



# CODE OF ETHICS



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**CODE OF ETHICS**

# **SUMMARY**

<b>FOREWORD</b>	<b>4</b>
<b>MISSION, VISION AND VALUES</b>	<b>5</b>
<b>RECIPIENTS, VALIDITY AND SCOPE OF APPLICATION</b>	<b>6</b>
<b>PRINCIPLES OF BUSINESS AND CONDUCT</b>	<b>7</b>
<b>ETHICAL PRINCIPLES IN INTERNAL RELATIONS</b>	<b>11</b>
<b>ETHICAL PRINCIPLES IN RELATIONS WITH THIRD PARTIES</b>	<b>12</b>
<b>IMPLEMENTATION RULES</b>	<b>14</b>



## FOREWORD

In the conduct of its business activities, **Eigenmann & Veronelli S.p.A.** (also referred to hereafter as simply the "**Company**" or "**EV**") adheres to ethical principles that derive from the individual and corporate values it has cultivated and grown over the years.

This **Code of Ethics** (hereafter referred to also as the "**Code**") establishes the values, ethical principles, and standards of conduct that all individuals representing **Eigenmann & Veronelli** are required to endorse and uphold.

Being part of **Eigenmann & Veronelli** therefore entails upholding and applying the principles and rules of conduct of the **Code** at all times.

## MISSION, VISION AND VALUES

### MISSION

Every day, **EV** seeks out new opportunities to grow its business as a distributor of chemical specialities and food ingredients by consistently remaining sensitive to the needs of our various stakeholders and transparent in our dealings with them. We exceed expectations thanks to the passion, competence and excellence of our people. Everyone is valuable and essential to our success.

### VISION

Working together as a team, we aim at becoming an internationally significant player in the provision of innovative services and solutions that create value for our employees, suppliers and customers.

**EV** is a qualified partner and business facilitator that consistently combines local market knowledge with innovation in the field of chemistry to create new value opportunities. **EV's** philosophy and guiding precept is encapsulated in our motto: "**Specialists in Formulating Value.**" This is our motto, but it is also a promise we have made to all our customers and suppliers, for we are committed to combining product innovation and solutions with new ingredients and fresh ideas, and to providing crucial expertise and guidance in what is an ever-evolving market.

5

## OUR VALUES

### ETHICS AND SUSTAINABILITY

We cultivate enduring and valuable partnerships grounded on complete respect for our partners with whom we share the wealth of experience and expertise we have gathered over the years as we steadfastly pursue our goal of innovation.

We are dedicated to setting a model of virtue in ethics and sustainability for our clients, partners and the planet.

### INNOVATION AND PERFORMANCE

We respond to evolving customer needs and expectations with a future-oriented business that is fuelled by the spirit of innovation, driven by ethical precepts of sustainability, and follows the cultural path that we have laid out as market facilitators.

While always ahead of the curve in spotting new market tendencies, we have never strayed from our promise to deliver quality, safety, technical excellence, integrity and innovation.

### EXCELLENCE

Our excellence lies in the ideas, advanced solutions and technical expertise that we offer our partners, suppliers and end customers.



## CARE AND RESPECT FOR PEOPLE

Our people are our greatest asset.

At **EV**, we cultivate and attract top talent by fostering a culture that values innovation, diversity, equity, inclusion, well-being and safety.

We support our team in tackling the daily challenges of their work while building a dynamic future.

## ESG STRATEGY

Environmental, Social and Governance (ESG) precepts are deeply embedded in our corporate culture. **EV** consistently incorporates sustainability into its processes not only by making ethics and integrity central to internal activities but also by applying them across the entire value chain.

Continuously improving our sustainability performance by fostering a culture of sustainability: that is our fundamental aim.

Hence our decision in 2022 to launch a sustainable strategy that set specific ESG objectives based on **three pillars**:

- **People: Safety, inclusion, empowerment**

Health and occupational safety

Emancipation, empowerment, Diversity, Equity & Inclusion (DE&I)

Support and well-being

- **Ethics and integrity**

Corporate culture



- **Sustainable innovation and product development**

Innovation and product development

Environmental impact



## RECIPIENTS, VALIDITY AND SCOPE OF APPLICATION

This **Code of Ethics** enshrines principles and rules that apply to all members of senior management and staff and anyone else who operates in the name and on behalf of **Eigenmann & Veronelli S.p.A.** (and who are collectively referred to in this document as **“Recipients”**).

