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1 FOREWORD

This Code of Ethics, approved by the Management of Globalchimica S.r.l. (hereinafter referred to as "Globalchimica"), collects the values in which Globalchimica is reflected, the rules of conduct and the responsibilities that Globalchimica recognises, respects and assumes as principles, which all the Recipients of the same, i.e. the Director, employees and other parties acting in the name and on behalf of Globalchimica, are required to comply with.

These reference values, rules and responsibilities, together with the defined objectives, imply and trace a path of constant growth for all, through active participation.

Globalchimica's "vision" is to become a reference for a proposal of high quality and personalized standard, a proposal that enhances the products and solutions to support the customer and his work.

The "mission": to formulate, produce and offer customized products and solutions, of high quality standards.

The Code therefore identifies the prerequisites aimed at ensuring that the company's activity is inspired by the principles of fairness, transparency, diligence, honesty, mutual respect, loyalty and good faith, in order to safeguard the interests of stakeholders and ensure an efficient, reliable, correct working method, based on compliance with the relevant legislation and ethical principles deemed adequate, necessary and essential to operate within the market, with regard both to the activities carried out within the Italian territory and to the activities aimed at other countries and the consequent relations with operators, companies and institutions.

The code presupposes compliance with binding and applicable regulatory and administrative provisions, as well as compliance with the voluntary codes to which Globalchimica has adhered, as well as precise compliance with company regulations and procedures.

In particular, Globalchimica is determined to carry out its activities in full compliance with Italian laws and those of the countries in which it may operate, also in collaboration or association with other companies. Globalchimica undertakes to ensure timely internal and external dissemination of the code, possibly through its website www.globalchimica.com.

In view of the above, Globalchimica:

- ✓ guarantees the timely dissemination of the Code within it and, in any case, to all Recipients;
- ✓ provides adequate information support;
- ✓ it shall ensure that all Recipients are required to comply with the code;
- ✓ it shall ensure that all Recipients report any shortcomings and actively contribute to its implementation;
- ✓ guarantees that all updates and changes are promptly brought to the attention of the Recipients.

2 CODE USAGE GUIDE

The Management draws up and approves the Code of Ethics, a document that summarizes the principles of conduct in Globalchimica's business, as well as the respective obligations and responsibilities of the Recipients. The Code is a fundamental element to ensure effective prevention and detection of violations of laws and provisions applicable to Globalchimica's activities.

Globalchimica strives to ensure that the Code is considered a standard of excellence for the conduct of business by those with whom it maintains long-term business relationships, such as consultants, experts, agents, customers and suppliers.

The Code applies to all aspects of Globalchimica's business and is available in the internal computer network; any variation and/or integration must be approved by the Management and will be adequately disseminated to all Recipients.

3 CONDUCT IN BUSINESS

Globalchimica carries out its activities in line with the principles contained in this Code and requires all Recipients of the Code to carry out their activities in the same way.

The Recipients of the Code must be aware of the fact that they represent Globalchimica and that their actions influence the company's reputation and its internal culture. Therefore, they must conduct their activities in accordance with the following policies.

3.1 CONFLICT OF INTEREST

All the Recipients of the Code, according to their respective powers and competences, are committed to acting in the strictest compliance with the law, regulations, best practices in the sector, as well as this Code in the exclusive institutional interest of Globalchimica for the most correct and effective pursuit of its corporate purpose, avoiding any conflict of interest, their own or that of third parties, with the company's interests, any involvement, in the business to be dealt with and/or concluded and/or executed, of its own interests or those of third parties, even if not conflicting, specifying its nature, terms, origin and scope, and refraining from any further activity relating to the same business until it is expressly authorized to proceed, possibly following particular precautions and instructions.

By way of example, the following may lead to a conflict of interest:

- ✓ economic interests of the employee and/or collaborator and/or their family in the activities of suppliers, customers and competitors;
- ✓ use of your position in the company or the information acquired in your work in a way that creates a conflict between your personal interests and those of the company;
- ✓ acceptance of money, favors or benefits from persons, entrepreneurs, or companies that are or intend to enter into business relationships with Globalchimica;
- ✓ the existence of stable work activities or collaborations with companies or professionals who have contractual relationships with Globalchimica.

