LUSOCHIMICA

ORGANIZATION, MANAGEMENT AND CONTROL MODEL

PURSUANT TO ITALIAN LEGISLATIVE DECREE NO. 231/2001

Of

Lusochimica S.p.A.

GENERAL PRINCIPLES OF CONDUCT

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This is an English courtesy translation of the Italian language version of Lusochimica's Management and Control Model. The Italian language version will prevail in the event of any discrepancies with, or omissions in, the English translation.

LUSOCHIMICA

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General Principles of Conduct

Heads of Departments, Functions and of the services involved in Areas at risk, as well as all recipients of the Model, within the sphere of their activities, are obliged to comply with the rules of conduct set out below, in accordance with the principles stipulated in the Model, and especially in the Lusochimica's Code of Ethics.

It is strictly forbidden to:

- engage in conduct such as to constitute the types of crimes envisaged by the Decree (see Annex A to the Special Part "**Description of predicate offences relevant for Lusochimica**");

- engage in conduct which, although not constituting the commission of a crime, consists of suitable acts unequivocally aimed at committing it;

- put in place or facilitate transactions that could effectively or potentially create conflicts of interest with the Company, and also any activities that could interfere with their ability to impartially make decisions in the best interests of the Company and in full compliance with the rules of the Code of Ethics;

- put in place or facilitate operations or activities that do not abide by the Code of Ethics;

- putting in place activities that are contrary to the procedures and principles of control required therein to prevent the crimes of counterfeiting distinctive signs of intellectual property works and industrial products.

It is also necessary:

- that all the activities and operations carried out on behalf of the Company are distinguished by strictly complying with applicable legislation, and the principles of correctness, transparency, good faith and the traceability of documentation;

- that effective conduct strictly complies with the conduct stipulated in internal procedures, with special attention paid to the conducting of "sensitive" activities;

- that those who perform a function of control and supervision on formalities connected with carrying out the above sensitive activities must pay particular attention to implementing the

formalities and immediately reporting any irregular situations to the Supervisory Board and, in any case, all information provided in the Company's Model.

In addition to the aforementioned rules of conduct, the following are further principles of conduct to be observed in order to mitigate the risk of the predicate offences specified in each case.

- **Crimes against the Public Administration (Art. 24 and 25 of Italian Legislative Decree no. 231/2001)**

It is strictly forbidden to:

- donate, offer or promise money to a Public Official or Persons in charge of Public Services;

- distribute, offer or promise gifts and presents that are not of modest value, as defined in the Farmindustria Code, in breach of the provisions of the Code of Ethics and corporate practices;

- agree on, offer or promise any advantages of any kind whatsoever, in favour of Public Officials or those in charge of Public Services, including healthcare professionals;

- provide services to partners and/or consultants and/or suppliers that are not adequately justified within the context of the relationship with the latter;

- pay fees to outsourcers that are not adequately justified in relation to the type of service that is provided and the applicable practices within the local environment;

- submit statements and/or documents and/or data and/or information that is untrue or incomplete to national, EU or foreign public bodies, and even more so when this is done to secure public funding, contributions or subsidised financing;

- to allocate amounts received from national or EU public bodies in the form of payments, contributions or funding, for purposes other than what they were originally intended.

Furthermore, in order to ensure the general principles indicated above are respected:

- in risk areas, relations with parties qualifying as Public Officials or Persons in charge of Public Services must be managed in a uniform manner, with the appointment of one or more people responsible internally for each action or series of operations carried out;

- appointments conferred on outsourcers must also be put in writing, indicating the fee agreed and must be signed in accordance with the mandates conferred;

- no type of payment may be made in kind;

- statements made to national or EU public bodies, for the purposes of securing public funding, contributions or financing, must only contain information that is absolutely true, and once these have been obtained, appropriate accounting must be issued in this regard.

➢ **Computer crimes (Article 24 *bis* of Legislative Decree no. 231/2001)**

All company resources, and specially those that cover significant positions in the usage and administration of computer systems, must base their actions on the following codes of conduct:

- **Confidentiality:** guarantee that specific data is protected from undue access and is utilised exclusively by authorised people. Confidential information must be protected both during the transmission phase and in the storage/retention phase, so that the information is only accessible to whoever is authorised to be aware of it;

- **Integrity**: guarantee that all corporate data is actually the original data entered into the computer system and that only legitimate changes were made. It must be guaranteed that the information is processed in such a way that it cannot be tampered with or amended by unauthorised persons;

- **Availability**: guarantee that corporate data is available in relation to the requirements of continuity in processes and in compliance with the regulations that require its retention.

