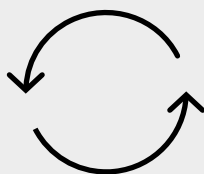
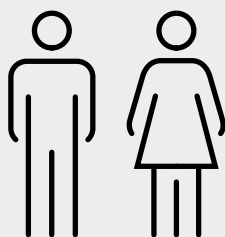
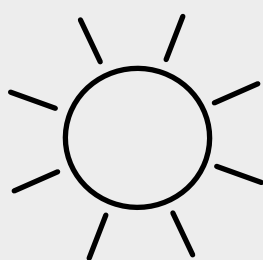


Supplier code of conduct



1. PREAMBLE

The NEODECORTECH Group has always attached the utmost attention to people and the environment.

NEODECORTECH longs to maintain and develop trustworthy relations with its stakeholders or with individuals, groups, bodies and organizations whose contribution is needed to fulfill the Group mission, or who express interests or expectations regarding its achievement. For each stakeholder, the NEODECORTECH Code of Ethics sets the professional principles on which all the activities are based.

Proof of NEODECORTECH's strategic approach is its day-to-day action across the board. The certifications obtained provide stakeholders with solid proof of the commitments undertaken, as a result of the path that the Company has been following for more than a decade now.

The certifications, listed below, have all been adopted voluntarily and are recognized internationally.

- UNI EN ISO 9001 Quality Management System
- UNI EN ISO 14001 Environmental Management System
- UNI ISO 45001 Occupational Health and Safety Management System
- UNI CEI EN ISO 50001 Energy Management System
- FSC® CHAIN OF CUSTODY Forest Certification System

At NEODECORTECH, we believe that ethics, integrity, transparency and commitment are the cornerstones to build lasting success by developing solid relationships of trust with our stakeholders.

That is why we ask our Suppliers to share our vision and ambition by operating according to our own standards of integrity, fairness, reliability and sustainability.

The Supplier Code of Conduct (hereinafter the "Code") is an integral part of the documental system brought to the attention of suppliers and as such supplements the clear and concise principles of the Group's Code of Ethics, as well as the principles set out in Legislative Decree 231/01, which are governed by the protocols of the Organization, Management and Control Models of the Group companies.

The Code sets out the ethical principles that underpin our company's commitment and which we expect you, our suppliers, to respect from the outset. It is crucial for your personnel and those of your subcontractors (hereinafter, "Suppliers") to be aware of the content of this document and ensure full compliance and dissemination.

Suppliers vouch, on behalf of NEODECORTECH, for work carried out by their subcontractors and suppliers and guarantee their compliance with this Code.

NEODECORTECH encourages all Suppliers to disseminate the principles of this document also through appropriate training and information activities for their employees.

2. WORKING CONDITIONS

PAY

Suppliers shall pay their employees regular wages, pay overtime at the rate required by the laws of the country in which work is performed and provide benefits as required by law. If legislation does not establish a minimum wage, Suppliers shall ensure that wages are at least equal to the average minimum in their industry.

HEALTH AND SAFETY

Suppliers shall provide their employees with a safe and healthy work environment to avoid accidents or personal injury that may be caused by, related to, or resulting from their work, including while operating machinery or traveling on business.

Suppliers shall also comply with all applicable local and international laws and regulations.

WORKING HOURS

Working hours and regulations shall be established by written contract with employees. Suppliers shall comply with the limits set forth in the laws of the country in which they work regarding working hours and overtime.

Suppliers may not enforce undue overtime: the maximum number of hours worked per week shall be in accordance with local law and at least one day off shall be allowed after 6 consecutive working days.

FREEDOM OF ASSOCIATION

Suppliers shall respect and recognize the right of each employee to bargain collectively, create or join the trade union of their choice without penalty, discrimination or retaliation.

DISCRIMINATION

Suppliers shall treat all employees fairly and equitably and shall not discriminate them on the basis of race, national or social origin, religion, disability, gender, sexual orientation, family responsibilities, union membership, political opinion, or any other status that may give rise to discrimination in hiring, pay, access to training, career development, benefits or termination.

HARASSMENT AND ABUSE

Suppliers shall treat their employees with respect and dignity and shall not permit or apply any type of corporal punishment, psychological or physical harassment or any other type of abuse.

