



HIGH PERFORMANCE THERMOPLASTICS



Code of Ethics

Approved by the Board of Directors with its resolution dated June, 24th 2024

Contents

01. INTRODUCTION	3
A. LATI'S IDENTITY AND ITS COMMITMENT TO GENERATING POSITIVE IMPACTS	3
02. STANDARDS OF CONDUCT	4
A. GENERAL ETHICAL PRINCIPLES	4
B. CARING FOR THE ENVIRONMENT AND FOR THE COMMUNITY	5
C. RESPONSIBLE WORKING CONDITIONS AND THE PROTECTION OF HUMAN RIGHTS	5
D. THE QHSE INTEGRATED MANAGEMENT SYSTEM	6
E. INTERNAL CONTROL	6
F. OPERATIONAL CONFLICTS OF INTEREST AND UNFAIR COMPETITION	7
G. ADVERTISING AND SPONSORSHIPS	7
H. GIFTS, DONATIONS, CONTRIBUTIONS AND SPONSORSHIPS	7
I. ACCOUNTING RECORDS	7
J. CONFIDENTIAL INFORMATION	8
K. PROTECTION OF PRIVACY	8
L. TECHNOLOGICAL INFRASTRUCTURE	9
03. STAKEHOLDER RELATIONS	10
A. THE IMPORTANCE OF LISTENING TO STAKEHOLDERS	10
B. EMPLOYEE RELATIONS	10
C. RELATIONS WITH EXTERNAL PARTNERS AND CONSULTANTS	10
D. CUSTOMER RELATIONS	11
E. RELATIONS WITH SUPPLIERS OF GOODS AND SERVICES	11
F. RELATIONS RELATED TO PROTECTION OF THE MARKET AND FREE COMPETITION	12
G. RELATIONS WITH THE PUBLIC ADMINISTRATION, WITH BODIES WHO PERFORM ACTIVITIES OF PUBLIC UTILITY OR INTEREST AND RELATIONS WITH SUPERVISORY AND CONTROL AUTHORITIES	12
H. RELATIONS WITH TRADES UNIONS AND POLITICAL PARTIES	12
I. RELATIONS WITH THE PRESS AND OTHER COMMUNICATIONS MEDIA	12
04. IMPLEMENTATION OF THE CODE OF ETHICS	13
A. SPHERE OF APPLICATION	13
B. WHISTLEBLOWING	13
C. COMPLIANCE WITH THE CODE OF ETHICS AND RELATED SANCTIONS	13
ADDENDA	14
ADDENDUM 1: BENEFIT COMPANIES AND LATI'S COMMON BENEFIT OBJECTIVES	14
ADDENDUM 2: WHISTLEBLOWING	15
ADDENDUM 3: GENDER EQUALITY POLICY	16
ADDENDUM 4: GLOBAL COMPACT	17

01.INTRODUCTION

Since its foundation, LATI has consistently sought to promote and adopt ethical values and principles, with a particular emphasis on environmental protection, workplace safety, the safeguarding of health, and the personal growth and professional development of its employees.

To clearly define the set of values and principles which inspire it, LATI has prepared this Code of Ethics. The Code confirms the importance of ethical-social responsibility in the conduct of the company's business and corporate activities, while fully respecting the legitimate interests of our stakeholders and our local communities. LATI requires compliance with the contents of this Code from its employees, from its operational partners, and from all stakeholders (e.g., customers, suppliers, territorial bodies, etc.) who, for whatever reason and by whatever means, have relations with LATI.

The Code seeks to go beyond mere regulatory compliance. It encapsulates LATI's intention to promote practices for social and environmental responsibility that also mirror rigorous and internationally recognized standards, guidelines and protocols.

A. LATI'S identity and its commitment to generating positive impacts

The identity of the company and its operations is codified in 6 hallmark values: know-how, integrity, sustainable development, employment and employability, participation and wellbeing. These values are the indispensable ethical compass for all LATI employees and partners.