3.2 CONFIDENTIALITY AND INSIDE INFORMATION

All Recipients of the Code are required to strictly comply with the laws in force on privacy. Globalchimica adopts the minimum and suitable security measures to reduce, as far as possible and according to technical progress, the risks of unauthorized communication and dissemination of the data of which it is the Owner, unauthorized access or, in any case, unauthorized processing. All the Recipients, in the exercise of their functions and within the scope of their competences, are responsible for the implementation of these security measures, both with regard to IT tools and with regard to paper archives and dossiers.

Except to the extent permitted by law and/or contractually, the Recipients of the Code shall not use, communicate or disseminate any company news however learned, to be considered as of now unconditionally confidential, as well as trade or industrial secrets, or, in any case, any company news/document objectively confidential or even only indicated as such by Globalchimica and acquired by it by virtue of and/or on the occasion of the relationships between them.

By way of example, it is specified that all *know-how* and all information relating to research and development, products, patented or registered or not, owned and/or in any case available to Globalchimica, or its client and/or supplier companies, all related documents, drawings, formulas, computer data, programs, ideas on any media stored, as well as all information related to the organization of Globalchimica, etc.

Particular attention must be paid by the Recipients to the communication and/or dissemination outside of documents, news and information relating to the sphere of activity of Globalchimica that are not in the public domain. The communication of such information, even if the directors or managers in charge have authorized its dissemination, will always take place through the channels and subjects appointed for this purpose within the *policy* dictated by Globalchimica.

As part of its normal business activities, Globalchimica collects a significant amount of personal data and confidential information, which it undertakes to process in compliance with all applicable privacy laws in the jurisdictions in which it operates and best practices for the protection of confidentiality.

To this end, Globalchimica guarantees a high level of security in the selection and use of its *information technology systems* intended for the processing of personal data and confidential information.

3.3 CORRUPTION AND ILLICIT PAYMENTS

All Recipients, in the exercise of their functions and within the scope of their competences, are responsible for the implementation and implementation of these precautions.

Globalchimica and the Recipients of the Code are committed to respecting the highest standards of integrity, honesty and fairness in all relations within and outside Globalchimica, in accordance with national and international anti-corruption laws.

Globalchimica does not tolerate any kind of corruption (accepting or offering money to obtain an improper commercial advantage).

No Director, employee, agent or other representative may directly or indirectly accept, solicit, offer or pay any money or other benefits (including gifts or gifts, except for commercial items of modest economic value that are commonly accepted internationally and permitted by applicable laws) even as a result of unlawful pressure.

3.4 MONEY LAUNDERING

Globalchimica and the Recipients of the Code must not carry out or be involved in activities that involve money laundering (the acceptance or processing of proceeds from criminal activities in any form or way) and/or self-laundering (the use in economic, financial and entrepreneurial activities of money, goods or other utilities resulting from a non-culpable crime committed by the offender himself).

3.5 COMPETITION

Aware of the fundamental importance of the existence of a competitive market, Globalchimica undertakes to comply with all current laws and regulations on competition and transparency in commercial transactions.

Therefore, Globalchimica and the Recipients of the Code will not engage in practices (such as creation of cartels, division of markets, etc.) that represent a violation of competition laws. In the context of fair competition, Globalchimica will not knowingly infringe the intellectual property rights of third parties.

3.6 REPUTATION

Globalchimica's corporate image, as well as the reputation and sustainability of its products, are necessary conditions for its present and future existence.

Therefore, the Recipients are required to always and scrupulously comply with the Code.

It is of fundamental importance that employees share with each other the commitment to comply with the Code and cooperate with Globalchimica for the application of its provisions.

