

# ICAP-SIRA

Sustainable procurement  
Code of Conduct





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## Our way towards an eco-sustainable future

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## 01 ICAP-SIRA's approach to sustainable procurement

Founded in 1945, we are a family-owned company dedicated to the production, development and commercialization of chemical specialties for the textile and nonwovens, coatings and pressure-sensitive adhesive sectors. Our commitment is to manage our overall impact with the Good Business approach aimed at identifying, evaluating and describing the social role that ICAP-SIRA plays in carrying out its business:

- to create and share economic value
- to give value to people's work and talents
- in bringing to the market products capable of responding to the needs of customers and society all within a framework of Social and Environmental Sustainability.

Our Vision is to become the preferred partner (Top 3 in selected niches) for chemical specialties: solution-oriented, sustainability-oriented and with a global footprint.

The **Mission** of Icap-Sira is to enable creativity, to let our customers' ideas be transformed into real solutions. We are committed to ensuring that our formulations - which are innovative and present in many everyday uses - guarantee business continuity in a changing world.

ICAP-SIRA adopted in 2023 a **Code of Conduct** ([www.icapsira.com/en/code-of-conduct/](http://www.icapsira.com/en/code-of-conduct/)) that outlines the requirements that the organization must comply with to carry out its business activities ethically and in respect of laws and regulations. It provides all employees, up to the highest management level, an information about the conduct that has to be held in the workplace and in all of their activities. Nevertheless, the described principles, values and provisions can be fully respected only if they are shared with all our partners and stakeholders and fostered in daily activities.

ICAP-SIRA is aware of the importance of industrial commitment to succeed in the achievement of the UN Sustainable Development Goals and is determined to positively contribute in the transition to a socially and environmental fair economy.

ICAP-SIRA decided to create,

implement and maintain an adequate Integrated Quality Management System, Environment, Health and Safety as a tool for integrating company strategies. ICAP-SIRA considers it a priority to guarantee, in a systematic and documented way, the safety of its own activities, with the aim of safeguarding the safety and health of workers and the population, the integrity of systems and environmental protection.

**ICAP-SIRA's Sustainable Procurement Code of Conduct (ISSPCoC) brings together ICAP-Sira's principles, values and commitments in the operation area of the Procurement Process. We share our values and integrity with our suppliers in order to build relationships based on the maximum transparency and we require our suppliers to commit and share our principles.**

The principles and commitments of this document are the ones that guide ICAP-SIRA's Procurement Process and have been divided into mandatory requirements and improvement actions; mandatory requirements are the minimum level of compliance that ICAP-SIRA will ask to its suppliers while improvements represent the area of the commitments related to quality, health, environment and social topics.

ISSPCoC cannot provide all the specific recommendations for every possible situation but in uncertain circumstances can be used as a guideline for an ethic solution of the problem.

## 02 Values

ICAP-SIRA bases its activity and the relationship with its partners on 5 values:

### Sustainable Performance

- **Being competent** We specialize in applied chemistry (chemical specialties) and tackling new industrial fields by evolving our structure and skills.
- **Result-oriented** We are a group of professionals, capable of long-term planning and successfully implementing our ideas: the company has all the skills to support the development of projects.



- **Sustainability** We develop products in line with our code of ethics, guaranteeing social, environmental and economic sustainability.

### Customer-centricity

- **Innovation** We have innovative ideas and help develop those of others also by collaborating with research institutes and universities. Flexibility, competence and service are the founding values of our customer relationship.
- **Being Solution-oriented** We are a chemical company capable of providing innovative and customized products with the aim of creating a winning synergy with customers and suppliers. We are financially, organizationally and technically sound.

### Reliability

- **Speed** Improving the existing high standards of service, safety and respect for the environment, through increasingly advanced tools and technologies.
- **Respect** Every request deserves reasoned and in-depth feedback.
- **Integrity** Honesty, integrity and consistency of conduct in compliance with internal and external rules.

### Responsibility

- **Proactivity** We encourage research into the activities connected to ours in order to reassess their mutual impact.
- **Transparency** We provide open access to our expertise accepting the input of others and giving feedback from a constructive point of view.
- **Care for people** We value experiences to stimulate their transfer to resources and we provide them with a path by listening to their proposals.

### Ambition

- **Passion** Passion is the catalyst that makes us act; it is contagious and transmitted by example.
- **Initiative** Passion drives us towards the initiative that we recognize and encourage and we address. Together, they enable us to set challenging goals.

**We are pleased to share these values with all our commercial partners believing that relationships based on these values will be safe, long-lasting and profitable for all.**

**03 Mandatory Requirements**

ICAP-SIRA works in compliance with the all the regulations in force in the countries in which it operates in and is committed to ensuring respect for these regulations in its own activities and those of its commercial partners.

