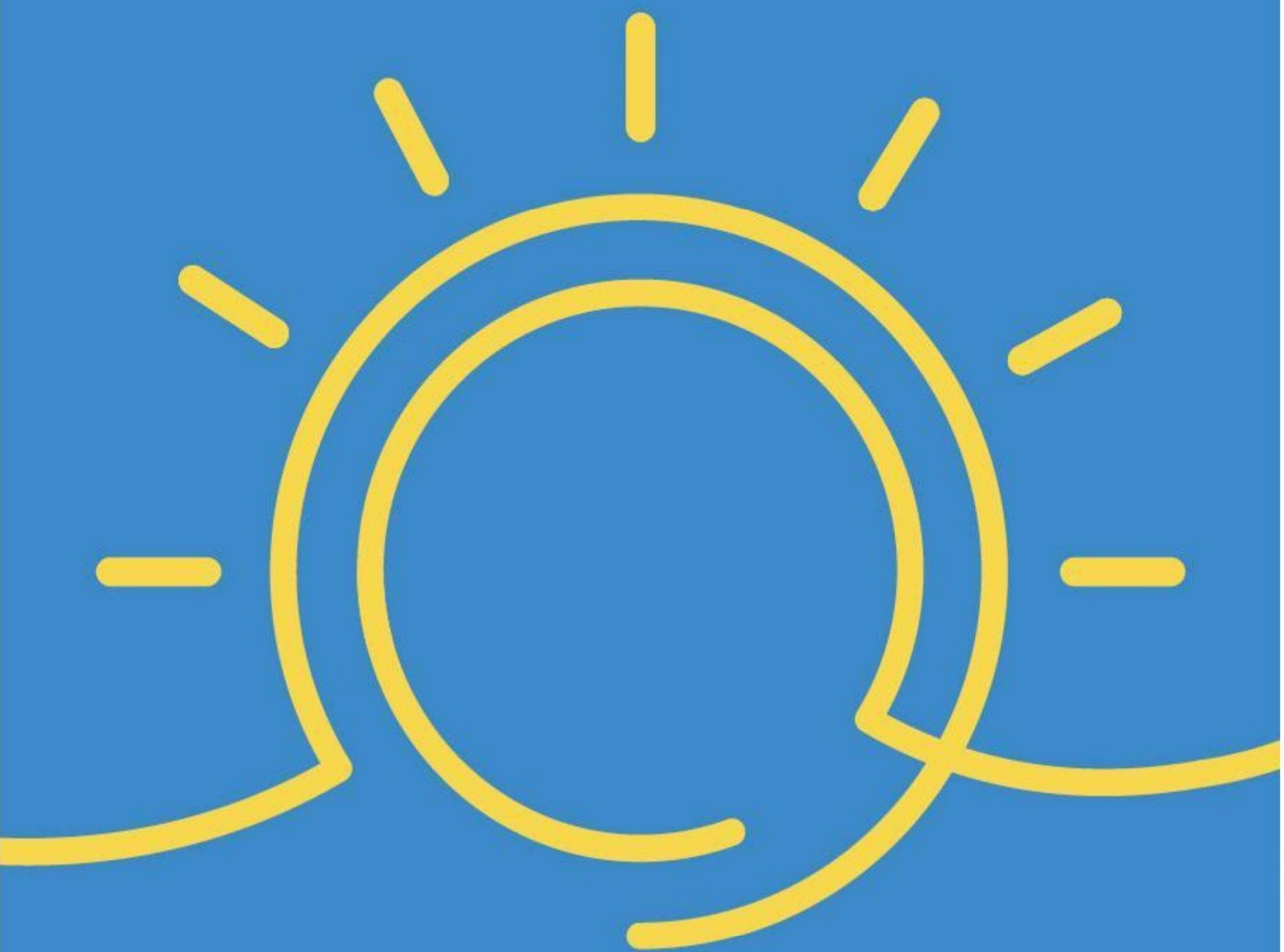


fater

Angelini Industries
P&G

SUPPLIER CODE OF CONDUCT



Every Day Matters

TABLE OF CONTENT

1. Living by our values: “Every day matters”	3
2. Purpose and scope of the document	4
3. Our expectations	4
3.1. Environment	4
3.1.1. Protect the environment	4
3.1.2. Fight against climate change	5
3.2. Social	5
3.2.1. Child and forced labour	5
3.2.2. Freedom of association	5
3.2.3. Work hours, wages and benefits	6
3.2.4. Non-discrimination, diversity and inclusion	6
3.2.5. Health and safety	6
3.2.6. Conflict minerals	6
3.3. Governance	6
3.3.1. Business integrity	7
3.3.2. Conflicts of interest	7
3.3.3. Anti-corruption and bribery	7
3.3.4. Gifts and entertainment	7
3.3.5. Confidential and competitor information	7
3.3.6. Data privacy and data protection	7
3.3.7. Intellectual property	8
3.3.8. Reporting on breaches and sanction for non-compliance	8
4. References	8

1. Living by our values: “Every day matters”

Dear Supplier,

We’re proud to share with you our first-ever Suppliers Code of Conduct, a meaningful step forward in our shared journey toward a more sustainable and responsible future.

At Fater, we believe that real progress can only happen together. That’s why this document isn’t just a set of rules, it’s an invitation to strengthen our collaboration and shape a future built on mutual trust, shared values and continuous improvement.

This Code reflects our commitment to open dialogue, active listening and joint responsibility. It’s a charter of principles meant to guide how we work together-based on respect, flexibility, and the will to create positive impact.

We see our Suppliers not only as essential contributors, but as true partners in reaching our ESG goals, whether it’s cutting CO₂ emissions, reducing plastic use, guaranteeing safety or helping us innovate for a better tomorrow for people and planet. You are a fundamental part

of the journey we want to drive: a collective effort for good, made up of people across companies and countries, committed to the same vision.

We also know that sustainability is no longer a choice, it’s a shared responsibility. As regulations evolve and expectations rise, collaboration across the supply chain is the only way forward.

Our culture at Fater is rooted in putting people first, with an enormous focus on their health, safety and wellbeing. We foster an environment of respect, trust and continuous learning where every voice matters. We want that same spirit to live in our relationships with our Suppliers.

We invite you to read the Code and give us your feedback .