These values underpin LATI's Vision, Mission and Purpose, which articulate the desire to

Values



Know-how

We cultivate and apply our know-how to ensure the production and the proper use of plastic materials. We constantly strive to raise awareness among the public and our customers.



Integrity

All our relationships are built on trust and mutual benefit and reflect a long-term vision of what we want to achieve with our employees, business partners, and customers.



Sustainable Development

We are committed to preserving the environment through the relentless pursuit of innovative product and process solutions, and the promotion of environmental sustainability wherever we operate. Our priority is qualitative, not quantitative growth.



Employment and Employability

Creating and maintaining employment is a primary goal for our company. We continuously invest in our people to generate opportunities for personal and professional growth.



Participation

Internally, we involve our people in strategic and operational decision-making. Externally, we actively participate as partners in our local communities to drive economic and social development and prosperity.



Wellbeing

We want our employees to feel involved, stimulated, and respected. We ensure their safety and promote their psycho-physical health

generate positive environmental and social impacts through product innovation, the conscientious use of plastics, and care for people and the local territory.



VISION

We seek to become a **partner of choice** for **safe, durable** and **ethical** solutions that **unleash the potential** of thermoplastic materials for our customers.



MISSION

Our threefold goal is to **preserve our primacy** in flame retardant materials, to **reinforce our reputation** for high-performance technical solutions and to **achieve leadership** in special compounds.



PURPOSE

We constantly strive to generate a **positive impact** on the environment and on society through our **innovative compounds** and to promote the **sustainable use** of plastic. We pursue **the wellbeing of our people** and the **development of the local territory**.

This commitment is formalized in the company's Statute. LATI is a "Benefit Company" a status that entails three common benefits goals related to:

- (a) the sustainability of its products.
- (b) the wellbeing of its people within and outside the organisation.
- (c) the development of the local territory and ecosystem.

The ethics and values that guide LATI in the conduct of its business are also embodied in the firm repudiation of the use of its products in applications that could harm people.

02.STANDARDS OF CONDUCT

A. General ethical principles

LATI:

1. **operates** in compliance with EU, national and international regulations and rejects all illegal practices.
2. **deems** its image and reputation values to be protected and developed, not least through the dissemination and observance of its Code of Ethics.
3. **believes** that the impartial treatment of people is a fundamental value within any relationship, whether internal or external, and is determined to protect it in all its forms.
4. **believes** that principles such as diligence, competence, professionalism, efficiency, honesty, transparency, reliability, fairness, unreserved cooperation, respect for freedom, dignity and diversity, and the rejection of any form of discrimination are crucial values in the work and performance of its employees.
5. **expects** its employees and partners to live up to the principles of responsibility, competence and respect.

Furthermore, although motivated by the pursuit of its interests, LATI will not justify or tolerate any behaviour on the part of its corporate governance bodies, its management and in general its employees, that may be in breach of current legislation, this Code of Ethics or internal regulations.

B. Caring for the environment and for the community

LATI considers respect for the environment (where ‘environment’ means the natural habitat and landscape in which all people interact) as one of the cornerstones of its *raison d’être* as a company within the broader local and supra-local context. The company therefore:

- a. deems the environment and nature to be absolute values and a collective heritage to be protected and defended and, to this end, undertakes to orient its industrial activities towards compliance with these principles.
- b. researches and develops technologies and products that are as environmentally friendly as possible and is constantly engaged in the quest for innovative solutions conducive to harmonious and balanced growth.
- c. assures continuous research into processes and products that best meet the needs of environmental protection, quality and safety.

LATI exercises the utmost care in respecting the interests of the community, interests that every employee and company partner should share and strive to achieve, driven by the goal of achieving widespread improvements in life quality and civil coexistence, to the benefit of sustainable development and the protection of future generations. The company seeks to combine its manufacturing activities with elements that underpin the social growth of the territory, including:

1. increased employment and the growth - thanks to the satellite activities generated by its industrial operations - of the productive and social fabric in which it operates.
2. the continuous provision of cultural and professional training to its employees.
3. the promotion of educational liaison programmes with schools and universities for the development of targeted research and for the implementation of professional induction schemes.
4. the transfer of sector-specific know-how to clients and to the bodies responsible for the application and control of regulations related to industrial and environmental impact risks.
5. constant attention to social and non-profit issues.

