



# CODE OF ETHICS

Approved by the Board  
of Directors  
of Polyglass S.p.A.  
on 25/11/2024

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## A message from our CEO

**Integrity, transparency and loyalty** are the principles that guide the Mapei Group in the daily management of business activities and relations. Our ethical principles are defined within the Code of Ethics of each Group Company and are applicable to all Group employees, suppliers, customers, agents, collaborators, and to all stakeholders interacting with the Group worldwide.

The Code defines our approach to sustainable business conduct, focuses on People's values and responsibilities, contains guidelines on Health, Safety and the Environment and, finally, defines the rules to ensure full awareness and implementation of the Code within each Group Company. The behaviour of People and their acting with integrity are the key to making our Company a place where we are proud to work and a reliable partner for all our stakeholders.

**Respect for the Code of Ethics is considered an essential requirement.** In carrying out day-to-day activities, in situations of uncertainty, the Code enables decisions to be made in accordance with our corporate values. In addition, this document contains information on tools that can help to detect queries or raise concerns without any form of retaliation.

We hope you enjoy reading this document and that we can provide an essential contribution to ensuring the dissemination of Polyglass' Code of Ethics so that its values, standards and principles are respected in our Company.

Thank you for your valuable contribution to the success of Polyglass.

# General Principles

01

The Code of Ethics (hereinafter also the ‘Code’) is a document summarising the ethical principles of conduct in the business of Polyglass Spa (hereinafter also ‘the Company’ or ‘Polyglass’), a company of the Mapei Group (hereinafter also ‘the Group’ or ‘Mapei’). The Code constitutes a reference tool through which Polyglass has defined standards applicable to its activities, also in order to control and prevent violations of internal and external standards.

The Code constitutes a ‘**charter of principles and values**’ of conduct, supporting **four fundamental pillars** of the Group and the Company:

- **Internationalisation,**
- **Specialisation,**
- **Research and Development,**
- **Sustainability.**

All Directors and employees of the Mapei Group and Polyglass (hereinafter also ‘Polyglass’s People’ or ‘employees’) and all entities, subjects (hereinafter also ‘Recipients of the Code’, including ‘Polyglass’s People’) must observe the principles, values and norms defined within the Code in carrying out their tasks and activities. Compliance with the Code of Ethics must be considered an essential part of the contractual obligations of the People of the Mapei Group, including those of Polyglass.

**The Company, under the responsibility of the Managing Director, must ensure that the principles and rules defined in the Code are respected and implemented.**

Polyglass carries out its business activities in compliance with the rules defined in the Code of Ethics and also endeavours to ensure that

the Code is considered a standard of excellence for the conduct of business by those subjects with whom it maintains business relations on a long-term basis, such as, by way of example, consultants, experts, agents, dealers, suppliers and customers.

**TRANSPARENCY, INTEGRITY** and **LOYALTY** characterise Polyglass’ business conduct.

Specifically, Polyglass commits itself to:

- disseminate the principles of ethics within the Company and towards all Addressees of the Code;
- ensure that anyone who reports violations of this Code in good faith is not subject to any form of retaliation;
- periodically monitor compliance with the Code;
- adopt, where necessary, fair and proportionate sanctions for violations of the Code.

In this regard, Polyglass strongly believes that the **efficiency and effectiveness of the Internal Control System** are essential requirements for carrying out the company’s activities in accordance with the standards defined in this document.

The 'Internal Control System' is the set of rules, procedures, organisational structures and related activities defined to ensure, through an adequate process of identification, measurement, management and monitoring of the main ones, the achievement of the following objectives:

- the effectiveness and efficiency of activities, ensuring the traceability of documentation and business decisions;
- reliability in the reporting and management of company information;
- compliance with laws and regulations;
- the protection of corporate assets.

Consequently, the Addressees of the Code are required to comply with the highest standards of business conduct and to contribute to the constant improvement of the Internal Control System.