The **Company** requires all external parties with whom it has dealings (e.g., consultants, suppliers, customers and partners) to conduct themselves in a manner consistent with the principles and rules of this **Code**.

The **Code** applies in all countries where the **Company** operates, their cultural, social and economic differences notwithstanding.

# PRINCIPLES OF BUSINESS AND CONDUCT

## RESPECT FOR OTHERS AND VALUE RECOGNITION

The existence and continuing development of **Eigenmann & Veronelli** utterly depend on the people who make up the **Company**

We uphold the fundamental rights of people by defending moral integrity and affirming the value of life, health and human dignity.

We repudiate all forms of discrimination on grounds of religion, sex, age, sexual orientation, racial or ethnic origin.

**EV** promotes diversity and inclusion and aims to build and maintain a working environment in which all staff feel welcomed and appreciated, and are given equal opportunities. A central **Company** value at **EV** is that gender equality is a strategic resource that fosters corporate growth.

**EV** requires each Recipient to:

- uphold a standard of conduct based on moral integrity, transparency, honesty and good faith;
- recognize and respect the personal dignity, privacy and personality rights of others;
- repudiate any discrimination based on differences of race, culture, religion, sex or political orientation.

7

## QUALITY, RESEARCH AND INNOVATION

**EV** pursues value creation by innovating, researching, producing and distributing unique products, namely: fine chemicals, specialities, food ingredients and performance chemicals.

**EV** has rapidly grown its business by combining its specific knowledge of local industrial applications with scientific innovation.

At **EV** we use only the highest quality and most reliable machinery, systems and professional-grade products that, combined with our advanced methodologies, enable us to deliver top-tier products.

When acquiring machinery and equipment, the **Company** accords primary importance to energy efficiency and other factors of environmental impact such as noise emissions.

For the sake of the environment and sustainable resource use, **EV** promotes policies to reduce consumption and waste.



## INTEGRITY, LOYALTY AND PROFESSIONALISM

Integrity, loyalty and professionalism are indispensable principles for **Eigenmann & Veronelli**.

**EV** requires every **Recipient** to:

- uphold a standard of conduct based on moral integrity, transparency, honesty and good faith;
- recognize and respect the personal dignity, privacy and personality rights of others;
- work with complete commitment to a level of professionalism that befits the nature of their task.

## BUSINESS ETHICS

It is an indispensable condition of **EV** that all Recipients:

- act conscientiously, with moral integrity and fairness;
- conduct themselves according to principles of loyalty, honesty and good faith and in a spirit of mutual collaboration;
- handle, process and communicate information with full accuracy and truth in dealings with internal and external parties alike;
- preserve the strictest confidentiality concerning any knowledge or information related to **EV** or its clients that they may acquire through the performance of their duties;
- ensure that every business operation is conducted in the **Company's** interest rather than for personal gain or the benefit of third parties. Recipients must promptly inform their superiors or supervisors of situations or activities in which their interests or the interests of their close relatives may conflict with those of **EV**, and of any other circumstances that may raise significant questions of appropriateness.

## COMPLIANCE WITH LAWS AND INTERNAL REGULATIONS

Compliance with current legislation and internal rules is one of the pillars upon which **EV** bases its actions.

All Recipients are therefore required to:

- observe all relevant laws and regulations when performing the activities assigned to them;
- be conversant with the relevant labour laws of the country (or countries) where they work;
- be acquainted with and observant of the **Code** and any internal procedures, policies, operational instructions that the **Company** may adopt.



## RESPONSIBILITY AND COLLABORATION

We aim for continuous improvement through responsible cooperation, achieved by means of:

- pro-active cooperation among workers from different areas of the **Company** as well as among workers in the same division. Actions at all levels and degrees of responsibility always seek the optimal outcome;
- the execution of efficient, productive and sustainable work in a corporate climate that is always and increasingly dedicated to full collaboration and common goals;

All **EV** employees with a coordination or management role or any position of responsibility must set an example, provide leadership and offer guidance that aligns with the principles of this **Code**. Through their example, they shall demonstrate to colleagues that adherence to the **Code** is a fundamental requirement for everyone's work and for achieving business results.

## ENVIRONMENTAL PROTECTION

The environment is a primary good that **EV** pledges to defend by adopting measures to prevent or at least minimize harm.

