



FACI S.P.A. CODE OF ETHICS

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1. INTRODUCTION AND GUIDE TO USING THE CODE

1.1 Purpose and Scope

This Ethical Code (hereinafter also referred to as "Code") is a document approved by the Board of Directors of FACI S.p.A. that incorporates the principles of the Ethical Code already approved for FACI Corporate S.p.A. as a guideline for the entire FACI Group, which defines the principles of conduct in business as well as the commitments and responsibilities of the Company. The Code, in particular, aims to formally define, formalize, and share the set of ethical values that FACI S.p.A. is inspired by, the observance of which by the Recipients constitutes the founding element for the proper functioning, reliability, and reputation of the Company itself. The Code is an integral part of the Organization, Management, and Control Model (OMCM) defined to prevent crimes provided for by Legislative Decree 231/01 and subsequent modifications – so-called predicate offenses.

1.2 Definitions and References

For the purposes of this Ethical Code, "Group" refers to the FACI Group (including all Italian and foreign companies); "employees" refers to all workers, clerks, managers, and executives of the Company, and "collaborators" refers to all professionals working for or on behalf of the company; "Supervisory Body" or "SB" refers to the control body dedicated to the care and surveillance of the functioning of the Organization and Management Model pursuant to Legislative Decree 231/2001 and subsequent modifications, established within FACI S.p.A. in compliance with such legislation.

Legislative Decree 231/2001 and subsequent modifications - "Discipline of the administrative responsibility of legal persons, companies, and associations, even without legal personality, pursuant to article 11 of the law of September 29, 2000, n. 300

1.3 Recipients of the Code

The Code is addressed to the corporate bodies of FACI S.p.A., administrators and auditors, management, all employees, collaborators, and all those who act and operate in any form, directly or indirectly, for the pursuit of the company's mission and objectives. FACI S.p.A. endeavors to ensure that the Code is considered a standard of best practice for conduct in business and the performance of professional activities by those with whom it maintains relationships, such as shareholders, customers, suppliers, contractors, consultants, agents, concessionaires, national and international public institutions, political and trade union organizations, associations, and all other stakeholders.

1.4 Dissemination and Communication

The Code is made known to all stakeholders either by direct delivery (using the most appropriate methods) or by making it available through the company's intranet. A copy of the Code is in any case handed over to every employee upon hiring. FACI S.p.A. commits to organizing training and awareness courses at all levels within the organization on the Code and its values.



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1.5 Revisions and Updates

The Code is subject to review and possible updating by the Board of Directors of FACI S.p.A. The review activity takes into account changes in the legislative framework, business practices, and ethical standards of the communities in which the Company operates, as well as the experience gained in applying the Code itself. The Legal Affairs function conducts periodic internal auditing activities on the functioning of the Code, the results of which, also to suggest modifications or integrations to the Code itself, are presented to the Board of Directors of FACI S.p.A. Any updates to the Code are then published and made available using the methods previously reported.

2. ETHICAL PRINCIPLES

- FACI S.p.A., in accordance with the development policies of the FACI Group, which has been operating in the Oleochemical sector since 1943, producing derivatives of vegetable oils and animal fats used as additives in various industry sectors (plastic, rubber, construction, paper, cosmetics, pharmaceuticals, etc.), intends to create value in the medium-long term based on ethical principles inspired by the highest standards of legality, diligence, transparency, fairness, and sustainability in business management and in full respect of the rules established to protect competition. For the FACI Group, adopting ethical conduct means integrating its business activities with the respect and protection of the interests of all those with whom the Company relates, both externally and internally, and with the safeguarding of environmental resources. With the issuance of this Code, FACI S.p.A. intends to equip itself with an effective tool so that the fundamental values of the FACI Group are clearly received and disseminated, making them a reference in the performance of business activities, allowing for the creation of a shared vision and culture. The Code, which is an integral part of the Organization, Management, and Control Model (OMCM) adopted by FACI S.p.A. pursuant to Legislative Decree 231/2001 and subsequent modifications, is intended for administrators, employees, and collaborators of FACI S.p.A. and for those subjects with whom the Company maintains business relationships on a durable basis, such as consultants, suppliers, contractors, and clients. The principles and provisions contained in this Code constitute exemplary specifications that must inspire all Recipients, in particular those with supervisory and coordination responsibilities of company activities, who in turn have the responsibility to direct employee behavior by example, to train their reports, and to enforce the behavioral standards defined. FACI S.p.A. finally asks that the Recipients respect and enforce the provisions of this Code and therefore commits to:
 - Disseminate the Code throughout the Company and to all Code Recipients;
 - Ensure that anyone who reports violations of the Code in good faith is not subject to any form of retaliation;
 - Periodically check compliance with the rules of the Code;
 - Adopt disciplinary measures that are fair and proportional to the violations committed of the rules of the Code.

3. VIOLATIONS AND REPORTING

The observance of the prescriptions of the Code constitutes an integral part of the contractual obligations of the Recipients, while their violation by the Recipients constitutes, depending on the cases, a disciplinary

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offense (punishable in compliance with the applicable regulations) and/or a contractual breach and may lead to compensation for damages possibly arising from such violation against the Company.

The Board of Directors of FACI S.p.A., through the organs and functions specifically assigned, is responsible for verifying infractions and imposing sanctions consistently, impartially, and uniformly, proportional to the violations and in compliance with the current provisions on labor relations regulation. The violation of the norms of the Code may lead, in cases of greater severity, also to the resolution of the contractual relationship, without prejudice to the possible request for compensation if such behavior results in damages to the Company.

Every company function is required to oversee and ensure the adherence of its actions and activities to the principles and rules of behavior of this Ethical Code. Each function is also responsible for the line controls within its competence, the detection of any non-compliances that may have occurred internally, and the reporting of the same.

FACI S.p.A. encourages employees to seek clarifications in any situation related to the Code in which they may be in doubt about what the most appropriate behavior is, in the first instance to their hierarchical superiors and/or directly to the Supervisory Body of FACI S.p.A. (SB). The hierarchical superior and/or the SB consulted have the obligation to provide feedback without any risk for the employee to suffer any form, even indirect, of retaliation.

