

CODE OF ETHICS  
of  
EVERCOMPOUNDS S.p.A.



# Workplace Conduct Guide

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*“Together we give life to rubber”*

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## Our Mission

Evercompounds has chosen to grow in the world through innovation, continuous improvement and quality, based on values such as focusing on customer's needs, the key importance of research and innovation, environmental protection and compliance with national and international regulations, while remaining true to its roots of company with an Italian heart.

In this sense, and to better meet the needs and expectations of its customers and to remain a leading player in its industry, Evercompounds engages constantly in business management practices based on these two main pillars:

Business Plan: improve competitiveness and customer satisfaction. Ensure the creation of a true added value for all its business partners, ensuring the sustainability of its business by providing quality goods and services at the best possible cost and with the utmost professionalism. In particular, we pursue our goals:

- increasing our production capacity, our range of products and our presence close to our customers through the acquisition and/or creation of new departments and/or production sites abroad.
- Improving our competitiveness through continuous monitoring and evaluation of our compounds in order to increase process efficiency, increase the quality and minimize the cost of products, as part of a process whose aim is operational excellence over time.
- By always listening to our customers and constantly enhancing our before-sales and after-sales support services, to become true business partners and not just suppliers, in order to be able to grow together and create solid and fruitful relationships with our customers.

Social and Environmental: preserve the health and safety of persons and property, and ensure respect for the surrounding environment. In particular, we pursue our goals:

- adopting a responsible attitude towards health and safety, and strictly complying with all regulations applicable at national and international level.
- by controlling our consumption of water and energy, and properly managing the disposal and enhancement of our waste.
- adopting a pollution and major industrial risk prevention policy.

In the long term, Evercompounds wants to ensure its own development through effective economic growth, the centrality of research and innovation, constant attention to the environment and the creation of strong partnerships with its customers. Because only by walking along their path together, side by side, Evercompounds and its customers can grow together and ensure a solid and lasting success.





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## Our Responsibilities

This Code of Ethics is inspired by an ideal of cooperation among people, respecting the role of each one, and is a guide to decision making and take action in a manner deemed to be consistent with the culture of responsibility, lawfulness, transparency and long-term value creation for all our stakeholders, therefore contributing to a sustainable development.

We are committed to ensuring lawfulness, transparency, fairness and honesty in all our activities and to creating long-term value for all our stakeholders. Therefore, we expect our interlocutors as well to adopt a socially responsible behavior and develop adequate ethical programs and safeguards, consistent with the principles and behaviors enshrined in our Code of Ethics.

### 1. General information

#### What is Workplace Conduct Guide at Evercompounds?

The Workplace Conduct Guide ("Guide") describes the workplace behavioral standards in place at the Company. These standards are informed by the Company's following core values:

- treat corporate assets as you would treat your own;
- behave keeping the Company's long-term success at heart;
- always act in the most appropriate way;
- operate with deep respect for the law.

The sections of this Guide identified as "Standard of conduct at work at Evercompounds: what to do and what to avoid" constitute the "Code of Ethics" that all company employees as well as independent members of the Company's Board of Directors must comply with in the course of activities carried out on behalf of the Company or in connection with it. Therefore, any reference to "employee" in this Guide also includes the independent members of the Company's Board of Directors considered in the performance of their Board functions.

#### Scope of standards application

The EVERCOMPOUNDS workplace behavior standards contained in this Guide apply to all employees of the parent company and its subsidiaries located all over the world. No one, at any level of the Company, has the authority to request or permit an employee to violate of any of the standards of workplace behavior adopted by EVERCOMPOUNDS and detailed in this Guide.

According to the meaning assigned to it in this Guide, the term "Company" refers to EVERCOMPOUNDS S.p.A. and all its subsidiaries. Subsidiary refers to a subsidiary or other entity of which EVERCOMPOUNDS holds, directly or indirectly, more than 50% of the voting rights or in which control of the entity is owned by or on behalf of EVERCOMPOUNDS. Employees with managerial or equivalent positions in uncontrolled subsidiaries in which EVERCOMPOUNDS holds a shareholding should, to the maximum extent possible, encourage such entities to adopt and follow workplace behavior standards in place at EVERCOMPOUNDS.

#### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

##### Compliance with workplace behavior standards at EVERCOMPOUNDS

- **Understand** the workplace behavior standards at EVERCOMPOUNDS contained in this Guide, as they are applicable to each role played within the Company.



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- **Comply** with the workplace behavior standards at EVERCOMPOUNDS contained in this Guide, as they are applicable to the role played within the Company.

#### Notification/Cooperation

- **Notify** the Company any matter that is believed to be a violation of statutory or behavioral standards in place at EVERCOMPOUNDS, which may have occurred during the course of business, whether such violation was perpetrated by a full-time employee, part-time employee, service provider, consultant or member of the Company's Board of Directors.
- **Cooperate** honestly and unreservedly in investigating alleged violations of workplace behavior standards in place at EVERCOMPOUNDS.
- **Do not hide** any violations of the law or this Guide, or alter or destroy evidence in an attempt to prevent or hinder investigations.

#### How to report violations

Potential violations of legal requirements or standards of behaviour at work must be reported to the following persons of reference:

- your manager or the higher level manager in the management hierarchy of the plant or Business Unit where you work;
- the staff of the relevant financial and accounting offices;
- the relevant internal inspection staff;
- the relevant human resources staff;
- the relevant representative of the company's legal department;
- the relevant internal security staff; or
- the ethics Committee.

Please use this email address: [conduct@evercompounds.com](mailto:conduct@evercompounds.com)

#### Subject matter of this Guide

This Guide details requirements concerning the workplace behavior of the Company's employees and executive personnel. It does not engender any contractual or any other right for employees and executive personnel, or any limitation or modification of any other requirements applicable to employee or executive personnel.

No retaliation will be allowed against employees who report a suspected violation.

## 2. General principles of business ethics

#### Summary of the corporate policy principle

The Company's fundamental ethical principle is "to act as deemed most appropriate". In addition to complying with the legal and other applicable requirements described in this Guide, employees should ask themselves the following questions before making any decision:

- By acting in this way, can I say that I “act in the most appropriate way”?
- Would I feel at peace if my action was reported in the media or referred to a person whose principles I sincerely esteem?
- Is my action able to protect the Company’s reputation as an ethically responsible company?
- Am I behaving in a transparent and honest way?

In all cases where the answer to any of the above questions is other than an unconditional “Yes”, do not take that action.

### 3. General compliance with statutory requirements

#### Summary of the corporate policy principle

The Company and its employees are subject to a wide variety of legal requirements when conducting business activities. Overall, the Company as a whole operates with a deep respect for the law.

#### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

- **Comply** at all times with all applicable legal requirements.
- **Understand** what legal requirements govern your business by relying upon the appropriate resources, including the staff of the Legal Department of the competent Company. No matter how many fundamental legal principles are enshrined in this EVERCOMPOUNDS Workplace Behavior Guide, not all legal requirements are described in it.
- In the event of any discrepancy between legal requirements within different jurisdictions, **contact** the Legal Department staff of the competent Company and comply with their instructions and recommendations.
- **Follow** the instructions provided by the Legal Department staff of the competent Company.
- Promptly **address and resolve** any legal compliance issues identified.

*No one, at any level of the Company, has the authority to request or permit an employee to violate the law.*

If someone attempts to do so, **report** the situation as described in the “How to Report Violations” paragraph of the “General Information” section of the Guide.



## 4. Accuracy of accounting books and company records

### Accounting books and records

#### Summary of the corporate policy principle

The Company does not accept in any way the intentional tampering with any documentation or accounting records and books. The Company must have adequate assurance that the information contained in accounting books and records, including any financial, accounting, personal or personnel benefit documents possibly completed by employees, is accurate, timely and complete.



#### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

- If you are responsible for recording transactions or events in corporate records, do **not** intentionally defer them or willfully record incorrect, incomplete or misleading information about such transactions or events.
- If you are not directly responsible for recording transactions or events, **provide** timely, accurate and complete information to those who are required to do so.

### Information disclosure surveillance

#### Summary of the corporate policy principle

Monitoring of information disclosure is carried out via systems and processes that allow verifying the availability of important information to the right people at the right time. The Company requires each sector to comply with surveillance activities on the disclosure of information in order to adequately verify that the most significant information is provided to the appropriate company levels, therefore allowing the adoption of appropriate measures for problem solving and considering the appropriateness of disclosing such information to third parties.

#### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

- **Make sure** that important information is reported to the auditor/accounting and financial manager of the business unit that will be affected.
- If you have any doubts about the accounting or financial reporting of information, **contact** the auditor/financial manager of the business unit or the local accounting office.

### Internal controls

#### Summary of the corporate policy principle

Internal controls are systems and processes that implement corporate policies, authorizations and procedures with adequate accounting and management records. This type of relationship is intended to ensure that business activities are managed appropriately. The Company will define a series of internal controls providing reasonable assurance that:

- Transactions are properly authorized and accurately recorded on the basis of the Company's policies and procedures;
- Company resources are adequately protected;
- The financial and management reports are reliable and accurate, and reflect the actual business activity;
- The activities comply with the applicable legal requirements;
- Business operations are effective and efficient.

In the final analysis, the creation and application of reliable and effective internal control systems is the responsibility of each employee, as it pertains to his/her related areas of activity.

**Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid**

- Regularly **check** for weaknesses in systems or processes and, if any significant ones are identified, make or suggest corrections.
- **Become familiar** with the internal control processes applicable to your work situation.
- Fully **cooperate** with both the internal inspection staff and the independent auditors engaged by the Company.

## 5. Conduct in the workplace

### Discrimination and harassment

**Summary of the corporate policy principle**

The fundamental rule of the Company is that all employees must treat their colleagues with respect. The Company will not partake in discriminatory or harassing activities or authorize employees to do so. Any form of retaliation against an employee who reports known or suspected discrimination or harassment is prohibited. Generally, discrimination refers to treating a person more or less favorably in employment relationships (such as selection, hiring, training, compensation and promotion) due to race, sex, color, religion, nationality, age, sexual orientation, disability or other personal characteristics unrelated to work. Generally, harassment refers to any behavior related to race, sex, color, religion, nationality, age, sexual orientation, disabilities or other personal characteristics unrelated to work, that creates an intimidating, hostile or offensive work environment, or that interferes without reason with an employee's job performance. Harassment can take a variety of forms, including offensive comments, advances, jokes, and other unwanted sexual, graphic, or physical conduct that creates an intimidating, hostile, or offensive work environment.

**Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid**

- **Do not take part** in discrimination or harassment.
- Immediately **report** any harassment or discrimination to which you are subject.
- **Report** any harassment or discrimination immediately if you know or suspect that others are subject to it.

### Violence in the workplace

**Summary of the corporate policy principle**

Any threat or act of violence committed by employees of the Company against third parties, or against the ownership of the Company or of third parties, with which they came into contact during the performance of their duties, constitutes violence in the workplace.

The Company does not allow any violence in the workplace.

**Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid**

- **Do not take part** in any kind of violent act (including threats), in the workplace.
- **Do not introduce weapons** into the Company's premises.
- Immediately **report** any workplace violence you suspect to be ongoing.



- The manager to whom a possible violence at the workplace is reported **must take appropriate measures**, first and foremost (with the help of the competent internal security staff) to protect the threatened persons or property, and secondly to ensure completion of appropriate investigations and, should the complaint be founded, to ensure that the violent conduct is adequately punished.

## Abuse of illegal substances and prescription medications

### Summary of the corporate policy principle

The Company does not tolerate the use of alcohol or psychotropic substances, both during and outside of work activities, to an extent that may negatively reflect on a safe and effective management of corporate affairs.

### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

- **Do not possess** illegal substances or other substances you have not been duly authorized to possess, within the Company's premises or during work activities.
- **Do not perform work** under the influence of alcohol, illegal substances or legally permitted substances used illegally.
- **Do not take part** in the sale or distribution of illegal substances, or legally permitted substances in an illegal manner, both inside and outside Company premises, both during and outside of work activities.
- Do not use alcohol or psychotropic substances outside of work to an extent that may adversely affect your working ability.
- **Report** to your manager or to the competent corporate health personnel the possible intake of any substance that may negatively reflect on your working abilities, even when such intake is legal (for example, drugs that, even if taken legally, may limit the ability to drive or operate heavy machinery).

## 6. Corruption and illegal commercial activities

### Commercial bribery

#### Summary of the corporate policy principle

The Company does not participate in commercial bribery practices. The offer to, or receipt by, customers or suppliers of the Company or their representatives, of personal donations, bribes or kickbacks with the intent or hope of obtaining more favorable negotiating terms or otherwise unavailable opportunities constitutes commercial bribery.

#### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

**Do not take part** in any type of commercial bribery practice.

### Unlawful payments to government officials

#### Summary of the corporate policy principle

The Company prohibits the payment of illicit payments to government officials. Illicit payments are direct or indirect payments, either in cash or in other valuable goods (for example, the offer of luxurious entertainment), to a government official or political party to influence acts or decisions, receive special treatment or obtain personal gains, as well as procure or retain business.

**Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid**

- Do not make illegal payments to government officials, **consult** with the Legal Department on the appropriateness of payments and **report** such payments to the relevant corporate tax office staff.
- **Do not record** any transactions if you suspect that they are improper payments made by third parties to government officials for an improper purpose.

## Prevention of money laundering and product diversion

**Summary of the corporate policy principle**

The attempt by individuals or organizations to hide the proceeds of illegal activities with the intention of making them appear legitimate constitutes money laundering. The sale or distribution of Company products on markets or customers other than those originally provided for in violation of a contract, a law or a regulation constitutes product diversion. The Company prohibits voluntary participation in transactions that facilitate money laundering or result in product diversion.

**Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid**

- **Make payments** for goods and services provided to the Company only by corporate check, draft or credit card or other approved and documented means of transfer. These payments must be payable to the person or entity legally authorized to receive the payment, except for any exceptions approved in advance by the staff of the competent corporate tax/legal office.
- **Do not allocate** payments to persons or entities in countries other than the one in which they reside or carry out financial activities, or have delivered goods or provided services, unless the staff of the competent corporate tax/legal office has determined in advance that the payment does not violate the applicable legal requirements.
- **Conduct business** only with customers willing to provide the information necessary to verify the legitimacy of their financial activities and the place of origin of any funds used.
- **Do not accept** third party checks for payment. Sales must be paid by check, electronic transfer or payment order specifically listing the customer as the payer. The use of cash must be minimal and the only course of action only in the absence of a safe and secure local banking system.
- **Do not ship** goods to customers in a way that differs from standard procedures, except for any exceptions approved in advance by the staff of the competent corporate tax/legal department.

## 7. Confidentiality

**Summary of the corporate policy principle**

The Company requires that confidential company information be kept as such. Confidential information is:

- non-public information which has become known as a function of duties performed and which could be useful to competitors or harmful to the Company if disclosed; and
- information not in the public domain and containing personal data obtained from other employees, customers or consumers.

If, at the time you are hired at the Company, you must comply with a legal requirement in relation to the confidential information of a previous employer, the Company expects the employee not to use or disclose such information in the course of his/her work activities at the Company. Likewise, the Company expects employees who terminate their employment relationship with it not to disclose confidential business information once outside the Company.

Employees should not find themselves in situations that could result in the inadvertent disclosure of confidential information, such as reading or discussing confidential information in public places or leaving important information, computers unattended and so on.

