



L'APROCHIMIDE S.R.L.

AZIENDA PRODOTTI CHIMICI MINERALI E DERIVATI
SOCIO UNICO

Sede Legale, Uffici e Deposito:
20835 MUGGIO (MB) Italy - Viale della Repubblica, 74
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PEC: aprochimide@grupposafin.it
CAP. SOC. € 1.000.000,00 INT. VERS.
POS. IMPORT-EXPORT MB 014046
R.E.A. MB-1039013
REG. IMPR. MI-MB-LO E C.F. 02857100586
PARTITA IVA IT 00991540964

ETHICS CODE

1. Ethical Principles

1.1 Legality: Compliance with Laws and Regulations

L'Aprochimide S.r.l. operates in full compliance with applicable laws and regulations; directors, employees, and those who collaborate and/or maintain relationships with it in any capacity are therefore required, within their respective areas of responsibility, to know and comply with applicable laws and regulations, as well as all national and international regulations and generally recognized practices.

Relations with public authorities of any kind, by those working for L'Aprochimide S.r.l. must be characterized by the utmost fairness, transparency, and collaboration.

The company is committed to acting with full regard for the public interest entrusted to it.

1.2 Integrity and Transparency

The principle of integrity and transparency requires Recipients to pursue the Company's interests and to base corporate actions on the truthfulness, accuracy, and completeness of information, both internally and externally, implementing specific procedures for the traceability of decisions. In the contractual formulas used during their business, the commitment is to detail the clauses clearly and comprehensibly, ensuring equal conditions among customers, without favouritism toward any interest group or individual.

1.3 Fairness and Honesty

The principles of fairness and honesty are fundamental foundations of the company's organizational management. They imply attention to and respect for the rights of those involved in its activities, including privacy, equal opportunities, loyalty, transparency, and mutual respect.

1.4 Efficiency

The principle of efficiency requires that, in every work activity, the use of resources be optimized, cost-effective management guaranteed, and a commitment to offering a service suited to the needs of the counterparty is undertaken.



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1.5 Responsibility to the Community

The company is aware of its social role; therefore, it intends to operate with respect for the community, implementing actions aimed at the sustainable development of society, environmental protection, and cultural and educational growth in the prevention and protection of individuals in the workplace.

2. Corporate Form and Organizational-Management Structure

The corporate and management structure adopted complies with current regulations; it is designed to ensure optimal collaboration among its members through a balanced balance of management, direction, and control roles. It is characterized by a focus on business results, ensuring the company's financial stability and maintaining, over time, a constant and sustainable creation of value.

3. Rules of Conduct

3.1 Conduct Rules for Governing Bodies

Members of the governing bodies must conduct their activities in accordance with the principles of fairness and integrity and refrain, within the scope of their duties, from engaging in conflicts of interest. They are also required to:

- conduct themselves, in their relationships with public institutions and private entities on behalf of the company, in accordance with the principles of autonomy and independence, in compliance with the guidelines provided by the company's governing bodies;
- participate promptly and in an informed manner in the company's activities;
- use information they gain knowledge of confidentially in their duties and refrain from using their position to obtain personal advantages, whether direct or indirect;
- compliance with laws and standards of conduct in all communications;
- compliance with applicable legislation and the principles contained in this Code.

To this end, L'Aprochimide S.r.l. adopts, based on its activities and organizational complexity, a system of functions that provides, in explicit and specific terms, for the assignment of tasks to personnel with suitable skills and competences.



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3.2 Conduct Rules for Directors, Employees, and Collaborators

3.2.1 Specific Duties of Directors

The directors are committed to pursuing the Company's best interests, establishing appropriate mechanisms for reporting decisions, ensuring the maintenance of the company's good reputation, and implementing financial communications to third parties in strict compliance with applicable legislation.

3.2.2 Respect for Individuals

L'Aprochimide S.r.l. considers respect for people the cornerstone of its relationships with employees and collaborators. The Company is committed to preventing all forms of discrimination in the workplace and promoting equal professional opportunities.

To this end, L'Aprochimide S.r.l. extends its principles of respect for fundamental rights to relationships with third parties, committing to conduct human rights due diligence throughout its supply chain, in accordance with international guidelines (e.g., ILO), requiring suppliers to respect fundamental human rights, including:

- The prohibition of forced or coercive labour;
- The commitment to adopt measures to prevent forms of child exploitation, in compliance with local laws, but promoting the protection of minors in accordance with ILO guidelines;
- The adoption of decent working conditions (fair wages, reasonable hours, and workplace safety).

L'Aprochimide S.r.l. has implemented a structured supplier evaluation and monitoring process through ESG self-assessment questionnaires (see Appendix), scoring, and KPI collection, to identify and prevent potential risks of human rights violations and promote a responsible and sustainable supply chain.