ICAP-SIRA adopted in 2011 an Organisation and Management Model according to DLgs231/2001 ([www.icapsira.com/en/corporate-governance/](http://www.icapsira.com/en/corporate-governance/)) with the goal of drawing up guidelines of behaviour to which employees must comply in their relations inside and outside the company inspired by ethical values and honesty, integrity, correctness, respect for laws and regulations and transparency of operations.

ICAP-SIRA supports the respect of Human Rights, Fundamental Freedom and Environmental Conventions and Agreements.

**ICAP-SIRA expects its suppliers to always comply in all of their processes with national and international regulations with particular attention to the ones related to the production and commercialisation of the goods and services they are supplying.**

We acknowledge that we all operate in different environments, from a geographical, legal, and cultural perspective. This means that the applicability of some topics may be less relevant or challenging to implement. So, we leave it to each organization to apply the principles of this document that fit its specific business.

**Labour and Human Rights**

**We and any supplier working for us (We) must comply with all applicable laws and respect internationally recognised human rights, wherever they operate.**

- **Forced and compulsory labour.**  
We must not use forced or bonded labour. Employment must always be voluntary. Employees must be entitled to terminate their employment after reasonable notice to employer. Employees are free to leave the Supplier's premises during non-working hours.
- **Child labour**  
We must comply with all local child labour laws and regulations, including legitimate apprenticeship programs. We are strictly prohibited to use child labour. Suppliers shall not employ children below the age of 15 (14 in certain developing countries) or below the age of completion of compulsory schooling in that country or the minimum age of employment under applicable national laws and regulations whichever is higher. Employees under 18 are not allowed to work in hazardous conditions. We must have a documented process in place to ensure that any identified child labour will be acted on immediately.
- **Discrimination**  
We must not discriminate in hiring and employment on the basis of race, colour, gender, sexual orientation, age, physical ability, health condition, nationality, social or ethical origin, union membership or marital status. All employees must be treated fair and equally.



- **Permit Freedom of association and collective bargaining**  
We will honour employees' rights to free association and their lawful right to join, not join or form a union within the laws of the countries where they work, without harassment, interference, or retaliation.
- **Working hours**  
We must not use illegal overtime. Working hours must not be excessive and not exceed the statutory limit. Adequate rest periods must be regulated between the Company and the employees. Overtime shall be voluntary and always be compensated.
- **Compensation**  
We must pay at least the minimum legal wage and all legally mandated benefits, so that the wage is sufficient to meet basic needs for employees and their entitled official dependents. We must pay compensation for overtime with respect to local law. Compensations must always be paid timely. Disciplinary deductions from wages are not allowed.
- **Harassment, harsh or inhumane treatment**  
All employees must be treated with respect and dignity; any form of mental or physical disciplinary action, harassment or abuse is not tolerated.
- **Health and safety**  
We must comply with all local laws, regulations and directives in the country where they operate. We must comply with all occupational health and safety laws, we must analyse the risk and take preventive and safe measures for their employees and sub-contractors.

**Safety and Environment**

**We and any supplier working for us (We) must comply with all applicable laws related to the respect of the environment and the safety of the areas in which they operate.**

- **Environment**  
We must have in place an effective environmental program which enables compliance with all local regulations.
- **Waste and Air Emissions**  
We must manage waste (waterbased and solid) and air emissions in accordance with the current local regulations. Prior to discharge, disposal or emission, materials must be identified, controlled and treated to minimize impact on

people and the environment. By-products generated from production have to be identified, controlled and treated as required by local regulations and disposed accordingly.

- **Chemical and Hazardous material**  
Suppliers of chemical products shall meet legal requirements relating to the production, transportation and use of hazardous substances, prohibit the use of substances that are subject to national or international bans and have in place appropriate measures for the management, storage and transportation of hazardous substances.

**Ethics, integrity and legal requirements**

**We and any supplier working for us (We) must comply with all applicable laws related to economic responsibility, accounting and taxation, and must work in a context of ethics and integrity.**

- **Corruption**  
We are expected to be free of any form of corrupt practices such as extortion, bribery, or fraud. We must not pay or accept bribes or kickbacks or offer/promise any improper advantage directly or through intermediaries, in both the public and the private sector.
- **Conflict of interest**  
We must prevent and avoid any situation that may create a conflict of interest. All appearances or actual conflicts of interest have to be reported to ICAP-SIRA.
- **Fair competition**  
We must not violate any applicable laws and regulations regarding unfair competition or antitrust. Suppliers must prohibit the adoption of methods entailing unfair competition.
- **Privacy and Intellectual Property**  
We shall safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected. Suppliers shall not use ICAP-SIRA's name or trademarks or that of our affiliates or products in publicity or advertising without ICAP-SIRA's prior written consent.



