethics and human rights made on the basis of a transparent and objective assessment of corporate sustainability performance also in collaboration with third operators supported by appropriate surveys and documentation.

Suppliers with whom the Group operates and will operate will be required to ensure operational standards compatible with the respect for human rights, workers and the environment. Suppliers will also be required to embrace our commitments to ensure transparency to remedy any shortcomings and to drive continuous improvement.

In our general conditions of sale and purchase and main contracts, our commercial partners are required to adhere to Italmatch principles and values in doing business as included in Italmatch Code of Ethics or the specific Supplier Code of Conduct.

Our commercial partners and other third parties working for the Group operating in violation of human rights will be requested to develop corrective actions and, in addition, Italmatch is allowed to terminate the business relationship as well as taking any other legal and remedial actions available under applicable laws.

5. OUR IMPACT AND MONITORING

We continue to strengthen our commitment for human rights to identify risk of actual and potential human rights issues in our supply chain and in our business.

We promote actions to manage and address human rights risks and impacts through dialogue and collaboration. We implement ways to remediate, cease or prevent adverse human rights impacts of our activities, and to mitigate any remaining impact to the greatest extent possible.

The following official e-mail address is active to report any violation of human rights principles and/or of this Policy: ethics@italmatch.com

With this regard, the Group enforces whistle-blower procedures prohibiting retaliation and discrimination against any employee and Group people in general who reports any wrongdoing or adverse human rights impacts of Italmatch Group's activities to the Compliance Team, in order to conduct the most appropriate due diligence activities and evaluate appropriate remedial actions, ensuring the protection of confidentiality.

Italmatch Whistleblowing Global Policy with specific reference to reporting, processing and managing the whistleblowing reports, is available on Italmatch Group official website: www.Italmatch.com.

We are committed to continue increasing the capacity of our management to effectively identify and respond to human rights concerns.

6. DISCIPLINE

The Group, Group Representatives as well as suppliers and commercial partners can be investigated by government regulators in different jurisdictions and, depending on the circumstances, prosecuted administratively, under civil law or under criminal law, which could result in severe fines and penalties, debarment and imprisonment if a violation of Human Rights

Laws is established. Any employee who violates this Policy, or more specific procedures as may be released on local basis by the competent Subsidiaries, and more in general Human Rights laws and principles, will be subject to discipline, according to applicable law and contractual provisions, which may include termination of employment. Additionally, employees can be personally liable for violations of the applicable laws and sanctions may be severe.

Distributors, agents, consultants, suppliers and commercial partners working for and with the Group who are found to be in violation of this Policy as well as Human Rights Laws will remain subject to termination of the business relationship in addition to any other applicable remedy from time to time.

7. GOING FORWARD

This Human Rights Global Policy consolidates our commitments and clarifies our processes and procedures. Its principles are implemented across our operations and value chain.

We regularly evaluate and review the best tools to strengthen our approach to addressing human rights. Believing in an integrated approach to human rights, we work through external initiatives and partnerships, such as NGOs, local communities, trade unions, suppliers and business partners to address shared challenges. In addition, we are committed to doing continuous training on the human rights principles to our employee.

This Policy is made available to all the parties concerned through its release on Italmatch Group official website www.italmatch.com. This Policy is reviewed every two years and may be unilaterally modified at any time and without notice; amendments may be necessary, among others, for compliance reasons and/or accommodate organization changes within the Group.

Legal & Compliance and Human Resources departments are in charge of monitoring the implementation of this Policy, without prejudice to ask for support of others relevant departments on as needed basis.

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