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CODE OF ETHICS

Organisation and management model drawn up pursuant to
Italian Legislative Decree no. 231 of 08/06/2001T

INTRODUCTION

This corporate code of ethics is a document that brings together the social and moral rules that must be respected by all members of the organisation. In particular, Azotal S.p.A. is committed to conducting its business in accordance with the highest standards of honesty, lawfulness, safety, transparency and environmental protection. These criteria must be observed and applied by all those who work within the company in any capacity (owners, directors, employees and/or collaborators, including stakeholders). The purpose of this code of ethics is to guide the choices made by the Company team in line with the aforementioned rules.

The principles listed and embraced by Azotal aim to promote trust, social responsibility, sustainability and safety by orienting company policies and regulations towards all stakeholders who are, in whatever manner, involved in company activities.



01



RELATIONS WITH EMPLOYEES

A

RESPECT AND DIGNITY

Every employee and collaborator, including stakeholders, must be treated with respect and dignity, without discrimination of any form, such as on the basis of gender, race, religion, sexual orientation or disability. The company is also committed to fostering an inclusive and collaborative working environment that favours the moral and social development of anyone (employees and others) with which it shares either direct or indirect interests.

B

OCCUPATIONAL HEALTH AND SAFETY

The company is committed to ensuring and maintaining a safe and healthy working environment, taking all necessary measures to prevent accidents and harm to the health of all its collaborators. Every individual is required to comply with occupational safety regulations and to promptly report any violation, accident or hazardous situation. In this regard, the company possesses the following certification: ISO 45001: Occupational Health and Safety Management Systems; the international standard for occupational health and safety, created to protect employees and visitors from work-related accidents and illnesses.

C

TRAINING AND PROFESSIONAL DEVELOPMENT

The company promotes the physical and mental well-being of its employees through various means:

- Meal allowances.
- System of partial reimbursement of healthcare costs.
- Training courses aimed at professional development in individual current and/or future fields of interest.
- Mental coaching to promote personal development and fulfilment, including through the acquisition of specific techniques to improve interpersonal, communication and decision-making skills.

D

CASES OF CORRUPTION AND CONFLICT OF INTEREST

All forms of corruption, extortion or bribery are strictly prohibited. When deemed appropriate, a modest gift may be made to persons who have relations with the company, provided that it has a maximum value of €60.00.

Anyone working within the Company is required to behave in an ethical manner and to comply with the rules set out in the National Collective Labour Agreement (hereinafter referred to as the NCLA). All reports of corruption will be subject to thorough internal investigation and, if necessary, disciplinary or legal action will be taken in accordance with the law and/or the NCLA. Personnel are obliged to avoid any situation in which their personal interests may influence or clash with the interests of the Company. Any potential or effective conflicts of interest must be declared and managed transparently and in accordance with company policies. Each company department is responsible for the truthfulness of the documentation produced and the information provided in the performance of the activities for which it is responsible.

E

PREVENTION OF HARASSMENT, INAPPROPRIATE OR DISCRIMINATORY BEHAVIOUR

The Company is strongly committed to promoting and maintaining a respectful and inclusive work environment, in which every individual has the right to work without being subject to inappropriate behaviour. All forms of harassment, bullying, discrimination (of any type, including racial, religious and sexual) or sexually inappropriate behaviour are strictly prohibited. All reports of conduct in breach of the aforementioned principles will be treated with the utmost seriousness and confidentiality, and appropriate and suitable disciplinary action will be taken. As a consequence, anyone working for or collaborating with the Company is obliged to contribute in a positive manner, avoiding any behaviour or language that is intimidating, hostile or offensive, and reporting any violation to the appropriate company representative.

F

USE OF ALCOHOL AND/OR NARCOTICS

The use of alcohol or narcotics before or during working hours is strictly prohibited. Any employee who is under the influence of alcohol or narcotics during working hours will not be admitted to the Company and will be subject to disciplinary proceedings pursuant to the NCLA.

G

SAFEGUARDING OF CORPORATE ASSETS

Employees are expected to use company resources in a responsible and efficient manner, avoiding waste and misuse. Unauthorised use or theft of company property is a serious offence and will be treated with the utmost severity, in accordance with the law and the NCLA.

COLLABORATION WITH AUTHORITIES AND INSTITUTIONS

The company promotes and supports dialogue and active cooperation with international, national and local authorities and institutions; it establishes relations with authorities based on the principles of fairness and transparency, in compliance with approved programmes, prior assessment of actions and sharing of related activities. Azotal furthermore undertakes, where necessary, to express its concern regarding any human rights issues that may arise in a host country.

The Company does not make any statements to authorities and institutions that are either false or not entirely truthful, nor does it induce or encourage anyone else to do so. Representatives of Azotal are to deal with authorities and institutions exclusively within the limits dictated by their role and position and, in any case, are to act only with prior authorisation.

Azotal does not make any contributions to political or trade union organisations, or to parties, movements or committees, and does not use the company name in an inappropriate manner in interactions with political parties, movements or committees.