3.7 INTERNAL CONTROL SYSTEM, COMPANY INFORMATION AND ACCOUNTING BOOKS

All Recipients are required to maintain effective internal control systems, as necessary for the achievement of the objectives, and are required to strictly comply with internal procedures and instructions. Recipients must act on their own authorization profiles and must maintain all appropriate documentation to keep track of actions taken on behalf of the company.

In the accounting management activity, the Recipients are called upon to act in compliance with the principles of truthfulness, accuracy and transparency and must inform the Management of any anomaly found.

The transparency of financial statements and accounting is a fundamental principle for the exercise of the business and for the protection of Globalchimica's reputation. All entries reported in the accounts must be supported by complete, clear and valid documentation, avoiding any form of omission, falsification and/or irregularities.

In the case of assets or income statement based on valuations and estimates, the relevant recording must be based on criteria of reasonableness and prudence.

Compliance with these principles also allows the company to plan its operating strategies based on the real economic and financial situation.

Globalchimica operates with the utmost transparency in line with the best business practices, with the aim of

- ✓ ensure that all transactions are duly authorised, verifiable and legitimate;
- ✓ ensure that all transactions are carried out in a timely manner, accurately recorded and accounted for and appropriately documented in accordance with applicable accounting standards and best practice;

- ✓ identify, analyse and manage with professional diligence the entrepreneurial risks associated with business activities;
- ✓ ensure that decisions on financial, tax and accounting issues are taken at an appropriate level and in full compliance with applicable laws.

3.8 COMPANY ASSETS

Employees and recipients of this document are required to operate with the diligence required and necessary to protect company resources, avoiding improper use that may cause damage or a reduction in efficiency for Globalchimica. The principles of integrity, fairness and responsibility are also the basis of the management and use of company *assets* available to employees,

The use of company resources is not permitted for personal use and interest of any kind. However, any use of company resources that is contrary to the laws in force is prohibited.

All Recipients are required to follow Globalchimica's Guidelines regarding the use, access and security of *software* and other *information technology systems*, *e-mail*, internal and external networks.

3.9 EXTERNAL ACTIVITIES

Globalchimica's employees may not sit on the Boards of Directors of other companies without Globalchimica's authorization and may not engage in business activities on a recurring basis that interfere with their respective obligations to Globalchimica.

All employment relationships of Globalchimica employees with Globalchimica's business partners or competitors, or the provision of services to them, require prior written authorization from the Management.

3.10 OBLIGATIONS

Globalchimica is a small company, every person who is part of it is responsible and must set an example and foster a positive climate, encouraging a transparent exchange of ideas and demonstrating a behavior in accordance with the principles of conduct in business contained in the Code, demonstrating that compliance with the Code is a fundamental aspect of work, business results must never be separated from compliance with applicable laws and the Code.

4 HUMAN RIGHTS AND WORKING CONDITIONS

Globalchimica, aware of its responsibility, recognizes that the motivation and professionalism of its collaborators are an essential factor in maintaining competitiveness and ensuring customer satisfaction.

The following principles, in accordance with national laws, the UN Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organization (ILO), confirm the importance of respect for the individual, guarantee equal treatment and exclude any form of discrimination.

Globalchimica supports the protection of fundamental human rights.

4.1 CHILD LABOUR AND FORCED LABOUR

Globalchimica does not employ any form of forced labor, compulsory labor or child labor, respecting the legally recognized minimum age to start working.

Mandatory overtime is never required, identity documents are withheld and no form of coercion is exercised.

Globalchimica also undertakes not to establish or maintain business relationships with suppliers who employ child labour, as defined above.

4.2 FREEDOM OF ASSOCIATION

Globalchimica guarantees all employees full freedom of association, whether it is aimed at trade union activity, civic issues and political parties and the freedom to form and participate in trade unions for the protection of their interests.

4.3 EQUAL OPPORTUNITIES AND NON-DISCRIMINATION

Globalchimica is committed to offering equal opportunities in work and professional advancement to all employees. The company is committed to creating an environment that fosters the full development and advancement of women.

