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CODE OF CONDUCT

Since 2005, COSMOCHEM S.A. has been trading in chemical raw materials.

Honesty, transparency, innovation, social and environmental responsibility are values that COSMOCHEM identifies with, as a result of its strong and widely recognized culture. A culture inspired by the way its founders conduct their business, which has evolved and gradually established itself as a fundamental element of the company over the last 15 years of tradition, experience, and action.

Today, due to the growth of its business activities, COSMOCHEM operates in several areas with continuous and rapid growth rates. Consequently, and in order to address the complexity of the situation, it is important to clearly define the values that COSMOCHEM accepts, recognizes, and shares with its staff, as well as the responsibilities it undertakes, both within and outside the Group.

For this reason, this Code of Conduct (hereinafter referred to as the "Code") has been adopted as an essential means of sharing and clarifying COSMOCHEM's values and principles.

1. INTRODUCTION

1.1 What is "Ethics"?

The term "Ethics" encompasses all rules of good practice – whether public or private – followed by individuals or groups.

This term, which is generally used in a variety of different contexts, refers to all the rules and principles that should be followed in everyday life. Although it is based on an abstract concept (consisting of principles and ideas), the application of

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ethics is anything but theoretical: it is strictly related to everyday life and translates into specific practices.

According to the German philosopher Immanuel Kant, "moral behavior" refers to the actions of a person who is motivated not by fear of punishment or hope of reward, but rather by his conscience, "and treats people and themselves as ends in themselves, not merely as means to achieve their ends."

1.2 Business Ethics

When making assessments regarding ethics in the broader business sector, rather than individual actions, the concepts of responsibility and individual awareness should be linked to the concept of "Socially Responsible Company."

For the COSMOCHEM Group, Social Responsibility means the company's ability to conduct its business activities while fully respecting the legitimate interests of its partners and customers, as well as protecting and preserving environmental resources for future generations.

In other words, COSMOCHEM, in carrying out its business activities, shows due respect for all living and non-living beings, and this is an end in itself and not a strategy for making a profit.

1.3 The Code of Conduct

In the context of business activity, unethical behavior can lead to "opportunistic" behavior, dictated by the mistaken belief that one is acting in the best interests of the company.

Therefore, the Code of Conduct is of utmost importance in ensuring that anyone acting on behalf of COSMOCHEM never, in any way, exhibits behavior that conflicts with these commonly accepted principles.

In any way, engage in behavior that conflicts with these commonly accepted principles.

This document is not intended to enhance the company's compliance with legislation or its reputation, due to the fact that legal liability, full compliance with the law and fairness – as well as high product quality – are already fundamental prerequisites for COSMOCHEM's existence and therefore cannot be considered as objectives of the Code of Conduct.

Therefore, the primary objective of this Code is to communicate and share the values that COSMOCHEM recognizes and accepts at all levels, so that they govern the conduct, actions, and decisions of all its employees and associates. actions, and decisions of all its employees and partners.

In other words, everyone should be aware that the well-being and respect for communities must always be taken into account in our daily activities.

1.4 The COSMOCHEM "style"

Today, it is essential to collect these "little things" in order to clarify how the company will operate from now on, as well as to ensure fair competition in the current industrial market, which is now much more responsible and mature.

This means conducting business activities in a proper and dignified manner, in strict compliance with regulations and, above all, involves COSMOCHEM's adherence to its common principles and values, which should be spontaneous and not the result of mere obedience or duty.

Through the exchange and application of the principles set out in this document, COSMOCHEM clearly defines its "style."

1.5 Communication of the Code of Conduct

This document aims to serve as a motivation for identifying appropriate behaviors and explaining why they are appropriate.

The primary objective is to introduce a method of ethical evaluation, both for choosing the appropriate behavior for all of us and for evaluating the actions of others, thus

bringing together the ethical and business spheres, individual and

corporate responsibility, and the personal and collective spheres: this approach will enable logic to be translated into truly sound practices.

This document will therefore be a "moral contract" accepted by all COSMOCHEM staff, external partners, and suppliers. It is intended to be a moral commitment. It will not directly strengthen COSMOCHEM's competitive position, but it will have an indirect impact by encouraging everyone to adopt an ethical approach and a common culture of values.

¹. *The term "personnel" refers to all Administrators, Auditors, Directors, Advisors, and all other employees of the company.*

2. OUR COMMITMENT

Through "Our Commitment," COSMOCHEM intends to announce the commonly accepted goals of all those who work for the Group, as well as those who maintain external partnerships on behalf of COSMOCHEM, whether they are individuals or teams.

Our Commitment

COSMOCHEM is committed to supplying products of the highest quality, while promoting the protection of environmental resources and human dignity.

COSMOCHEM focuses on the following areas of activity:

COSMETICS HOUSEHOLD

CARE &

DETERGENTS FRAGRANCES &

FLAVORS PAINTS AND COATINGS

PHARMA

FOOD

People

People are the main and constant point of reference for COSMOCHEM's activities.