C. Responsible working conditions and the protection of human rights

LATI complies with the prevailing labour protection regulations in all the countries where it operates. It respects and supports the observance of internationally recognized human rights by incorporating the principles of the United Nations Global Compact into its strategies, policies and procedures.

- **Prohibition of forced labour, child labour, slavery or human trafficking**

LATI rejects all forms of forced labour, slavery and human trafficking and does not hire people under the legal age of majority.

The establishment of the relationship between LATI and each employee and collaborator occurs freely and free from threats and coercion. All employees and collaborators can freely terminate their relationship with LATI in accordance with the provisions of the prevailing legislation in Italy (for those to whom it applies, and as per the stipulations of the CCNL National Collective Labour Agreement).

To this end, and as a matter of principle, LATI abhors any form of blackmail or coercive action against employees, including the withholding (depending on the type of

existing employment relationship), of money, remuneration, emoluments, salary, salary allowances or original documents.

- **Diversity, inclusion and equal opportunities**

LATI believes that plurality and diversity are positive contributors to the growth of the organization and the community. For this reason, LATI has adopted appropriate tools and a Gender Equality Policy to support and foster the creation of an internal culture oriented towards respect for all forms of diversity and inclusive work environments.

- **Combatting harassment**

LATI is committed to combatting and sanctioning all forms of physical, verbal, and digital violence and discrimination. The channels for reporting such acts of violence are set out in Addendum 2.

- **Working hours and remuneration**

LATI respects the prevailing legislation in respect of working hours and overtime. The company also guarantees that workers are paid at least as per the set contractual minimums established by national collective bargaining and undertakes to ensure that working conditions allow for a decent standard of living and guarantee the welfare of people within and outside the organisation.

D. The QHSE integrated management system

With the commitment and involvement of the entire organisation, LATI has implemented the Integrated Management System for Quality (UNI EN ISO 9001: 2015 and IATF 16949:2016), Health and Safety (UNI ISO 45001:2018), Environment (UNI EN ISO 45001:2015) and Energy (UNI EN ISO 50001:2018). The company's primary objective is the effective application of management systems to continuously improve manufacturing processes, product quality levels, customer satisfaction and the continuous improvement of environmental and health safety procedures in its organisational and management processes.

In addition to the constant monitoring of key process indicators related to manufacturing quality and environmental performance, LATI is also committed to the dissemination and promotion of a culture of safety, regardless of any economic considerations, not least through the cooperation of all its senior and operational management, who are required to comply with these principles.

E. Internal control

An indispensable part of LATI's organisational culture is the existence of an adequate control system for the improvement of the company's efficiency and its decision-making effectiveness; hence the company's attention to raising the awareness of its employees. 'Internal control system' refers to the set of tools and processes used to verify any activity that may facilitate:

- the pursuit of the company's objectives.
- the reliability and integrity of financial and operational data and information.
- the efficiency, effectiveness and economy of company activities.
- the protection of the company's assets.
- the compliance of all company actions and decisions to be executed or adopted with the respective laws, regulations and contracts.
- the protection of information deemed confidential or secret.

Within the scope of their functions and responsibilities, members of the Boards of Directors, Boards of Statutory Auditors, of other supervisory and control bodies/functions, and all management and employees are required to participate in the design and implementation of an effective corporate control system.