Let us know what resonates, where we can improve, and how we can move forward-together.

Best Regards,

Giovan Battista Bisogni

Procurement Executive Director

2. Purpose and scope of the document

The Supplier Code of Conduct provides the principles to be adhered to by all Suppliers that deliver goods and/or services (hereinafter referred to as “Suppliers” in this document) to any entity of the Fater Group (hereinafter referred to as “Fater” in this document), including its subsidiaries or affiliate entities as well as their respective employees and agents. Fater is aware of the important role played by its Suppliers in contributing to the achievement of its goals and therefore expects them to abide by high technical standards and professional principles.

These principles are contained in this Supplier Code of Conduct, which defines the Environment, Social and Governance (ESG) requirements we expect our Suppliers to adhere to without prejudice to the further requirements provided by contracts with the Suppliers.

All activities are carried out in compliance with the law and the International Conventions, and in strict respect for the human rights laid down in the United Nations Universal Declaration. The United Nations 2030 Agenda for Sustainable Development, presented in September 2015, identifies 17 Sustainable Development Goals (SDGs) that represent common objectives of sustainable development in today's complex social challenges. These objectives constitute an important reference for the international community and for Fater, in conducting its activities within the countries in which it operates. Every action, project, initiative and decision are based on strict compliance with law, protection of workers, protection of the environment, protection of the interests of employees, customers, business and financial partners and local communities, creating value for all stakeholders.

Finally, with the aim of promoting the continuous improvement based on Suppliers’ listening and in view of the evolution of the context in which the company operates, the Supplier Code of Conduct will be periodically reviewed, in light of the main considerations arisen from the discussion with our Stakeholders.

3. Our expectations

Observance of the principles provided in this Supplier Code of Conduct is a pivotal part of any agreement between Fater and its business partners. We expect our Suppliers to take steps to ensure that all their employees and contract workers understand and adhere to the requirements of this code, and we require the provisions of this code to be complied with within our business partners’ own supply chains.