**EV's** enterprise and business production policies strike a balance between the imperatives of economic growth and value creation and the imperatives of respect for and defence of the environment. The **Company** is committed to managing and reducing its environmental impact. We insist on consistent respect for the environmental and prudent, accountable management of energy and natural resources, reflecting our social responsibility to society.

The **Company** aims to build a more sustainable value chain through responsible sourcing and efficient manufacturing.

We pledge to:

- use processes, technologies and materials that reduce the consumption of energy and natural resources and have the lowest possible environmental impact;
- limit the production of waste;
- involve and motivate all staff by taking action to acquaint them with environmental issues.

**EV** requires its employees to refrain from engaging in or contributing to actions that may harm the environment. In their daily activities, they shall be committed to upholding principles related to environmental management, compliance with environmental laws, responsible sourcing and utilization of materials, efficient use of energy and water, responsible waste management, the promotion of a circular economy, and the preservation of biodiversity.

Over its years of operation, **EV** has received multiple **certifications** (refer to the relevant section of the **Company** website - [www.eigver.it](http://www.eigver.it) - for details).



## HEALTH AND SAFETY

The workplace environment and the health and safety of our employees are key assets that must be protected.

**EV** is committed to spreading and consolidating a culture of safety by developing risk awareness and promoting responsible behaviour among all **Recipients**. To implement its workplace safety policy, **EV** provides ongoing training and promotes safety awareness.

Each Recipient's responsibility towards their colleagues and co-workers entails devoting the utmost attention to injury prevention and the correct implementation of company procedures.

Every **Recipient** must follow the **Company's** safety instructions and directives.

## SUSTAINABILITY AND CORPORATE SOCIAL RESPONSIBILITY

Firmly convinced of the fundamental importance of promoting a model of social responsibility and sustainable development, the **Company** actively supports and invests in initiatives to nurture community and employee well-being.

**EV's** technological advances proceed from the installation of systems that demand less energy and produce less waste. **EV** maintains a consistently sharp focus on the best available technologies for deployment when modifying a plant or expanding a production line.

## INFORMATION SECURITY AND TRADE SECRETS

In accordance with the law, **EV** safeguards the confidentiality of its own and its customers' information. Recipients may use confidential information solely for the purpose of fulfilling their professional responsibilities.

Consequently, any information or intelligence about the **Company** and its activities, including information or intelligence about parties in a business relationship with the **Company**, is treated as confidential and may not be disclosed without authorization.

## TRANSPARENCY

Where regulations so require, **Recipients** must provide accurate, complete and reliable documentation on the activities they carry out in connection with their work.

Such documentation must be designed to facilitate inspections into the nature of and reasons for a given transaction, and the identification of the parties who authorized, executed and/or took control of it.

**EV** strives for consistency and transparency in all economic activities to prevent the occurrence of suspicious transactions.

## USE OF SOCIAL NETWORKS AND THE COMPANY WEBSITE

The use of social networks and the website must adhere strictly to the principles outlined in this **Code**. Only authorized **EV** personnel may publish content.

Considering the significant resonance and potential for reputational impact, **EV** urges Recipients to exercise the utmost caution when deciding on which content and material to publish. Whatever is published must comply with the law, accord full respect for the freedom, integrity, and dignity of individuals, and cause no direct or indirect harm to the **Company's** image, reputation or credibility.

11

## ETHICAL PRINCIPLES IN INTERNAL RELATIONS

### OUR PEOPLE

We believe that our people make a difference and encourage them to take a pro-active approach to personal development.

Committed to maintaining and encouraging a positive working environment, **EV** has built its relationships with employees and partners on foundations of loyalty and trust.

Transparent criteria determine the selection and recruitment of staff, who are assessed on their competence and professionalism.

The **Company** orients its initiatives and strategies towards the achievement of its key objectives, which are :

- to increase the **Company's** capacity to attract young recruits;
- to leverage new professional skills, guarantee stability of employment and offer new career opportunities.



**EV** expressly prohibits:

- the recruitment and employment of foreign workers without valid residency permits;
- all forms of psychological, physical and sexual harassment;
- child labour and forced labour.

## CORPORATE BODIES

**EV**'s corporate bodies exercise their functions on the basis of collaboration and transparency. All **Recipients** belonging to such bodies are therefore expected to provide clear, precise and accurate information on the industrial, economic and financial management of the **Company**, as required by law.