F. Operational conflicts of interest and unfair competition

Management, employees and company collaborators are bound, within the scope of their respective relationships with LATI, to avoid any situation in which a conflict with the interests of the Company may arise or which may interfere with their ability to take impartial decisions in the best interests of LATI. Any situation that may constitute or determine a conflict of interest must be promptly reported by individuals to their superior or to the body of which they are a member, and, where provided for by the 231 Organizational Model, to the Supervisory Board (SB). Likewise, the person involved shall promptly refrain from intervening in the operational/decision-making process, and the respective managerial superior or body shall:

- identify the appropriate operational solutions for each specific case, to safeguard transparency and correctness of conduct in the performance of company activities.
- communicate the necessary written instructions to the persons concerned and – for reference purposes - to their hierarchical superior, as well as to the Supervisory Board.
- file all relevant documentation received or transmitted.

The management, employees and collaborators of LATI are also bound to avoid any form of unfair competition towards LATI. Employees and collaborators whose activities entail the acquisition of commercial, technical, product or process information are bound to avoid the disclosure of such information both during the employment relationship and after its eventual termination.

G. Advertising and sponsorships

As an enterprise, LATI is publicly exposed and socially responsible. Consequently, for the valorisation of its brands and products, it chooses to use the most appropriate tools, including the use of mass media, as well as technical and specialist communication channels.

If deemed necessary, sponsorships and contributions may be used for the purposes of studies, research, conventions and seminars, as well as other subject matters of immediate interest to the company. In selecting any such initiatives, LATI operates in compliance with fairness, transparency and internal rules and regulations.

H. Gifts, donations, contributions and sponsorships

LATI supports social responsibility initiatives, not least through the disbursement of sponsorships or contributions in favour of foundations, institutions and organisations whose activities seek to enhance the local territory, improve living standards and disseminate culture and solidarity in local communities. Sponsorships and donations to companies or associations, whether recognised or not, must be duly authorised and unambiguously identify the interested parties and the motives underlying the disbursement. The transfer of financial resources must be carried out through authorised intermediaries to ensure their traceability.

I. Accounting records

LATI deems the correctness, precision, completeness and formal and substantial regularity of its accounting records to be essential in the financial reporting of its operations. These records must be kept in compliance with the accounting principles set down by law and by the competent authorities.

In the accounting records of LATI's operations, company employees and collaborators, within the scope of their respective relationships with LATI, are required to scrupulously respect the prevailing legislation and internal procedures, to ensure that every operation is not only correctly recorded, but is also authorized, verifiable, legitimate, congruous and appropriate.

Within the scope of their respective relationships with LATI, all employees and collaborators are bound to act with transparency towards LATI, towards the appointed External Auditors and towards the members of the Board of Statutory Auditors, as well as offering these bodies the utmost cooperation in

the performance of their respective verification and control activities.

Any type of corporate transaction likely to cause unfair damage to creditors is prohibited. It is forbidden to engage in any conduct that may damage the integrity of the company's assets. It is likewise forbidden to perform any act, whether simulated or fraudulent, designed to influence the will of the members of the Shareholders' Meeting to obtain a different resolution from that which would otherwise have been adopted.

For all transactions, suitable supporting documentation of the activity performed must be recorded and kept on file to ensure:

- readily accessible accounting records.
- the identification of different levels of responsibility.
- the accurate reconstruction of the transaction, and verification of the decision-making, authorisation and execution process, not least to reduce the likelihood of errors of interpretation.

Each record must reflect the evidence contained in the supporting documentation. This is to allow for checks that certify the reasons for the operation and its underlying processes. It is the duty of all LATI employees and/or collaborators, within the limits of their established relationship with the company, to ensure that the documentation is easily traceable and logically ordered. Moreover, should they become aware of omissions, falsification or negligence in accounting records or the documentation on which the records are based, they are obliged to report these facts to their superior, to their company contact person and to the Supervisory Body.

J. Confidential information

Confidential information refers to all knowledge acquired by an employee or collaborator in the performance of their respective activities (e.g. a project, a negotiation, an agreement, a proposal, a price list etc.) or any fact or event, even if future and uncertain, related to LATI's activities, the dissemination or use of which may cause danger or damage to the company, or an undue gain or advantage in favour of the employee or of third parties, including collaborators.