At the same time, we would like this Code of Conduct to serve as the basis for providing Fater with encouraging feedback on shared principles and resulting execution; at the same time, Suppliers’ listening represents an opportunity to highlight improvement areas on which Fater wants to focus to consolidate the process of continuous reciprocity that has been established.

3.1. Environment

Compliance with all Environmental applicable laws and regulations, in the various communities in which the Supplier operates, is a prerequisite for maintaining any commercial relationship with Fater. Supplier is encouraged to operate in an environmentally responsible and in efficient manner. This comprises the aspects reported below.

3.1.1. Protect the environment

Fater encourages its Suppliers to reduce their negative environmental impacts by protecting the environment.

Supplier shall prevent the exploitation, destruction, or neglect of natural resources and are recommended to undertake best efforts to reduce the impact on natural resources of their business activities. Suppliers shall have a management system in place to reduce water consumption, waste and energy in their own operations.

Supplier shall respect the rights of local communities, including indigenous peoples, where applicable, and other vulnerable and disadvantaged groups in connection with the Supplier's activities and operations.

Supplier shall have management systems in place when using forest products, operating in full compliance of EUDR Regulation. Such system can be based on a widely accepted third party verified certification scheme, as FSC, PEFC, OEKO-TEX and enable transparency as well as traceability along the value chain. If the business partner is a cellulose or cellulose derivative Supplier, Fater will require FSC certification during contractual phase.

3.1.2. Fight against climate change

Suppliers are recommended to use and consume natural resources, including sources of energy, in an optimized and efficient way, with particular focus on implementing action regarding climate change. Suppliers shall have management systems in place to monitor and continuously improve energy efficiency and greenhouse gas (GHG) emissions in their operations and are encouraged to undertake reasonable efforts to use 100% of its purchased electricity from renewable.

Moreover, Suppliers are encouraged to set targets, according to Science-Based Targets initiative (SBTi) or other scientifically based and recognized frameworks based on GHG protocol, to reduce the greenhouse gas (GHG) emissions caused by their operations directly (Scope 1) or indirectly (Scope 2) and those caused in their value chains (Scope 3).

Upon request, and if available, Suppliers shall be able to provide Fater with data on their organization's impact on climate change (e.g., Products' LCAs or Carbon Footprint, and/ or Corporate Carbon Footprint) through Fater's chosen tools and in a timely manner.

Finally, it is strongly suggested that Supplier offers their employees training on climate change topics.

3.2. Social

Suppliers of Fater shall respect all internationally recognized human rights and treat all people with dignity, in accordance with the provisions of the SA8000:2014 International Standard and in compliance with the requirements listed therein based on the Universal Declaration of Human Rights, ILO documents and other international standards concerning human and labor rights. Suppliers shall exercise human rights due diligence to identify and prevent negative human rights impacts of their own operations and supply chain with a focus on where they have the highest risks.

During contractual phase, Fater will request the Supplier's SA8000 certification, in lack of which Fater will provide a self-declaration questionnaire to the Supplier.

3.2.1. Child and forced labour

Fater does not tolerate child and forced labour under any circumstances. We support the rights of the child, including the right to education, the right to rest and play, and the right for the child to have his basic needs met. Suppliers shall protect the right to employment and voluntary work, as any use of forced, bonded and compulsory labour or non-voluntary prison labour is repudiated. The ordinary and overtime work carried out for the Supplier shall be voluntary and without any form of coercion, including the psychological one. Suppliers shall prevent all forms of cruel and inhuman activity throughout the whole supply chain. Suppliers shall therefore scrupulously act in respect and compliance with the regulations prescribed by the International Labor Organization (ILO), rejecting any form of exploitation of children that compromises their health or prevents them from attending compulsory schooling.

3.2.2. Freedom of association

Suppliers shall maintain an open and constructive dialogue with their employees and trade union representatives. In accordance with local laws, the right of all workers to freely associate, join trade unions, have representatives, join works councils and participate in collective bargaining must therefore be respected. Moreover, employees acting as workers' representatives shall not be penalized in any way or be subject to any form of retaliation by reason of their role.