## ETHICS

1776

What is right? And what is wrong? Though most people do not ask themselves these questions as often as they might, thinkers have puzzled over them since ancient times. In so far as the conclusions which they have reached can be called a science, they form the science called *ethics*.

Ethics can be looked at from either of two widely different points of view. We can call it the science of right and wrong according to accepted standards. Or we can regard it as the science of conduct of the ideal man. In the former sense, drunkenness may be ethical if the world approves it. In the latter sense no amount of approval can make it right if it is not an ideal condition for man. It might also be said that judging the conduct of others we ought to measure allowance for custom, but in setting standards for our own conduct we will gain by setting them on a higher level.

# Business Conduct

022



Polyglass carries out its activities by requiring the People of Polyglass, and all the Recipients of the Code, to carry out their activities consistently with its values of business conduct.

All Recipients of the Code must be aware that they represent Polyglass and that their actions have an impact on its image and reputation.

Therefore, all business activities carried out on behalf of Polyglass must be conducted observing the rules highlighted below.

#### **Compliance with laws and anti-corruption**

Polyglass and all the Addressees of the Code are committed to maintaining the highest integrity, honesty and fairness in all relations inside and outside the Company, in compliance with national and international laws and regulations.

Particular attention is drawn to the need to constantly comply with the anti-corruption regulations in force in the countries where the company's activities are carried out. Polyglass does not tolerate in any way any kind of corruption or behaviour capable of improperly influencing the decisions of representatives of the Public Administration, physical or legal persons, in order to obtain undue commercial advantages.

All Addressees of the Code must reject any form of active or passive corruption, whether national or international. No Director, Manager, Employee, Agent or other Representative may, directly or indirectly, accept, solicit, offer or pay sums of money or other benefits (including services, benefits or gifts), not even as a result of unlawful pressure.

The Polyglass Anti-Corruption Principles provide a standard of reference regarding the prohibition of corruption and corrupt practices within the Group on a global level.

All situations and/or suspicious behaviour that constitute or could potentially constitute cases of corruption must be reported immediately to one's line manager and/or the Corporate Internal Audit Department.

#### **Conflict of interest**

**All decisions made on behalf of Polyglass must be made exclusively in the best interests of the Group and the Company itself.**

**A conflict of interest, with particular reference to personal, financial or family interests, would impair an individual's ability to carry out his or her duties and responsibilities objectively on behalf of the Group and Polyglass or could compromise his or her independence of judgement.**

Consequently, all the Addressees of the Code of Ethics must avoid any possible situation that could

influence or interfere, even only in appearance, with their ability to make decisions in the exclusive interest of the Group and the Company.

The Company's People are not allowed to compete with the Group and Polyglass, with particular reference to business or activities in which the Group or the Company are involved, in the purchase, sale or lease of goods and they are not allowed to accept on their own behalf any activity or financial opportunity in which the Group or the Company might be interested.

You must immediately inform your hierarchical superior of any relevant economic interest of your own or of a member of your family in any person or organisation that is in competition with Polyglass.

Typical cases of potential conflict of interest are, by way of example only:

- having financial or commercial stakes in supplying companies, clients or competitors;
- exploiting for personal purposes any business or profit opportunities concerning Polyglass;
- being an employee of a Company for profit, outside the Mapei Group or Polyglass, without the prior authorisation of one's hierarchical superior and the communication to the Human Resources Office;
- establishing and favouring professional and commercial relations with children and/or relatives of any degree;
- accepting from third parties benefits and advantages of economic value in any form due to/accounting for one's position of work/responsibility.

**The key to dealing with all potential conflicts is complete transparency and stating the facts to one's line manager while maintaining the utmost integrity, honesty and fairness. In case of doubt, total transparency is always best.**

Any conflict of interest, even potential ones, if not properly communicated internally and carefully managed, could lead to:

- lack of trust between People and the Mapei Group or the Company;
- a hostile company climate that could affect other colleagues;
- discontent and mistrust between People of the Group and Polyglass, customers or suppliers;
- reputational damage to the Group and the Company;
- exposure of the Company to possible legal action.