The nature of the high technology that characterises LATI, and therefore the quality of the information that may become known to an employee or collaborator, necessitates utmost respect for the protection of industrial and commercial secrecy, both with reference to third parties and to persons not functionally authorised to engage in communication.

At all times, and especially during the stipulation and execution of contracts, the duty of confidentiality must be strictly observed in relations with third parties, in contacts with the press, and in relations with persons not authorized to communicate company matters. Any breaches by the employee or collaborator may jeopardize their relationship with LATI.

Any form of exploitation, use for financial gain, or direct or third-party investment which originates from confidential company news, is unlawful and therefore strictly prohibited.

In the event of termination of the employment or collaboration relationship, and where – shortly after said termination – the former worker uses confidential information acquired during their employment for personal advantage and to the detriment of LATI's interests, LATI will be entitled to take all appropriate actions for the protection of its assets and to obtain compensation for any damages incurred, whether in the form of lost profits or of future damages.

K. Protection of privacy

LATI protects the privacy and confidentiality of information and data relating to employees, collaborators or third parties, collected for or during the performance of company management activities.

Any information or other material obtained by an employee or collaborator of LATI in relation to their employment, is strictly the property of the company. No employee or collaborator may use such information for their own benefit or for the benefit of third parties. Confidential data or documents must

not be disclosed, nor used or communicated, without specific authorization.

L. Technological infrastructure

LATI IT systems and equipment must not be used for unauthorized and/or illicit external activities, gambling or pornography. The downloading of illegal or inappropriate content or programmes from the Internet onto an individual's company computer is strictly forbidden.

Employees and collaborators must use the tools at their disposal in compliance with company procedures and policies. Likewise, they must always use software for which a regular licence has been acquired, in compliance with the conditions of the respective licencing agreement in place. It is not permitted to sell, transfer or otherwise make available to any unauthorised person software or related documentation licensed to or owned by LATI.

It is strictly forbidden for LATI employees and collaborators with access to the company's IT infrastructure to:

- share login credentials for any system.
- access, download, create or forward emails, documents or images that are offensive or may cause distress to other people.
- install or use hardware or software on any of the company's systems unless specifically authorised to do so by the IT team.

03. STAKEHOLDER RELATIONS

A. The importance of listening to stakeholders

LATI believes that collaboration with its stakeholders is one of the cornerstones of its business strategy and its ability to maximize long term value creation. The engagement of stakeholders is therefore deemed an integral part of the company's ordinary business management activities.

This commitment is borne out by LATI's twofold quest to listen to and take on board stakeholder requests, and to guarantee clear and transparent information, both through the company's institutional communication channels, and through prompt and timely responses to requests for information from internal and external stakeholders.

B. Employee relations

HUMAN RESOURCES MANAGEMENT

Any form of non-inclusion and/or discrimination for reasons of ethnicity, religion, age, sex, nationality, political or trade union affiliation, whether adopted during recruitment, during the contractual employment relationship or upon its eventual termination, is considered a breach of this Code of Ethics.

THE SOURCING AND SELECTION OF HUMAN RESOURCES

In the search for and selection of its personnel, LATI adopts criteria of objectivity, competence and professionalism, applying the principle of equal opportunities without favouritism or discrimination, to attract the labour market's top talents. Where it deems it useful, LATI entrusts the tasks of sourcing, selecting and administering personnel to qualified suppliers, who undersign the company's Code of Ethics and Gender Equality policy. These suppliers must guarantee that no person contacted will be asked for money or other benefits to assure their candidacy for recruitment or employment by LATI.

THE WELLBEING OF HUMAN RESOURCES

LATI consistently pays the utmost attention to the valorisation of human resources, deeming the threefold criteria of professional competence, honesty and dedication the fundamental principles for people's career prospects. The company likewise undertakes to protect the psycho-physical integrity of its employees and collaborators, with lasting respect for their personality and dignity, and carries out constant preventive actions to ensure that any discrimination in the workplace is avoided and, where it occurs, is appropriately sanctioned.

