

ARTIFICIAL INTELLIGENCE GLOBAL POLICY

1. INTRODUCTION

This Artificial Intelligence Global Policy (“**AI Policy**” or “**Policy**”) contains the key principles that frame and guide the informed and conscious use of Artificial Intelligence during working activity regardless the location (office, home office, workspaces, etc.).

2. SCOPE

This Policy is applicable to Italmatch Chemicals S.p.A. and all its subsidiaries (collectively “Italmatch Group” or the “Group”) and to all of Italmatch Group officers, directors and employees and everyone acting as intermediary (among others, agents and distributors) and representative of Italmatch Group dealing with Italmatch Group information (“Group Representatives” or “Users”).

This Policy is not intended to be exhaustive and does not address every aspect of compliance with **AI** laws¹, best practices and guidelines, being currently evolving on the subject.

It provides elements and guidance on situations that Group Representatives may encounter in the performance of their duties using authorized **AI** in order to detect and avoid potential violations of laws and of this Policy; Group Representatives must exercise common sense and good judgment in encountering situations not addressed in this Policy and should consult with their superior manager and the IT Department and Legal & Compliance Department.

The guidance provided in this Policy is in addition to the indications set forth in any other policy, procedure, code or guidelines that may have established by each competent Group’s entity on local basis, in alignment with local legislations.

3. PURPOSE

The purpose of this Policy is to provide guidelines for the appropriate use and management within the Group during working activity of Artificial Intelligence (**AI**, as better defined below) including machine learning, generative AI, algorithmic AI, natural language processing, data management and computer vision.

Within the Group, the use of **AI** is allowed limited to the AI technologies, as authorized by the Group. As general rule, the use of **AI** should take into account, on primary basis, the need to protect Italmatch Group intellectual property and related assets as well as ensure compliance with data and personal information protection, ethical practices and the highest standards, in line with the Company's Code of Ethics and our Global Policies.

With this purpose, this Policy establishes the principles and guidelines to:

- ensure the responsible, transparent, secure and trustworthy use of **AI** by the Users;
- inform about the risk the use of **AI** could entail, such as disclosure of Group confidential information and data, asset losses, disclosure of personal data and violation of data protection laws, reliance on incorrect/inaccurate generated results and poor performance.

¹ With reference to the European level, the dispositions of EU Regulation 2024/1689, released on July 12, 2024, took effect on August 2024, subject to the staggered applicability of certain rules that may be anticipated at 2025, for full operativity in 2027.

4. DEFINITION OF ARTIFICIAL INTELLIGENCE

Artificial Intelligence (“AI”) system means the automated system designed to operate with variable autonomy levels, and which may be adaptable after diffusion and which, for explicit or implicit objectives, deduces from the input it receives how to generate outputs as predictions, content, recommendations, or decisions that may affect physical or virtual environments.

5. MAIN PRINCIPLES OF CONDUCT AND USE

- **Responsible AI use**

As aforementioned, the use of AI is allowed only and exclusively with regard to prior approved AI technologies, in accordance with the internal *AI Tools Access and Usage Procedure* (here Annex n. 1), within the limits of this Policy, lawful and to the extent it can bring an expected benefit in doing working activity.

The use (by the User) of authorized AI for personal purposes is strictly forbidden.

- **Transparency**

Transparency and accountability are fundamental principles in decision-making processes using AI. To this end, we will maintain clear documentation and information regarding the role of AI in critical decisions.

- **Data Minimization and User Responsibility**

Data Minimization is fundamental principle in AI use.

Data of any type shared with AI must be specific and limited to what is strictly necessary for the specific purposes for which they are shared.

Users should be aware that disclosure of data and information to AI may compromise the confidentiality of the data disclosed and could entail data losses; in fact, data disclosed to AI could be used by AI to train its models also for the benefit of any other user.

The responsibility of data and information shared with the AI remains of the User who makes use of it, who must always act keeping in mind the Policy and minimize data disclosure preventing data losses.

The use of authorized AI may mitigate the risk of data loss but, as good practice, data minimization is always recommended.

- **Personal Data Protection and Privacy**

The Group is committed to ensure AI use meets the highest personal data protection standards. AI shall always be used and managed in compliance with personal data protection laws, IT training and procedures and best practices for personal data management and security.