#### **Gifts, donations, sponsorships and events**

Polyglass adopts procedures aimed at carrying out marketing initiatives to support and promote the image of the Company and its activities, always guaranteeing the professionalism and reputation of the Recipients of such activities and the consistency of the operation with the principles defined in the Code.

It is permitted to offer gifts, donations, sponsorships or organise events under certain circumstances. The exchange of gifts of modest value, commonly accepted internationally, allows to strengthen and develop business relationships; sponsoring or organizing an event helps to strengthen the reputation of Polyglass; donations to charitable causes allow to support the communities in the countries where Polyglass operates.

### **Enterprise Resource Management**

**All Addressees of the Code are obliged to protect Polyglass' tangible and intangible resources and to use them appropriately through responsible behaviour.**

Company resources and assets are the property of Polyglass and are intended exclusively for company use. The People of Polyglass are therefore obliged to:

- use company assets and funds in a legal and responsible manner;
- protect all Polyglass assets from theft, waste and neglect;
- ensure responsible disposal of excess materials in accordance with relevant procedures;
- not use company assets, funds and other resources for external, unauthorised activities.

### **Intellectual Property**

Polyglass' continued success and future growth depend on innovative products and solutions. In order to achieve a consistent competitive advantage for all Polyglass activities, it is necessary to protect the Group's and Company's intellectual property from theft, misuse and loss.

**All Polyglass' intellectual property, know-how, trademarks, patents, copyrights and trade secrets are by definition strategic assets that each Code Recipient must protect.**

In fact, in the case of improper - even involuntary - disclosure of such strategic resources, Polyglass could suffer damage both to its assets and image.

Therefore, all Polyglass' People and the other Recipients of the Code are obliged not to disclose to third parties information concerning technical, technological and commercial knowledge, as well as other non-public information concerning Polyglass.

Polyglass recognises and undertakes to respect the intellectual property rights of third parties.

### **Confidentiality and data protection**

As part of its day-to-day business operations, Polyglass collects a significant amount of personal data and confidential information, which it is committed to handling in compliance with the privacy laws in force in the jurisdictions in which it operates and with data protection best practices.

To this end, **Polyglass guarantees a high level of security in the selection and use of its Information Technology systems intended for the processing of personal data and confidential information.**

### **Information Technology Systems Management and Cybersecurity**

The digitisation of processes and services has led to a significant growth of the IT infrastructure and the volume of data managed. IT software and services play a crucial role in supporting operations worldwide. It is crucial to address the risks associated with the possible compromise of IT systems and the confidentiality, integrity and availability of information. Polyglass has defined and implemented an effective cybersecurity control system to address the increase in cyber attacks that could lead to both financial and operational impacts.

**Awareness of individual behaviour and Polyglass  
People are the key to protecting IT systems  
from any potential attack or misuse.**

Consequently, the Persons of Polyglass are obliged to:

- comply with the company's information protection policies and data protection requirements;
- use and protect passwords to access computers and networks;
- store sensitive, proprietary or highly confidential information in secure files on secure servers provided by the Group;
- protect all electronic devices at all times;
- comply with information security controls;
- protect company equipment and systems from pornography, gambling and other illegal, offensive or inappropriate use.

**Accuracy and transparency of accounting records  
It is essential for financial reporting purposes that  
Polyglass' books and records accurately and  
honestly reflect all transactions.**

The results of Polyglass' operations must be recorded in accordance with legal requirements and generally accepted accounting principles. All entries must be supported by appropriate documentation. Examples of Polyglass documents include financial statements, travel and expense reports, documentation of purchases and sales, internal management reports, and any other document referring to an economic or financial value or transaction.

It is forbidden to falsify or omit any transaction that may result in an asset, liability, income or expense being improperly recorded.

**Avoidance of fraudulent behaviour**

**Polyglass ensures that all business activities are always conducted with integrity and honesty.**

Fraudulent behaviour is not permitted under any circumstances.