3.2.3. Work hours, wages and benefits

Supplier shall always respect and comply with ILO Standards, applicable laws and collective bargaining agreements, if applicable, on working and resting hours, including overtime working hours, as well as annual, sick and parental leave and any other applicable leave regulations. Supplier shall always pay and provide its employees' wages and benefits that, as a minimum, comply with applicable laws and collective bargaining agreements. Supplier shall provide its employees with information about their employment terms and conditions, including benefits. Compensation shall be paid to employees regularly, in a timely manner and in full according to applicable laws and shall comply with applicable national wage laws. Compensation and benefits should be fair and competitive and should aim at providing an adequate standard.

3.2.4. Non-discrimination, diversity and inclusion

Fater rejects all forms of discrimination, specifically discrimination by race, gender, age, language, nationality, ethnic origin, religion, sexual orientation, inheritance, trade union or political affiliation, personal or social status, disability and health status, and is committed to ensuring equal opportunities at work and in career advancement.

Supplier shall treat everyone with dignity and respect and provide equal employment opportunities and conditions based on the individual's ability to do the job, regardless of employee including, but not limited to age, nationality, disability, gender identity, race, ethnicity, skin colour or cultural background, union affiliation, religion or belief, health information including pregnancy or sexual orientation. Supplier shall not tolerate humiliating or physical punishment or allow any employee to be subject to verbal, psychological, physical or sexual harassment or abuse. The terms and conditions of employment with the Supplier, including hiring, training, working conditions, remuneration, allowances, promotions, discipline, dismissal or retirement, shall be based solely and objectively on qualifications, performances, skills and experience of everyone.

3.2.5. Health and safety

The Health, Safety and Environment (HS&E) policy adopted by Fater aims to protect health of its employees, external service providers and the communities living near the sites as well. Supplier shall comply with Health and Safety Regulations and ensure safe, protected and healthy workplaces. Suppliers shall adequately protect their employees against risks related to machines and equipment, chemical, biological and physical hazards. The risks shall be identified, evaluated and mitigated through proper design or preventative maintenance and safe work procedures. Employees shall be provided with appropriate personal protective equipment including access to first-aid supplies. Moreover, safety information shall be made available to everyone, to educate, train, and protect the employees from safety hazards. Supplier shall have adequate emergency preparedness procedures in place to identify and assess potential emergency situations. Supplier shall identify potentially hazardous substances in chemical products and articles used in its production and ensure that they are handled, transported, stored, recycled and disposed of safely. Employees shall have ready access to clean drinking water, hygienic toilet facilities, hygienic food preparation and storage and eating facilities (where applicable), adequate ventilation, light and temperature levels, and acceptable levels of noise.

3.2.6. Conflict minerals

Where applicable, in accordance with the provisions of the OECD guidelines, regarding the due diligence for a responsible supply chain involving minerals coming from conflict zones or at high risk, Suppliers shall ensure responsible sourcing of minerals (tin, tantalum, gold and tungsten) by ensuring that none of the products supplied to Fater contains minerals from conflict zones, that directly or indirectly finance or benefit armed groups and cause or foster human rights abuses.

3.3. Governance

Compliance with all Governance applicable laws and regulations, in the various communities in which the Supplier operate, is a prerequisite for maintaining any commercial relationship with Fater, in accordance with the provisions of the 231 Model of organization of Fater, which will be provided during contractual phase. To meet these requirements, Supplier shall conduct their business in an ethical manner and act with integrity, while complying with all applicable laws and regulations.

3.3.1. Business integrity

Fater acts responsibly and works with the maximum commitment, adhering to strict principles of ethics, loyalty and professional correctness and operates in a framework of loyal competition with honesty, integrity, correctness and good faith, respecting the lawful interests of shareholders, employees, customers, commercial and financial partners. Therefore, Suppliers must comply with all applicable International, European, national, regional and local laws and regulations. Suppliers shall not practice or tolerate any form of corruption, extortion and money laundering.