## 04 Improvement actions

### • Sustainable Value Creation

ICAP-SIRA aims at creating sustainable value for its direct stakeholders and for the community as a whole; it began its Sustainability path and the results are described in the Sustainability Report that is published every year ([www.icapsira.com/en/sustainability/](http://www.icapsira.com/en/sustainability/)).

The actions that Characterise ICAP-SIRA's approach are described in the following "impact pillars" :

- **"Chemistry at the service of people"**: the research for quality and success of its products, through constant investment in research and innovation, to always meet customers' needs, guaranteeing security and indirectly contributing to the development of the community.
  - **"Value talent and skills"**: the creation and organization of good employment, paying attention to the development and to the growth of talents, in a safe, healthy environment, that values differences;
  - **"Sustainable economic value"**: the production of economic value for the company and for all those involved in the production cycle, in order to give steadiness and sustainability to the company along the years and create value for communities.
  - **"Respect for the environment and care for the community"**: the ethical and responsible management of environmental and social external factors connected with ordinary business activities.
  - **"Govern the enterprise in a responsible and sustainable manner"**: ICAP-SIRA's willingness to adopt a specific basic attitude and undertake a serious commitment in that direction, adopting consistent strategic processes, with a systematic assessment of results and a transparent approach to information sharing and reporting.
- In particular, ICAP-SIRA put its attention on the following improvement areas:
- **Responsible supply chain**  
ICAP-SIRA intends to write a Sustainable Procurement Policy and accordingly select, evaluate and monitor its suppliers on the basis of environmental and social sustainability criteria (e.g. respect for human rights, ISO 14001, ISO 45001 and SA8000 certificates). ICAP-SIRA shall ask its suppliers information, certifications and data necessary for the Corporate Sustainability Reporting in accordance with European requirements.
  - **Responsible use of raw materials**  
ICAP-SIRA pays attention to the responsible use of raw materials and the related activities in order to optimize the quantity of materials used as well as the selection of more sustainable ones.
  - **Responsible water use**  
ICAP-SIRA works in the optimization of use and management of available water and puts in place initiatives for the recovering of used water.
  - **Waste management**  
Management of waste resulting from production activities and waste optimization is one of the most important initiatives; re-use process are under investigation.
  - **Energy efficiency and GHG emissions reduction**  
ICAP-SIRA supports the careful use of energy resources and the initiatives to reduce emissions, using, for instance, policies for energy optimization.
  - **Transport and logistics**  
ICAP-SIRA set a list of activities regarding the implementation of optimization policies (energy and non) for transport and logistics.
  - **Risk Management**  
In challenging times ICAP-SIRA is aware of current and potential risks connected with activities and schedules policies to manage such risks, with particular reference to sustainability issues.

- **Diversity and inclusion**

ICAP-SIRA encourages the contribution of different skills to develop synergistic work.

- **Transparency in Communication**

ICAP-SIRA commits to communicate information to its stakeholders, in a clear and transparent manner.

• **Quality Management**

ICAP-SIRA considers its quality policy as a continuous improvement of processes, aimed at creating products and providing services that fully satisfy the needs and expectations of both internal and external interested parties. ICAP-SIRA encourages its suppliers to consider safeguarding the safety and health of workers and the population and protecting the environment as a priority. ICAP-SIRA intends to evaluate and monitor its suppliers, also on the basis of Quality criteria in accordance to ISO 9001 standard.

**05 Acceptance**

As an ICAP-SIRA supplier, and part of our supply chain, we expect that you will conduct your business in line with the values and principles outlined in this ISSPCoC, always in full compliance with all applicable laws and regulations and that you select your own suppliers and counterparties accordingly.

By accepting to work for or with ICAP-SIRA, suppliers commit to abide by this ISSPCoC, violation of the mandatory requirements may result in suspension or termination of the business with ICAP-SIRA.

If you become aware of a violation or suspected violation of this ISSPCoC you can write an e-mail to: [sustainability@icapsira.com](mailto:sustainability@icapsira.com). In addition ICAP-SIRA instituted a Whistleblowing Policy for anonymous disclosures. All the details for making such disclosures and subsequent data treatment can be found in the dedicated page of ICAP-SIRA website. ([www.icapsira.com/en/whistleblowing/](http://www.icapsira.com/en/whistleblowing/)).

ICAP-SIRA is implementing a Policy with an audit plan for supplier qualification that will include the mandatory requirements and the improvement actions described in this document. ICAP-SIRA reserves the right to conduct audits and assessments to verify the compliance with this ISSPCoC.

For further information, contact the following email address: [sustainability@icapsira.com](mailto:sustainability@icapsira.com).





The mark of  
responsible forestry



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