They must absolutely be avoided:

- the forgery or alteration of cheques, bills of exchange or any other document;
- misappropriation of funds or other property;
- mismanagement or misreporting of funds or financial transactions;
- theft or dishonesty;
- destruction or misappropriation of documents, furnishings, facilities or equipment.

All situations and/or suspicious behaviour that constitute or may potentially constitute cases of fraud must be reported immediately to one's line manager and/or the Corporate Internal Audit Department.

**Fair competition**

Polyglass recognises the fundamental importance of a competitive market and is committed to fully respecting the competition rules and other consumer protection laws applicable in the countries where it operates.

**Polyglass and the Persons of Polyglass do not engage in practices that may constitute a breach of competition law.**

In the context of fair competition, Polyglass does not knowingly infringe intellectual property rights of third parties.

It is permitted to gather information about our competitors through public sources, including

articles, advertisements, brochures, analyst reports, press releases and public documents.

All Polyglass People are expected to maintain and improve their relationships with all categories of stakeholders acting in good faith, with loyalty, fairness, transparency and always respecting Polyglass' core values.

### Customer relations

The excellence and durability of Polyglass products are based on constant research and development aimed at offering increasingly sustainable and quality solutions and services that ensure full satisfaction of customer expectations.

**For Polyglass it is fundamental that its customers are treated with fairness and honesty, and therefore it demands from Polyglass' People and the Addressees of the Code that every relationship and contact with customers be marked by honesty, professional correctness and transparency.**

Polyglass' People must comply with the Company's internal procedures aimed at achieving this objective by developing and maintaining profitable and long-lasting relations with customers, offering safety, assistance, quality and value supported by continuous innovation.

Polyglass must avoid unfair discrimination in negotiations with customers and must not make improper use of contractual power to the detriment of any customer.

### Supplier Management

Suppliers play a key role in improving Polyglass' overall competitiveness.

**Polyglass requires that suppliers and their employees comply with the principles and rules of this Code.**

All Polyglass People are invited to **establish and maintain stable, transparent and collaborative relations with suppliers, based on fairness, impartiality and ensuring equal opportunities for all parties concerned.**

In order to constantly guarantee the highest level of customer satisfaction, the Company selects suppliers through the use of appropriate and objective criteria that take into account aspects such as innovation, quality, technical-professional suitability, economic criteria and sustainability (i.e. compliance with applicable laws on human rights, labour, health, safety and the environment) as crucial success factors.

It is therefore expected that all Polyglass People who deal with suppliers:

- select suppliers on the basis of competitive bids based on objective criteria for assessing the performance and quality of their services;
- ensure that all suppliers' offers are compared and examined fairly without favouritism;
- are transparent about the bidding process and provide honest and sensitive feedback on rejected bids.

In particular, you must avoid receiving any personal advantage from your employment or qualification with Polyglass.

Particular care must therefore be taken when personally using the services or purchasing the goods of a counterparty or entity that does or intends to do business with Polyglass.

**In order to avoid even the semblance of a conflict of interest**, it is necessary to pay the right price (market price) for such goods or services and to avoid in any way that one's own advantage is transformed into a detriment or lesser advantage for Polyglass.

**Political financing**

In order to maintain the highest level of neutrality, no funding may be made, in the name of Polyglass, to political parties, committees or candidates, nor to persons holding public office in any country, even if this were to be considered lawful from a regulatory point of view.

**Local Community**

**The Group and the Company are committed to contributing to the development and growth of local communities in the countries in which they operate**; in particular, and as far as possible, by supporting and promoting the recruitment of local workers and the creation of partnerships with local suppliers, thus contributing to the economic and social development of the countries in which they operate.

Donations and sponsorships in support of cultural initiatives or sporting events for the growth of the territory, always guaranteeing the integrity of the Addressees and the consistency of the initiative with the provisions of the Code, strengthen relations with the local communities involved in Polyglass' activities.

**Company Reputation**

Polyglass' image and reputation represent the perception that stakeholders have of the Company and its activities. Polyglass is committed to protecting its reputation by respecting the principles of the Code of Ethics.