In particular, it is forbidden to:

- alter public or private IT documents with probatory value;

- abusively access the IT or ITC system of public or private parties;

- abusively access the IT or ITC system of public or private parties in order to alter and/or cancel data and/or information;

- abusively possess or utilise codes, passwords or other means of access to a computerised or telematic system of competitors, public or private parties, in order to acquire confidential information;

- abusively possess or utilise codes, passwords or other means of access to its own computerised or telematic system in order to acquire confidential information;

- conduct activities for the procurement and/or production and/or circulation of equipment and/or software in order to damage a computer or telematic system, of public or private parties, the information, data or programmes they contain, or to favour the total or partial interruption or the alteration of its functioning;

- illegally intercept, impede or interrupt communications;

- modify and/or cancel data, information or programmes of private or public parties or that are in any case of public utility;

- damage other parties' computer or telematic information, data or programmes;

- destroy, damage, render unserviceable IT or telematic systems of public utility;

- engage in any of the forms of conduct referred to in cyber crime cases, in order to compel someone to do or not to do something, thereby procuring for oneself or others an unfair profit to the detriment of others.

The parties referred to above must therefore:

- use the information, applications and equipment exclusively for office purposes;

- avoid bringing into and/or storing in the Company (in paper, electronic format and by using corporate tools) on whatever basis and for whatever reason, documentation and/or computer material of a confidential nature and owned by third parties, unless these were acquired with the express permission strictly for work purposes;

- avoid transferring outside of the Company and/or transmitting files, documents, or any other confidential documentation owned by the Company itself or by another company in the Group, unless for purposes strictly pertinent to carrying out one's duties;

- avoid using software and/or hardware tools able to intercept, falsify, alter or eliminate the content of communications and/or computer documents;

- utilise the connection to the internet for the purposes and time strictly necessary to carry out one's work;

- respect the procedures and standards set, reporting any anomalous usages and/or functioning of computer resources to the competent functions without delay;

- only utilise products acquired officially by the Company on the Company's equipment;

- abstain from making copies of data and software that was not specifically authorised;

- refrain from utilising the compliance instruments available outside of the prescribed authorisations;

- comply with any other specific regulation referring to access to systems and the protection of the Company's data and application assets;

- scrupulously comply with the provisions of the corporate security policies for the protection and control of computer systems;

- use artificial intelligence systems in compliance with ethical standards and for the sole purpose of improving business operations.

➢ **Organized crime offences, receiving stolen goods, money laundering, transnational crimes and terrorism-related crimes (Articles 24 *ter*, 25 *quater*, 25 *octies* Legislative Decree no. 231/2001; Art. 10, Law 146/2006)**

In order to ensure the general principles indicated above are respected:

- with regard to the commercial/professional reliability of suppliers and partners, all the necessary information must be requested, utilising in this regard the tools made available by external consultants;

- the appointments conferred to any service providers and/or natural persons that see to the Company's economic/financial interests, must also be put in writing, with the content and economic conditions agreed on specified;

- it is necessary for the competent functions to check on payments being made on a regular basis in respect of all counterparties (including companies in the same Group); in particular, a

specific check must be done that the party on the order form corresponds with the party receiving the relevant payment;

- such formal and substantive check (check on the counterparty company's registered address, check on the credit institutions used, check on the use of any trust companies) and must also be guaranteed with regard to corporate financial flows and payments to third parties and to companies within the Group;

- the minimum standards and requirements set for the purposes of selecting parties providing goods and/or services, which the Company intends acquiring, must be diligently complied with;

- the assessment criteria for bids must be set;

- maximum transparency must be ensured in the case of entering into agreements/joint ventures aimed at making investments;

- maximum traceability must be ensured for transactions covering goods, valuables or capital involving not only Company Personnel but also external professionals (inter alia, accountants, financial advisers).

- that full cooperation shall be guaranteed with the Judicial Authority, including the rejection of influencing any parties called to make statements or inciting the latter from availing themselves of the right not to respond.

➢ **Crimes against industry and trade (Art. 25 *bis*.1 of Legislative Decree no. 231/2001)**

In order to ensure that the general principles indicated above are respected, the Company:

- has rules in place on the use of material protected by industrial property rights;

➢ **Corporate crimes (Article 25 *ter* of Legislative Decree no. 231/2001)**

Based on the controlling principles outlined above, it is necessary that all operations carried out within the context of "sensitive" activities are properly documented.