#### **Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid**

- In the absence of a legal requirement concerning the disclosure of certain information, **do not intentionally disclose** confidential information to persons (except Company employees or third parties who have the right to learn about it to promote the Company's economic interests) who are not expressly bound or required to ensure its confidentiality (unlike, for example, a person who has signed a Confidential Disclosure Agreement [CDA] with the Company).
- If you believe that there is a legitimate need to reveal confidential information to people who are not expressly bound or required to ensure its confidentiality, **submit a request** for exemption in advance to your manager. The manager will make a determination in this regard after consulting with the internal security staff, the competent corporate Legal Department and, possibly, other competent offices.
- If, at the time you are hired at the Company, you are expected to comply with a legal requirement in relation to the confidential information of a previous employer, **do not use or disclose** such information in the course of your work activities at the Company.



## 8. Conflict of interest

### Commercial, financial and personal relationships

#### Summary of the corporate policy principle

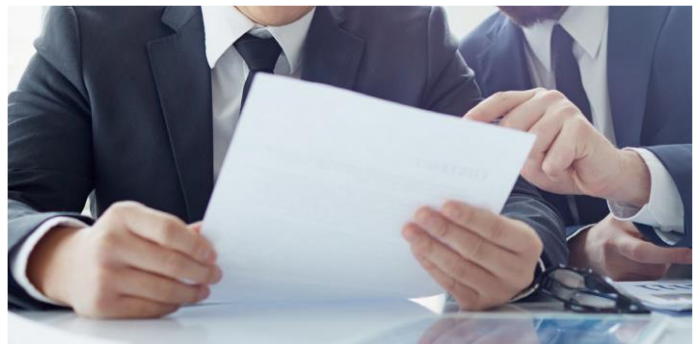
All employees are required to always and exclusively act in the best interest of the Company. The existence of personal, financial or other interests capable of interfering with the aforementioned requirements or the use of a position held at the Company for personal gain constitutes a conflict of interest. The Company requires that all potential conflicts of interest be reported and that prompt measures be taken to remove them, if expressly requested.

#### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

- An employee who is in a problematic situation which could give the impression of interfering with the obligation to exclusively act in the best interest of the Company, **must report** the potential conflict. Many of these potential conflicts can be resolved.
- If you become aware of a potential conflict of interest of another employee or a member of the Board of Directors, **report it** as previously described.
  - Any employee in a situation of potential conflict must report such situation to their manager.
  - If you believe that another employee is in a potential conflict situation, report it to the employee's manager or your own manager.
  - If a colleague has reported a potential conflict situation, report the situation to the relevant corporate Legal Department staff.

Once a potential conflict has been reported, the Company will determine whether the conflict can be substantiated and, if so, what measures to take or whether to grant exemptions.

- **Do not desist** from taking corrective measures relating to a conflict of interest and requested by the Company.



### Misuse of corporate resources

#### Summary of the corporate policy principle

The Company does not allow improper use of corporate resources. The use of Company property or information to obtain an advantage or personal gain or of third parties external to the Company, such as friends or family members, constitutes improper use.

Improper use also includes personal use of Company property or technology that is not limited or incidental, and any use contrary to other corporate regulations.

#### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

- **Do not make use** of the Company's property or information for non-business purposes, except in cases of limited or incidental personal use.

- **Reimburse** the Company for company credit card charges relating to personal expenses.

## 9. Business conduct and fair competition

### Appropriate treatment of customers

#### Summary of the corporate policy principle

The Company treats all customers fairly and does not offer anyone an unfair advantage over a competing customer. The Company does not discriminate based on a customer's size, type, industry or commercial strategy.

#### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

- **Offer** customers equal opportunities in relation to prices, conditions of sale or commercial promotions to competitors within a given market.
- **Do not put pressure on or agree** with a customer on the prices they will assign to the Company's products.
- **Do not terminate** a relationship with a customer based on discussions or agreements with other customers.
- **Do not bind** the customer to sell the Company's products only to certain people or entities, or only in certain geographical areas, without the approval of the staff of the competent corporate Legal Department.
- **Do not enter into agreements** that prevent the customer from purchasing products from competitors of the Company or that require the customer to purchase all or most of the necessary Company products without the authorization of the staff of the competent corporate Legal Department.
- **Do not ask** a customer to purchase an unwanted Company product in order to be able to purchase a Company product they need, without prior authorization from the staff of the competent corporate Legal Department.
- **Make sure** that all the advice offered in relation to the category of relevance is based on objective data and focused on the advantages inherent in the Company's products, rather than on the negative points of a competitor's products.
- **Do not establish strategies** with a customer in relation to price conditions or promotions for the products of a competing brand of the Company's products.
- **Do not share** a customer's confidential business information with any of his competitors.

### Appropriate treatment of suppliers

#### Summary of the corporate policy principle

The Company allows suppliers to compete fairly to obtain exclusive agreements with the Company based on the total value offered to the Company by an individual supplier.

#### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

- **Base decisions** regarding the purchase of material or services for the Company only on the merits or the total value of the available offers.
- **Do not make purchase decisions** based on mutual agreements (for example, a supplier who promises to buy certain products of the Company if the Company purchases certain products of the supplier).

- If making purchasing decisions on behalf of the Company, **do not solicit** current or potential suppliers on behalf of charitable organizations, civic associations or entities of a similar nature (solicitations made to obtain a personal advantage are prohibited and discussed above in the “Conflicts of Interest” section).
- **Do not share** a supplier’s confidential business information with any of his competitors.

## 10. Influence on life and political and civil institutions

### Summary of the corporate policy principle

As part of its social responsibilities, the Company often takes a position on issues of public nature that may reflect on its activities, and undertakes to influence laws and government decisions within lawful parameters. The Company does not make contributions, directly or indirectly, in cash or other valuable assets to individuals or political parties for the purpose of procuring or retaining business.

### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

- **Do not use** Company funds to make contributions to a candidate or political party without the written permission of the Ethics Committee (corporate contributions to candidates or political parties are prohibited by the laws of many countries).
- **Do not use** Company assets, including conference rooms, office supplies, postal services, telephones, faxes and computers, for conducting election campaigns, raising funds for candidates or party purposes without the written permission of the Ethics Committee.
- **Do not participate** in the election campaign of candidates during work or within the Company’s premises, unless authorized by the Ethics Committee.
- **Do not contact** a government official for the purpose of influencing the adoption of government laws or regulations on behalf of the Company, unless this commitment has previously been reviewed by Company Governance or External Relations personnel.
- **Make sure** that any activity undertaken to influence government laws or regulations on behalf of the Company is reported to the relevant corporate tax office staff.

## 11. Privacy

### Summary of the corporate policy principle

In the course of its activities, the Company collects information containing personal data from a variety of groups, including consumers, suppliers, customers, employees, job candidates and shareholders. This is information that, whether as stand-alone or in association with other information collected, allows you to identify a specific person (such as name and address or identity card number).

The Company aims to create an atmosphere of trust and safety that encourages people to share their personal information with it. In this way, the Company will be able to better understand their needs and therefore provide superior information, services and products. To this end, it is necessary that all Company employees, in addition to complying with all the requirements of the applicable privacy laws, undertake to protect the personal information of third parties as they would their own. This includes the notification of types of use, offer of choices concerning use, possibility of access and updating, and provision of reasonable protection of personal information.

#### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

If your role implies the collection or processing of information containing personal data:

- **Do not collect or use** personal information, except for appropriate business purposes.
- **Do not share** with anyone any personal information collected, with the exception of those who have a legitimate business reason for obtaining such information.
- **Take** all necessary protective measures for personal information entrusted to your care.
- **Inform** people of the collection of their personal information and how such information will be used (including any transfer to third parties).
- **Offer** consumers, suppliers and customers the choice of whether to grant the use of their personal information for purposes other than that for which the information was originally collected.
- **Take** all necessary measures to delete personal information relating to a consumer, supplier or customer from the Company's archives if the consumer, supplier or customer requests it.
- **Offer** people the opportunity to correct their personal information stored in corporate archives. Obviously, any information that the Company gathers on employees, such as possible future assignments, compensation schedules and so on, as well as information potentially subject to legal or labor disputes is excluded.
- **Do not voluntarily collect** personal information relating to minors without the specific authorization of the staff of the competent corporate Legal Department.
- **Take appropriate** measures to ensure that suppliers comply with the Company's privacy policies and guidelines in Company-related activities.