3.2.3 Professional Development and Growth

L'Aprochimide S.r.l. considers professional development and growth to be important objectives. It encourages responsible participation in the company's life, placing great importance on communication and dialogue with employees and collaborators, and promotes training and development opportunities for them.



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In addition to honesty, loyalty, ability, professionalism, integrity, technical preparation, and personal dedication, the key requirements of its employees and collaborators include a commitment to continuing education.

L'Aprochimide S.r.l. has formalized these issues through a "Statement on Working Conditions and Social Benefits" and a "Training Policy."

3.2.4 Hiring Practices

L'Aprochimide S.r.l. ensures that employee evaluation focuses on verifying the fulfilment of professional, behavioural, and attitudinal requirements, and does not permit favouritism and/or discrimination of any kind. Professional growth is based on measurable objectives.

Hiring is conducted in accordance with applicable regulations and collective bargaining agreements.

3.2.5 Workplace Environment and Privacy Protection

L'Aprochimide S.r.l. is committed to maintaining a work environment that guarantees personal dignity, not tolerating any form of harassment and/or discrimination. In compliance with current legislation, it is committed to ensuring the protection of the privacy of its employees and collaborators regarding information pertaining to the private sphere and opinions.

L'Aprochimide S.r.l. has adopted a privacy system in compliance with the GDPR.

3.2.6 Conflicts of Interest and Anti-Corruption Policy

Employees and collaborators must avoid any conflicts of interest and refrain from actions compromising integrity or transparency. Corruption and illicit practices are strictly prohibited, including offering or requesting money, gifts, services, favours—directly or indirectly—from public officials or private individuals.

Examples of conflicts include:

a) own or hold majority or controlling stakes in companies or other entities that are in competition with L'Aprochimide S.r.l.;



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- b) have another employment and/or professional relationship in competition with L'Aprochimide S.r.l.; this applies to both employees and, unless otherwise explicitly defined in the contract, collaborators;
- c) for collaborators, disseminating confidential news and information of which they have become aware because of the assignment carried out and/or carrying out acts prejudicial to the client's business;
- d) initiate, conclude, and finalize negotiations and/or contracts involving partners, collaborators, or legal entities of the employee and/or collaborator or in whom he or she is interested;
- e) enter personal contracts, under particularly favourable conditions and preferential treatment, with parties with whom the company has business relationships;
- f) accept from external parties' remuneration or other benefits for activities required of him in carrying out his official duties.

A whistleblowing procedure, complete with a specific form, is available for reporting any suspected corruption.

3.2.7 Duties of Employees and Collaborators

Employees and collaborators undertake to comply with the obligations set forth in the Code, basing their conduct on the principles of integrity, fairness, loyalty, commitment, respect, and good faith.

Employees and collaborators are required to use and safeguard company assets and the assets they have at their disposal for professional purposes. Each employee or collaborator is directly and personally responsible for the protection and legitimate use of the assets and resources entrusted to them for the performance of their duties.

Each employee or collaborator is responsible for the security of the IT systems used, is subject to compliance with applicable regulatory provisions and the terms of the license agreements and must refrain from using the aforementioned systems and equipment for purposes other than those related to the employment relationship.

3.2.8 Health and Safety

L'Aprochimide S.r.l. is committed to protecting the moral and physical integrity of its employees and collaborators; internal procedures are designed to ensure a safe and



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healthy work environment in compliance with current legislation on prevention and protection.

3.2.9 Environment

L'Aprochimide S.r.l. is committed to environmental protection. All company employees are required to strictly comply with company regulations that may impact the environment, particularly regarding atmospheric emissions, solid and liquid waste management, and the use and storage of hazardous substances.

Compliance with company regulations must be ensured for any quantity of waste or products to be disposed of or treated.

For a more detailed description of our environmental principles, objectives, and operating procedures, please refer to the attached document "Corporate Environmental Policy" and the Ecovadis assessment, which is a key element in monitoring and improving our company's sustainable performance.

3.3 Conduct Rules for Commercial Partners, Suppliers, Clients, and Users

L'Aprochimide S.r.l. bases its relationships with suppliers, granting and/or contracting public entities, customers, users, and business partners in general on the principles of transparency, objective evaluation, equality, fairness, and competition, as well as operations based on maximum collaboration between the parties. In this context, the formalization of contractual relationships based on clarity, simplicity, and information aimed at encouraging informed decisions is promoted.

3.3.1 Client Relations

L'Aprochimide S.r.l. is committed to ensuring the achievement of high-quality standards in the production of its products, encouraging interaction with customers, including through the management and rapid resolution of problems.