WORKPLACE HARASSMENT

All employees and collaborators are required to conduct themselves at all times with respect for the personalities and rights of their coworkers, employees, collaborators and third parties, regardless of their hierarchical position within the company. LATI requires that in internal and external working relations all forms of harassment be avoided. These include behaviours that may prove aggressive, hostile, denigratory, persecutory, humiliating or harmful to individuals' psychophysical integrity, as well as forms of violence or harassment that reflect individuals' personal and cultural uniqueness.

C. Relations with external partners and consultants

LATI undertakes the identification and selection of external collaborators (e.g. agents, representatives, etc.) and consultants with total impartiality, autonomy and independence of judgement, and focusing primarily on the essential elements of competence and professionalism.

All those who establish and maintain relationships with external collaborators and consultants must observe the relevant company procedures and policies.

LATI expects external collaborators and consultants to behave in compliance with the prevailing legislation and with this Code.

D. Customer relations

In the performance of its activities and in the management of relations with its customers, LATI models its conduct on criteria of respect, courtesy, transparency, honesty, efficiency, professionalism and compliance with the rules protecting competition. In particular:

- 1 LATI strictly adheres to the law, the principles of this Code of Ethics and internal procedures, while always guided by the goal of maximising value for the customer.
- 2 LATI favours ethical conduct without exception, even if in apparent conflict with a customer's immediate interest.
- 3 Acts of commercial courtesy, such as gifts or forms of hospitality, are allowed provided they are of modest value and in any case not such as to compromise the integrity and reputation of either party, or to influence the recipient's independence of judgement.

E. Relations with suppliers of goods and services

LATI is committed to seeking professionalism and commitment to sharing the Code in its suppliers and external collaborators, promoting long-lasting and profitable relationships in compliance with the spirit and the substance of the Code. In supply relationships, LATI itself operates in compliance with the law, the Code and internal procedures, requiring employees who are entrusted with the task of selecting supply contracts to behave impartially, to avoid conflicts of interest and to report the possible occurrence of such situations to the Supervisory Body. More specifically, such employees shall:

- observe internal procedures for the selection and management of relationships with suppliers and external collaborators.
- not preclude any person in possession of the necessary requirements from competing to win a supply contract from LATI.
- adopt exclusively objective evaluation criteria in the selection process, according to declared and transparent methods.
- observe and require observance of the agreed contractual conditions.
- bear in mind that acts of commercial courtesy, such as gifts or forms of hospitality, are allowed provided they are of modest value and in any case not such as to compromise the integrity and reputation of either party, or to influence the recipient's independence of judgement.

Any remuneration to be paid must be exclusively commensurate with the service indicated in the contract and payments cannot in any way be made to a person other than the contracted party nor in a third country other than that of the parties or of execution of the contract, and may only be made by traceable means.

F. Relations related to protection of the market and free competition

LATI acknowledges the inspirational principles of the EEC Treaty and therefore avoids anti-competitive practices or the stipulation of agreements and practices that may jeopardize trade or that may seek to prevent, restrict or distort competition within the market.

LATI also acts to avoid the creation of a monopolistic or exclusive position in the European common market or a substantial part of it.

G. Relations with the Public Administration, with bodies who perform activities of public utility or interest and relations with supervisory and control authorities

In its relations with the Public Administration, with bodies who perform activities of public utility and public interest, and with supervisory and control authorities, LATI complies strictly with the applicable EU, national and corporate regulations. The management of negotiations, the assumption of commitments and the maintenance of relationships of any kind with the above-mentioned bodies are the sole and exclusive domain of the company functions designated, authorized or delegated for this purpose.

In dealings with such bodies, no employee or collaborator may seek to improperly influence the decisions of the institution concerned to induce behaviours that contravene or are contrary to official duties.

