

Code of Ethics

Speciality Chemicals International Limited

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Mission

We commit to being a benchmark in the field of specialty chemicals, by making best use of our technical capabilities and by respecting environmental sustainability.

We aim at:

- Transmitting, in a clear way, our values to all our customers;
- Granting all our workers with the tools necessary to grow from both a personal and professional point of view;
- Constantly improving our performance;
- Ensuring that our contribution to the general welfare of our community is recognized.

All our activities aim at reaching these goals. We strive at constantly improving our performances and meeting our customers' expectations, by providing them with proposals which take their specific needs into consideration, acting with integrity, proposing fair contractual terms and delivering clear and complete information.

Scope and availability

This Code of Ethics applies to all the Companies of the Group and to all the stakeholders that are part of it. As for third parties, the Group is committed to ensure that customers, suppliers and all external contractors meet the provisions contained herein.

The Code of Ethics is available for all external contractors (customers, suppliers, etc.) and interested parties at the following link: [Sustainability | Polynt](#)

Communication and functioning

The Code of Ethics and any update thereto is communicated, internally, to all workers and other stakeholders, by electronic mail with return receipt. All workers that do not have an electronic mail will be able to consult the Code of Ethics on a bulletin board.

The Code of Ethics is not aimed at simply satisfying a legal need but at establishing an ethical and behavioural target, overcoming a mere punitive approach and reaching, at all levels of the Group, both internally and externally, a widespread level of adherence to shared principles.

Monitoring of application and reporting of violations or non-compliant behaviors

The monitoring of the application of the Code of Ethics is the responsibility of:

- each worker;
- each function manager;
- Control bodies.

Among the several control committees, the Supervisory Board established in Italy is requested to verify the exact application

of the Code of Ethics, with specific regard to the provisions contained in legislative decree No. 231/2001.

Any violation or non-compliant behaviour shall be reported through the following specific whistleblowing portal at the following link: <https://polynt.integrity.complylog.com/>

Breaching the Code of Ethics exposes the breaching person to the disciplinary sanctions applying in its jurisdiction and may bring to legal actions against him/her.

Corporate Social Responsibility

All workers undertake to comply with the applicable laws and the principles of this Code of Ethics.

Workers shall always act in a responsible way towards both their community and environment, keeping the highest professional standards and observing the values of transparency, loyalty and honesty.

Each worker has to improve its knowledge of the more advanced professional techniques and implement them.

Whenever the applicable laws and company procedures do not provide for clear conduct guidelines, workers must behave in a professional way and pursuant to the diligence standards appropriate to the specific situation, keeping a correct behaviour in a spirit of good faith. In these circumstances workers should in any case coordinate with their supervisor.

Workers commit to 1) behaving in an ethical way and comply with rules of law, 2) being professional and fair in their business relations, 3) applying the principles of the

“Responsible Care®”, 4) observing human rights and workers’ rights, 5) behaving in a correct, polite and respectful way towards their colleagues in their working relations, 6) assessing in a fair and appropriate way the rights and interests of business partners, clients, authorities and public opinion, 7) respecting the environment, 8) being loyal towards the Group.

Contents of the Code of Ethics

The Code of Ethics has to inspire all company policies and the procedures adopted and define the Group position in the following fields:

- Compliance with laws
- Legislative decree No. 231/2001 (applicable to Italian companies)
- Relations with public officials, public service providers and private individuals
- Controls over trade
- Commercial relations
- Fair trading
- Safety, health and environment
- IT security
- Use and protection of personal data, company assets and confidential information
- Personnel selection, recruitment and evaluation
- Discrimination in the performance of the employment relationship
- Conflict of interests

Compliance with laws

Each worker is expected to know the laws governing his/her field of activity and the management is expected to provide for behavioral instructions and appropriate training of personnel.

The Group undertakes to regulate the employment relationship in a fair and equitable way, guaranteeing the health and safety of each worker and the compliance with the environmental legislation.

The Group expects each worker to comply with the rules governing their work activities, to obtain the necessary authorizations and to manage the production plant in strict compliance with applicable laws.

Should judicial proceedings arise in relation to the alleged violation of industry legislation, the management of the Group shall be immediately informed and shall always take full responsibility for its actions and will abide by the decisions of the judicial authorities.

Legislative decree No. 231/2001 (applicable to Italian companies only)

Companies complying with legislative decree No. 231/2001 on the administrative liability of legal entities, of Companies and associations, have adopted and implemented an “Organisation, management and control Model” (the “231 Model”). The adoption of rules of conduct are aimed at preventing the offences identified by the abovementioned

legislation and represent an essential element of the internal preventive control system.

The auditing and supervision are respectively delegated to the Internal Audit and the Supervisory Body.

Any amendment and integration to the 231 Model are carried out with the support of the Internal Audit function and/or external specialized professionals.

Relations with public officials, public service providers and private individuals

Italian companies must comply with the rules set forth in the 231 Model and the corporate policies in place also **while interacting with public officials, public service providers or in the relations with private individuals**. Relationships must be based on complete transparency, full respect of the applicable laws, clarity and certainty of the methods of communication of the operations performed, so to avoid interpretative bias in the tracking and reconstruction of the followed procedures.

Controls over commercial exchanges

The Group encourages the initiatives aimed at avoiding the sale of chemical products that, by abuse, could be used for war and paramilitary military purposes or to produce drugs.

Commercial relations

The Group's commercial relations are guided by the principles of this Code of Ethics and require its commercial partners to observe it (customers, suppliers and other external workers).