FORCED AND/OR IRREGULAR LABOUR

The use of forced labour by Suppliers, obtained under threat of punishment, withholding identification, requiring workers to pay "deposits" or applying any other restraint is strictly prohibited. Suppliers shall comply with all applicable regulations to prevent illegal, clandestine and undeclared labour.

CHILD AND YOUTH LABOUR

The employment of children under the minimum age set forth in the locally applicable regulations or in the legislation requiring completion of compulsory schooling and, in any event, not less than 16 years of age, is strictly prohibited.

An employee under the age of 18 is considered a young worker. Workers under the age of 18 should be assigned activities that are compatible with the protection and development of their physical and mental health: young workers should not be exposed to situations that are hazardous to their physical and mental health and development; young workers should not work at night.

3. ENVIRONMENT, ENERGY, HEALTH AND SAFETY

ENVIRONMENT - ENERGY

Suppliers shall operate in compliance with all applicable environmental laws and regulations and with the requirements of NEODECORTECH's Environmental and Energy Management System, assess their environmental and energy impacts and define strategies to reduce negative impacts as much as possible.

Additionally, Suppliers shall, in the course of their business:

- respect the local area by promoting the responsible use of resources and the use of recycled, recovered and/or less environmentally harmful products, opting for local products, in support of the regional economy and more generally of the principles of the green economy and the fight against climate change;
- minimize impacts on natural ecosystems and inconvenience to local communities resulting from activities by limiting, where possible, the production of waste, emissions and effluents, and promoting the recovery and reuse of waste;
- reduce fresh water use by reusing process water to replace fresh water (recirculating water and closing cycles) where possible;
- implement measures for the efficient and responsible use of energy resources;
- continuously improve its environmental performance, in particular through proper waste management, prevention of air, water and soil pollution, reduction of greenhouse gas emissions, focusing on the use of renewable energy, reduction of water and energy consumption and safe management of hazardous chemicals;
- adopt measures to preserve biodiversity and ensure traceability and regulatory compliance of raw materials and chemicals used;
- implement best practices along the supply chain to respect animal welfare;
- ensure that personnel whose activities generate direct environmental impacts are trained, qualified, and have the resources necessary to carry out their work effectively.

CHEMICALS

Suppliers shall create, maintain and continually update a list of all chemicals used in production, other operations or services along with their valid Material Safety Data Sheets (MSDS).

The list includes chemical name, function/area of use, and reference to the MSDS. The sheet shall be written in a language understood by workers.

Suppliers shall implement and document appropriate routines for purchasing, warehousing, handling and using chemicals, along with procedures to be followed in the event of an emergency.

Chemicals shall be stored, handled, and transported in a manner that prevents air emissions, soil contamination, leakage into water, and ignition/explosion hazards, and in a manner that preserves the health and safety of Workers.

Information regarding proper handling of compounds and chemicals and related hazards shall be posted and prominently displayed in areas where such substances are used and filed.

The flooring of chemical storage facilities shall have a solid surface that is impervious to substances.

WASTE

Suppliers shall compile a continually updated list of hazardous and non-hazardous waste generated on site to monitor the type and quantity of waste generated.

Suppliers shall implement and document appropriate routines governing the handling, storage, transportation, recovery and disposal of hazardous and non-hazardous waste. These routines are designed to prevent air emissions, soil contamination, leakage into water, and ignition/explosion hazards, preserve worker health and safety, and include rules and instructions for use in emergency situations.

Hazardous waste is separated from non-hazardous waste and stored in an orderly fashion. Waste sorting and/or storage areas are identifiable and marked and their drums/containers are properly labeled. Waste is sorted and sent for recovery to the extent allowed by local conditions and infrastructure.

Suppliers shall ensure that contractors performing waste transportation, storage and final disposal operations are authorized in accordance with applicable laws.

Suppliers shall guarantee that no waste, hazardous or otherwise, is incinerated or buried on site.

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4. WORKING METHODS

PROFESSIONAL APPROACH

Suppliers shall conduct their business in accordance with the principles of legality, professional integrity, transparency, diligence and fair competition.

LEGAL REQUIREMENTS

Suppliers shall comply with all local, national and international laws in the conduct of their business. In accordance with the provisions of the Group's Code of Ethics, in carrying out their activities, Suppliers shall also act in compliance with the principles described therein as well as in compliance with Legislative Decree 231/01 as set out in the Organization, Management and Control Models of the Group companies.

CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Suppliers shall consider confidential, and treat as such, any information (project, document, sample, prototype, etc.) brought to their knowledge for the fulfillment of the contractual obligations with NEODECORTECH.

The service performed by the Supplier to the benefit of NEODECORTECH shall not confer on the Supplier any intellectual property rights to any logos and creations received from NEODECORTECH, in particular, but not limited to designs, products, prototypes, samples, plans, equipment, images, standards and tools.

The use of these elements outside the scope defined by NEODECORTECH would constitute an offense of intellectual property infringement and would give rise to civil and/or criminal proceedings.

Suppliers shall receive NEODECORTECH's approval before subcontracting any part of the manufacturing process. Approval is contingent upon the subcontractors' acceptance of this Code and all other applicable conditions.

QUALITY STANDARDS

Suppliers shall share NEODECORTECH's commitment to producing high quality products that meet customer requirements. Training initiatives, technological innovation, and adoption of best practices for continuous improvement are encouraged. Suppliers are required to prove and implement effective corrective actions should any anomalies/non-conformities be found.

PREVENTION OF CONFLICTS OF INTEREST

Suppliers shall comply with all applicable laws regarding conflicts of interest and make their best effort to prevent the occurrence of situations that create a conflict of interest in their business dealings with NEODECORTECH.

ANTI-CORRUPTION

Suppliers agree to condemn and act against corruption in all its forms, including extortion and racketeering. Suppliers shall not offer, directly or through an intermediary, money or any other advantage of any kind to third parties, and shall not seek or establish personal relationships of favour, influence, intrusion with the aim of directly or indirectly influencing business activities.

CUSTOMS AND SECURITY AUTHORITIES

Suppliers shall comply with applicable customs laws, including those related to import and export and the prohibition of transshipment of goods in the country of import and export.

INFORMATION TRANSPARENCY

Suppliers shall provide clear and accurate information regarding the methods and resources used, the manufacturing sites (if any), and the characteristics of the products or services provided and shall refrain from making any misleading statements.

5. WOOD-DERIVED PRODUCTS

NEODECORTECH, which aims to design and manufacture printed paper, impregnated paper, laminated edges and CPL laminates with materials originating in properly-managed forests, from controlled sources or from recycled material, has chosen to guarantee its customers the possibility to access an FSC® certified production and to implement a Multisite system of FSC® Chain of Custody management.

Forest Stewardship Council (FSC®) is an independent, non-profit, non-governmental organization established to support environmentally sound, socially beneficial, and economically sustainable management of the world's forests.

The FSC® vision is that the world's forests meet the social, ecological and economic rights and needs of present generations without compromising those of future generations.

Illegal timber harvesting is a problem of international concern.

NEODECORTECH expects Suppliers to verify their supply chain, ensure the legal origin of the timber contained in the products supplied to NEODECORTECH, and cooperate to collect the following information, whenever requested to do so:

- names of companies in the supply chain
- species of trees from which the products come from and country of origin of the harvested timber
- documentation of timber harvesting rights within officially recognized territorial boundaries
- payments made in connection with timber harvesting rights, including harvesting fees
- documentation related to product transportation, woodworking, sales and customs clearance.

All the information received by the Supplier shall be kept confidential and shall only be shared with the relevant Authorities in case of audits and/or inspections.

6. AUDITS

NEODECORTECH reserves the right to verify compliance with the principles of this Code and to conduct compliance audits, even without prior notice.

Suppliers undertake to respond transparently to any questionnaires and/or surveys promoted by NEODECORTECH.

Suppliers shall grant access to NEODECORTECH representatives and agree to correct and improve any problems or defects found.

ACCESS TO INFORMATION

Suppliers shall keep appropriate documentation to prove compliance with this Code and provide access to complete, original and accurate files to NEODECORTECH representatives.

REPORTS

Suppliers have established documented routines for handling reports and complaints regarding issues related to Code violations such as discrimination, harassment or abuse. These routines are known to Workers and outline how all workers, including self-employed and subcontracted workers, can report problems and file complaints directly to the Supplier.

Suppliers undertake to inform NEODECORTECH if the violation occurred is closely related to the work that affects it and could be the source of reputational damage by sending notice to the address **compliance@neodecortech.it**.