**It is essential to carefully ensure that the Company's image is not damaged in all communications. The company's reputation also depends on the conduct of each individual employee, therefore, all Addressees of the Code must:**

- act with the best interests of Polyglass in mind;
- demonstrate Polyglass' values in daily professional behaviour;
- avoid speaking or writing on behalf of Polyglass unless previously authorised;
- avoid speaking or writing on topics that are not within one's competence;
- make sure that there is no confusion between personal opinions and those of the Company (for example, it is necessary to avoid using e-mail messages or cards headed to Polyglass to express personal opinions or for personal activities).

**Public institutions**

**Polyglass adopts a collaborative, loyal and transparent approach in its relations with representatives of the Public Administration, always ensuring prompt and clear answers to any formal request.**

Relations with public institutions must only be handled by the functions and employees delegated to do so. Such relations must be conducted with transparency in compliance with Polyglass' values.

Gifts or donations to representatives of public institutions must be offered by Polyglass and the Addressees of the Code in respect of the law and with caution and common sense in order to avoid possible misinterpretations and reputational damage.

### **Media Relations**

Communication to the media plays an important role in the creation of Polyglass' image; therefore, all information concerning the Company must only be given in a truthful and homogeneous way by managers and employees or delegates in charge of relations with the media, strictly respecting the Group's and Polyglass' policies. No other Polyglass employee must provide representatives of the media with information not in the public domain concerning the Group and the Company, nor have any kind of contact with them aimed at spreading confidential company news, taking care instead to communicate to the contact person or the competent function any questions posed by the media.

Technology and social media constantly create new ways of interacting and communicating. In this regard, the Mapei Group and Polyglass generally apply the same rules as the traditional means of communication. Furthermore, **Polyglass is committed to defining standards for the responsible use of social networks during work activities or with regard to brand information, with the aim of not inadvertently revealing confidential information regarding activities or future projects.**

# People

03



### **Human rights and labour policies**

The Mapei Group and Polyglass operate in compliance with the main United Nations Conventions, including the Conventions of the International Labour Organisation and the World Health Organisation.

Wherever it operates, Polyglass recognises and respects all the laws governing labour and personnel selection, including laws protecting human rights, freedom of association, privacy and equal employment opportunities.

**Polyglass guarantees working conditions that respect human rights, completely avoiding any form of illegal, child, forced or coercive labour, human trafficking or any practice that is considered a modern form of slavery.**

Therefore, Polyglass:

- considers a positive and transparent approach with employees as the best way to act in their interest;
- supports the protection of human dignity and the abolition of the exploitation of child, forced or involuntary labour;
- promotes the professional and personal development of Polyglass People;
- strives to avoid any form of discrimination in employment practices within the Company, starting from the recruitment phase;
- undertakes to cooperate with duly elected employee representatives in order to protect the interests of Polyglass People, taking into account the Group's and the Company's mission.

### **Equal opportunities**

The Mapei Group and Polyglass undertake to offer equal opportunities to all its People, at any level, guaranteeing equal work opportunities and promoting fair professional development based exclusively on merit and professional skills, without any form of discrimination.

In particular, **the Company undertakes to guarantee that its employees, in every phase of the employment relationship, are treated according to their ability** to meet the requirements of the position and the duties assigned, **avoiding any form of discrimination** due to ethnicity, gender, sexual orientation, social and personal position, physical and health condition, disability, age, nationality, religion, trade union membership, or political and/or personal convictions.

**All our People believe in diversity as an opportunity to share different points of view and are proud to be part of a working environment where multiculturalism generates multiple perspectives.**

Considering Polyglass' attention to People and their growth as central elements of the Company, safety, training and constant updating on specific topics are primary needs for Polyglass.

As far as the recruitment process and professional growth are concerned, effective measures must be taken to avoid favouritism, within the limits of the information available.