When executing these operations, the following codes of conduct need to be respected:

- guarantee compliance with the conduct stipulated in the corporate Code of Ethics, with special reference to the requirement of ensuring that every operation and transaction is correctly recorded, authorised, verifiable, legitimate, consistent and appropriate;

- maintain correct and transparent conduct, in compliance with the applicable provisions of the law and regulations, in all the activities aimed at preparing the financial statements and the other corporate communications, in order to provide shareholders and third parties with true and correct information on the Company's economic and financial situation and equity;

- maintain correct and transparent conduct, ensuring full compliance with the applicable provisions of the law and regulations, in the acquisition, processing and communication of the data and information necessary to enable a well-grounded judgement on the Company's economic and financial situation and equity;

- guarantee compliance with the principles of integrity, correctness and transparency so as to allow recipients to form a substantiated and informed opinion of the Company's economic and financial situation and equity, its outlook and on the financial products;

- observe the prescription set by law to protect the integrity and effectiveness of share capital and to act in compliance with internal corporate procedures, which are based on these rules, in order not to generally prejudice the rights of creditors and third parties in this regard;

- abstain from carrying out operation or initiative when there is a conflict of interests, or when there is a conflict of interest between a third party and the Company;

- ensure proper functioning of the Company and corporate bodies, guaranteeing and supporting any form of internal control over company management envisaged under the law, as well as the free and regular exercising of the vote in Shareholders' Meetings;

- promptly, correctly and in good faith carry out all the communications provided for in the law and regulations in relations with the Public Supervisory Authorities, by not impeding them from exercising their supervisory functions;

- maintain correct and truthful conduct in relations with the press and information bodies;

- conduct in respect of activities and relations with other Companies in the Group is based on the highest level of correctness and integrity, to ensure compliance with applicable legislation and regulations.

➢ **Private Bribery (Article 25 *ter* of Legislative Decree no. 231/2001)**

In relation to private individuals and relations with employees, it is prohibited:

- solicit or receive, directly or through an intermediary, an undue advantage of any kind, or accept the promise of such an advantage, for oneself or for a third party, in the performance of management or work functions of any kind on behalf of the Company, in order to perform or omit an act in violation of the obligations inherent to one's role or of loyalty obligations in general;

- promising, offering or granting, directly or through an intermediary, an undue advantage of any kind to persons performing managerial or work functions of any kind within the Company or on behalf of a private sector entity so that they perform or omit an act in breach of their duties.

Furthermore, in order to ensure the principles indicated above are respected:

- the recruitment of personnel and its management must be done in compliance with the corporate procedures, ensuring:

  - a planning process for the resources to be appointed, taking into account effective needs;

  - identification of the minimum requirements to cover the role and the relative remuneration level, in accordance with the provisions under the National Collective Labour Agreements (CCNL) (where applicable) and the reference remuneration tables;

  - definition of a selection process for staff that governs that: **(i)** multiple candidates are sought in relation to the complexity of the role that needs to be covered; **(ii)** the management of conflicts of interest between the selectors and the selected applicant; **(iii)** during the screening phases, verification as to whether the candidates correspond with the defined profile;

  - pre-appointment checks conducted aimed at preventing prejudicial situations arising, which expose the Company to the risk of committing the contemplated crimes;

- authorisation for the appointment from the appropriate levels;

- systems that guarantee the traceability of attendance and correctness of the remunerations paid;

- contracts between the Company and reference people from agencies, suppliers, consultants and customers must be defined in writing with all their conditions and terms and observe the indications of the points below:

  - contracts with all third parties (agencies, consultants, etc.) to contain a specific clause that governs the consequences of violating the rules in the Model;

  - agencies or their reference people, suppliers, distributors and third parties in general must be selected according to transparent methods and based on predefined qualitative and quantitative criteria;

  - the contract must be approved according to appropriate authorization levels;

  - furthermore, when managing contracts, checks must be done on the consistency of the order in relation to the parameters provided in the contract; on the completeness and accuracy of the invoice and its compliance with legislative prescriptions, and those set by corporate procedures;

  - in the scope of relations with companies, foundations, associations and other private entities, the types of relations and the relevant ways in which these are managed must be identified, as well as the procedures for the collection, verification and approval of the documentation to be sent to members of companies, foundations, associations and other private entities;

  - the procedures for controlling financial flows and the traceability of payments must be complied with;

➢ **Crimes against individuals (Article 25 *quinquies* of Legislative Decree no. 231/2001)**