Globalchimica applies the principle of equal treatment to all workers, without distinction of gender, race, religion, ethnicity, language, sexual orientation, political opinion, disability or age, personal beliefs.

Globalchimica ensures that for all aspects of the employment relationship, employees are treated in accordance with their ability to meet the requirements of the job, avoiding any form of discrimination.

4.4 HARASSMENT

Globalchimica considers absolutely unacceptable any type of harassment or harassing behavior, such as those related to race, sex or other personal characteristics, which have the purpose and effect of violating the dignity of the person to whom such harassment or behavior is addressed, both inside and outside the workplace.

4.5 INCLUSION

Globalchimica promotes an inclusive corporate culture, valuing diversity at all levels of its organization. Each individual is encouraged to contribute fully, developing their potential in a respectful and collaborative context.

4.6 WORKING ENVIRONMENT

All employees must strive to maintain a decent and collaborative work environment, in which the dignity of each individual is respected.

In particular, all Globalchimica employees:

- ✓ they must not work under the influence of alcohol or drugs;
- ✓ in places where smoking is not prohibited by law or company regulations, they must be sensitive to the needs of those who may experience physical discomfort due to the effects of "passive smoking";
- ✓ they must avoid behaviour that may create an intimidating or offensive climate towards colleagues or subordinates in order to marginalise or discredit them in the work environment.

4.7 RECRUITMENT

Globalchimica implements transparent recruitment procedures that comply with international labor regulations, without deception, burdens or unfair practices for the worker. Each worker receives a written contract, drafted in a language they understand, which clearly sets out their rights and obligations.

4.8 PAY AND WORKING HOURS

Globalchimica complies with national and international regulations on working hours and ensures that workers receive a salary that complies with current laws and industry practices, always sufficient to meet essential needs and guarantee a decent standard of living. Minimum wages, overtime pay, paid leave for family reasons and access to statutory benefits and benefits are respected.

5 HEALTH, SAFETY AND ENVIRONMENT

5.1 HEALTH AND SAFETY IN THE WORKPLACE

Globalchimica recognizes health and safety in the workplace as a fundamental right of employees and a key element of corporate sustainability.

All decisions taken by Globalchimica must respect and guarantee health and safety in the workplace. Globalchimica has adopted and continues to improve an effective occupational health and safety policy that is based on individual and collective preventive measures to minimize the potential risks of injury in the workplace.

Globalchimica believes in the dissemination of a culture of accident prevention and risk awareness among workers, and actively promotes it, in particular through appropriate training and information courses.

Employees must consider themselves personally responsible and adopt the preventive measures established by Globalchimica for the protection of their health and safety communicated through specific directives, instructions, training and information.

Each employee is responsible for the proper management of safety and should not expose himself or other workers to hazards that may cause injury or harm to themselves.

5.2 ENVIRONMENTAL PROTECTION IN PROCESSED PROCESSES

Globalchimica considers environmental protection a key factor to be promoted in the general approach to business activities.

Globalchimica is committed to continuously improving the environmental performance of its production processes and to meeting all the main legislative and regulatory requirements on the subject.

Globalchimica stimulates and encourages employees to actively participate in the implementation of these principles through the dissemination of information and expects employees to play an active role in the application of these principles in their work activities.

5.3 ENVIRONMENTAL IMPACT AND PRODUCT SAFETY

Globalchimica is committed to formulating, producing and marketing, in full compliance with legislative and regulatory requirements, products that meet high standards in terms of environmental performance and safety. Globalchimica is committed to continuous research in order to introduce materials into its formulations that are less and less dangerous for health and safety, secondary materials or materials of natural origin.

6 RELATIONS WITH THE OUTSIDE WORLD

Globalchimica and its employees are required to maintain and improve their relations with the various categories of third parties by acting in good faith, with loyalty, fairness, transparency and with due respect for the fundamental values of Globalchimica.