3.3.2 Supplier Relations

Relationships with suppliers are based on:

- Regarding supplier selection: compliance with competition principles and objective assessments of the competitiveness, quality, utility, and price of supplies. Furthermore,



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supplier selection is conducted in compliance with ESG (environmental, social, and governance) criteria, verified through the completion of an ESG self-assessment questionnaire submitted to suppliers, to promote responsible and sustainable practices throughout the supply chain.

- Transparency and completeness of information, diligence, good faith, and traceability throughout the supply process.
- Regarding gifts, donations, and benefits: the prohibition, in business relationships with customers and suppliers, of donations, benefits, gifts, and acts of courtesy and hospitality intended to undermine the integrity and independence of the Parties. Employees and collaborators shall refrain from accepting or donating sums of money in any case.

In any case, it must be ensured that all purchases are made in compliance with company procedures (see "Sustainable purchasing policy"; "Supplier evaluation procedure"), both for the selection of the supplier and for the formalisation of the order, the acceptance checks and the verification of the correspondence between the goods received and the invoices.

4. Relations with Authorities, Public Institutions, and Other Representatives of Collective Interests

4.1 Authorities, Public Administrations, Local Authorities and Supervisory Authorities

Relationships (and the related management of financial resources) with public officials and public service representatives (acting on behalf of central and local public administrations, legislative bodies, community institutions, or international public organizations), with the judiciary, with public supervisory authorities, and with other independent authorities must be undertaken and managed in compliance with applicable laws, regulations, and the principles established by this Code of Ethics.

Institutional relationships are maintained exclusively by representatives who have received explicit authorization. Employees and collaborators will refrain from accepting, offering, or promising, even indirectly, money, gifts, goods, services, benefits, or undue favours in connection with relationships with public officials, public service representatives, or private individuals, with the aim of influencing their decisions. This is except for gifts or acts of courtesy and hospitality of modest value, in accordance with



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normal commercial and courteous practices, provided they are not intended to undermine the integrity and independence of the parties.

Requests and offers (even if not accepted) of money or favours of any kind (including gifts and presents of more than modest value) made improperly to, or by, those acting on behalf of L'Aprochimide S.r.l. in the context of relationships with the Public Administration are also not permitted. Nor are the solicitation of confidential information or acceptance of requests for contributions and sponsorships acceptable.

4.2 Public Funding

Should L'Aprochimide S.r.l. access public funding and grants of any kind and for any reason, it undertakes, and undertakes that its employees and collaborators, involved in any capacity in the management of the activities subject to the public funding, comply with all applicable regulations for such grants and not divert the funds received for purposes other than those intended.

4.3 Participation in Tenders and Relations with Clients

L'Aprochimide S.r.l., in relation to its participation in tenders, calls for bids, and/or projects, evaluates the appropriateness and feasibility of the requested services, with regard to regulatory, technical, and financial conditions. It undertakes not to undertake contractual commitments that could compromise its financial stability. In its relationships with clients, it ensures fairness and clarity in commercial negotiations and in the assumption of contractual obligations, as well as the faithful and diligent fulfilment of such obligations. In particular, about public administration tenders, it undertakes to operate in strict compliance with laws and regulations.

L'Aprochimide S.r.l. requires its employees and collaborators to pay particular attention and care in operations relating to tenders, contracts, authorizations, licenses, concessions requested and/or the management and use of public funding of any kind, relationships with supervisory authorities or other independent authorities.



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5. Operational Procedures and Records

5.1 Operational Procedures

L'Aprochimide S.r.l.'s management system includes the separation of duties, the participation of multiple individuals in the same decision-making process, and specific authorization and documentation requirements.

Proper implementation of these requirements allows for the identification of the individuals responsible for the decision-making, authorization, and execution of operations. In accordance with the principle of separation of duties, key operations are performed by different individuals, limiting the assignment of excessive powers and functions to any single individual.

Management procedures govern the execution of key operations, ensuring compliance with the requirements of legitimacy, authorization, consistency, appropriateness, proper recording, and verifiability, including with respect to the proper use of financial resources. Every operation implemented must be supported by adequate, complete, and properly archived documentation. The documentation is retained in the records to allow external auditing bodies to verify and identify the individuals who authorized, performed, recorded, and inspected it.

5.2 Accounting Records

The Recipients entrusted with maintaining accounting records are responsible, within the scope of their functions and duties, for ensuring that management facts are represented in the accounting information system accurately, completely, truthfully, and transparently and for allowing any checks by those responsible for supervisory and control activities and/or by the Public Administrations granting the provision of a public service.

The administrative and accounting system must ensure the reliability of accounting data and consistent guidance between company guidelines and accounting records. This aims to minimize the possibility of error and enable its timely identification, enabling the reception, organization, processing, and storage of accounting data relating to internal and external management events.

Accounting records must be based on accurate and verifiable information; each entry must be traceable to the relevant management transaction and must be accompanied by documentation that ensures the preparation of the financial statements and internal



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reports and, consequently, the updating of the mandatory accounting books. This documentation must be retained for any necessary verification.

