YEAR 2026

Supplier Code of Conduct

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ELAchem

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Our Mission

"We must not sacrifice a strong and solid economy to safeguard the health of our planet"

- Dennis Weaver

Protecting the environment and implementing sustainable strategies are in no way in opposition to economic development. On the contrary, it is possible to achieve consistent financial development by establishing a harmonious and strong relationship with the sustainable approach.

- For Elachem, sustainability is an element that, although innovative, must become an integral part of the business strategy. We know that this is a very ambitious goal and sometimes still difficult to pursue, but we want to achieve it with extreme commitment and with the support of all our stakeholders.
- The relationship that Elachem has with its suppliers is based on respect for fundamental values and principles not only at the business level but also and above all on interpersonal relationships: loyalty, transparency, fairness, mutual support, trust and responsibility are the pillars.
- Why the Code of Conduct? Elachem believes that it is necessary to strengthen relationships with its suppliers, hoping for a close collaboration that considers business strategies but also the desire to create a quality *supply chain*, both from the point of view of products but also in compliance with legal issues and sustainability.

Elachem is committed to respecting the principles of "Sustainable Development", meeting the goals of the 2030 Agenda and collaborating with suppliers who share the same ideals.

The code is based on the Universal Declaration of Human Rights and the principles expressed in internationally recognized standards on responsible business management. These include the United Nations Global Compact, the International Labor Organization's (ILO) Core Labor Standards, the Rio Declaration on Environment and Development, and the global chemical industry's Responsible Care® program.

The Universal Declaration of Human Rights

www.ohchr.org/EN/UDHR/Documents/UDHR_Translations/itn.pdf

The 10 Principles of the United Nations Global Compact

https://www.unglobalcompact.org

International labour standards

https://www.ilo.org/rome/norme-del-lavoro-e-documenti/lang--it/index.htm

The Rio Declaration on Environment and Development

https://www.isprambiente.gov.it/files/agenda21/1992-dichiarazione-rio.pdf

Purpose

With this Supplier Code of Conduct, hereinafter referred to as the "Code", Elachem intends to share with its Suppliers its path of building a sustainable *supply chain* from an environmental, social and economic point of view.

In order to pursue this goal, Elachem believes that fruitful cooperation between the different and multiple actors in the supply chain is fundamental and necessary.

Scope

The Code is used by Elachem to manage its relationships with Suppliers, where the term "Supplier" refers to a natural or legal person who, as a third party and/or on the basis of a contractual agreement, provides any type of raw material, goods, technology, know-how or services to Elachem.

The Code is applied and shared with all suppliers active at Elachem and with all those who will always enter into new business relationships with Elachem.

Elachem is committed to complying with the law wherever it does business, and suppliers are expected to do the same. The latter, with a view to implementing a highly sustainable value chain, will undertake to communicate and share the principles set out in this code, where possible, also with their suppliers, so as to create a *totally sustainable* supply chain.

Suppliers are encouraged to continuously monitor the matters covered by this Code and to comply with all applicable legislative requirements. They are also invited to continuously improve the suitability, adequacy and effectiveness of their policies.

CLIMATE AND ENVIRONMENT

Suppliers are required to commit to operating responsibly and efficiently from an environmental and resource point of view. It is also required that all applicable national laws, regulations and rules on the limitation and prevention of environmental impact are complied with. The above includes the following aspects:

- **Climate protection**
  Suppliers are required to commit to climate protection, becoming one of the fundamental elements of their business strategy. They are therefore invited to carry out a proper assessment of the impact and risks that climate change may have on their supply chain. It will therefore be crucial that they set clear and defined targets to reduce greenhouse gas (GHG) emissions caused directly (Scope 1) or indirectly (Scope 2) by their operations and in their value chains (Scope 3). These targets should be achieved by the next few years, just as the achievement of *net zero* greenhouse gas emissions across the value chain should be planned by 2050.
  Elachem may need to ask its suppliers for the carbon footprint of the organization and/or specific products: it would certainly be qualifying for the supplier to make it available.

