



ICAP-SIRA CHEMICALS AND POLYMERS S.P.A.

ORGANIZATION, MANAGEMENT AND CONTROL MODEL

PURSUANT TO LEG. DECREE 231/01

ANNEX 9 TO MOGC

WHISTLEBLOWING POLICY

Parabiago, 20 March 2018

ICAP – SIRA
Chemicals and Polymers S.p.A.
The President

(Dr. Massimo Medini)

WHISTLEBLOWING PROCEDURE

Icap - Sira s.p.A. intends to protect its company and those who collaborate with it by setting up a Whistleblowing Policy, i.e. a procedure which allows anyone with an interest in making or, in any case, the intention to make anonymous reports to inform of any irregular, illegal or fraudulent conduct committed within Icap Sira S.p.A. by other parties belonging to the organisation.

The main objective of this measure is to allow the company to monitor and reduce as much as possible the risk of suffering and causing damage of any kind (including but not restricted to: damage to the environment, economy, health and safety, image, etc.).

Allow us to take this opportunity to remind you that the importance and the responsibility of following up any whistleblowing reports found in the context of company operations are expressly provided for and highlighted in the Management and Control Model pursuant to Legislative Decree 231/2001, adopted by our Company, as well as in the Consolidated Act 81/2008 on health and safety.

Kindly be informed that any report under this procedure will not replace or cancel out the right and/or obligation of each person to apply to the competent Judicial Authorities where deemed necessary.

1. The recipients of the procedure

The procedure described below for the management of the reports referred to in the introduction must be known, followed and adopted by the following entities:

- a) Icap - Sira S.p.A. employees;
- b) Customers, suppliers, partners, consultants, partners of Icap - Sira s.p.A. and more in general anyone who is in relationship of interest with the company;
- c) Directors and members of the corporate bodies of Icap - Sira s.p.A.

2) Purpose of reports

The reports will concern all facts and/or omissions considered potentially dangerous and/or risky, such as to threaten the company organization as a whole or other employees, customers, suppliers, consultants, partners or, again, the community.

The following violations are certainly relevant:

- a) Corporate laws and regulations;
- b) Company procedures;
- c) Principles and Procedures of the Management and Control Model pursuant to Legislative Decree no. 231/2001

and/or any other fact and/or omission that may constitute damage to the company's assets and/or image.

3) The entities to which the reports must be sent

Reports must be addressed to the Supervisory Board of Icap - Sira S.p.A.

As already stated, the Supervisory Board pursuant to Legislative Decree no. 231/2001 (SB) will be the recipient of all specific reports concerning, in the first place, the violation of the Organization, Management and Control Model.

The SB will be considered the guarantee recipient of the received report.

4) Whistleblowing methods and channels

Alternatively, reports may and must be sent in the following ways:

- a) By email to odv@m.icapsira.com
- b) By registered letter with recorded delivery to the ordinary mail address of the Margiotta Law Firm, located in Milan, Viale Sabotino, 19/2, attention lawyer Germano Margiotta.

It remains understood that the latter will be the only person with access to the correspondence referred to above.

By express legislative provision, it is specified how the reports in question may also be submitted anonymously.

In any case, all reports must indicate as much information as possible regarding the irregularity detected so that the alleged violation can be thoroughly analyzed.

If possible, the documentation supporting the report should also be submitted together with the notification in question.

To facilitate the reporting procedures, the following is a summary of the essential points which the whistleblowing system should include:

- i. A detailed description of the facts and/or the omission;
- ii. Date and place of occurrence;
- iii. Indication of persons involved;
- iv. Where appropriate, indication of any persons informed of the facts.

5) Whistleblowing report management

Upon receipt of the report, the SB will send the whistleblower - when identifiable and traceable - a message to inform it has taken charge of same.

First of all, then, the content of the report received, including the degree of risk involved and the extent of its urgency, will be assessed.

If necessary, in compliance with the protection of the rights of the whistleblower, the whistleblower will be asked to accept an interview.

Following the assessment of the report received, the Supervisory Board pursuant to Legislative Decree no. 231/2001 will inform the directors and members of the corporate bodies of Icap - Sira S.p.A. so that appropriate measures can be adopted and, where possible, the relevant corrective measures can be taken to eliminate and/or curb the possible identified risks.

For reasons of transparency and filing, in any case, the Supervisory Board, pursuant to Legislative Decree no. 231/2001, will prepare a detailed report of the examination carried out.

If the outcome of the latter does not reveal elements that require the involvement of the company management, the report will be filed, after adequate justification.

The Supervisory Board will report to the Executive Committee on the extent of the reports received.

Finally, it is specified that the SB itself will provide feedback to the whistleblower on the activity carried out.

6) Protection of Privacy

Icap - Sira S.p.A. declares and guarantees that the data which comes into its possession following the reports received and having regard to the data of the whistleblower him/herself will be processed in full compliance with current Privacy legislation.

The Controller of the data concerning the whistleblower, limited to the need to verify the reports received, will be the Chairman of the incumbent Supervisory Board.

The personal data contained in the reports will be protected by appropriate measures to prevent their loss, dissemination or theft.

For all the above reasons, third parties will be prevented from accessing the documentation relating to the report received, unless an exception is appropriate for purposes of further investigation and verification.

7. No retaliation

Icap - Sira S.p.A. protects the rights of whistleblowers, first and foremost the right to Privacy. This is why the company undertakes to maintain the utmost confidentiality regarding the personal identity of the whistleblower in question and also ensures his/her confidentiality at the time of the result of the investigation and ascertainment of the reported irregularities.

The Company will not tolerate any form of retaliation against the whistleblower.

Therefore, if, following a report, or before it is made, the whistleblower receives, by way of example and without restriction, threats and/or warnings of any kind and nature or is dismissed, demoted, unjustifiably transferred, harassed, subjected to mobbing, etc., he/she may immediately refer the matter to the Supervisory Board pursuant to Legislative Decree no. 231/2001.

Maximum confidentiality is ensured by Recipients pending investigation.

8) Improper whistleblowing

The Company reserves the right to take the most appropriate legal measures, including disciplinary actions, in the event of whistleblowing reports being made without justification and without any grounds.

Any abuse of this Policy for the sole purpose of damaging the company or third parties will entitle Icap-Sira S.p.A. to evaluate the termination of the employment contract and/or *ipso iure* collaboration.

20 March 2018

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(Dr. Massimo Medini)