In order to ensure that the general principles indicated above are respected, the Company:

- requires a commitment from its personnel as well as from third parties with whom it may have a qualified legal relationship (such as suppliers, partners and consultants) to comply with legal obligations concerning the protection of child and women labour, health and safety conditions, trade union rights or, in any case, rights of association and representation;

- verifies compliance with labour law and trade union agreements for employment and labour relations in general, as well as compliance with the rules of propriety and good conduct in the working environment, paying particular attention to abnormal work situations;

- uses up-to-date IT tools that counter access to websites containing child pornography material ("content filtering" tools);

- evaluates and regulates with particular attention and sensitivity the direct and/or indirect organization of travel or periods of stay in foreign locations with specific regard to locations known for the phenomenon of so-called "sex tourism".

➢ **Crimes relating to non-cash payment instruments and the fraudulent transfer of values (Art. 25 *octies*.1 of Legislative Decree no. 231/2001)**

In order to ensure compliance with the general principles set out in the introduction, the Company provides for the obligation to use the utmost caution in the safekeeping of the company credit card and to notify the company immediately in the event of any theft or loss thereof, as well as the threefold prohibition of:

- improperly using credit or payment cards while not being their holder, or any other similar document enabling the withdrawal of cash or the purchase of goods or the provision of services or any other non-cash means of payment;

- in order to make use of them or allow others to use them in the commission of crimes concerning non-cash payments or to manufacture, import, export, sell, transport, distribute, make available or in any way procure for oneself or others equipment, devices or computer programmes which, by virtue of their technical or design characteristics, are primarily intended to commit such offences;

- Altering the operation of a computer or telecommunications system in any way whatsoever, or intervening without right in any manner whatsoever on data, information or programmes

contained in a computer or telecommunications system or pertaining to it, procuring for oneself or others an unjust profit to the detriment of others.

➢ **Crimes relating to copyright infringement (Article 25 *novies* of Legislative Decree no. 231/2001)**

All recipients of the Model are strictly forbidden from:

- engaging in any conduct which, while not actually constituting any of the criminal offences referred to in the family of predicate offences pursuant to. Legislative Decree no. 231/2001 indicated above, may in abstract terms become one;

- duplicating, importing, distributing, selling, renting, disseminating/transmitting to the public, possessing for commercial purposes, or for gaining a profit therefrom of computer programmes, protected databases or any other work protected by copyright and related rights, including works with a literary, musical, multi-media, cinematographic, artistic content, without having the rights to do so;

- disseminating a copyright protected work or part thereof via telematic networks, without having the rights to do so;

- engaging in file sharing, with the exchange and/or sharing of any type of file via peer-to-peer platforms.

Furthermore, in order to ensure the principles indicated above are respected, the Company requires:

- the observance of rules on the use of material protected by copyright;

- the formalisation of research contracts and specific clauses to manage copyrights;

- the prohibition on installing and using file sharing systems without authorisation.

➢ **Inducement not to make statements or to make false statements to the judicial authorities (Article 25-*decies* of Legislative Decree no. 231/2001)**

It is strictly forbidden to:

- in any way and in any form, coerce the will of those called to make statements to the Judicial Authority or to induce those to avail themselves of the right not to respond;

- in any way, induce those called to make statements before the Judicial Authority to make false statements;

- donate, offer or promise money, gifts, gratuities or other benefits to people called on to make statements before the Judicial Authority;

- put in place any conduct, while not materially integrating the crime applicable as above, could become applicable in abstract terms;

- put in place or facilitate operations or activities that do not abide by the Code of Ethics.

Furthermore, in order to ensure the general principles indicated above are respected:

- in relations with the Judicial Authority, especially where these refer to proceedings in which the Company could be directly or indirectly involved, it must ensured that the suspects or defendants can freely express their representation of the facts should they decide to submit to questioning.

➢ **Employment of third-country citizens whose stay is illegal (Art. 25 *duodecies* of Legislative Decree no. 231/2001)**

Recipients of the Model must adhere to the following principles:

- in the case of temporary workers being used through appropriate recruitment agencies, to ensure that their appointees are in order regarding their residence permit, and specifically require the agencies to sign an undertaking to comply with the Model;

- to ensure, on the basis of specific contract clauses that the third parties with whom the Company collaborates (suppliers, consultants, etc.) make use of workers in order regarding their residence permit, and specifically require the former to sign an undertaking to comply with the Model;

- the measures provided for under corporate procedures aimed at preventing the employment of workers staying illegally and at protecting workers must be complied with;

- under no circumstances must child labour be utilised, and no collaboration must be established with those that exploit this;

- an adequate system of mandates and powers of attorney must be in place regarding the recruitment of workers;

- a monitoring system to be in place for the formalities related to residence permits (expiry, renewal, etc.).