## ETHICAL PRINCIPLES IN RELATIONS WITH THIRD PARTIES

**EV** works towards its objectives in an environment populated by stakeholders, each with specific needs and expectations. In its dealings with stakeholders at various levels and for various purposes (e.g., upstream and downstream supply chain operators, rival companies, local communities and institutions), the **Company** shall act in accordance with the prescriptions of this **Code**.

## RELATIONSHIPS WITH CUSTOMERS AND PARTNERS

**EV** transacts with partners and customers with a reputation for reliability and whose operations align with **EV**'s ethical principles.

**Recipients** shall:

- act with maximum transparency in all interactions with customers and partners;
- support in all possible ways the maintenance of current contractual arrangements and the signing of new ones, which also entails focusing on the handling of suggestions and complaints;
- encourage open dialogue and collaboration with customers and partners.

## RELATIONSHIPS WITH CONTRACTORS, CONSULTANTS AND SUPPLIERS

**EV** selects its contractors, consultants and suppliers with reference to their quality, competitiveness, professionalism and regulatory observance.

We limit all our commercial dealings exclusively to parties who enjoy a solid reputation for trustworthiness and are observant of the law in the conduct of their business.

**EV** avoids suppliers without proper credentials and investigates those in countries with child labour risks.

**EV** expects all its suppliers, consultants and contract parties to respect the law and this **Code of Ethics**.

## RELATIONS WITH INSTITUTIONS AND PUBLIC OFFICIALS

**EV's** interactions with public institutions and officials (national, EU and international) shall be conducted with transparency and integrity by authorized personnel, who shall refrain from any actions that may be seen as improperly influencing decisions or seeking preferential treatment.

13

**EV** may support pro-social and community programmes, non-profit foundations and charitable associations without departing from the strictures of the law or this **Code**.

## GIFTS, FAVOURS AND OTHER BENEFITS

In relations with customers, partners, contractors, consultants, suppliers, public institutions, public officials and with third parties in general, the **Recipients** shall not promise, accept or offer gifts, favours, benefits (both direct and indirect) and acts of courtesy or hospitality that exceed normal business practices, local customs, and ordinary standards of courtesy, or that are intended to obtain preferential treatment, or other improper advantages, in relation to business operations related to **EV**.

**Recipients** who are offered or promised gifts, favours, benefits or acts of courtesy or hospitality shall promptly inform the relevant corporate body, which shall decide on the acceptability of what is being offered or promised.



## IMPLEMENTATION RULES

### SANCTIONS FOR NON-COMPLIANCE

This **Code** lays down the fundamental principles and rules of conduct of **EV** whose designated corporate bodies enforce them with fair and proportionate sanctions that match the severity of the **Code** violation, as per current regulations.

#### *Senior staff - Managers*

Non-compliance with the **Code** by senior staff or managers of **EV**, being contrary to the terms of employment, shall result in the application of disciplinary sanctions.

Sanctions shall adhere to legal requirements and relevant national labour agreements, and shall be proportionate to the severity and nature of the non-compliance.

Duly designated corporate functions with delegated powers shall be in charge of investigating non-compliance, managing disciplinary proceedings and imposing sanctions.

#### *Third parties*

Compliance with the **Code** is also mandatory for contractors, consultants and any other parties in contractual relationships with the **Company**, and shall be enforced through specific contractual clauses. Violations of the **Code** by contractors or consultants may lead to contract termination and could result in the **Company** seeking damages if a violation causes it harm.

## COMMUNICATING THE CODE

**EV** shall apprise all **Recipients** of the provisions of the **Code** and its scope of application, and shall urge compliance with it.

In particular, the **Company** shall see to

- the distribution of the **Code** among **Recipients**;
- the interpretation and explication of its provisions;
- the verification of actual compliance;
- the updating of provisions of the **Code** according as needs arise from time to time.

The **Company** shall furnish third-party contractors working on single assignments or in ongoing relationships with a copy of the **Code** for their information.

## REPORTING VIOLATIONS

For the efficacy of the **Code**, **EV** has adopted a whistleblowing procedure that outlines how to report actual or suspected violations.

The report should include specific, substantiated information that reasonably suggests the reported actions or omissions are violations observed through work or professional activities.

The reporting party must supply all useful information to enable verification and confirmation of the facts as stated.

## ENTRY INTO FORCE AND COORDINATION WITH COMPANY PROCEDURES

The **Code** has been approved by the Board of Directors of Eigenmann & Veronelli and is adopted with immediate effect.

The **Code** supplements but does not replace existing or future company procedures that shall remain in effect as long as they do not conflict with the **Code**.

