QUALITY, HEALTH, SAFETY, ENVIRONMENT, SUSTAINABILITY POLICY

Vigevano, 27/05/2025

Il Legale Rappresentante

ELACHEM S.p.A. is an important Italian company that operates not only on the national territory but also, and above all, internationally in the chemical sector and in particular in the production and marketing of polyurethane systems applied to footwear and saturated polyester resins.

This Policy defines the objectives and principles of action of Elachem SpA to guarantee the quality of its products and the satisfaction of its customers, the protection of the health and safety of workers, the protection and safeguarding of the environment, compliance with sustainability criteria.

This Policy is considered valid for all Elachem Stakeholders and therefore for employees, management, visitors, customers, suppliers.

It is the responsibility of the Top Management and the Heads of Departments involved in the management of the issues covered in this Policy, to follow up and comply with it.

This document is made available to all interested parties by posting on company bulletin boards and publishing on the website.

QUALITY

The priority and vital objectives for the success of our Organization, from the point of view of Quality, are Customer satisfaction, the continuous search for cost competitiveness and profit that make the investments necessary for the expansion of our company sustainable and guarantee an acceptable return for our shareholders and stakeholders.

In order to achieve these objectives effectively, Elachem pursues the following strategies with commitment and constancy:

- partnership with the Customer, with the aim of pursuing the continuous improvement of the products and services offered
- Product quality with the goal of "zero defects“
- *just in time* deliveries
- constant search for innovative and competitive solutions
- continuous improvement of business processes
- growth and motivation of resources, with the aim of achieving effectiveness and competitiveness in the activities carried out
- collaboration and support for supplier growth
- UNI ISO 9001:2015 certified integrated company management system since January 2020 and UNI ISO 14001:2015 and UNI ISO 45001:2018 since October 2020
- definition, understanding and verification of the compliance of the products supplied with the customer's requirements and current regulations
- assessment and reduction of the risks associated with each production process and solution of any problems that, even potentially, may generate non-conformities of the products and services provided
- focus on increasing customer satisfaction
- dissemination of the "Culture of Quality" through:
  - ❖ continuous communication on the importance of compliance of all production processes and all activities carried out in the Organization with the requirements of the Quality Management System;
  - ❖ the active involvement of all personnel in the continuous improvement of processes and all activities carried out in the Organization, in order to increase the effectiveness of the Quality management system;
  - ❖ the systematic verification of the achievement of the expected results by the Quality Management System.

HEALTH & SAFETY

Elachem is committed to promoting and safeguarding the health and safety of workers in order to prevent accidents and occupational diseases and promote people's well-being.
This is because it believes that the health and safety of its staff are part of the company's assets and are values to be safeguarded at all costs and in every location.
The Company therefore requires all personnel to ensure that the company's activities are always carried out in such a way as not to jeopardize their own safety and that of their colleagues in any way.
To this end, any work carried out or intended to be carried out within the Company must always be combined with a specific assessment and prevention of the risks associated with it, aimed at protecting the health and safety of the personnel present in the Company, in accordance with the mandatory requirements.

In order to pursue these principles effectively, the following strategies are applied:

- Prior assessment for each new activity that is intended to be carried out with reference to the health and safety of workers
- design of machines, plants or equipment using the best available technologies and scrupulously observing the provisions of current regulations on accident prevention and worker safety
- carrying out specific courses open to all personnel involved in the use of machines, systems and equipment, in order to make them aware of their operation, safety devices and rules of use and maintenance
- maintenance of machinery or systems or equipment and performance of work activities in full compliance with the mandatory requirements on accident prevention
- minimization of any risk to health and safety, through the continuous verification of the possible existence of new technologies that can improve the activities carried out

HEALTH & SAFETY

- periodic review of any accidents, injuries and near misses that may have occurred within the Organization, in order to identify the best corrective and preventive actions and verify their effectiveness in order to achieve the goal: zero injuries/accidents
- involvement and awareness of all personnel in the dissemination and application of this policy through specific training, training, and updating activities on health and safety
- development and proposal of internal programs within the Organization that protect and improve the physical and psychological health of its employees and prevent situations of stress or discomfort
- offering its employees adequate working conditions that allow them to achieve a healthy work-life balance, promoting work benefits such as flexible working hours, salary or social benefits, agreements with companies, businesses, gyms, local wellness professionals in order to improve the quality of life of its employees
- offer its employees adequate wages in accordance with the national contract of reference, working hours and benefits appropriate to their job
- Ensuring structured social dialogue through employees' recognised representatives and collective bargaining
- management of the main stages of the career of its employees, supporting their development through adequate training and through appropriate and incentive remuneration

SUSTAINABILITY

Elachem has also developed and integrated aspects related to Sustainability into its Policy, aiming to constantly improve its performance through the integration of this concept into the corporate strategy and the definition of related objectives aimed at respecting environmental, social and governance issues.

This Policy and its objectives recall and support the main standards and guidelines, set out below:

- I Sustainable Development Goals (SDGs) delle Nazioni Unite
- The 10 principles of the UN Global Compact
- The principles of Responsible Care, the voluntary program to promote the Sustainable Development of the global chemical industry
- International standards such as UNI ISO 45001:2018 and UNI ISO 14001:2015
- All international and national laws applicable in the countries in which ELACHEM operates

The Elachem Group is aware that, in order to contribute to sustainable development, it is necessary to ensure the sustainability of its activities along the entire value chain.

For this reason, Elachem's Health, Safety, Environment and Sustainability Policy is addressed internally to its employees and externally to all suppliers, business partners and collaborators.