Polyglass allows the hiring of employees' relatives in compliance with the Group's rules, recruitment

procedures and ethical principles defined in the Code, in order to prevent:

- direct hierarchical reporting or any indirect supervision of relatives or colleagues with whom there is a romantic relationship;
- the appointment of employees to roles where they can influence, control or define the career, remuneration or, in general, the work and working conditions of other employees who are relatives or with whom there is a romantic relationship.

In general, employees may carry out other work activities outside Polyglass, provided that such activities are not carried out within their normal working hours and that such activities do not affect the possibility of carrying out their work within Polyglass.

In particular, employees are required to confidentially report any existing or potential personal relationships to their hierarchical superior and to the Human Resources Function.

In any case, it is forbidden for all Polyglass' People to accept or request promises or payments in money, goods or benefits, or services of any kind that could in any way be aimed at favouring the recruitment of a specific person as an employee or his/her transfer or promotion.

**Harassment, bullying and mobbing**

Polyglass makes sure that every employee always has the right to respect and human dignity. All behaviour or actions which may - even indirectly - violate this right and, in particular, all forms of harassment, bullying or mobbing are not acceptable.

**At Polyglass it is facts and ideas that are questioned, not people.**

Polyglass does not allow any kind of harassment or misconduct, such as those related to ethnicity, gender or other personal characteristics, which have the aim and/or in any case the effect, even unintentional, of violating or upsetting the sensitivity and dignity of the person to whom such behaviour is directed, inside or outside the work environment.

**Working Environment**

**The Mapei Group and Polyglass are committed to guaranteeing a safe and positive working environment, free from any form of discrimination and to protecting the dignity, freedom and human and labour rights of each individual.**

All Polyglass' People have the right to a healthy, safe and protected working environment and must guarantee a decent and collaborative working environment in which the dignity and psychophysical integrity of each individual is respected.

Therefore, the Company expects all the Addressees of the Code of Ethics to contribute to promoting and maintaining a climate of mutual respect in the work environment. In particular, they must:

- comply with the Group and Company rules on the environment, health and safety at work;
- take all reasonable precautions to maintain a safe and healthy working environment;
- ensure that you do not put yourself or others at risk by your actions;
- make sure they know what to do in the event of an emergency in the workplace;

- promptly report to the relevant management all behaviour or conditions that may compromise the safety of the work environment, as well as all accidents or near misses, even minor ones;
- not to work under the influence of alcohol or drugs, nor to possess, consume, offer or distribute drugs, alcohol or other substances with similar negative effects during work or on the premises;
- not possessing real or fake weapons in the workplace;
- in places where smoking is not prohibited by law, be sensitive to the needs of those who may feel discomfort due to the effects of 'passive smoking' in the workplace;
- avoid conduct that may create an intimidating or offensive climate towards colleagues or subordinates in order to marginalise or discredit them in the work environment.

### **Privacy**

Within the scope of its business activities, the Group and Polyglass handle personal data and confidential information, constantly ensuring compliance with current legislation and best practices applicable in local jurisdictions.

**Polyglass respects the confidentiality of personal information and protects their privacy rights by applying high standards of data protection.**

All data of employees or other persons that it is necessary to acquire in the course of the employment relationship will be confidential and accessible or transmitted only for legitimate and appropriate purposes.

The Company requires and keeps only the data

necessary for the efficient management of its business, in a lawful and ethical manner, minimising the need for Polyglass People to access personal information.

Polyglass Persons who are authorised to access personal data:

- must only provide such information to authorised persons - if actually necessary - and always in accordance with internal rules and current data protection legislation;
- must never provide such information to third parties outside Polyglass, unless there is a legal obligation to do so or the employee's specific authorisation has been obtained;
- store such information securely and never for longer than is necessary to fulfil the legal or business reason behind the data collection.

Polyglass expects all its People:

- ensure that all personal data to which they have access is kept safe and secure;
- refrain from accessing and storing personal data unless they have appropriate authorisation and a clear business need to know such information;
- respect colleagues' right to privacy;
- report any loss of data or breach of information for which they are responsible;
- collect, use, disclose or store the minimum amount of personal data necessary to fulfil a legitimate purpose;
- retain personal data only as long as necessary for the purpose for which it is stored.