It is also recalled that in compliance with Legislative Decree 24/2023 ("Whistleblowing Decree") on "implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and provisions concerning the protection of persons reporting breaches of national legal provisions," FACI S.p.A. has activated an internal reporting channel that, through a specific platform accessible through the FACI Group's website, allows the encrypted electronic submission of reports:

[Faci Group Whistleblower System | Home \(whistleblowersoftware.com\)](https://www.faci.com/whistleblowersoftware.com)

Through this internal channel, violations committed in the work context defined in the same Whistleblowing Decree, including those related to the predicate offenses for the application of Legislative Decree 231/2001 and subsequent modifications, can be reported in particular. This internal reporting channel can be used by employees, collaborators, shareholders, persons who exercise (even on a de facto basis) administration, direction, control, supervision, or representation functions of the Company, and other third parties who interact with the Company (including suppliers, consultants, intermediaries, etc.), as well as interns, trainees, voluntary workers, candidates for employment relationships, and former employees who become aware of the aforementioned violations by reason of the employment relationship. In implementing the Whistleblowing Decree, FACI S.p.A. guarantees the confidentiality of the identity of the whistleblower, the person involved in the report, as well as the content of the report itself and the related documentation: Reports concerning any violations by the SB may be addressed directly to the Board of Directors of FACI S.p.A., so that it delegates one of its members to carry out the investigations deemed necessary and/or appropriate.



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4. RESPECT FOR ALL LAWS

FACI S.p.A. conducts its activities in full compliance with the current anti-money laundering regulations and the provisions issued by the competent Authorities. To this end, FACI S.p.A. commits to avoiding carrying out suspicious operations in terms of correctness and transparency and to verifying beforehand the available information regarding customers, suppliers, contractors, and external collaborators to ascertain their respectability and the legitimacy of their activities. All Recipients also commit to operating in such a way as to avoid implications in operations that may potentially facilitate the laundering of money deriving from illegal or criminal activities. Each Recipient who performs operations and/or transactions on behalf of the Company involving sums of money, goods, or other economically assessable utilities must act under authorization and provide upon request any valid evidence for its verification at any time.

Receipts and payments must strictly be made through bank transfers and/or bank cheques issued with a non-transferable clause. Furthermore, all Recipients are required to: I. Not accept goods and/or services and/or other utilities for which there is no adequately authorized order/contract; II. Not make cash payments exceeding 1,000 euros (for this purpose, payments made in multiple installments of a lesser amount but related to the same supply and cumulatively exceeding 1,000 euros are relevant).

4.2 Laws Relating to Import/Export and Sanction

FACI S.p.A. commits to respecting the norms regulating Import/Export activities, including the temporary restrictions decided from time to time by the Italian State and the supranational organizations to which the Italian State belongs (E.U., NATO, U.N., etc.).

4.3 Privacy

FACI S.p.A. protects the confidentiality and privacy of information and data related to employees, external collaborators, clients, suppliers, business partners collected on the occasion or as a result of work activities. Every Recipient is required to comply with this principle and the current regulations. The privacy of employees and collaborators is protected by adopting standards that specify the information that the Company requires from them and the related processing and conservation methods suitable to ensure the maximum transparency to the interested parties and the inaccessibility to third parties, except for justified and exclusive reasons of work. Any investigation into the ideas, preferences, personal tastes, and, in general, the private life of employees and collaborators is prohibited. Furthermore, except for the cases provided by law, the communication/dissemination of personal data without the prior consent of the interested parties is prohibited.

4.4 Antitrust Regulations

The Company and all Recipients commit to respecting antitrust regulations (which prohibit behaviors aimed at limiting competition) and to avoid any unfair action towards commercial counterparts (e.g., sabotage, falsification of technical, commercial, and accounting documents, and in general, any scheme of fraud). Commercial initiatives such as exclusive agreements, binding purchases, under-cost sales, etc., must be authorized by the Chief Executive Officer.

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4.5 Protection of Industry and Trade

FACI S.p.A. commits never to undertake aggressive or misleading commercial policies aimed at influencing the consumer in purchasing its product through any form of physical-psychological intimidation or through false communication about the product that could deceive the customer.

FACI S.p.A. inspires its conduct towards competitors on the principles of loyalty and fairness and consequently condemns and disapproves of any behavior that may constitute an impediment or disturbance to the exercise of a company or trade or that may be related to the commission of crimes against industry and commerce, where the Companies have conformed to the principles provided by the same.

Therefore, it is expressly forbidden for all Recipients to:

- Use violence on things or employ fraudulent means to hinder the industrial or commercial activity of others;
- Engage in industrial, commercial, or any other productive activity acts of competition by resorting to violence or threat;
- Perpetrate behaviors capable of causing harm to national industries by selling or otherwise circulating on national or foreign markets industrially produced goods with counterfeit or altered names, brands, or distinctive signs;
- Deliver to the buyer, within the scope and/or exercise of a commercial activity, a movable thing for another (aliud pro alio) or a movable thing that by origin, provenance, quality, or quantity is different from that declared or agreed;
- Sell or otherwise circulate works of intellect or industrial products bearing national or foreign names, brands, or distinctive signs - capable of deceiving the buyer about the origin, provenance, or quality of the works themselves or the product;
- Manufacture or industrially use objects or other goods made by usurping or violating the title of industrial property, even knowing of its existence, and seek to profit from the aforementioned goods by introducing them into the state territory, holding, selling, or otherwise circulating them;
- FACI S.p.A. also commits not to engage in illicit or otherwise unfair behaviors aimed at gaining possession of trade secrets, supplier lists, or information related to the infrastructure or other aspects of third parties' economic activities. The Company also does not hire employees from competing companies in order to obtain confidential information, nor does it induce the personnel or clients of competing companies to disclose information they cannot disclose.

4.6 Tutela dell'ordine democratico e contrasto al terrorismo

FACI S.p.A. demands respect for all laws and regulations that prohibit engaging in terrorist activities as well as subversion of the democratic order; therefore, it also prohibits mere membership in associations with such purposes. FACI S.p.A. condemns the use of its resources for financing or carrying out any activities aimed at achieving terrorist objectives or subversion of the democratic order. It is also expressly forbidden for any employee of the Company, wherever operating or located, to become involved in any practice or other action suitable to constitute terrorist behaviors or subversion of the order. In case of doubt or if a situation appears ambiguous, every employee is called upon to turn to their functional manager or a company lawyer.

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4.7 Protection of Individual Personality

FACI S.p.A. condemns any possible behavior aimed at committing crimes against individual personality.