Sustainability is a broad concept within which aspects such as Environment, Health and Safety, Human Rights, Quality, Social Initiatives, Management of Energy and Water Resources and Sustainable Procurement are identified.

SOCIAL SUSTAINABILITY

HUMAN RIGHTS

Elachem recognizes and guarantees respect for human rights based on the United Nations Universal Declaration of Human Rights.

In particular, Elachem includes among its objectives:

- the total absence in the Organization of forced and child labor, by which we mean the work carried out by people aged 18 and over, and any form of discrimination
- the recognition of the value of each individual, protecting his or her physical and moral integrity and stimulating continuous personal and professional growth. The Organization does not tolerate in any way any discrimination or harassment from a personal or sexual point of view and also undertakes to combat by all means any form of discrimination based on age, gender, sexual orientation, disability, race, nationality, political or religious orientation or any other personal characteristic that is irrelevant to the work sphere
- a healthy and safe workplace for all employees and people who access the plant and collaborate with the Organization
- the right to free association and adherence to national collective agreements
- the confidential storage of the information in its possession, refraining from using the private data of third parties, except when expressly and knowingly authorized to do so, and, in any case, in strict compliance with the legislation in force on the protection of personal data
- compliance with national laws and standards in terms of employment and work

SOCIAL SUSTAINABILITY

SOCIAL INITIATIVES

Elachem recognizes the importance of supporting the community in which it operates, actively financing the socio-economic development of the territory and the well-being of local communities. All aimed at building relationships that favor the development of sustainable projects.

To do this, Elachem collaborates with various companies in the city of Vigevano in order to establish agreements that can benefit both the economic development of commercial activities and the well-being of its employees through access to certain services at preferential conditions.

In addition, Elachem directly supports local initiatives related to volunteer projects and sports realities of great impact for the city of Vigevano.

ENVIRONMENTAL SUSTAINABILITY

Elachem recognizes the need to invest in the research and development of new technologies and processes aimed at mitigating the effects of climate change, reducing emissions, energy consumption and improving the energy efficiency of production processes. Elachem actively monitors the risks arising from climate change and is committed to defining appropriate mitigation and adaptation measures for its activities.

From the point of view of energy consumption, Elachem is committed to:

- develop processes that minimise both energy absorption and their emissions of any kind
- reuse the energy dissipated from production processes for the production of additional energy that is needed for the operation of company production
- promote and increase the use of energy from renewable sources
- Minimizing energy consumption at the various operating sites

ENVIRONMENTAL SUSTAINABILITY

To protect the environment, Elachem is committed to adopting improvement strategies aimed at:

- Minimize emissions into the environment
- Protect soil, groundwater and groundwater from pollution
- minimise the amount of waste produced, optimising its management and promoting recycling and reuse
- Prevent pollution in wastewater discharges
- reduce water consumption through the use and development of innovative systems, technologies and infrastructures
- monitor and ensure that the water used by both employees and anyone accessing the production site complies with hygiene and health requirements
- recover raw materials and finished products where possible
- promote responsible behaviour and consumption of water resources through specific awareness-raising, involvement and training initiatives for all staff
- carry out periodic monitoring of environmental aspects, such as chemical and microbiological analyses of water, controls on air pollutants and emissions in accordance with the provisions of the Integrated Environmental Authorisation in its possession

The monitoring of these parameters is carried out periodically. In addition, Elachem ensures that all legal requirements applicable to its business are distributed, enforced and complied with with a proactive approach.

ECONOMIC SUSTAINABILITY

CIRCULAR ECONOMY

Elachem promotes, where possible and feasible, a production and consumption model based on the reuse and recycling of materials aimed at extending the life cycle of products, reducing waste and minimizing the environmental impact caused by the production and use of its products.

In this regard, Elachem undertakes to:

- carry out preventive analyses of the raw materials that can be used to make a certain product, focusing the choice on those with a lower environmental impact
- carry out Life Cycle Assessment (LCA) analyses to quantify the impacts on the environment that are associated with its products and their end of life
- provide correct information to customers on the final destinations of their products, in order to facilitate the collection, reuse, recovery of products, as well as promote the correct delivery to separate collection services
- develop technical proposals for products that can be recovered at the end of their useful life and, therefore, reused as secondary raw materials for any other purpose
- implement sustainable packaging solutions, favoring recyclable packaging and reducing the use of single-use packaging
- favour, where possible, the recovery rather than the disposal of processing waste
- manage the waste generated in an optimal and efficient way, disposing of it correctly according to current legislation

ECONOMIC SUSTAINABILITY

SUSTAINABLE PROCUREMENT

Elachem is aware that sustainability is also an integral part of the procurement process and therefore it is essential that the procurement of raw materials plays a leading role in the development of sustainability, defining sustainable purchasing strategies in the supply chain.

Elachem guarantees:

- a commitment to fostering innovation in its sourcing markets, with the aim of increasing the availability and effectiveness of sustainable solutions
- the commitment to work in partnership with suppliers to achieve common goals and continuously improve their performance over time
- the commitment to collaborate with suppliers who comply with the provisions of the Elachem Supplier Code of Conduct and, more importantly, the principles of the Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- the commitment to periodically qualify suppliers and, in particular, to also consider aspects relating to the management of environmental and social practices in the supply chain
- the commitment to encourage its suppliers to pay more and more attention to aspects related to sustainable practices

COMMUNICATION & TRAINING

It is Elachem's commitment to communicate and ensure the application of the Policy described therein through activities to involve and raise awareness of all personnel and the entire value chain.

Elachem's Health, Safety, Environment and Sustainability Policy is also always available to the public and interested stakeholders on the website at www.Elachem.com.