- **Purpose Limitation and Accountability**

AI is not a substitute for the critical evaluation and User judgment; therefore, the User must always be vigilant and carefully scrutinize the generated result.

Responsibility for outcomes generated by AI and duly scrutinized by the User shall be clearly defined, to maintain trust and integrity in our operations with any and all our stakeholders.

Among others, this is important for monitoring/scrutinizing that the AI outcome does not infringe intellectual property rights of third parties in accordance with the set up/license conditions of the AI.

6. AI TRAINING

The Group recognizes the importance of training as an essential part in the implementation process of **AI** technologies. For this purpose, employees shall receive appropriate training on approved **AI** and how to use **AI** responsibly and effectively. They should also act staying informed about progresses in AI technology and potential ethical concerns that may impact on the Group, our business and lives. IT department shall be the owner of these awareness and training initiatives, construed and deployed in collaboration with other departments such as HR and Legal & Compliance.

7. ENDORSED TOOLS AND AI EVOLUTION

The **AI** technologies are growing fast, and a large number of new tools/technologies are launched regularly. In order to mitigate the risks of misuses highlighted in this Policy, the Group will determine which **AI** and apps are allowed or may be further allowed taking into consideration the technology evolution.

The IT department will assess and endorse specific **AI**, Apps and Tools, which officers, directors and employees will be authorized to use. Specific levels of authorization may be also set up along with special training and/or technical procedures depending on the approved **AI**.

Unauthorized **AI** applications are forbidden within the corporate network, and in particular not fed with Italmatch confidential information and data.

8. MONITORING AND REPORTING

Please be informed that, the use of **AI** previously approved by the IT department will be constantly and duly monitored by the IT department and kept under control to ensure the proper use of the AI in accordance with this Policy.

Under the same purpose, Users are informed that the Group may also conduct regular audits, also with external partners.

The Group ensures an open-door policy to strengthen Italmatch Group commitment to ensure compliance with laws and Policy; any employee who learns of information about a suspected violation of this Policy must report it to the Compliance Team and the IT Team in order to conduct the most appropriate due diligence activities and evaluate appropriate remedial actions.

Anyone filing a complaint concerning a violation or suspected violation of this Policy must report the suspected violation including details offered for the subsequent investigation and must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense. The above report is particularly important as self-report in case the User evaluates a possible his/her misuse of **AI** to manage appropriately and promptly the case in accordance with the applicable laws.

The following official channel e-mail addresses are active to report any violation of this Policy: ethics@italmatch.com / compliance@italmatch.com.

With this regard, the Group also enforces whistle-blower channel/procedures prohibiting retaliation and discrimination against employees and Group people who report of a suspected violation in good faith, ensuring the protection of confidentiality.

Italmatch Whistleblowing Global Policy with specific reference to reporting, processing and managing the whistleblowing reports is also available on Italmatch Group official website: www.Italmatch.com.

9. DISCIPLINE AND SANCTIONS

Any employee who violates this Policy (by way of examples, breaches of data security or misuse of **AI** without limitation), or more specific procedures set forth by the Group companies on local basis, as well as **AI** laws, will be subject to discipline, which may include termination of employment. Employees, in addition, can be personally liable for violations of the applicable laws and related applicable sanctions may be severe.

Agents, consultants, and in general other Group Representatives working on behalf of the Group who are found to be in violation of this Policy will be subject to termination of the business relationship as well as any other legal and remedial actions available to the Group under applicable laws.

10. GOING FORWARD

This Policy, approved by the Board of Directors of Italmatch Chemicals S.p.A., consolidates our commitments and strengthens our processes. Its principles are implemented across our operations also through dedicated training. We will regularly evaluate and review the best tools to strengthen our approach toward the **AI** use: believing in an integrated approach, we also work through external initiatives and partnerships to address shared challenges.

This Policy is made available to all the parties concerned through its release on Italmatch Group official website www.italmatch.com.

This Policy is reviewed every two years and may also be unilaterally modified at any time and without notice; amendments may be necessary, among others, for compliance reasons and/or in accordance with any regulatory changes.

In the event of any discrepancies between the English version of this Policy and any translated version, the English version shall be binding.

Legal & Compliance and IT Departments, through dedicated help desk, remain available to support in addressing any doubts and are in charge of monitoring the implementation of this Policy, without prejudice to ask for support of others relevant departments on as needed basis.