RELATIONS WITH STAKEHOLDERS

A

PRODUCT QUALITY AND SAFETY

The company is committed to ensuring the highest quality and safety of its products, strictly complying with all international standards (where applicable) and safety requirements. The varied range of products is subject to strict quality and conformity checks before being commercialised, thus guaranteeing the application of criteria based on accurate and comprehensive communication regarding quality and quantity, as well as safe and effective information for users.

The production chain is subject to inbound and outbound quality control.

Suppliers of products and services are obliged to produce certification and technical documentation to demonstrate that the goods and services that they supply correspond to Azotal's CSRD (Corporate Sustainability Reporting Directive) protocols. The company has ISO 9001 Quality Management System Certification.

This certification is demonstration that quality management processes within the company are structured to ensure efficiency, reliability and client satisfaction.

These criteria are also applied to packaging, which must meet the inalienable requirement of sustainable quality.

B

INFORMATION TRANSPARENCY

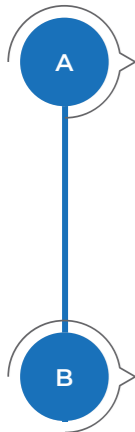
Azotal is committed to providing full, accurate and comprehensible information regarding its products, enabling users to make informed decisions concerning the handling and/or subsequent commercialisation of the same. At the same time, the company provides transparent and accessible information concerning benefits, side effects and contraindications, thus allowing users to make informed choices.

C

RESPONSIBILITY IN MARKETING AND COMMUNICATION

The company is committed to conducting marketing and communication activities in an ethical and responsible manner, avoiding misleading or manipulative practices. In order to fulfil this commitment, particular attention is paid to commercial communications, ensuring that they are truthful, not misleading, and respectful of both current regulations and the ethical principles developed by industry associations with which Azotal participates, and from which it draws inspiration for the introduction of regulations and company policies relative to the sector. In addition, the company promotes the responsible use of marketed products, to avoid any excessive or unnecessary consumption.

PROTECTING THE ENVIRONMENT



SUSTAINABLE DEVELOPMENT

The company promotes sustainable development by integrating environmental criteria into business decisions and production processes. Particular focus is placed on the company's ongoing commitment to identifying and adopting sustainable practices that take into account the environmental, economic and social aspects of its corporate activities.

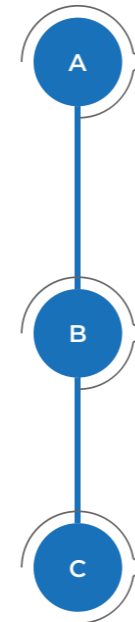
REDUCING ENVIRONMENTAL IMPACT

The company is committed to taking measures to reduce the consumption of natural resources in its production processes, as well as the pollution and environmental impact resulting from said processes, periodically monitoring and assessing its operations, and constantly seeking to improve environmental performance, energy efficiency and waste reduction through the adoption of ecologically friendly practices. To this end, the company strictly adheres to applicable environmental laws and regulations, striving to exceed the minimum required standards and actively collaborating with the relative authorities and stakeholders to ensure that natural resources are respected and preserved.

The use of renewable energy, the reuse of assets and a zero-waste policy influence all company activities.

The company has **ISO 14001 Environmental Management System Certification**.

PROMOTION OF THE CODE, OVERSIGHT AND DISCIPLINARY SYSTEM



PROMOTING THE CODE

The effectiveness of this code of ethics is reliant on its being communicated and understood within the Company, and therefore it is essential that respect for and application of the same is actively implemented throughout the organisation, to ensure that its principles and the policies it inspires are shared.

TRAINING AND AWARENESS

Each and every member of the Company Team will undergo regular training sessions on the content of the code of ethics and the conduct they are expected to adopt.

COMMUNICATION AND CONSULTATION

The company encourages open and transparent communication concerning the code of ethics, and invites feedback and suggestions from stakeholders.

OVERSEEING APPLICATION

A

MONITORING AND ASSESSMENT

The Company will conduct regular internal audits to assess the application of the code of ethics and adherence to its provisions. Periodic reviews of business processes will also be conducted to identify any areas of risk or non-compliance. Updates to the Code will be made whenever necessary and, in any case, no later than three years from the date of issue of the previous and most recent update.

B

REPORTING AND MANAGEMENT OF VIOLATIONS

Every stakeholder is required to promptly report any suspected or confirmed violations of the code of ethics or any non-compliant conduct through the channels set up by the Company, which will be equipped to guarantee the confidentiality of the reporting party and the proper handling of violations.

07

DISCIPLINARY SYSTEM

A

DISCIPLINARY MEASURES

In the event of violation of the code of ethics, the Company will apply disciplinary measures proportionate to the seriousness of the violation and in accordance with the applicable collective labour agreement (NCLA).

B

FAIRNESS AND IMPARTIALITY

The disciplinary system will be administered in a fair and impartial manner, in accordance with the applicable collective labour agreement, guaranteeing the right of defence in the event of disciplinary action.

Azotal spa
The Legal Representative
Francesco Botti

AZOTAL SPA
il Legale Rappresentante
Botti Francesco



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 **Azotal**



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