

CODE OF CONDUCT FOR SUPPLIERS

June 2026

INTRODUCTION

Esseco Industrial S.p.A., the industrial holding company of Esseco Group, operates internationally in the development, production and marketing of chemical solutions and ingredients used across a wide range of industrial sectors, making a tangible contribution to improving the quality of everyday life. The Group's growth is based on a model that integrates quality, safety, sustainability, and responsibility. This Code of Conduct for Suppliers sets out the binding principles and requirements applicable to all suppliers, subcontractors and business partners and forms an integral part of contractual relationships.

VALUES AND PRINCIPLES

Esseco Industrial operates in accordance with the principles of the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights, the ILO Conventions and the Universal Declaration of Human Rights, promoting quality, integrity, responsibility and sustainability throughout the supply chain.

GOVERNANCE AND COMPLIANCE

Esseco Industrial adopts a structured governance system based on its Code of Ethics, certified management systems, and internal control models. It operates in compliance with applicable regulations, including REACH Regulation (EC) No 1907/2006, the GDPR (Regulation (EU) 2016/679), the NIS2 Directive (Directive (EU) 2022/2555) and Regulation (EU) 2023/1230 on product safety.

SUPPLIER REQUIREMENTS

Suppliers shall comply with all applicable laws and regulations and shall ensure:

- environmental management in compliance with applicable regulations, including REACH, the Basel Convention and Regulation (EU) 2023/1115;
- the protection of occupational health and safety, in accordance with Directive 89/391/EEC and ILO standards;
- product quality and safety, in accordance with Regulation (EU) 2023/1230,

Esseco Industrial S.p.A.

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Società soggetta all'attività di Direzione
e Coordinamento di Esseco Group S.p.A.
C. F. 00989420039

Codex Alimentarius and HACCP principles;

- the management of nonconformities through CAPA and root cause analysis;
- cybersecurity and data protection, in accordance with the GDPR, NIS2 and ISO/IEC 27001;
- business continuity, including business continuity planning and disaster recovery;
- the responsible and ethical use of technologies, in line with the EU AI Act and the OECD AI Principles;
- business integrity and anti-corruption, in accordance with Italian Legislative Decree No. 231/2001 and UNCAC;
- respect for human rights, in line with the CSRD and UN principles, and a risk-based approach to supply chain management, including monitoring and audits.

REGULATORY REFERENCES

Regulation (EC) No. 1907/2006 – REACH;

Directive 89/391/EEC;

ILO Conventions No. 155 and No. 187;

Basel Convention; Regulation (EU) 2023/1115;

Regulation (EU) 2016/679 – GDPR;

Directive (EU) 2022/2555 – NIS2;

ISO/IEC 27001;

Regulation (EU) 2023/1230;

Codex Alimentarius;

Italian Legislative Decree No. 231/2001;

UNCAC; Directive (EU) 2019/1937;

Universal Declaration of Human Rights;

Directive (EU) 2022/2464 – CSRD;

UN Guiding Principles;

ISO 14001; ISO 45001;

OECD AI Principles;

EU AI Act.

SIGNATURE

Per Esseco Industrial S.p.A.

Roberto Vagheggi

Signature: _____

Date: _____

For the Supplier

Company name: _____

Name: _____

Signature: _____

Date: _____