

ICAP Leather Chem S.p.A. in addition to ensuring business continuity and the economic growth derived from the development, production, and sale of chemical products for the leather, textile, coating, and adhesive markets, also pursues the following strategic macro objectives:

customer satisfaction, environmental protection, safeguarding the health and safety of workers and the neighbourhood, respect for human rights, continuous performance improvement, increased corporate profitability, staff growth and engagement, rejection of child and forced labour, prohibition of any form of discrimination, the right to fair and equal pay and proper working hours, proper management of chemical substances, the fight against corruption, mitigation and adaptation to climate change, and the promotion of gender equality and equal opportunities within the organization.

To make this decision systematic, Management has decided to adopt, in its Lainate and Arzignano plants, an Integrated Management System compliant with the standards UNI EN ISO 9001, UNI EN ISO 14001, UNI EN ISO 45001, SA 8000, with the requirements of Legislative Decree 105/2015, the UNI PdR 125, and the ZDHC Protocol for chemical substances.

The adopted System is based on a “risk-based thinking” approach, which allows to identify the hazards and the threats that could generate risks in the business processes and seize opportunities for improvement and for the “life cycle perspective” criteria, allowing the determination of the upstream and downstream impacts of activities and products.

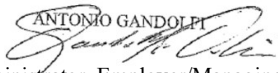
The achievement of the company’s macro-objectives involves:

- the compliance with all applicable and mandatory laws and regulations, as well as voluntary standards and practices
- attention to environmental protection and workplace safety, viewed as prevention rather than mere corrective or legislative compliance actions
- identifying and meeting the needs and expectations of customers and all stakeholders to prevent dissatisfaction, complaints, and disputes
- systematic identification of environmental aspects and risks affecting all those working for the organization
- preventing environmental incidents with repercussions on workers and neighbourhood's health, as well as occupational injuries and diseases, mitigating potential harmful effects through the application of the best available and practicable techniques
- ensuring proper and responsible behaviour in the use of chemicals (monitoring, controlling, and reducing restricted substances and eliminating banned ones)
- adopting a circular economic system, reducing the consumption of natural resources, and promoting the use of renewable, recovered, and recycled energy and materials
- considering employees as a strategic resource, ensuring respect for their rights and dignity, promoting their professional and personal development, and guaranteeing equal treatment and opportunities between men and women in all stages of the employment relationship (recruitment, training, career development, pay, work-life balance), while countering all forms of stereotypes, prejudice, or gender discrimination
- promoting actively women’s empowerment through skills development, equal access to leadership and decision-making roles, and work-life balance policies, while valuing diversity as a strategic asset for innovation, organizational well-being, and sustainable growth
- improving organizational structure through minimal formalism, high dynamism, awareness, and enhancement of available human resources to meet their expectations
- digitalizing workflows to improve process efficiency, ensure easy accessibility, and secure data storage
- involving Suppliers to ensure compliance with the company’s policy requirements
- collaborating with Customers, Suppliers, local Authorities, control bodies, and social partners to manage issues related to environmental protection, health and safety, and the principles of gender equality and equal opportunities along the supply chain, encouraging ethical and inclusive behaviour among business partners
- developing and maintaining open and constructive relationships among company resources, with trade unions, industry associations, relevant bodies, local populations, institutions, and the social community
- promoting information, training, awareness, coaching, consultation, and worker engagement, according to their roles and responsibilities, to achieve corporate objectives, and fostering an inclusive corporate culture through dedicated listening tools
- adopting whistleblowing procedures and ensuring, through specific measures, that no disciplinary or retaliatory actions are taken against those who report comments, recommendations, complaints concerning the workplace and/or potential nonconformities with the Code of Ethics and Conduct and the Integrated Management System
- defining measurable indicators and improvement objectives in line with corporate strategies, performance, and equal opportunity goals
- conducting periodic reviews of the Integrated Management System to verify the achievement of objectives and to decide on new improvement actions.

The Management of ICAP Leather Chem S.p.A. considers it essential to promote this policy among all stakeholders, sharing its objectives with all company staff, and fostering awareness, participation, and accountability in each role within the organization, through effective, transparent, and respectful communication that values diversity and inclusion, both at individual and collective levels.

Management believes that this ambitious project requires the participation of all personnel, who must regard this policy as a point of reference, and is confident that this message will be embraced unanimously with a spirit of collaboration, participation, responsibility, and commitment.

Lainate, 10/11/25


 ANTONIO GANDOLPI
 Sole Administrator, Employer/Managing Director
 ICAP Leather Chem S.p.A.