Any employee or collaborator who receives instructions or indications to act otherwise must report any such incident immediately, as per Article 4., below. The same restrictions apply where an external consultant or third party manages relations with the Public Administration. LATI in the first instance undertakes to select third parties who guarantee that they share the principles of the Code.

Specifically, in the course of any relationship with the public administration, LATI condemns the following actions:

- the contemplation or proposal of employment and/or business opportunities that may personally benefit Public Administration employees.
- the offering or provision of benefits of any kind.
- the solicitation or obtainment of confidential information that could compromise the reputation and integrity of either party.

H. Relations with trades unions and political parties

LATI does not make contributions of any kind, whether direct or indirect, to trade union organizations or political parties, nor to their representatives or candidates, except in those forms and means permitted by the prevailing legislation. LATI bases its relations with such organizations on principles of fairness and cooperation.

I. Relations with the press and other communications media

LATI only interacts with the press and other media through the company bodies and functions delegated to do so, and in the spirit of maximum fairness, accuracy and transparency.

04. IMPLEMENTATION OF THE CODE OF ETHICS

A. Sphere of application

LATI ensures the widest possible dissemination of the Code of Ethics within and outside the organization. All persons working in and with LATI - to whom this Code applies – and insofar as it involves their area of responsibility, must be familiar with and observe the provisions of this Code and must likewise promote awareness of it to all those involved in its application (e.g., new hires, third parties, etc.).

The Code of Ethics is distributed and adopted at LATI's subsidiaries and foreign branches. In the case of non-controlled subsidiaries, the representatives designated by LATI in the subsidiary's governing bodies are required to promote the principles and contents of the Code in their respective areas of competence. Collaborators are likewise informed of this.

The same principles must therefore inspire the members of the Board of Directors in every decision made or action planned, and likewise all employees and collaborators, within the scope of their respective relationships with LATI.

B. Whistleblowing

If any individual who works for LATI discovers that another person is not applying or is about to breach any of the principles of the Code of Ethics, they are duty-bound to report it through the reporting channels set up by the company. LATI takes all reports of suspected breaches of the Code of Ethics or of the prevailing legislation very seriously and investigates them promptly.

LATI will not, under any circumstances, tolerate any form of retaliation against anyone who has raised concerns in good faith, and under no circumstances will it take or threaten any adverse action or form of discrimination against anyone who reports wrongdoing or expresses concerns related to matters covered in this Code.

The channels for submitting such reports are detailed in Addendum 2.

LATI reserves the right to report to the competent authorities any circumstances and conducts engaged in by the recipients of this Code of Ethics that are in violation of the principles contained herein.

C. Compliance with the Code of Ethics and related sanctions

LATI deems compliance with the principles and norms illustrated in this Code of Ethics an integral and essential part of the contractual obligations stipulated with employees, also pursuant to Articles 2104 and 2105 of the Civil Code, and likewise for collaborators.

Any failure by LATI employees to comply with the rules of conduct established by this Code of Ethics and by company procedures, or any breach thereof, shall constitute a disciplinary offence. Any subsequent sanction applied in this regard shall be proportional to the seriousness of the offence, in compliance with the provisions of the National Collective Labour Agreement (CCNL) for the employee's sector, and shall reflect the gravity of the specific case.

If a manager breaches the Code of Ethics, LATI will evaluate the facts and behaviours and take appropriate action against those responsible. In the event of such a breach, the SB will inform the whole Board of Directors and the Board of Auditors, who will take appropriate action in accordance with the law.

Any conduct in violation of this Code of Ethics engaged in by collaborators, consultants, or other third parties linked to LATI by a non-employee contractual relationship may result in termination of the contractual relationship, without prejudice to any claim for compensation if damage is caused to LATI by such conduct, even independently of the termination of the contractual relationship.