➢ **Tax offences (Art. 25 *quinquiesdecies* of Legislative Decree no. 231/2001)**

In order to ensure compliance with the general principles set out in the introduction, the Company, among other things:

- ensures full compliance with current tax legislation and applicable best practices on the subject, inspiring all conduct concerning the receipt, management and/or issuance of tax documentation with principles and criteria of the utmost caution and prudence;

- ensures compliance with the principles of integrity, propriety and transparency of compulsory private contracts and of the invoicing process and the recording of invoices;

- undertakes to consistently and congruously document every sensitive and/or relevant management operation or fact, so that it is possible to identify the responsibility of those who have operated (assessed, decided, authorised, performed, controlled the operation) at any time;

- within institutional processes, ensures as far as possible that separate functions decide on an operation, authorise it, execute it, record it and control it by virtue of the principle of segregation of duties;

- guarantees immediate access to accounting documents to inspection or control authorities, in the exercise of their functions, as well as to the Statutory Auditors Board, the Independent Auditor, or the SB.

➢ **Smuggling (Art. 25 *sexiesdecies* of Legislative Decree no. 231/2001)**

In order to ensure compliance with the general principles set out in the introduction, the Company provides for the prohibition of, among other things:

- introducing foreign goods across the border by land, sea or air in breach of the rules, prohibitions and limitations;

- unloading or depositing of foreign goods in the intermediate space between the border and the nearest customs post;

- concealing foreign goods on a person or in luggage or packages or among other goods or in any means of transport, in order to evade customs inspection;

- removing goods from the customs areas without having paid the duties due or without having guaranteed their payment;

- taking national or nationalised goods subject to border duties out of the customs territory without having paid such duties;

- using fraudulent means for the purpose of obtaining undue refunds of duties established for the import of raw materials used in the manufacture of domestic goods that are exported;

- provide, in customs documents and declarations, untrue or incomplete information regarding the quality, quantity, value, origin, or tariff classification of goods;

- subjecting the goods to artificial manipulation or using other fraudulent means in import or temporary export operations or in re-export and re-import operations, for the purpose of evading the payment of duties due;

- evade or withhold from assessment or payment of excise duty products subject to such tax (e.g., alcohol and solvents, energy products), as well as create, alter, or use accompanying documents containing untrue data regarding the nature, quantity, or destination of such products.

Ethical Principles and Rules of Conduct for the Company regarding health and safety in the workplace

As already outlined in the Code of Ethics of the Model, since it was established, Lusochimica has adopted and implemented a policy founded on ethics.

In particular, the Company has always paid constant attention to the continuous improvement of safety, understood as the prevention of injuries, accidents, and dangerous behavior, as well as occupational hygiene and medicine, plant safety, operation and maintenance.

To effectively implement its commitment at all levels the Company's goal is that of striving to:

- consider the protection of the health and safety of workers a corporate objective to be achieved and continuously improved, in compliance with the technical and structural standards of the law in relation to plants, equipment, workplaces, and chemical, physical and biological agents, etc.;
- analyze and assess the risks of accidents in relation to legislative provisions, guarantee the safety of employees and the surrounding environment and adopt measures to limit any potential consequences;
- act in compliance with all national laws and local regulations in force, adopting all the necessary preventive measures in its activities and updating them according to technical progress and experience;
- check that the design of the plant, machinery and equipment, as well as the workplaces, is carried out in such a way as to safeguard the health of workers;
- assign tasks and responsibilities regarding safety at work by creating a suitable organizational structure, such as emergencies, first aid, management of contracts, periodic safety meetings, consultation with workers' safety representatives;
- involve the entire company structure, according to its own attributions and competences, in the achievement of the assigned safety objectives;
- ensure the activity of preventive, periodical and extraordinary health monitoring, as well as the information, education and training of the workers;

- guarantee availability of necessary protective and preventive equipment/devices and verify their use;

- provide measures to ensure that third parties operating within the company's premises adopt behaviors, practices and procedures that are consistent with the principles of the Special Part B of the Model;

- conduct or verify the operation of plants and equipment in order to ensure their compatibility with the protection of employee safety;

- involve its own employees in the concrete definition of the objectives and in the implementation of the modification and improvement plan, providing them with all the tools and knowledge so that they operate in accordance with the safety provisions and procedures;

- ensure appropriate supervisory activity with reference to workers' compliance with safety procedures and work instructions;

- periodically review the contents of the Risk Assessment Document to verify its adequacy, effectiveness, and applicability.