## 12. Environment, health and safety

### Product safety

#### Summary of the corporate policy principle

- The Company's products and product packaging will be safe for consumers if used as intended.
- The Company will endeavor to ensure the safety of its activities for employees, neighbors and the environment.
- The Company will comply with or exceed all the requirements of applicable laws and regulations in relation to product safety and labeling.
- The Company will provide relevant and adequate evidentiary information to interested parties on the safety of its products and their packaging.

#### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

- **Make sure** that safety assessments and appropriate legal due diligence are an integral part of the development activities of any product in which you are involved.
- **Make sure** that any concerns that have been raised about the safety of a product under development are promptly reported to the staff of the Product Safety Office and the relevant corporate Legal Department in order to perform the appropriate assessments.

- **Make sure** that any reports concerning the safety of Company products distributed to customers have been promptly notified to the staff of the Product Safety Office and the relevant Corporate Legal Department in order to make the appropriate assessments and to find solutions.
- Promptly **address and resolve** any legal compliance issues identified.

## Employee safety

### Summary of the corporate policy principle

The Company is committed to providing a safe and healthy working environment to all its employees. Nothing, not even urgent business needs, can justify circumvention of the Company's safety procedures.

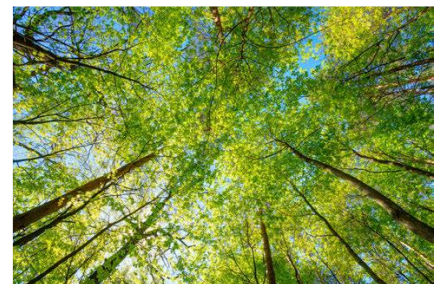
### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

- **Do not expose** yourself or your colleagues, agents or consultants of the Company to a situation involving significant risks for your physical safety or the safety of these subjects.
- **Report** any relevant safety concerns of which you are aware to the personnel of the Corporate Safety Office or the relevant corporate Legal Department.
- Promptly **address and resolve** any legal compliance issues identified.
- Promptly **report** any complaints or health issues to the Health Department of the concerned facility.

## Environmental quality

### Summary of the corporate policy principle

- The Company will meet or exceed all applicable environmental requirements.
- The Company will evaluate its environmental performance, also committing to constant improvement.
- The Company will provide interested parties with adequate evidentiary information on the environmental implications of its activities and products.



### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

- Make sure that environmental safety assessments are an integral part of any product development or design of any production activity in which you are involved.
- **Make sure** that any concerns that have been raised about the safety of a product being developed or a production activity in the design phase are promptly reported to the corporate staff responsible for environmental safety assessments, before the product is distributed or the project is implemented.
- **Make sure** that any reports made concerning the environmental safety of distributed products or of the Company's activities have been promptly notified to the corporate staff responsible for environmental safety assessments, so that they can proceed to the necessary assessments and resolutions.



## 13. Special legal issues

### Customs offices

#### General Overview

Every country has put in place specific legal requirements for the transfer of goods to and from abroad.

#### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

As with all other legal requirements, **understand** and **comply** with the legal requirements relevant to your business activities.

### Export restrictions

#### General Overview

The laws of many countries prohibit the direct or indirect export (or even transport to and from abroad) of certain goods, software, technologies and other goods of foreign countries.

#### Workplace behavior standards at EVERCOMPOUNDS: what to do and what to avoid

As with all other legal requirements, **understand** and **comply** with the legal requirements relevant to your business activities. In the event of a conflict between the laws of two different countries, **consult** the staff of the Legal Department of the competent company and comply with their instructions and recommendations.