4.8 Protection of Corporate Organization from the Risk of National and/or Transnational Associative Phenomena

FACI S.p.A. condemns any behavior carried out both on national territory and at a transnational level by subjects who hold a leading or subordinate role that could even indirectly facilitate the realization of criminal types such as conspiracy to commit crimes, mafia-type association, and obstruction of justice. To this end, FACI S.p.A. commits to activating all necessary modes of preventive and subsequent control (verifiability, traceability, monitoring, segregation of duty, etc.). FACI S.p.A. establishes that business relationships must be entertained exclusively with clients, collaborators, partners, and suppliers of reliable reputation who carry out lawful commercial activities and whose proceeds derive from legitimate sources. To this purpose, rules and procedures are provided that ensure proper identification of customers and the appropriate selection and evaluation of suppliers to collaborate with.

FACI S.p.A. adopts all necessary control tools so that its operations are traceable (i.e., meeting minutes, reporting mechanisms, etc.). In this way, FACI S.p.A. strives to prevent the occurrence of internal associative phenomena aimed at committing illicit acts using the means, resources, and assets of the company for these purposes.

FACI S.p.A. promotes development and legality in the territorial areas where it operates; therefore, it favors its participation in any memoranda of understanding (or similar agreements) defined between public entities, companies, trade associations, and trade union organizations aimed at preventing criminal infiltrations.

5. FAIRNESS WITH THIRD PARTIES

Every employee is required to interact loyally with other employees and with all their counterparts, particularly with clients, suppliers, and competitors. No one should seek illicit advantages through deception, unfair behaviors, or fraudulent actions.

FACI S.p.A. prohibits Recipients from engaging in any form of exploitation (e.g., slavery, etc.), soliciting/offering sexual and forced labor services. The Company also does not admit any violent behavior and intimidation against any employee under any circumstances. Each Recipient neither accepts nor performs for themselves or others, pressures, recommendations, or indications that could prejudice the Company or provide undue advantages for themselves, FACI S.p.A., or third parties; each Recipient also rejects and does not make improper promises and/or offers of money or other benefits unless they are of modest value and not related to any kind of requests. Should the Recipient receive an offer or a request for benefits from a third party, unless it involves customary commercial gifts of modest value, they should not accept such offer or adhere to such request and must immediately inform their hierarchical superior or the person to whom they are required to report for the necessary actions. FACI S.p.A. will not tolerate exceptions to the policies indicated. Any violations will be immediately reported to the competent Authorities and will entail disciplinary sanctions

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5.1 Relations with Customers

FACI S.p.A. commits to managing commercial relationships with customers in a fair, loyal, and professional manner in compliance with the laws in force, the agreed quality and service standards, and the contracts in force. During commercial negotiations, FACI S.p.A. provides clear, accurate, and truthful information and assumes the resulting contractual obligations as well as their diligent fulfillment. In marketing its products, FACI S.p.A. guarantees the origin, provenance, and performance of the same, respecting the UNI-EN ISO 9001 standard norms. FACI S.p.A. commits to informing customers about the content of this Code, who, when entering into a contractual relationship, will declare that they are aware of the principles stated in it, committing to respect them in the context of the activities they carry out on behalf of FACI S.p.A., and to not adopt any behavior that could induce the Company, through its executives and employees, to violate the rules specified in the Code itself. FACI S.p.A. commits to not arbitrarily discriminate against its customers. The selection of potential customers and the determination of the conditions for the sale of company goods and/or services must be based on objective assessments regarding their solidity, quality, reliability, and other qualifying aspects, respecting the existing company procedures. Accurate and comprehensive information about the goods or services being sold must be provided so that the customer, even potential, can make informed decisions. In the process of selecting customers, all accessible information related to customers must be acquired to be used not only for the usual commercial evaluation but also for checking possible relationships with subjects and activities attributable to criminal organizations. In this regard, FACI S.p.A. is inspired by the evaluation criteria on the reliability and professionalism of customers. The acquisition and collection of information relating to significant customers must be carried out both at the start and during the relationship to verify, in addition to the correctness of commercial and administrative data, the maintenance over time of the selection requirements required by the Company and, in particular, the reliability of the same. Contracts and commercial agreements must be:

- Executed as consciously established by the parties;
- In compliance with the laws and regulations in force, the national and community legislation on antitrust and competition protection, and any other internal provision on the matter without resorting to elusive or incorrect practices (such as the insertion of vexatious practices or clauses against customers and consumers);
- Complete so as not to neglect any element relevant to the customer's decision.

Employees and collaborators of FACI S.p.A. also commit to not offering or receiving gifts, presents, or other advantages that can even be interpreted as exceeding normal commercial practices or courtesy, or anyway, even if of modest value, if the donation aims to obtain illicit facilitations. It is not allowed to correspond or offer directly or indirectly payments and material benefits of any kind to influence or compensate an act of their office. In relations and commercial or promotional relationships, illegal, collusive practices, illicit payments, attempts of corruption, and favoritisms are prohibited. FACI S.p.A. also commits to not exploit conditions of ignorance or incapacity of its counterparts. FACI S.p.A. directs its activity towards satisfying and protecting its customers by listening to requests that may favor an improvement in the quality of products and services. For this reason, it directs its innovation and marketing activities towards high-quality standards of its services and

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products. FACI S.p.A. commits to responding to suggestions and complaints from customers and their protective associations, using suitable and timely communication systems. FACI S.p.A. also commits to preserving all official information and documents concerning relationships with its customers for the periods established by the laws in force. Such preservation is carried out in the most appropriate ways to ensure transparency and traceability of any contractual relationship with the customers themselves. It is in any case forbidden to undertake unfair actions to the detriment of customers.

5.2 Relations with Suppliers

In relationships with suppliers of goods and services, FACI S.p.A. adheres to principles of transparency, equality, loyalty, impartiality, cost-effectiveness, and fairness, avoiding relationships that could generate personal advantages or conflicts of interest. FACI S.p.A. commits to informing suppliers about the contents of this Code. At the time of entering into the contractual relationship, suppliers must declare that they are aware of the principles stated in the Code, committing to respect them in the context of their activities on behalf of FACI S.p.A., and to not engage in any behavior that could lead FACI S.p.A., through its managers and employees, to violate the rules specified in the Code itself.