Specifically, it is prohibited to:

- record false income or expenditure in the accounts, or conceal funds through accounting devices;
- make payments intended, in whole or in part, for purposes other than those reported in the supporting documentation.

The processing of individual accounting entries for the purposes of preparing the financial statements must be conducted in accordance with the valuations and classifications of financial statement items required by civil law, supplemented and interpreted by the relevant accounting principles. In the case of valuations of financial statement items, the relevant recording must comply with the criteria of reasonableness and prudence, and the supporting documentation must clearly highlight the application criteria in the valuation. L'Aprochimide S.r.l. therefore guarantees complete accounting and documentary traceability of each transaction and the ability of the accounting system to implement appropriate internal and external control procedures.

5.3 External Communications

Relations with external stakeholders must be handled only by expressly authorized individuals. External communications must follow the guiding principles of truth, fairness, transparency, and prudence, promoting awareness of corporate policies and the company's programs and projects.

Recipients are required to maintain the utmost confidentiality regarding information learned in the performance of their duties, in accordance with laws, regulations, and circumstances. They are required not to disclose or improperly request information about documents, training projects, company operations, and, in general, any information learned in the course of their work.

Information or news relating to users and employees is also considered confidential. Violation of confidentiality obligations by Recipients seriously undermines the relationship of trust and may result in disciplinary or contractual sanctions.



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5.4 Corporate Disclosure

L'Aprochimide S.r.l. ensures maximum collaboration, fairness, and transparency in its relationships with its shareholders, refraining from providing false, misleading, or misleading statements and committing to providing adequate and complete disclosure.

It provides timely and complete information, clarifications, data, and documentation requested by customers, suppliers, users, public authorities, including those granting public services, institutions, bodies, and entities, and any other stakeholders within the scope of their respective functions.

Also about any activities carried out using public resources, L'Aprochimide S.r.l. is committed to ensuring the transparency of its administrative and management actions.

6. Internal Control System

The internal control system is the set of processes designed to monitor the efficiency of company operations, the reliability of the financial statements, compliance with laws and regulations, and the protection of company assets to identify, prevent, and/or mitigate risks to which the company may be exposed.

The Company, through its Chairman, periodically reviews the adequacy and effective functioning of the internal control system and takes any action deemed necessary or appropriate to ensure its optimal functioning.

Risk prevention and identification of their origins constitute a continuous and systematic process for pursuing the objectives of compliance with laws and company procedures, the preservation of corporate assets, the effective and efficient management of activities, and the creation of accurate, complete, and reliable external reporting.

6.1 Reports

All Recipients and interested parties, both internal and external, are required to report in writing and not anonymously any non-compliance with this Code and any requests for violations, from any source, to the President of the company.

L'Aprochimide S.r.l. protects the authors of reports by maintaining their identity confidential, without prejudice to legal obligations.



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6.2 Sanctions System

Compliance with the provisions of the Code of Ethics must be considered an essential part of the obligations imposed on employees by Article 2104 of the Italian Civil Code, as well as an essential part of the contractual obligations imposed on other Recipients.

A serious and persistent violation of the provisions of the Code undermines the relationship of trust established with L'Aprochimide S.r.l. and constitutes a breach of the obligations arising from the employment relationship, with all contractual and legal consequences, including its relevance as a disciplinary offense. Consequently, disciplinary action (contained in the disciplinary system adopted by the company) and compensation for damages are envisaged, without prejudice, for employees, to compliance with the procedures established by the Workers' Statute and the collective bargaining agreement.

6.3 Implementation, Communication, and Supervision

To ensure effective implementation of the model, the Code is brought to the attention of those with whom L'Aprochimide S.r.l. maintains contractual relationships. L'Aprochimide S.r.l. promotes awareness and compliance with the Code among stakeholders, particularly directors, employees, collaborators, partners, consultants, customers, and suppliers, requiring compliance and imposing appropriate disciplinary or contractual sanctions in the event of non-compliance.

For employees and collaborators, the Code is made available on the intranet site and on the company noticeboard, and a copy is provided to all employees.

For other Recipients, information and dissemination of the Code of Ethics are provided through specific documentation. When establishing new employment, consultancy, and collaboration relationships, L'Aprochimide S.r.l. undertakes to provide timely and comprehensive information regarding the content of the Code of Ethics.

6.4 Amendments, Additions, and Updates

The Board of Directors has the power to amend or add to the Code of Ethics and issue directives and instructions.

7. Attachments

- "Declaration on Working Conditions and Social Benefits"



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- "Training Policy"
- "Corporate Environmental Policy"
- "Whistleblowing Procedure with Reporting Form"
- "Supplier Evaluation Procedure"
- "ESG Self-Assessment Questionnaire for Suppliers"