### **Polytical activities**

**The Mapei Group and Polyglass guarantee the highest level of neutrality** and, to this end, do not

support or endorse political activities, organisations or their representatives in any form.

The Company respects the right of Polyglass' People to participate in the political process as persons, as long as they do not induce the false belief that they represent the Company in that capacity.

Therefore, all employees participating in political activities:

- clarify with absolute transparency that they do not represent the Mapei Group and Polyglass in any way;
- avoid any use of company resources (including working hours, telephones, documentation, electronic mail or other) to carry out or support personal political activities or those of external third parties.



# Health, safety and environment

04

### Health and safety in the workplace

The Mapei Group and Polyglass recognise health and safety in the workplace as a fundamental right of its People and a key element of corporate sustainability. **Safeguarding the health and safety of People and stakeholders is a fundamental duty for long-term success**, achievable through continuous investment in resources, improving the performance of processes and products, in compliance with compulsory and voluntary standards and with the legislation in force on the subject.

Polyglass promotes compliance with current regulations and legislation and requires continuous improvement in business management and performance.

Polyglass guarantees the development and implementation of a management system for the prevention and minimisation of potential risks of injury and/or stress in the workplace.

Polyglass actively promotes a culture of safe behaviour within the Company and risk awareness among Polyglass People through specific training and information courses.

All Polyglass People must consider themselves personally responsible and adopt the preventive and behavioural measures established by the Mapei Group and Polyglass for the protection of their own health and safety communicated through specific procedures, instructions, training and information. Each Polyglass Person must not expose themselves or other workers to dangers that may cause injury or damage.

### Environmental protection in work processes

**The Group and the Company are committed to acting sustainably and consider environmental protection a key factor to be promoted in the general approach to the Company's activities.**

Polyglass therefore aims to continuously reduce the environmental impact of the Company's activities, where this is operationally feasible and economically sustainable.

The Mapei Group and Polyglass are committed to continuously improving the environmental performance of their production processes and, following the best reference practices, to anticipate and satisfy all the main legislative requirements and regulations in each country in which they operate.

To this end, the Group and the Company are committed to developing and implementing effective environmental management systems, based on principles of optimising the use of energy and natural resources, preventing pollution, reducing excess materials produced, supporting the fight against climate change, reducing environmental impacts and protecting ecosystems and biodiversity.

Polyglass conducts its business with a sustainable conscience, with the aim of supporting and guiding its strategic partners in achieving their objectives and preventing, reducing, mitigating and compensating for any negative environmental impacts along the entire production chain.

Furthermore, Polyglass stimulates and encourages Polyglass People to participate with conviction in the implementation of these principles through the

dissemination of information and ongoing training and, consequently, expects all Polyglass People to play an active role in the application of these principles in their work.

**Environmental sustainability and product safety**

The Mapei Group and Polyglass strive to develop and implement innovative technical solutions to minimise environmental impact and maximise safety.

The Mapei Group and Polyglass are committed to producing and selling, in full compliance with legislative and regulatory requirements, products that meet the highest standards in terms of environmental performance and safety.

Sustained by a deep interest in safeguarding the environment, **the Group is committed to developing a ‘circular approach’ that guarantees a high level of product sustainability**, assessing environmental impacts through *Life Cycle Assessment* (LCA), as certified and communicated through *Environmental Product Declarations* (EPD).





# Promotion, dissemination and reporting

05

### **Dissemination**

The Code of Ethics is published on the corporate Intranet, and each Group subsidiary receives, adopts and translates it into its local language. Any adaptation at a local level, only permitted following regulatory requirements, must be shared and approved in advance by the Parent Company. The Code is available to all Mapei Subsidiaries and each Managing Director of reference, or his delegate, must transmit it to all new employees during the recruitment phase and must also guarantee its diffusion to all Polyglass People on the occasion of updates or modifications.

