

Suppliers Code of Conduct

People, Planet and Prosperity



Lamberti

Designing new values in chemistry



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A reliable Supply Chain is a key aspect of operating responsibly and safely in our business. It is therefore of utmost importance for us to source our raw materials, products, assets and services from suppliers who share our values and principles for doing business.

We expect our suppliers to share the principles expressed in this Suppliers Code of Conduct through the “3P” approach: People, Planet and Prosperity



People

Freedom of association and collective bargaining

The Lamberti Group promotes freedom of association – with no pre-emptive authorization, and applies collective bargaining agreements in defining employees' contractual condition, according to local laws and regulations. Likewise, suppliers must guarantee freedom of association and the right to collective bargaining in accordance with applicable laws.

Child and forced labour

The Lamberti Group rejects any form of illegal, child or forced labor. Our suppliers must not engage with any sort of unlawful, child or obliged labor in all their business operations.

Non-discrimination

The Lamberti Group opposes any discriminatory or harmful behavior towards people for physical or mental disabilities, for diversity of culture, race, religion, gender, sexual orientation. We expect our Suppliers not to discriminate their employees on personal characteristics such as illness, disability, religious belief, nationality, skin color, gender, sexual orientation.

Health and safety

The Lamberti Group guarantees health and safety in workplace. We promote the culture of safety and we take care of both employees' and external workers' health and safety. Our Suppliers must comply with all occupational health and safety laws, they must analyze the risk and they must take preventive and safe measures for their employees and sub-contractors.

Harassment and violence

The Lamberti Group fully rejects and opposes all harassment and violence of sexual, racist, cultural and religious nature. We expect our Suppliers to implement equivalent measures to avoid any kind of harassment and violence in their workplaces.

Personal data and privacy

The Lamberti Group protects both employees' and third parties' personal data, ensuring compliance with the relevant mandatory legislation. Our Suppliers should guarantee the same behavior by putting in place compliant procedures for the management and protection of all the personal data acquired while carrying out their business.



Planet

As a member of Responsible Care, a voluntary membership program that guides participating companies towards a sustainable development model of the global chemical industry, the Lamberti Group expects from its suppliers an approach coherent with its sustainability policies, through the adoption of behaviours procedures and technology improvements aimed to pursuing a responsible use of natural resources.

Sustainable use of resources – Energy & Water

The Lamberti Group believes that Energy efficiency and responsible Water use are key drivers for a sustainable development that must involve all partners. We encourage our suppliers to use energy-efficient technologies in their production and services.

We pay particular attention to the water network and we expect our suppliers to limit the amount of wastewater discharges and to focus on the quality of the water bodies into which they discharge such wastewaters.

Suppliers must commit themselves to minimizing the amount of pollutants in their wastewaters through improvements in their processes and products as well as through the adoption of new technologies for their abatement.

This commitment will improve the impact on the biodiversity of fresh water streams and the sea.

Sustainable use of Raw Materials

Lamberti expects its suppliers to develop sustainable products and services in a new vision along the entire life cycle of products, from raw materials to production processes and use, considering an eco-design approach and the adoption of the life cycle assessment (LCA) methodology. We encourage the reduction in the consumption of non-renewable raw materials, and the investment in low impact, up-cycled or recyclable, natural origin materials.

This will improve the safety and health of users and workers and the lowest possible environmental impact.

Emissions reduction

We ask our suppliers to reduce Greenhouse Gas (GHG) and pollutants in air emissions by optimizing their processes and improving energy efficiency. These efforts represent a clear opportunity to tackle the negative effects of climate change and to anticipate future sustainability challenges.

Waste management

We encourage our suppliers of chemicals and services to adopt a new model of circular economy in order to prevent or minimize the production of wastes in their processes, aiming to reuse and recycle, whenever possible, and only as a last resource to dispose wastes in landfills.

Sustainable logistics and packaging

An innovative approach to logistics and packaging is very important. We encourage all the players along our supply chain (suppliers and forwarders) to consider sustainability as a strategic goal in their value chain and to direct their industrial choices towards a sustainable and safe distribution of goods.

Our suppliers must comply with all applicable transport and custom regulations and they must implement all the measures to ensure a safe and secure shipment of goods and products in order to protect the environment and communities during transportation.



Prosperity

Competition laws

The Lamberti Group adopts policies designed to encourage and protect a fair competition within the market. Our Suppliers must operate in compliance with the laws and regulations in force in their business environment regarding competition, prohibiting the adoption of methods entailing unfair competition.

Business integrity

Suppliers must not offer or receive money, gifts or benefits also through intermediaries, in both the public and private sector, with the purpose of obtaining favorable treatments of any kind, and in relation to the performance of business that might affect the independence of judgement of the Lamberti Group, its employees, collaborators and representatives.

Conflict of interests

Suppliers must prevent and avoid any situation that may create a conflict of interests. A conflict of interests occurs when a Supplier's collaborator puts in place initiatives aimed at pursuing personal advantages in the Supplier's transactions with Lamberti, or when a Supplier carries out actions which may determine a personal advantage for a Lamberti collaborator, in conflict with that of the Lamberti Group.

Confidentiality of information

Suppliers, in strict compliance with the laws in force, must guarantee the utmost confidentiality with regard to key and confidential information transmitted by the Lamberti Group, including those related to the intellectual property. Suppliers guarantee that the confidential information will be managed correctly and require their employees and collaborators to keep all confidential information regarding the Lamberti Group strictly private and confidential, no matter how they have been transmitted or acquired by the Suppliers.

Transparency, fairness, good faith of negotiations and contracts

Suppliers should negotiate contracts with the Lamberti Group in a fair, complete and transparent manner, based on principles of mutual trust, fairness and

good faith, attempting to foresee and communicate the circumstances that could have a material effect on the established relationship. The establishment of a contract with the Lamberti Group must always be based on relationships of extreme clarity and transparency refraining, whenever possible, from undertaking contractual restrictions that may create forms of dependency of one of the parties. Should unexpected events occur, Suppliers undertake not to take advantage of such situations of dependency or weakness of the counterpart.

Respect of local laws

Suppliers must act with strict professionalism and in compliance with the laws in force. Under no circumstances can the pursuit of the Suppliers' interest be allowed to prevail over the compliance with the laws in force and the contents of this Code, and, more generally, with the principles of protection and safeguard of the person, the worker, health and safety and the environment, promoting sustainable development, under penalty of termination of any business relationship or ongoing contract with the Lamberti Group.

Respect of local communities

The Lamberti Group has a solid longstanding relationship with its local communities and is fully aware of its responsibility towards them. In the same way, we expect our Suppliers to act in their geographical areas of interests with full respect for the environment, its safety and that of the local communities.

Fraud prevention and money laundering

The Lamberti Group promotes the principle of ensuring honest business practices. Suppliers must prohibit, also with the collaboration of any third parties, behaviours or initiatives that could favour money-laundering, or the receiving and use of goods or benefits acquired illegally

The Lamberti Group promotes the adoption of tools designed to prevent, discover and report any unlawful conduct and/or behaviours carried out by a Lamberti employee or anyone acting on behalf of Lamberti in breach of this Code. For this reason, a whistleblowing system has been set up, which protects the whistleblowers' identity and their right to confidentiality. The reports can be sent by email to the address whistleblowing@lamberti.com.



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