The selection of suppliers is based on objective and documentable criteria, aimed at finding the best balance between economic advantage and quality of performance. FACI S.p.A. also considers the economic, financial, and technical reliability of the counterparty as well as transparency regarding the origin of the purchased products, in order to avoid acquiring products of illicit origin, such as counterfeit products or products resulting from theft.

In managing relationships with suppliers, Recipients are required to:

- Establish transparent, collaborative relationships in line with the best commercial practices, meticulously observing the complex of rules provided by national and community legislation, by procedures deriving from quality, safety, and environmental management systems, as well as by internal regulations regarding supplier selection;
- Verify the identity of third parties with whom FACI S.p.A. interfaces;
- Justify the selections made and properly contract all supplies;
- Ensure the most advantageous relationship between quality, cost, and delivery times;
- Avoid any initiative that could lead to unjustified favoritism, advantaging one supplier over others;
- Not pursue personal gain in procurement operations;
- Demand the application of contractually stipulated conditions;
- Operate within the scope of current legislation and demand its punctual compliance;
- Refrain from accepting gifts, presents, or other advantages, even if of modest value, if the donation aims to obtain illicit facilitations;
- Not correspond or offer, directly or indirectly, payments and material benefits of any entity to influence or compensate for an act of their office;
- Not engage in illegal, collusive behaviors, illicit payments, attempts of corruption, and favoritisms;
- Avoid making monetary donations, distributing gifts outside of what is anticipated by company practice, and granting other advantages of any nature (e.g., promises of employment).

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Relations with suppliers are regulated by the principles mentioned above and are subject to constant monitoring. Suppliers are required to communicate without delay any situation and/or circumstance that may arise, which could affect the maintenance of the selection criteria required by the Company. In this regard, the declaration of false or incomplete data by the supplier may lead to the termination of the supply contract. FACI S.p.A. also commits to preserving all official information and documents relating to relationships with its suppliers for the periods established by current regulations. Such preservation is carried out in the most suitable ways to ensure the transparency and traceability of any contractual relationship with its suppliers. Regarding the selection of suppliers, FACI S.p.A. realizes its commitment to pursuing sustainability goals described in the Group's ESG plan, which is updated periodically and is aimed at combating deforestation, enhancing the traceability of the supply chain, ensuring food safety, protecting human and workers' rights, with the formalization of the following policies:

- The current Supplier policy of the Group;
- Company policies aimed at quality, health and safety, and environmental protection, formalized within an Integrated Management System certified according to ISO 9001, ISO 14001, and ISO 45001 standards;
- A policy aimed at food safety for end customers, within the production of Magnesium Stearate and Calcium Stearate used in pharmaceuticals and feed, with the implementation of Management Systems certified according to the EXCIPACT and FAMI-QS standards;
- The Palm Oil Position Paper, policy related to sustainable sourcing, within the framework of joining the RSPO - Roundtable on Sustainable Palm Oil;
- The policy aimed at supply chain security, particularly in the context of commercial exchanges, with the achievement of Authorized Exporter status and the corresponding AEOF certification

5.3 Relations with External Collaborators (Professionals and Consultants)

FACI S.p.A. proceeds to the identification and selection of professionals and consultants with absolute impartiality, autonomy, and independence of judgment. In relationships with professionals and consultants, Recipients are required to:

- Carefully evaluate the opportunity to resort to the services of external collaborators and select counterparts with adequate professional qualifications and reputation;
- Justify the selection of counterparts;
- Establish transparent, collaborative relationships in line with the best commercial practices;
- Constantly ensure the most advantageous relationship between the quality of the service and cost;
- Demand the application of contractually stipulated conditions;
- Operate within the applicable legislation and demand its punctual compliance;
- Not correspond or offer directly or indirectly payments and material benefits of any kind to influence or compensate an act of their office;
- Not engage in illegal practices, collusive behavior, illicit payments, attempts of corruption, and favoritisms;

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- Avoid exchanging courtesy gifts or acts of hospitality that do not have a predominantly symbolic value;
- Not recognize remunerations that cannot be justified by the type of assignment or local practice;
- Include a specific clause of respect for the ethical code attached to the contract itself: the violation of the ethical code may lead to the termination of the contract itself.

5.4 Relations with Governments, Institutions, and Public Offices or Those Performing Public Functions

- The relations with the Public Administration and with Institutions (e.g., Ministries and their peripheral offices, public entities, companies operating in the public services sector, territorial bodies, local entities, Data Protection Authority) are handled by the Company's Management or by company representatives delegated, considering the principles of correctness and transparency. In particular, as a mere example, the following behaviors are prohibited, carried out in Italy or abroad, either directly by Recipients or through persons acting on behalf of the Company:
 - Promise, offer, or in any way pay or make available sums, goods in kind, or other benefits (except for gifts or utilities of modest value and in line with normal commercial practice) even following illicit pressures to public officials or to private interlocutors entrusted with public service. The above prescriptions cannot be circumvented by resorting to various forms of aid or contributions (e.g., assignments, consultancies, sponsorships, employment opportunities, etc.);
 - Conduct acts involving foreign government representatives or public organizations that can be interpreted as illicit money offers to obtain unfair commercial advantages;
 - Adopt such behaviors towards spouses, relatives, or kin of the persons described above;
 - Adopt behaviors aimed at improperly influencing the decisions of officials dealing with or making decisions on behalf of the public administration;
 - Provide or promise to provide, solicit or obtain confidential information and/or documents, or in any case, such as to compromise the integrity or reputation of one or both parties. FACI S.p.A. also prohibits relationships between private individuals, corruption practices, favoritisms, collusive behaviors, direct and/or indirect solicitations, even through promises of personal benefits. FACI S.p.A. does not admit the direct or indirect provision of contributions, in money, in kind, or in any other form, to political parties, committees, and political and trade union organizations, or their representatives, outside the cases and in the ways allowed and regulated by the current legislation. FACI S.p.A. will never be represented in the relations with the Institutions or with Public Officials by Administrators, Employees, or Collaborators with reference to whom conflicts of interest may arise. In this regard, FACI S.p.A. prohibits the appointment as its representatives of subjects who:
 - Have been accused of illicit conduct in business;
 - Are in a conflict of interest or have family or other relationships known to be able to illicitly influence the decisions of any subject belonging to the public administration, unless such a situation has been preliminarily and adequately declared to the Supervisory Body and evaluated by it in terms of the possibility of conferring the aforementioned power of representation. The individuals appointed by the Company to manage relations with any public authority for: sending documentation and/or declarations; requesting authorizations; participating in tenders, etc., must verify that the information provided by any means and

for any reason corresponds to the truth, is accurate, and correct. To drastically avoid or limit the risk related to the behaviors described above, every employee, by virtue of their powers and functions, must promptly report to their superior any doubts regarding possible violations of the Code by external collaborators. Without prejudice to all the obligations imposed by the current legislation in the field, the Recipients will refrain, during negotiations, requests, or relations of a commercial nature with the Institutions or with Public Officials, from undertaking (directly or indirectly) the following actions:

- Examine or propose employment and/or commercial opportunities that may personally benefit employees of the Institutions or Public Officials;
- Offer or in any way provide, accept, or encourage gifts, favors, or commercial practices or behaviors that are not based on the utmost transparency, correctness, and loyalty, and in any case, that are not in compliance with the applicable legislation;
- Solicit or obtain confidential information that may compromise the integrity or reputation of both parties or that violate the principle of equality of treatment and the procedures of public evidence activated by the institutions or by Public Officials.

5.5 Employment Relationships with Subjects of the Public Administration

It is prohibited to maintain employment relationships and consultancies with former employees of the Italian or foreign Public Administration who, due to their institutional functions, participate or have personally and actively participated in business negotiations or endorsed requests made by the Company to the Italian or foreign Public Administration, unless such relationships have been preliminarily and adequately declared to the Board of Directors of FACI S.p.A. and evaluated by the Supervisory Body before proceeding with any hiring.

5.6 Financing/Contributions from the Public Administration

FACI S.p.A. condemns any behavior aimed at obtaining any type of contribution, financing, subsidized loan, or other similar financial aid from the State, the European Union, or any other public entity through altered or falsified declarations and/or documents, or through the omission of due information, or more generally through the use of artifices or ruses, including those carried out using a computer or telematic system, intended to deceive the granting entity. FACI S.p.A. guarantees respect for the allocation condition of contributions, subsidies, or financing aimed at supporting initiatives directed towards the realization of works or the performance of activities of public interest obtained from the State or any other public entity or the European Union, even of modest value and/or amount.

5.7 Inspections by the Public Administration

- FACI S.p.A. commits to maintaining relationships of absolute transparency and cooperation with the Public Administration. Any Public Official requesting information should be treated with the utmost courtesy but should only receive public information. For everything else, to ensure that only accurate and verified information is provided, it is necessary to request that the request for information be made formally. The

information requested will be checked by the competent Offices and communicated to the Public Official by a person authorized by the Company to disseminate official information. In case a Recipient is involved in any way in a judicial proceeding on behalf of the Company, they commit to making truthful declarations and to abstain from actions that may obstruct the activities of the Public Administration, respecting the laws and the principles of loyalty, correctness, and transparency. It is absolutely forbidden to assume behaviors towards the subject called to make declarations before the Judicial Authority within the framework of a criminal proceeding and having the faculty to not answer, behaviors aimed at conditioning or influencing them within the scope of their declaration; therefore, all company functions that interact with the subject by virtue of work activities are required not to assume behaviors that could be conditioning for the subject (i.e., decisions on the evaluation of performances or on the awarding of prizes, or on the imposition of disciplinary sanctions, etc.) in order to safeguard the principle of independence and autonomy of the same in expressing themselves before the Judicial Authority. It is expressly forbidden to:

- Carry out activities that may unfairly favor or harm one of the parties involved;
- Influence in any way the will of the subjects called to respond to the judicial authority;
- Promise/offer money or other benefits to subjects involved in proceedings or people close to them.

5.8 Relations with Public Supervisory Authorities

Recipients must scrupulously observe the provisions issued by the competent Institutions or Public Supervisory Authorities for compliance with the legislation in force in the sectors related to their areas of activity. Recipients, within the framework of proceedings with Institutions and/or Public Supervisory Authorities, must not submit applications or requests containing untrue statements to obtain improperly concessions, authorizations, licenses, or other administrative acts. Recipients must comply with any request coming from the aforementioned Institutions or Authorities within their supervisory functions, providing - where required - full cooperation and avoiding obstructive behaviors.

6. HEALTH AND SAFETY

FACI S.p.A. commits to conducting its activities with special attention to the work environment and the safety of its personnel and third parties, aiming for the continuous improvement of its performance in this area and the timely adoption of the regulations on workplace safety for which it pledges to ensure compliance.

FACI S.p.A. also commits to consumer safety within the production of excipients for pharmaceutical use and additives in feed.

The responsibility of each Recipient towards their colleagues and coworkers demands utmost care in preventing risks of accidents. Every Employee is required to comply with safety and prevention measures established to avoid any possible risk to themselves, their colleagues, and third parties.

In particular, employees must follow the instructions and directives given by those to whom the Company has delegated the fulfillment of obligations in health and safety matters in the workplace.

With special reference to activities with a high impact on worker health and safety, FACI S.p.A. ensures that:

- Risks to workers are, as far as possible and guaranteed by the best available techniques, avoided, also by choosing the most suitable and least dangerous materials and equipment, and such risks are mitigated at the source;
- Unavoidable risks are correctly assessed and adequately mitigated through appropriate collective and individual safety measures;
- Information and training for workers are widespread, updated, and specific to the role performed;
- Rapid and effective response is provided to any needs or non-compliances in safety matters that emerge during work activities or during checks and inspections;
- Work organization and operational aspects are realized in a way to safeguard the health of workers, third parties, and the community and the environment in which the company operates.

To achieve the above objectives, FACI S.p.A. allocates organizational, instrumental, and economic resources with the goal of ensuring full compliance with the current accident prevention regulations and continuous improvement in the health and safety of workers in the workplace and the related prevention measures.