Commercial partners are chosen on the basis of objective evaluations, pursuant to the principles of fairness, economic efficiency, quality, innovation, continuity, ethicality, in compliance with corporate policies and with national and international industry legislation.

Fair trading

The Group undertakes to comply with the principles of fair trading and observes national and international laws which contrast cartels or other anticompetitive structures.

The compliance with antitrust laws shall be granted in all kind of agreements and entrepreneurial practices. In particular, the Group:

- Does not deny, hide, manipulate or delay any information required by Antitrust Authorities;
- Forbids discussions or other kind of contacts with competitors about the determination, stabilization or discrimination as regards prices;
- Prohibits any agreement with competitors in relation to territories or markets where the competing products are sold aiming at assigning markets or clients;

- Prohibits discussing or having other kind of contacts with suppliers or customers limiting in an unlawful way the exchanges or excluding one or more competitors from the market.

The rules aimed at banning and/or limiting cartels, as far as applicable to the entities being part of the Group, form a substantive part of this Code of Ethics.

Safety, health and environment

In all its business activities, the Group is committed to preserving the health of its workers, to guaranteeing and adopting best practices in the management of safety at work and to carrying out its business activities in full compliance with environmental regulations.

The principles regarding safety, health and the environment, which are an expression of our corporate ethics, are a priority and apply to all Group companies that offer a safe working environment and ensure that their workers use processes, technologies and resources suitable for minimizing risks related to safety, health and the environment.

IT security

The Group, being aware of the continuous technological changes, aims at adopting effective IT security policies by protecting systems and information from potential attacks and guaranteeing maximum service continuity. In the area of IT risks, the following activities are prohibited:

- alter IT documents, public or private, with probatory value;
- improperly access the computer or telematic system of public or private entities;
- unlawfully access computer or telematic systems of the Group in order to alter and/or delete data and/or information;
- possess and unlawfully use codes, keywords or other means making it possible to access to computer or telematic systems of public or private competitors in order to acquire confidential information;
- possess and unlawfully use codes, keywords or other means making it possible to access to computer or telematic systems of the Group in order to acquire confidential information;
- carry out activities of procurement and/or production and/or diffusion of equipment and/or software of the Group in order to damage a computer or telematic system, of public or private subjects, the information, data or programs contained therein, or to facilitate the total or partial interruption or alteration of its functioning;
- carry out fraudulent activities of interception, obstruction or interruption of communications relating to a computer or telematic system of public or private subjects of the Group in order to acquire confidential information;

- install, for any Group company, equipment for the interception, impediment or interruption of communications of public or private subjects;
- carry out activities of modification and/or deletion of data, information or programs of private or public subjects or in any case of public utility;
- carry out activities to damage the information, data and computer or telematic programs of others;
- destroy, damage, make unusable computer or telematic systems of public utility.

Use and protection of personal data, company assets and confidential information

In order to guarantee the protection of the personal data of worker(s), the Group undertakes to process such data in compliance with the applicable laws and, in particular, according to the principles of transparency, lawfulness, guarantee of quality and correctness of the data.

In accordance with the principles of correct company management, the Group has the duty to protect and make use of the company assets with caution. All workers are required to safeguard, preserve and defend the assets and resources assigned to them in the frame of their work and to use them properly and for the benefit of the social interests, preventing any improper use.

Confidential information and company secrets must be treated and protected in an appropriate manner, in accordance with company procedures.

If necessary, the information must be further protected through intellectual property laws.

Worker(s) having access to confidential information or Group company secrets are prohibited from transmitting such information to third parties, including acquaintances and relatives, or using it for purposes other than legitimate company objectives. Worker(s) must take all possible precautions to protect confidential company information and company secrets in order to prevent any improper use. All information circulating, stored or archived within the Group will be managed through a professional information management system. Worker(s) must keep confidential the information acquired when working, even if not expressly covered by secrecy.

Personnel selection, recruitment and evaluation

During the selection, recruitment and career advancement phases of the worker, the Group undertakes to make assessments solely on the basis of the correspondence between specific professionalism requirements with respect to the position or duties and on the basis of transparent and provable merit considerations, in line with the defined company procedures and adopts selection methods that respect human dignity in order to prevent any form of personal or illegal labour exploitation.

Discrimination in the performance of the employment relationship

The Group is committed to adopting non-discriminatory labour policies. Regardless of their hierarchical level, all

workers are required to treat their colleagues with fairness, courtesy and respect.

The Group does not allow any discrimination, harassment or abuse due to ethnicity, nationality, skin color, religion, age, gender, physical aspects or similar reasons.

The Group does not make direct or indirect use of child labour and does not allow exploitation of workers in any form or manner whatsoever.

The Group does not recruit, use, hire or employ, either directly or indirectly, manpower for illicit purposes and does not perform any action that could represent intermediation of illicit manpower. Any kind of forced labour is forbidden.

Any freedom of association and the right to collective bargaining is free.

Conflict of interests

The interests of the Group take priority in all business relations. None of the workers can benefit directly or indirectly from the improper use of relationships or relations with persons or legal entities outside the Group.

Worker(s) must do everything possible to avoid situations that could lead to conflicts between their company position and their personal interests.

If, despite the commitment of the persons concerned, a conflict of interest arises or is likely to arise, it is essential that the person involved and their responsible managers communicate frankly and openly with each other.

All efforts must be made for the conflict to be uncovered and settled in good faith and in the spirit of ethical values.

Under no circumstances may third parties be used to circumvent the above behavioral principles.