3.3.2. Conflicts of interest

Suppliers shall do business in an open and transparent way to demonstrate that they are an honest and reliable partner. Supplier shall conduct business in a manner that avoids situations private, financial or other external interests conflict with the job responsibilities of the employee. Suppliers shall disclose to Fater any situation that could constitute a conflict of interest, such as Fater employees having professional, private and/or significant financial advantages or interests in any of the Supplier's businesses.

3.3.3. Anti-corruption and bribery

Suppliers shall not engage in, endorse nor tolerate any form of bribery or corruption, directly or indirectly. Supplier shall not offer nor accept any form of improper benefit to or from a third party, private or public, with the purpose of obtaining or retaining business or any form of preferential treatment. Such benefits may comprise not only cash but also job opportunities, favours, travel, facilitation payments, promises to pay debts or unlawful gifts and entertainment. Suppliers shall not offer or accept bribes or other unlawful incentives to or from their business partners or government officials as stated in the United Nations Convention against Corruption.

3.3.4. Gifts and entertainment

Suppliers shall not offer to Fater employees any kind of gifts or personal benefit which could be perceived as a bribe. In all cases, gifts or entertainment shall not be offered to improperly influence a business relationship and must not violate applicable laws or ethical standards.

3.3.5. Confidential and competitor information

Suppliers shall safeguard and make only appropriate use of confidential information, including competitor information, and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected. Supplier shall guarantee the security of the information, according to its importance and, where necessary, perform a risk assessment to identify the most appropriate security measures. Moreover, Supplier shall comply with all applicable fair trade, competition and anti-trust laws and regulations and shall not have any anti-competitive discussions or enter into any anti-competitive agreements.

3.3.6. Data privacy and data protection

Suppliers shall manage personal data and confidential information by complying with data protection and information privacy laws as well as best practices applicable in the jurisdictions where they operate. Suppliers shall protect the privacy rights of their stakeholders, using collected personal data only for rightful, defined and appropriate purposes. Suppliers are required to ensure the respect and protection of personal data they use, both their own data and those of the third parties, guaranteeing the adoption of dedicated procedures, in particular through the implementation of adequate security measures. Whenever a Supplier is entrusted with personal information about individuals, Supplier shall safeguard it and take appropriate steps to protect it from misuse. Suppliers are also required to ensure to have adequately trained the persons in charge of data processing, as well as according to the applicable law to have correctly appointed the privacy representative in every area of company activity.

3.3.7. Intellectual property

Suppliers shall recognize the ownership and avoid the infringement of any and all intellectual property rights of Fater and third parties, including but not limited to those concerning trademarks, trade names, signs, logos, domain names, distinctive signs, patents, know-how, registered designs and models. Finally, Suppliers shall identify and report to Fater any violation, even potential.

3.3.8. Reporting on breaches and sanction for non-compliance

Suppliers are responsible for monitoring the compliance with this Supplier Code of Conduct both internally and within their supply chain (Supplier's sub-suppliers).

Suppliers must report to their Fater representatives what they believe to be a violation of this Supplier Code of Conduct and shall be proactive and promptly informing Fater of any significant problem that is incompatible of it.

With a view to collaboration and full transparency, the corrective measures eventually put in place, to achieve the compliance with the Code itself must be shared as well.

If a Supplier or any of its own sub-suppliers fails to comply with the requirements set forth in this Supplier Code of Conduct, will result in review, and possible termination of, the business relationship by Fater.

Fater could verify alignment to and implementation of the above requirements through the use of supplier self-declaration, or other assessments and for designated Suppliers at high-risk regarding ESG requirements, through independent verification including third-party audits.

4. References

- International Labour Organization (ILO)
- Universal Declaration of Human Rights, United Nations
- United Nations Global Compact
- United Nations Guiding Principles
- 17 Sustainable Development Goals
- Science Based Target initiative
- United Nations Framework Convention on Climate Change
- Forest Stewardship Council Standard
- SA 8000 - Social Accountability International Standard
- ISO 20400:2017 - Sustainable Procurement