In accordance with these principles, employees are also required to continuously support FACI S.p.A. in achieving the defined objectives in the area of worker health and safety and consumer safety, becoming active participants in the following:

- Implementation of an Integrated Management System (IMS) compliant with UNI EN ISO 9001:2015 - UNI EN ISO 14001:2015 - UNI ISO 45001:2018 - RSPO (Roundtable on Sustainable Palm Oil) – EXCiPACT – FAMI-QS standards and certified by third parties.
- Execution of formalized processes for risk assessment in the areas of worker health and safety, the environment, and consumer food safety.
- Implementation of prevention and protection measures for identified risks.
- Monitoring, formalizing objectives, and implementing work processes and/or technologies to improve performance in terms of worker health and safety.
- Provision of adequate human and structural resources to adequately respond to continuous legislative updates, such as REACH and CLP/GHS regulations.
- Formalization and implementation of plans for managing any emergencies in the areas of worker health and safety, environmental issues, and consumer food safety.
- Implementation of health surveillance for all employees.
- Raising employee awareness to promote a healthy lifestyle with the cooperation of the Competent Doctor.
- Participation of the Company in a welfare fund for workers and their families to support medical expenses not related to work activities.
- Provision of adequate human and structural resources to adequately respond to continuous legislative updates, such as REACH and CLP/GHS regulations.
- Application of Good Manufacturing Practices (GMP) and HACCP standards to the production of pharmaceutical excipients and additives for the feed sector.
- Maintenance of recognitions obtained from competent Authorities for the production of additives for the feed sector.

- Careful selection of suppliers.
- Implementation of safety systems to prevent fraud and protect against potential tampering with processes.
- Careful organization of corporate security with the implementation of surveillance systems and anti-intrusion devices

7. ENVIRONMENT

FACI S.p.A., given its activity in the oleochemical sector, is intrinsically part of a circular economy policy due to the use of fat-based raw materials derived from the recovery activity of the food industry (tallow, lard, and acid oils from olive). Therefore, safeguarding the environment as a whole is an integral part of the Company's mission. FACI S.p.A. commits to carrying out all its activities with respect for the principles of Environmental Sustainability, acting through concrete choices guided by the following principles:

- Commitment to comply with all regulations related to environmental protection;
- Direct commitment to a constant reduction of the impact of production activities;
- Design of increasingly sustainable products;
- Attention to the needs of all stakeholders and the local community;
- Preparedness to respond to the stimuli of those customers who make sustainability their development strategy;
- Preference for suppliers who demonstrate the best performances in terms of sustainability.

In line with these principles, employees are required to continuously support FACI S.p.A. in achieving the objectives defined in the area of environmental strategy, becoming active participants as follows:

- Implementation of an Integrated Management System (IMS) compliant with UNI EN ISO 9001:2015 - UNI EN ISO 14001:2015 - UNI ISO 45001:2018 - RSPO (Roundtable on Sustainable Palm Oil) – EXCiPACT – FAMI-QS standards and certified by third parties.
- Monitoring, formalizing objectives, and implementing work processes and/or technologies to reduce energy consumption.
- Purchase and/or generation of renewable energies (photovoltaic panels).
- Implementation of a Monitoring and Control Plan (MCP) for environmental aspects and impacts, reported and supervised by local Public Control Bodies.
- Monitoring, formalizing objectives, and implementing work processes and/or technologies to improve environmental performance in terms of:
 - Reduction in the use of water resources;
 - Improvement of the quality of discharged wastewater;
 - Improvement of air emissions quality;
 - Minimization of noise and odor emissions;
 - Optimization of waste quantities produced with a priority for recovery.
- Mapping and assessment of water stress to identify exposure to risks related to water supply.
- Rationalization of water resource use.
- Implementation of a rainwater collection and management system.

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- Careful management of non-conforming products in line with UNI EN ISO 9001 and 14001 standards.
- Monitoring of greenhouse gas emissions, also verified by a third party within the ETS (Emission Trading Scheme) system.
- Monitoring of the Carbon Footprint of both the organization and the product in line with ISO 14067:2018 standards and GHG Protocol and TfS guidelines.
- Study to reduce direct CO2 equivalent emissions derived from Scope 1 and Scope 2 aimed at Carbon Neutrality and achieving the objectives set by the Paris Agreements of 2015 on climate change.
- Encouragement of suppliers to reduce direct CO2 equivalent emissions derived from Scope 3.
- Implementation of objectives to combat deforestation in the context of procurement with the purchase of sustainable palm oil, also certified RSPO (Roundtable on Sustainable Palm Oil).
- Implementation of work processes and/or technologies for the safe management of hazardous substances.
- Formalization and implementation of a detailed maintenance plan for plants and equipment.
- Participation in thematic platforms such as CDP (Carbon Disclosure Project) and ECOVADIS, sharing results with interested customers

8. CONFLICT OF INTEREST

FACI S.p.A. prohibits employees from privately pursuing any business opportunities that could interest FACI S.p.A. Employees who hold positions of responsibility and their close relatives must not be involved in any transaction that could potentially compete with FACI S.p.A. (unless declared and authorized). No employee may pursue business opportunities that interest the Company or could compromise the ability to make decisions in the best interest of the company.

A conflict of interest occurs when the personal activities or relationships of the Recipients interfere, even apparently, with the ability to act in the best interest of the company they work for. Any situation potentially suitable to generate a conflict of interest must be immediately communicated by the Recipient to their hierarchical superior/company reference and results in the obligation to refrain from performing acts connected or related to such a situation.

Examples of conflicts of interest include:

- Acting as a consultant or employee for an external company that:
 - Markets products/services competing with those of the Company (even if in the development stage);
 - Provides products or services to the Company;
 - Purchases goods and services from the Company.
- Acting as a consultant or employee for an independent company if the obligations stemming from these roles interfere in any way with the responsibilities of the Employee towards FACI S.p.A.
- Managing on behalf of the Company of belonging operations with members of one's own family.
- Accepting money, favors, or utilities from people or companies that are or intend to enter into business relations with the Company.



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In compliance with Article 2391 of the Italian Civil Code, each administrator must inform the other administrators and the Board of Statutory Auditors of any interest they have, on their own or on behalf of third parties, in a particular operation of the Company, specifying its nature, terms, origin, and extent. Administrators must abstain from voting on that operation or transaction.

9. PROTECTION OF INFORMATION

9.1 Management of "Confidential Information"

"Confidential information" is considered to be knowledge of projects, proposals, initiatives, negotiations, intentions, commitments, agreements, facts, or events, even if future and uncertain, relating to the activity sphere of the Company not publicly known, which if disclosed could harm the Company itself. Anyone who, in the performance of their duties, becomes aware of confidential and/or sensitive information is bound to confidentiality. The Company protects confidential information regarding clients, suppliers, and business partners disclosed during the performance of work duties. It also prohibits its employees and collaborators from unlawfully obtaining confidential information regarding clients, suppliers, and business partners. It is against the law and therefore strictly prohibited to exploit or use for economic or direct investment purposes, directly or through intermediaries, corporate news of a confidential nature.