6.1 CUSTOMERS

Globalchimica pursues the goal of fully satisfying the expectations of the end customer. Everyone is required to act in such a way as to exceed customer expectations and continuously improve the quality of the products and services offered.

When interacting with customers, unfair discrimination in negotiations must be avoided and bargaining power must not be misused to the detriment of any customer. It is essential that customers are treated with fairness and honesty, and, therefore, Globalchimica requires that every relationship and contact with customers be based on honesty, professional fairness and transparency.

Employees must follow internal procedures aimed at achieving this goal through the development and maintenance of profitable and lasting relationships with customers, offering safety, assistance, quality and value, supported by continuous improvement and innovation.

6.2 SUPPLIERS

Suppliers play a fundamental role in improving Globalchimica's overall competitiveness.

In order to constantly guarantee the highest level of customer satisfaction, Globalchimica selects suppliers through the use of appropriate and objective methods that take into account quality, innovation, costs and services offered, together with the values outlined in the Code.

All those who come into contact with suppliers are invited to establish and maintain transparent and cooperative relationships with them.

6.3 PUBLIC INSTITUTIONS

Relations with public institutions must be managed only by the functions and employees delegated to do so, with transparency, in compliance with Globalchimica's values.

Gifts or courtesies (where permitted by law) towards representatives of public institutions must be of modest value and appropriate and, in any case, such as not to be interpreted as aimed at acquiring or trying to acquire undue advantages for Globalchimica.

Globalchimica acts in full cooperation with regulatory and governmental bodies in the context of their legitimate scope of business. If Globalchimica is subject to legitimate inspections conducted by public authorities, the company will fully cooperate.

If a public institution is a customer or supplier of Globalchimica, the latter must act in strict compliance with the laws and regulations governing the purchase from or sale of goods and/or services to that particular public institution.

Any lobbying activity may be carried out only where permitted by the law in force and in strict compliance with this law and, in any case, in absolute compliance with the Code.

6.4 TRADE UNIONS AND POLITICAL PARTIES

Any relationship of Globalchimica with trade unions, political parties and their representatives or candidates must be based on the highest principles of transparency and fairness and in strict compliance with the laws in force.

Contributions of money, goods, services or other benefits are prohibited, except those imposed or expressly permitted by law and, in the latter case, authorized by the Administrator.

Any contributions by Globalchimica employees, as well as the activity they provide, are to be considered exclusively paid on a personal and voluntary basis.

7 IMPLEMENTATION AND SANCTIONS

The control of compliance with the Code of Ethics is delegated to the sole director Clara Besson. Cases of violation of legal and/or corporate regulations or of this Code of Ethics must be promptly reported in writing to the Management, as the Control Body.

It is to be considered a contractual obligation for all employees and collaborators of Globalchimica to comply with the Code, also in compliance with the regulations in force. Compliance with the Code of Ethics is an integral part of the contractual obligations, pursuant to Article 2104 of the Civil Code for employees, as well as for collaborators.

Globalchimica reserves the right to issue disciplinary sanctions to personnel who operate in a manner that does not comply with this Code of Ethics. Violation of the obligations provided for constitutes an offence of a disciplinary nature, punishable pursuant to art. 7 of the Workers' Statute and the disciplinary rules provided for by the CCNL Small and Medium Industry Chemistry. Without prejudice to the cases in which the violation also gives rise to criminal, civil, administrative or accounting liability of the employee, it is a source of disciplinary liability ascertained at the end of the disciplinary proceedings, in compliance with the principles of gradualness and proportionality of sanctions. For the purposes of determining the type and extent of the disciplinary sanction concretely applicable, the violation is assessed in each individual case with regard to the seriousness of the conduct and the extent of the damage, including moral damage. The applicable sanctions are those provided for by law, regulations and the CCNL Small and Medium Industry Chemistry in force.

The application of dismissal without notice remains unaffected for cases already provided for by law, regulations and the CCNL in force.

Publication date: 22/12/2025

The Management

A handwritten signature in blue ink, appearing to read 'Clara Besson', written over a horizontal line.