- **Emissions**
  Emissions are the release of air pollutants, noise, vibrations, lights, heat or radiation and other forms of environmental impact generated by the supplier's systems which, due to their nature, extension and duration, may lead to significant dangers or inconveniences to the environment.
  The supplier is required to classify, verify, manage emissions and treat them in a way that makes them harmless.

- **Water resources**
  The quality and availability of water in reservoirs and groundwater is the basis for the livelihoods of humans, animals and plants and must therefore not be compromised in any way by the supplier. Water should therefore be used sparingly in all business processes.
  The supplier must ensure that wastewater from its operations, manufacturing processes and sanitation facilities is treated as necessary before it is discharged. The concentration of hazardous substances in the water must be reduced in such a way that the wastewater does not cause adverse effects on humans and the ecosystem.
  If there is no wastewater treatment infrastructure at the production site, it will be necessary to appoint qualified/suitable companies for its transport and treatment

- **Waste**

  Suppliers are required to undertake and implement all possible efforts to ensure that the handling, storage, transport, reuse, recycling and disposal of all types of waste, solid and liquid, hazardous and non-hazardous, is carried out in a safe and compliant manner.

  Hazardous (or special) waste poses a risk to health and/or the environment. The handling, storage, transport and disposal of waste must be carried out by qualified personnel and in such a way that it does not have harmful effects on the air, soil, water and health of employees. Hazardous waste must be properly labeled and disposed of. Handling must be carried out using suitable protective equipment. Hazardous waste should be stored separately from non-hazardous waste. Waste recycling must be preferred to disposal and the recovery of materials for the production of raw materials for a new product is to be preferred to energy recovery where waste is incinerated and used for energy production.

- **Chemicals and hazardous substances**

  Hazardous substances are defined as all substances, mixtures and products with hazardous properties that may cause harm to human health, are flammable, explosive or hazardous to the environment.

  Handling, storage, transport and disposal of such substances must be carried out by qualified personnel. Containers of chemical and hazardous substances must be closed and labelled with safety information, in relation to the risk they pose.

  For all hazardous substances, suppliers will make available, as required by current legislation, and by the Reach Regulation, safety data sheets containing all the necessary and relevant safety information.

- **Responsible sourcing of raw materials**

  The supplier develops appropriate measures to ensure and improve the transparency and traceability of the raw materials used to make the product, throughout the *supply chain*. In particular, it will have to ensure that the raw materials used come from verified and responsible sources.

  In addition, it will have to pay particular attention to those raw materials containing minerals and metals from conflict-affected or high-risk areas such as regions that are the scene of armed conflicts, in situations of fragility, or in countries where government and national security are weak or absent altogether and where international law and human rights are systematically violated.

  The supply of raw materials must not be linked to human rights violations or the financing of armed groups. To ensure this, the supplier will apply the utmost diligence regarding the provenance and surveillance processes of these materials, in accordance with the OECD Due Diligence Guidance for a Responsible Supply Chain

of Minerals from Conflict-Affected or Other Risk Areas. In order to protect ecosystems and biodiversity, it is forbidden to extract raw materials in protected natural areas.

OECD Due Diligence Guidance for a Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas

http://mneguidelines.oecd.org/mining.htm

LABOUR AND HUMAN RIGHTS

Our suppliers are required to protect the human rights of their employees, local communities and vulnerable groups, treating them with dignity and respect, avoiding any form of violence, intimidation, harassment or aggression.

- **Prohibition of discrimination**
  No form of discrimination shall be tolerated, i.e. any treatment aimed at penalising or denigrating a person on the basis of age, physical characteristics, sex, pregnancy, gender identity, social or ethnic origin, nationality, language, colour, religion, physical or mental disabilities, as well as political orientation, participation in an employee representative body, of union membership or volunteering.

- **Rejection of forced labor, modern slavery and human trafficking**
  Any form of forced labor, modern slavery and exploitation is prohibited. All workers make their work or service available on a voluntary basis. Excess overtime, withholding personal documents, other sensitive documents and wages is prohibited.

- **Prohibition of child labour**
  Child labour in any form and exploitation is prohibited. The minimum age for admission to work must not be lower than that indicated by the International Labour Organization.