9.2 Management of "Insider Information"

"Insider information," according to Article 181 of the Consolidated Finance Act (TUF), is precise information, not yet made public, directly or indirectly concerning one or more issuers of financial instruments or one or more financial instruments, which if made public, could significantly affect the prices of such financial instruments. FACI S.p.A. ensures and guarantees adequate management and protection of insider information through the definition of appropriate procedures and the establishment of a register of persons who have access to such information. In the context of proper market operation, it is forbidden to intentionally spread false news inside or outside the Company concerning FACI S.p.A. itself and its collaborators. It is also prohibited to buy or sell shares of the Company when in possession of insider information about the Group or the Company itself.

9.3 Dissemination of News or Conduct of Operations on Financial Instruments

It is forbidden to spread false news, both inside and outside FACI S.p.A., concerning the Companies themselves, their employees, collaborators, and third parties working for them. In line with the principles of transparency, completeness, and correctness of information, communication to the outside is based on the right to information. Under no circumstances may Recipients knowingly disseminate false news or comments not based on objective facts. Institutional and product advertising promotion by FACI S.p.A. respects the fundamental ethical values of the civil society in which it is disseminated, always maintains the contents of truthfulness, and rejects the use of vulgar or offensive messages.

All operations involving the Company's securities or financial instruments must be managed exclusively by corporate functions formally assigned to this task. The purchase and/or sale of shares and/or securities of the

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Company or issued by other entities or companies must always be authorized by the Company's top management (CEO).

It is forbidden to carry out any fraudulent activity aimed at altering the price formation of financial instruments on the market. In this sense, it is expressly forbidden to carry out operations aimed solely at influencing financial markets, causing an artificial increase or decrease in the quotation of securities or financial instruments.

All company representatives and external collaborators of FACI S.p.A. are required to comply with the entire legal framework and the principles of fairness, avoiding behaviors that could directly or indirectly compromise the integrity and reputation of FACI S.p.A.

10. Protection of Intellectual Property

FACI S.p.A. recognizes the value of intellectual property as a fundamental asset for the development and competitiveness of the Company. Therefore, it commits to respecting the intellectual property rights of others and to protecting and enhancing its intellectual property rights, ensuring their correct and effective utilization. The Company encourages innovation and the development of new technologies, products, and services, guaranteeing the legal protection of the results achieved through patents, trademarks, copyrights, and any other form of legal protection applicable to intellectual creations. The use of the Company's intellectual property assets is allowed exclusively for corporate purposes and in accordance with the procedures established by FACI S.p.A., and any use that is not expressly authorized is strictly prohibited. FACI S.p.A. is committed to preventing and combating any form of infringement of its intellectual property rights and to taking appropriate legal actions to protect its assets and interests. Employees, collaborators, and all those who operate on behalf of FACI S.p.A. are required to contribute to the protection of the Company's intellectual property, respecting the confidentiality of information and avoiding any behavior that could harm the integrity and exclusivity of FACI S.p.A.'s intellectual property rights.

11. Use of Company Assets

FACI S.p.A. commits to providing employees with the necessary equipment to perform their assigned duties while fully respecting the safety requirements set by current regulations. Under no circumstances is it permitted to use corporate assets for purposes contrary to the law, public order, or good morals, nor for committing or inducing the commission of crimes.

The use of corporate properties for private purposes is prohibited. Theft or misuse of corporate property and any scheme designed to cover up thefts, abuses, and shortages could lead to disciplinary sanctions including dismissal and reporting to the competent authorities. Thefts or damages to the properties of other Recipients will be treated in the same way as thefts of corporate property.



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11.1 Use of Information Systems

No one may use the company's information systems to access, view, post, transmit, download, or distribute obscene, offensive, harassing, inappropriate content, or content that is not in line with laws and regulations, nor to commit or induce the commission of crimes, damage or alter the information systems/information itself, or illegally obtain confidential information. Additionally, no employee is allowed to install unlicensed software on computers provided by the Company, or to use and/or copy documents and material protected by copyright (audiovisual, electronic, paper, or photographic recordings or reproductions) without the express authorization of the rights holder, except in cases where such activities are part of the normal performance of their functions. Finally, it is explicitly prohibited to make illegal downloads or to transmit content protected by copyright law to third parties. FACI S.p.A. also condemns the use of databases (data extraction, reproduction, public presentation, etc.) for purposes different from those for which they were created and in any case contrary to what is allowed by copyright protection regulations.

12. ACCOUNTING AND INTERNAL AUDIT

A proper management of all accounting obligations reflects on the reputation and credibility of the company. Accounting data is not limited to financial information but also includes other documents such as expense reports and any document that contains accounting, administrative, or financial information.

FACI S.p.A. commits to respecting all applicable regulations, particularly those related to the drafting of financial statements and any type of mandatory administrative-accounting documentation. The accounting is set up on generally accepted accounting principles and systematically records management events. All accounting operations must be accurately reflected in the company's accounting, and under no circumstances can incomplete, inaccurate registrations not corresponding to the underlying operations and supported by adequate documentation be justified.

In general, every employee is required to maintain accurate documents and reports. Adequate supporting documentation must be retained for each accounting record. This documentation must make the rationale of the underlying operation and the related authorization traceable. The supporting documentation must be easily accessible and filed in a way that always allows easy consultation.

Recipients are required to promptly report the existence of errors or omissions in the accounting recording process of management facts. Employees who knowingly prepare or authorize significantly incomplete or inaccurate documents and reports will be subject to disciplinary action.

In the event of legal proceedings, investigations, or inspections, FACI S.p.A. will make available the requested documentation and will not destroy any official documents until the completion of the proceedings.

12.1 Relations with Corporate Governance Bodies

FACI S.p.A. bases its relations with corporate control bodies on the utmost professionalism, transparency, and collaboration. In full respect of their institutional role, FACI S.p.A. commits to promptly and diligently implementing the prescriptions and any required compliance activities.

The corporate control bodies are guaranteed free access to data, documents, and information necessary for the performance of their activities. The data and documents are made available promptly and in a language

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that is clear, objective, and comprehensive, so as to provide accurate, complete, faithful, and truthful information.

It is forbidden for anyone to prevent or hinder the performance of the verification activities of these bodies.