The duties and tasks of Third-Party Recipients

As stated in Lusochimica's Code of Ethics, Third parties coming into contact with the Company must cooperate to best of their ability and competencies in order to promote behavior aimed at ensuring the health and safety or workers.

The duties and tasks of Contractors

Contractors must:

a) guarantee they have the professional technical qualifications in relation to the work to carry out on the basis of a project or works contract or service provision contract;

b) incorporate the information provided by the Employer regarding the specific risks existing in the environment where they are destined to work, and on the prevention and emergency measures adopted by the Employer;

c) cooperate with the Employer to implement the prevention and protection measures from risks at work affecting the activities referring to the works contract or service provision contract;

d) coordinate the protection and prevention interventions for the risks that Workers are exposed to, together with the Employer.

The duties and tasks of Suppliers

Suppliers must comply with the prohibition from manufacturing, selling, renting and allowing the use of work equipment, personal protection devices and installations not complying with applicable legislation and regulations on health and safety in the workplace.

In the case of items with financial leases subject to compliance certification procedures, these must be accompanied by the relevant documentation provided by the assignor.

The duties and tasks of Designers

The Designers of premises, workstations and installation must comply with the general principles of prevention regarding health and safety in the workplace when making their project and technical decisions, choosing equipment, components and protection devices that adhere to legislative provisions and applicable regulations on the subject.

The duties and tasks of Installers

For the part they are competent for, installers must abide by the regulations for health and safety in the workplace, as well as the instructions provided by respective manufacturers.

General Principles of Conduct related to environmental protection

Since its establishment, Lusochimica has adopted and implemented a policy centered on ethics, in line with the principles and rules of conduct set forth in the Code of Ethics adopted by the Company.

For the purposes hereof, the Company has always demonstrated constant attention to the continuous improvement of its environmental performance, understood as pollution prevention, reduction of emissions and discharges, responsible waste management, efficient use of natural resources and energy, as well as protection of the soil, subsoil, and water, in compliance with applicable laws and with the goal of minimizing the impact of its activities on the environment and the surrounding territory, from a perspective of sustainability and responsibility toward future generations.

More specifically, all the subjects to whom the Model is addressed are absolutely forbidden to:

- establishing, promoting or causing others to carry out conduct considered, both individually or collectively, to either directly or indirectly incorporate the cases of the crimes included among those under Article 25-*undecies* of the Decree;
- take any direct actions for the unequivocal purpose of committing the types of crimes included among those covered by art. 25-*undecies* of the Decree.

The recipients of the Model shall adhere to the following rules, and must:

- always consider predominant the need to protect the environment as compared to any economic consideration;
- contribute, in accordance with their own competence, to the fulfilment of the duties included within the protection of the environment;
- always assess the effects of their conduct in relation to the risk of causing damage to the environment: every action that could have an environmental impact must focus on reducing the actual or potential damage that could be caused to the environment to a minimum;
- pursuant to their training and experience, as well as the instructions and means provided or arranged by the employer, not engage in improper actions that might cause damage to the environment;
- refrain from undertaking on their own operations or actions that are not included within their own duties or, in any case, may cause damage to the environment;
- observe all the measures provided by the company procedures to prevent the production and to

reduce the harmfulness of waste;

- ensure the protection of the soil and subsoil, conservation of the territory as well as the protection of surface, marine and underground waters;
- take all the precautions necessary to keep air pollution to a minimum and to keep emissions below the limits established by law;
- carry out the temporary storage and subsequent delivery of waste under safe conditions and in compliance with current laws;
- respect the procedures aimed at preventing environmental emergencies and limiting the damage should such emergencies occur;
- verify the environmental compliance of products placed on the market or put into circulation by the Company;
- attend specific training courses on environmental matters;
- promptly report to the competent departments any anomalies, spills, limit exceedances, malfunctions, environmental complaints, or documentation discrepancies relating to waste, discharges, emissions, soil, products, or environmental suppliers;
- do not evade, alter, or omit records, tracking forms, RENTRI data, sampling, test reports, authorization checks, or other documentary evidence relevant to environmental traceability and the Model.

As regards any operation carried out by the above-mentioned individuals and assessed as potentially at risk of committing a crime, the Supervisory Board will be entitled to carry out the controls deemed most appropriate.