Consumers of our products will have four basic rights: the right to safety, the right to information, the right to choose, and the right to be heard.

COSMOCHEM's Human Resources

COSMOCHEM's human resources (such as company employees, etc.) are our central point of reference for growth and success.

COSMOCHEM recognizes cultural and skill diversity as a fundamental value for its sustainability and aims to attract and develop the leadership skills, passion for products, and intellectual curiosity of each employee.

Fairness, transparency, and respect should inspire every decision and action, in a context of mutual trust and interdependence.

COSMOCHEM's Products

Our products are our daily commitment, and all our efforts are aimed at improving them.

COSMOCHEM strives to focus on innovation in order to supply high-quality products that are considered unique by customers.

COSMOCHEM's Suppliers

Our suppliers are the backbone of COSMOCHEM's corporate identity.

Our suppliers are governed by the same code of conduct. The quality of their products, together with our communication strategy, guarantees continuous support for all our partners.

Environmental Policy

COSMOCHEM is committed to carrying out its work with full respect for the environment and human health, aware of its social and ethical responsibilities towards the communities in which it operates and from which it draws its resources.

Customers

COSMOCHEM considers its customers as partners in the pursuit of business success.

With this in mind, COSMOCHEM seeks to cooperate with them as much as possible in order to improve business categories and commercial practices, further strengthening its respect for them.

Competitors

COSMOCHEM perceives the role of its competitors as a constructive challenge and a point of reference, aiming to achieve success.

COSMOCHEM strives to operate within a framework of healthy competition for the continuous improvement of its business activities.

Profit

Profit is one of the main pillars of the company's sustainability and plays a key role in promoting growth and prosperity.

3. VALUES

COSMOCHEM has been managed by the same family for two generations now, which explains its strong identity, always based on human and professional "style," while at the same time characterized by fairness, integrity, and the ability to balance respect for the communities in which it operates with its core interests.

Business practices may change over time, but consistency in these values has always been of paramount importance to COSMOCHEM.

COSMOCHEM's "style" is based on the personal and professional mutual development of its employees and will continue to exist as long as these core values are respected by all employees.

Given this, COSMOCHEM affirms its commitment to operate within the framework of the United Nations Universal Declaration of Human Rights, the Fundamental Conventions and Recommendations of the International Labor Organization, the Earth Charter published by the Earth Council, and the United Nations Global Compact.

3.1 Honesty and Transparency

Honesty is the fundamental principle underlying all of COSMOCHEM's activities and affairs, its various initiatives, its products, its information and communication strategies, and is also an important part of the Company's management policy.

All of COSMOCHEM's relationships with its partners² are governed, at all levels, by honesty, integrity, loyalty, and mutual respect, based on the belief that clear, transparent, and timely dialogue is fundamental to the Company.

3.2 Social Responsibility

COSMOCHEM firmly believes that, in order for its business activities to operate within the ethical framework it has set, it will operate with respect and protect human rights, the planet's potential, and the well-being of the communities in which it operates, while promoting human development in a sustainable manner.

COSMOCHEM further recognizes that social and ethical responsibility also applies to all communities, even those in developing countries that produce basic raw materials for some of our products.

²The term "partners" refers to individuals, groups, or organizations whose interests are directly or indirectly affected by COSMOCHEM's activities.

3.3 People at the Center – Diversity & Inclusion

COSMOCHEM, consistent with its desire to develop a culture based on ethics, supports the uniqueness of each individual, respecting their natural, cultural, and ethical identity and their right to interact and relate to others.

COSMOCHEM seeks to pay special attention to all the needs that arise in each person's life, given that human life inspires all of the Company's activities.

COSMOCHEM supports and respects human rights in all its activities and sphere of influence, offers equal opportunities for the development of its people, and protects their privacy. COSMOCHEM believes that doing the right thing is also good for its business and that respecting diversity and promoting inclusion can be a competitive advantage, with cultivating a more dedicated workforce that makes better decisions based on a better understanding of the people who buy the products that are sold by the company around the world. COSMOCHEM does not tolerate any form of discrimination or exclusion based on, among other characteristics, age, culture, ethnicity, nationality, religious beliefs, racial characteristics, political opinions, marital status, pregnancy, military service, gender, sexual orientation, and/or expression, genetic information, health status, or disability.

3.4 Employee Rights

COSMOCHEM guarantees its employees' right to form associations and recognizes the right to collective bargaining. The company is committed to not benefiting, even indirectly, from any form of forced or compulsory labor, or child labor. COSMOCHEM condemns any form of discrimination against its employees on the basis of age, gender, sexual orientation, health status, race, nationality, political or religious beliefs. It unequivocally rejects any form of discrimination in the areas of recruitment and human resource management.

COSMOCHEM is firmly committed to preventing any form of direct or indirect harassment and exploitation in the workplace. Furthermore, COSMOCHEM is committed to adopting only meritocratic criteria in all decisions concerning the professional careers of its employees, based on their performance and professionalism.