12.2 Safeguarding the Rights of Corporate Creditors

FACI S.p.A. expressly prohibits its employees and those acting on its behalf from carrying out any operations that prejudice creditors.

Indeed, FACI S.p.A. pursues the protection of the interest of corporate creditors as an ethical principle, to ensure that the guarantees of their credit are not diminished.

Therefore, administrators are prohibited from carrying out reductions of the share capital, mergers with other companies, or carrying out divisions for the purpose of causing harm to creditors.

12.3 Use of Banknotes, Public Credit Cards, Stamp Duties

FACI S.p.A., sensitive to the need to ensure fairness and transparency in business conduct, requires that Recipients comply with current regulations on the use and circulation of coins, public credit cards, and stamp values. Therefore, it will severely penalize any behavior aimed at the illegal use as well as the forgery of credit cards, stamp values, coins, and banknotes.

12.4 Internal Controls

FACI S.p.A. has an internal control system (tools and processes necessary or useful for directing, managing, and verifying the company's activities) aimed at guiding the corporate organization, monitoring the achievement of defined objectives, and ensuring compliance with legal provisions.

Each Employee, within the scope of their functions, is responsible for defining and operating the control system and for maintaining documentation supporting the operations carried out.

13. HUMAN RESOURCES AND EMPLOYMENT POLICY

Loyalty, capability, professionalism, seriousness, and staff preparation represent values and conditions essential for achieving the Company's objectives.

FACI S.p.A. is committed to supporting the professional development of each employee or collaborator and to operating to create and maintain open dialogue and a relationship of loyal collaboration.

13.1 Selection, Enhancement, and Professional Training

The selection and hiring of staff must occur in strict adherence to the rules of FACI S.p.A. and with absolute transparency in evaluating the competency requirements, professionalism, reliability, ability, and potential.

FACI S.p.A. endeavors to ensure:

- The resources hired correspond to the profiles actually needed, avoiding favoritisms and concessions;
- Recognition of merits and respect for equal opportunities;



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- Development of competencies, abilities, and knowledge of each employee, also through training and professional updating activities.

Even the mere suggestion of increases in remuneration, other benefits, or career progression as compensation for activities that deviate from the Laws and the Code is prohibited.

Staff are hired under a regular employment contract; any form of irregular work is not tolerated.

Furthermore, the employment of foreign workers entirely lacking a residence permit or with a revoked or expired permit, for which a renewal application has not been submitted documented by the relevant postal receipt, is strictly prohibited.

13.2 Equal Opportunities

Each Recipient recognizes and respects the personal dignity, private sphere, and personality rights of any individual. Recipients work with women and men of different nationalities, ages, cultures, religions, political ideas. Discriminations, harassments, or offenses of any kind are not tolerated..

13.3 Child Labor

At FACI S.p.A., 100% of employees are hired under a National Collective Bargaining Agreement and have reached at least 18 years of age. FACI S.p.A. commits to respecting and disseminating to internal and external parties its commitment not to use child labor and to promote all actions aimed at developing a culture of protection for young workers.

In particular, it commits to:

- Employ and allow work on the Site only to individuals who have reached 18 years of age;
- Respect collective labor agreements and all legislation on the employment of minors and young people in the company, also regarding contractors;
- Respect the legislation that protects the needs related to working students.

13.4 Work Environment and Work Organization

It is the duty of all Employees to cooperate in maintaining a serene and welcoming internal climate and to respect the defined organizational structures. To this end, FACI S.p.A. formalizes and disseminates organization charts and job descriptions that define a precise and articulated framework of responsibilities. All Recipients are required to value the different social and cultural backgrounds of colleagues and to create an environment where ideas can be freely expressed in a climate of mutual trust and respect. Within the work environment, Recipients maintain conduct based on seriousness, order, and decorum.

FACI S.p.A. promotes a rational work organization that focuses on employee well-being. To this end, it adopts, compatibly with the tasks performed, tools such as flexible hours and remote work.

13.5 Remuneration

At FACI S.p.A., 100% of employees are hired under a National Collective Bargaining Agreement, with remunerations significantly above subsistence levels. FACI S.p.A. commits to determining employees'

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remuneration, both in monetary and benefits form, solely based on assessments related to specific professionalism, acquired experience, demonstrated merit, and achievement of assigned objectives.

In addition, FACI S.p.A. participates in a welfare fund for workers and their families to support medical expenses not related to work activities.

13.6 Travel and Expense Reimbursements

FACI S.p.A. is committed to ensuring that the Employee on a business trip is treated decently and has working and living conditions in line with those guaranteed at the usual workplace.

Specific policies are defined for managing business trips and reimbursing incurred expenses. All expenses must be appropriate and in line with the principles of the Code as well as supported by adequate justifying documentation.

13.7 Political and Trade Union Activities

Relations with political parties, trade unions, and other interest-bearing associations are managed by the company management, or by the company representatives delegated, in compliance with the rules of this Code, paying particular attention to the principles of impartiality and independence. Trade union activity is free and managed in compliance with the provisions of the Workers' Statute. FACI S.p.A. will not, under any circumstances, provide funds or contributions to political parties or candidates..

14. GIFTS AND COURTESIES

FACI S.p.A. is committed to managing its activities with clients and suppliers with integrity and transparency, leveraging high levels of service and quality, and without accepting or promising anything of value that could somehow influence the outcome of the transaction.

Consequently, Recipients are prohibited from offering or promising to third parties as well as accepting or requesting from third parties, directly or indirectly, even on festive occasions, gifts, acts of hospitality, benefits, or other utilities (even in the form of money, goods, or services) not authorized, except for those of modest value.

Only gifts of modest value directly attributable to normal commercial relationships or courtesy are allowed and, in any case, such that they cannot give the other party or a third unrelated and impartial party the impression that they are intended to acquire or grant undue advantages.



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ACKNOWLEDGMENT AND ACCEPTANCE OF THE CODE OF ETHICS

The Declaration of acknowledgement and acceptance of the Code of Ethics must be signed whenever the Code is updated.

The signed declaration is kept by the Management that manages relations with the counterparty (e.g., Personnel Office, Purchasing Office, etc.).

"I, the undersigned, declare that I have read and understood the Ethical Code of FACI S.p.A. I also declare to accept this Ethical Code in every part and to be aware that I am obliged to fully comply with its provisions and that any violation will be subject to sanction in accordance with applicable Regulations

Name (in full)

Organization, title and role

Signature

Date