

PROCHIMICA NOVARESE S.p.A. SUSTAINABLE PURCHASING AND SUPPLIER MANAGEMENT POLICY

[1. Purpose and scope]

This Sustainable Purchasing and Supplier Management Policy defines the commitments of Prochimica Novarese S.p.A. to integrate environmental, social and ethical criteria into the process of selecting, evaluating and managing suppliers, in addition to traditional considerations such as price, quality, service and reliability.

The Policy applies to all suppliers of goods and services to Prochimica Novarese S.p.A., including critical subcontractors operating on its behalf.

[2. References]

This Policy is consistent and complementary to:

- The company's ISO 14001 certified Environmental Management System.
- The commitments undertaken under RSPO certification for the supply chain, where applicable.
- The Prochimica Novarese Code of Ethics and the HR Policy, which define principles and rules on human rights, working conditions, anti-corruption and business integrity.

[3. Commitments on suppliers' environmental practices]

Prochimica Novarese undertakes to:

- Manage the risks of negative environmental impacts linked to its supply chain, giving preference to suppliers that adopt good environmental practices, comply with applicable legislation and, where possible, are certified to recognised standards (e.g. ISO 14001, RSPO or equivalent).
- Take into account, in supplier evaluation, elements such as waste management, use and disposal of chemicals, energy and water consumption, emissions and pollution prevention.
- Request from critical suppliers, where relevant, information or documentation on their environmental performance (e.g. certifications, safety data sheets, REACH declarations, etc.).
- Promote continuous improvement by encouraging suppliers to reduce the environmental impacts of their processes and products.

[4. Commitments on suppliers' social practices]

Prochimica Novarese undertakes to:

- Prevent negative social impacts in the supply chain, with particular attention to working conditions, health and safety, working hours, remuneration and the protection of vulnerable groups.
- Work with suppliers that respect fundamental principles on human and labour rights, including the prohibition of child labour, forced labour or labour resulting from human trafficking, and non-discrimination.

- Promote among its suppliers social standards consistent with those adopted by the company and set out in the Code of Ethics and internal policies.
- Intervene, in the event of serious or repeated violations, by requesting corrective actions and, if necessary, suspending or terminating the supply relationship.

[5. Ethical and compliance commitments]

Prochimica Novarese:

- Rejects any form of corruption, extortion, fraud or conflict of interest in relationships with suppliers.
- Expects its suppliers to adopt comparable ethical standards, preventing unlawful practices, unauthorised gifts and benefits, favouritism and other non-compliant conduct.
- Requires suppliers to comply with all applicable laws, including those on product safety, transport of dangerous goods, data protection and occupational health and safety.

[6. Qualitative objectives and targets]

In the medium term, Prochimica Novarese sets itself the following objectives:

- Integrate environmental and social criteria into supplier evaluation, at least for the purchasing categories that are most critical in terms of environmental and social impact.
- Give preference, all other technical and economic conditions being equal, to suppliers that demonstrate stronger environmental (e.g. ISO 14001 certification, adherence to RSPO or equivalent standards) and social commitments.
- Formalise a process for the periodic assessment of sustainability risks in the supply chain and a system for monitoring progress.

By way of example, the company aims to:

- Obtain, by 2027, the signature of the Supplier Code of Conduct from at least 50% of strategic suppliers.
- Include, by 2027, social, environmental and ethical clauses in contracts with key strategic and critical suppliers.

[7. Implementation, responsibilities and review]

Responsibility for implementing this Policy is shared between Management, the Purchasing Department and the functions involved in managing supplier relationships.

The Policy is communicated internally to relevant personnel and made available to suppliers on request or through the usual communication channels.

Management periodically reviews this Policy (at least every three years, or in the event of significant changes) to verify its adequacy in light of regulatory developments, reference standards (ISO 14001, RSPO, etc.) and company needs.

San Pietro Mosezzo, January 2026

Management

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