ADDENDA

Addendum 1: Benefit Companies and LATI's Common Benefit objectives

A Benefit Company is a new legal form of enterprise, regulated by Law No. 208, dated December 28th, 2015, (paragraphs 376-383 and addenda 4 – 5), effective as of January 1st, 2016, which allows a for-profit company to balance public benefits with shareholder profits. Unlike a traditional company, whose sole purpose is to distribute dividends to shareholders and investors, the directors of a benefit company are obliged to balance the interests of shareholders, the interest of the public and the interests of other interested parties (e.g. employees and other stakeholders). (Source: *Assobenefit*, 2024)

The Common Benefit objectives set down in LATI's company Statute are:

1 – The Sustainability of the company's products

LATI, also in partnership with other enterprises, is committed to creating innovative products that have positive environmental and social impacts, as well as contributing to the creation of a sustainable culture in the use of plastic materials. The company promotes these goals by acting with the utmost responsibility and awareness in the selection of suppliers, in the choice of raw materials to be used in the manufacturing cycle, by working on the streamlining of energy consumption, by extending product life cycles with a view to circularity, by prioritizing product safety, and by organizing activities to raise awareness of the sustainable use of plastic materials.

2 - People's wellbeing within and outside the organization

LATI is committed to the promotion and maintenance of the physical, psychological and social wellbeing of the people involved in company activities. The company therefore seeks to embrace and nurture the ethical dimension of work by promoting the development of human capital and a culture of competence, ensuring the protection, safeguarding, dignity and safety of people, supporting personal and professional growth and fulfilment through the organization of a stimulating and productive work environment, and promoting company welfare initiatives geared to the improvement of people's private lives.

3 – Acting to develop the local territory and ecosystem

LATI recognizes its social function and role as a positive force within the territories in which it operates. The company undertakes to broaden its corporate citizenship and to constantly improve its impact on the local territory by supporting and promoting projects to disseminate the culture of sustainability and the common good, activating collaborations and synergies with all local stakeholders, adopting values such as transparency, dialogue and the pursuit of cooperation in its management and corporate communication practices.

Within its reference ecosystem, the company is likewise committed to developing and maintaining long-lasting relationships geared to generating shared value with customers and suppliers.

Addendum 2: Whistleblowing



The graphic features a large blue document icon with a folded top-left corner. Inside the document, the LATI logo and 'HIGH PERFORMANCE THERMOPLASTICS' text are in the top right. The central area shows a group of six business silhouettes in shades of blue, with five light blue speech bubbles above them. A white silhouette of a person on the right has a speech bubble containing a whistle icon. The background of the document is filled with a pattern of blue and brown plastic granules. At the bottom left of the document, the word 'Whistleblowing' is written in blue. At the bottom right, there is a large blue circular button with a white downward-pointing arrow.

LATI® HIGH PERFORMANCE THERMOPLASTICS

Whistleblowing

DOWNLOAD

Addendum 3: Gender equality policy

LATI® HIGH PERFORMANCE THERMOPLASTICS

Gender equality policy

DOWNLOAD

Addendum 4: Global Compact

Human Rights

Principle I

Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle II

make sure that they are not complicit in human rights abuses.

Labour

Principle III

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle IV

the elimination of all forms of forced and compulsory labour;

Principle V

the effective abolition of child labour; and

Principle VI

the elimination of discrimination in respect of employment and occupation.

Environment

Principle VII

Businesses should support a precautionary approach to environmental challenges;

Principle VIII

undertake initiatives to promote greater environmental responsibility; and

Principle IX

encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle X

Businesses should work against corruption in all its forms, including extortion and bribery.

Vedano Olona (VA), 24 June 2024



LATI S.p.A. - Vedano Olona
HEADQUARTER
Via F. Baracca, 7
ITALY - 21040 - VEDANO OLONA (VA)
☎ +39-0332-409111
🌐 <https://www.lati.com>

LATI S.p.A. - Gornate Olona
MANUFACTURING
Via delle Industrie, 1
ITALY - 21040 - GORNATE OLONA (VA)
☎ +39-0331-863111
🌐 <https://www.lati.com>