3.5 Environmental Protection and Animal Welfare

COSMOCHEM's commitment to the planet aims to preserve nature and its beauty for current and future generations, to whom the necessary values and traditions that lead to the sustainability of humanity and the environment will be passed on.

COSMOCHEM is committed to adopting the "precautionary principle³" in all its actions and to applying a preventive approach to the environment and biodiversity. In addition, COSMOCHEM supports the promotion of initiatives to strengthen corporate environmental responsibility and the development of technologies that contribute to environmental protection.

In line with the above, COSMOCHEM's commitment to ensuring the current and future well-being of people and the planet also includes the well-being of animals.

COSMOCHEM does not trade in materials that are tested on animals, nor does it finance or support, directly or indirectly, the testing of products on animals, unless strictly required by the authorities for reasons dictated by legal or regulatory provisions.

3.6 Compliance with Applicable Laws, Codes, and Regulations

COSMOCHEM considers compliance with national and international legislation to be of paramount importance in the conduct of its business. Therefore, COSMOCHEM is committed to adapting its operations to prevent offences and criminal acts and to comply with the principles of general practice.

Furthermore, general practice but and every decision that COSMOCHEM makes will be dictated by possible developments in applicable legislation.

³. *According to the "Precautionary Principle," in cases of doubt regarding the safety of a product or process in relation to the environment or human health, the burden of proof of safety lies solely with the manufacturer.*

4. RULES AND CODE OF CONDUCT

4.1 Relationships with all Partners

COSMOCHEM aims to maintain and develop relationships of trust with all its partners, at all levels, characterized by fairness, cooperation, and mutual respect. The term "partners" refers to shareholders, investors, employees, contractors, customers, suppliers, competitors, public bodies, local and national communities, and the media.

4.2 Marketing and Communication

COSMOCHEM considers its customers as partners in dialogue: they have the right to be fully informed so that they can make an informed choice at the time of purchase.

To achieve its goals, COSMOCHEM is committed to:

- guarantee a relationship of trust and loyalty with its partners,

COSMOCHEM's communication policy:

- it is human-centered, recognizing the multifaceted needs of the individual (physical, psychological, cultural, and emotional); marketing activities will in no way prevent full transparency regarding the content and proper use of products;
- it will avoid any vulgar, contradictory, uncertain, or ambiguous messages;
- always recognize the company's responsibility in influencing human choices, while guaranteeing a fair relationship with its partners.

4.3 Information and accounting records

COSMOCHEM's communication with its partners and its relations with them will be governed by the principles of transparency, fairness, timeliness, and consistency, in accordance with the right to information.

Every employee will cooperate to ensure transparency in accounting records, based on true, accurate, and complete data for accounting entries.

Each employee should also cooperate so that all transactions are approved in a timely and proper manner, are reasonable, legal, verifiable, adequate, and recorded in the accounting books in a proper manner, in accordance with reasonable criteria, so that each operation can be easily traced.

Under no circumstances should false or misleading data be recorded in the books of the Company (or the Group) for any reason.

No employee should be involved in such illegal activities, or of requested by someone superior.

4.4 Internal Audit

One of the key points of COSMOCHEM's policy is represented by the Internal Audit Department, which includes all necessary or useful procedures concerning all its employees and aims to achieving the Company's objectives, complying with corporate rules and procedures, protecting corporate assets, and providing accurate, impartial, and complete information on accounting data.

Therefore, COSMOCHEM has established and developed appropriate tools and procedures to address, manage, and control activities within the Company.

Fully aware that a positive attitude towards control is essential in order to increase its effectiveness, it is COSMOCHEM's policy to improve and disseminate, at every level of the organisation, a culture characterized by an awareness of the fundamental importance of control.

The responsibility for creating and maintaining an effective internal control system lies with all COSMOCHEM employees. Therefore, all executives will be asked to participate in the Company's internal control system, each in their own field of activity, and to share the values and tools of internal controls with all their colleagues.

Each employee shall be responsible for the Company's tangible and intangible assets and their proper use; no employee may misuse or allow others to misuse the Company's assets.

4.5 Bribery and Abuse

COSMOCHEM is committed to taking all necessary measures to prevent and avoid bribery and abuse.

Any form of payment, by any means, for the purpose of obtaining favorable treatment, directly or indirectly, in the exercise of any activity related to COSMOCHEM is prohibited.

No employee should accept any form of gift that exceeds or could be interpreted as exceeding normal commercial practices or gratitude received from third parties. This rule, which is not subject to exceptions, shall apply both in cases where the employee seeks his or her own personal benefit and in cases where it is contrary to the interests of the Company.

4.6 Diligence and Impartiality in Contracts

All contracts and work assignments should be performed in accordance with what has been specified by the parties involved.

In order to ensure the proper and fair management of contractual relationships, COSMOCHEM refrains from taking advantage of its dominant position in relation to contractors; in addition, COSMOCHEM is committed to always providing accurate and adequate information to every employee and third party included in the aforementioned contracts.