Training initiatives can be different and adapted according to the role and responsibilities held by each person within the organisation.

**All Polyglass' People will be informed about the respect and observance of the Code, as well as Polyglass' rules and procedures, which constitutes a specific contractual obligation and, in case of violation, could lead to consequences in accordance with local regulations of reference.**

The Code of Ethics is available to all stakeholders through the Company's website and on the intranet.

### **Implementation and control**

**Compliance with the Code of Ethics is an essential requirement; an effective Internal Control System is the main tool to ensure proper monitoring of the implementation of the Code.**

The Managing Director must ensure compliance with the Code of Ethics and carry out adequate dissemination, monitoring and control of its

implementation. He/she must also monitor and keep track of any violations or unethical behaviour that may occur within the Company.

Specifically:

- the implementation of the Code of Ethics must be constantly monitored by the Addressees, also by accepting any reports and suggestions;
- any conduct in conflict with the Code of Ethics must be monitored, analysed and corrected;
- appropriate training and dissemination plans for the Code must be drawn up.

Every company function oversees and guarantees the adherence of its actions and activities to the principles and rules of behaviour of the Code of Ethics.

All Polyglass' People are obliged to know and diligently respect the principles and rules defined in the Code as well as refrain from any behaviour in violation of the same.

The Code of Ethics cannot define specific indications for every possible situation. In case of doubts about the interpretation of the Code, situations of uncertainty or when you feel particularly pressured to make a decision, you should ask yourself the following questions:

- Is what I am doing allowed?
- Am I respecting Polyglass values and principles?
- Is my behaviour in line with company procedures?
- Am I behaving correctly?
- Would I feel comfortable if my actions were made public?

If the answer to any of these questions is 'no' or if you are in doubt about the legality of conducting

company business or the application of a Code principle, you should intervene and seek advice through the most appropriate channel.

**Expressing doubts and asking questions helps to handle situations correctly and to solve potential problems.** The Company encourages Polyglass People to ask for clarification regarding the Code - through their hierarchical superiors, to the competent Human Resources function or directly through the dedicated channel at central level: [codeofethics@mapei.com](mailto:codeofethics@mapei.com).

All requests for clarification will be answered promptly.

#### **Reports and violations**

**It is compulsory to respect the values, principles, rules and policies contained in this Code.**

In line with the ethical principles of transparency, integrity and loyalty that guide the Group and the Company, Polyglass People must report to their hierarchical superior, to Human Resources or through the appropriate channels any violation or behaviour that is not in line with the values and principles of the Code, information regarding possible violations or any request received in violation of the Code. Maximum cooperation is expected in order to detect any possible violation.

Anyone in a managerial or executive role should set an example by carrying out their duties and responsibilities in accordance with the principles and rules of conduct contained in the Code. Each manager is responsible for line controls within his or her responsibility, and for monitoring and reporting any possible violation or unethical behaviour that could occur in his or her function.

The Mapei Group and Polyglass have defined a standard of reference for *Whistleblowing* in order to report any illegal conduct, misconduct or conduct that constitutes or may constitute a violation of the Code of Ethics, the anti-corruption principles or any other internal or external reference standard.

**A dedicated channel for reporting any issues centrally is available at the following e-mail address: [codeofethics@mapei.com](mailto:codeofethics@mapei.com) (managed exclusively by the Corporate Internal Audit and HR Corporate & Organisation Function) or via the *Whistleblowing Portal* available online.**

No form of retaliation, discrimination or sanction, whether direct or indirect, will affect those who report in good faith.

In case of violation of the Group's or Company's policies, or of conscious authorisation of a violation, any employee may be subject to disciplinary action and to the application - proportional to the gravity of the violations committed - of disciplinary sanctions, including dismissal and compensation to Polyglass for any losses deriving from their actions. Furthermore, should the circumstances arise, a breach of the Code could also result in Polyglass taking legal action against the person who has committed or is involved in the commission of unethical behaviour, or reporting the matter to the relevant authorities, in accordance with current legislation and regulations.



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