- **Protection of local communities and vulnerable groups**
  Providers will respect the rights of local communities and other vulnerable and disadvantaged groups.
  Illegitimate eviction and confiscation of land are not accepted. Suppliers will listen to the concerns of residents and do what they can to create positive impacts through their involvement. Support for local job creation, local sourcing, education provision and infrastructure development is encouraged.

- **Right to freedom of assembly and association**
  In accordance with local laws, suppliers will respect the right of their employees to freely associate, form and join trade unions, have representatives, join workers' works councils and participate in collective bargaining.
  Suppliers will not adopt disqualifying attitudes towards employees who act as workers' representatives, allowing them to exercise their role without fear of retaliation or discrimination.
  In accordance with current national legislation, employees must be granted the right to freedom of assembly and association.

HEALTH AND SAFETY AT WORK

- **Adequate working conditions**
  The supplier must ensure humane working conditions are not hazardous to health. Sufficient clean sanitary facilities must be available in its facilities, and the company and offices must be cleaned regularly to ensure workplace hygiene.

- **Occupational health and safety**
  The supplier must be aware of the operational risks associated with its activities and take measures to prevent and reduce emergencies.
  Suppliers must ensure controls, procedures and preventive maintenance to eliminate or reduce occupational health and safety risks. If the risks cannot be adequately eliminated, suppliers undertake to provide employees with appropriate personal protective equipment which is periodically checked to ensure its proper functioning.
  Employees must receive adequate training on how to behave in emergencies, fire or first aid situations. Such training must be documented and repeated within the limits established by law.
  For each hazardous chemical to be used, the possibility of replacing it with alternatives that pose a lower risk must be considered and for all these substances the safety data sheet must be available and correctly filed.

- **Working hours**
  The working hours of suppliers' employees must not exceed the maximum limit set by applicable national laws.

- **Pay**
  Employees must receive adequate and regular remuneration, equivalent to at least the national minimum wage. In the absence of applicable legislation, compensation and benefits must be sufficient to ensure an adequate standard of living for employees and their families.

ETHICAL CONDUCT

- **Corruption**
  No form of corruption is tolerated, and the supplier is required to avoid personal dependency on customers and other businesses. In addition, you must not accept or offer bribes or other forms of illegal payments.
  The supplier must not accept or offer gifts or other gifts with the intention of being able to receive preferential treatment or to be able to obtain/maintain business relationships or to influence business decisions.
  The Supplier must also prepare internal rules that prohibit bribery and corruption and must ensure constant training for its personnel to ensure compliance with the aforementioned principles.

- **Fair competition**
  The supplier must comply with the principles of fair competition and may not enter into agreements that are detrimental to the principles of competition with other market operators.

- **Money laundering and illicit financing**
  The supplier must source its financial resources exclusively from lawful sources. It may not directly or indirectly support terrorism or activities related to organized crime.

- **Data protection and security**
  Any personal data of which the supplier becomes aware during the performance of the activities envisaged must be processed in compliance with the principles and rules contained in EU Regulation 679/2016 (hereinafter "GDPR") and Legislative Decree 196/2003 (hereinafter "Privacy Code").
  The provider undertakes to implement security measures to ensure an adequate level of data protection in accordance with Art. 32 of the General Data Protection Regulation EU 679/2016 (hereinafter "GDPR"). Should the supplier become aware of a data breach involving information owned by Elachem, it will be its obligation to inform the latter of such breach without undue delay and providing all the information required by Article 33 of the GDPR. The supplier also undertakes to maintain the utmost confidentiality regarding the information exchanged between the parties during the relationship and to use it only for the purposes envisaged. The supplier may not transfer this information to third parties unless expressly authorised by Elachem.

We act responsibly as a company, as employees and as individuals to promote the protection of the environment, people and our future.

We thank all the suppliers who, together with us, are committed to adopting responsible and ethical conduct in the economy.

#MAKETHEFUTURESUSTAINABLE

Sincerely, on behalf of Elachem

Federico Brusa

