#### CODE OF CONDUCT

### Why do we have a code of conduct?

#### Welcome to our Code of Conduct.

Integrity is essential to the conduct of our business activities. Our Code of Conduct explains this vision to our employees, business partners and all other stakeholders. The Code reflects the core values that should guide us to behave correctly in all circumstances. The Code applies to the members of our workforce, which, for the purposes of this Code, includes all those who work with our organisation: full-time and part-time employees, temporary workers, contract workers and managers. We also expect our suppliers and distributors and all other stakeholders to act with integrity and in accordance with our Code. These parties may, in some cases, be required to explicitly accept the Code.

#### What are the individual responsibilities arising from the Code?

We expect our workforce to understand and adhere to the principles and requirements contained in the Code in any situation that may involve the Company, both during and outside working hours. This may include, but is not limited to, conduct on social media. We periodically offer training to ensure that our workforce understands their responsibilities under the Code. Staff must attend these trainings and confirm adherence to it.

#### Do supervisors have special responsibilities?

People to whom Ma-Ter will assign authority to supervise, direct and manage others must set an example in terms of compliance with the Code. In addition, supervisors should actively listen to the issues raised by members of their teams, providing them with support and encouraging them to report any breaches of the Code.

#### What is the relationship between the Code and regulations?

Ma-Ter is committed to complying with applicable laws. This is fundamental to the way we operate. It is imperative and non-negotiable. Sometimes our Code may be stricter than the local law. In such cases, we expect our workforce to behave in a manner that conforms to the stricter standards required by the Code.

#### When should a Code violation be reported and what happens next?

Anyone who has questions about the Code, becomes aware of a potential Code violation, or has other concerns may file a report with their supervisor or the Human Resources Department.

It is everyone's responsibility to report alleged or potential violations of the Code. Reports will be investigated by qualified personnel or experts in the specific field in a manner that maximises confidentiality. No one else, not even supervisors, shall conduct such investigations. All reported cases will be tracked to their full

conclusion. If a breach of the Code is confirmed, corrective action will be taken. Ma-ter will not tolerate any retaliation against those who make a report in good faith and cooperate with the investigation. Anyone who retaliates against a person who makes a report in good faith will be subject to disciplinary action.

#### How is the Code enforced?

We expect our workforce to behave correctly and in accordance with the Code. If a violation of the Code is confirmed, we will endeavour to apply the appropriate disciplinary sanctions, which may include dismissal or termination of business relations.

## PROTECTION OF OUR PEOPLE

# PRINCIPLE: Protecting diversity and ensuring a fair and inclusive working environment

Ma-Ter is committed to protecting diversity, which is a key strength. We are also committed to ensuring a fair and inclusive working environment, where favouritism, violent behaviour and harassment will not be tolerated, nor any form of discrimination based on age, race, gender, sexual orientation or religion. Ma-Ter promotes diversity and equal employment opportunities, where everyone is valued according to their contribution to the Company. We embrace, among others, the United Nations ("UN") Declaration on Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

We expect our workforce to behave respectfully in professional relationships with colleagues, customers, visitors and other business partners. In cases of violation, appropriate disciplinary action will be taken

#### PRINCIPLE: Ensuring health and safety

Ma-ter promotes and encourages a culture of accident prevention, health protection and risk awareness in the workplace. We ask our workforce to strictly observe safety regulations and exercise constant vigilance to identify potential risks and address them immediately. We also ask our business partners to observe the same rules when they are on our premises.

### BUSINESS CONDUCT

# Conduct business in a sustainable manner

## - Respect for legality

#### **PRINCIPLE: Conducting business sustainably**

Conducting business in a sustainable manner is an essential value for our company. We strive to match business objectives with the limitation of negative impacts on present and future generations and resources. Ma-ter is firmly committed to acting in a socially responsible manner and in line with sustainable practices that include protecting the health and safety of the workforce, prohibiting child and forced labour, and ensuring compliance with conflict minerals and environmental protection regulations.

#### **Environmental protection**

Protecting the environment, in particular contributing to a decarbonised economy, is one of our priorities. Ma-ter is committed to continuously improve the environmental performance of its operations and to comply with the provisions of applicable laws and regulations. Furthermore, we are committed to developing and implementing innovative technical solutions to limit the environmental impact and maximise the safety of all our business activities.

#### Customers, suppliers and partners

Ma-ter encourages the adoption of sustainable practices and sharing them with its suppliers, distributors and business partners. The selection of suppliers is not only based on the quality and competitiveness of products and services offered, but also on their adherence to social, ethical and environmental principles, maintaining the highest quality standards.

#### **PRINCIPLE: Respect for legality**

At Ma-ter we all have a responsibility to behave correctly. To do this, we must first understand and respect the laws and regulations that affect us.

#### Compliance with laws

Ma-ter is committed to acting in compliance with applicable laws and regulations. In pursuit of this goal, the organisation undertakes regular training, awareness-raising activities and consultancy.

#### **Anti-money laundering.**

Ma-ter prohibits money laundering and any initiative that may finance or facilitate criminal activities of any kind. Ma-ter is committed to reporting suspicious business partners, and to taking all measures deemed appropriate if improper conduct is established.

#### Export and trade regulations.

There are laws that restrict the export of certain categories of goods or technology to specific countries or individuals. Other regulations prohibit conducting any kind of business with specific individuals or companies. Ma-ter requires the entire workforce to comply with international and local regulations, including those concerning customs, tax regimes, embargoes and export control measures

#### Competition

Ma-ter prohibits anti-competitive practices, recognising the fundamental importance of a competitive market. In addition, the organisation is obliged to fully comply with competition law and other consumer protection measures in force in the countries where it operates. Each member of the workforce will be responsible for ensuring that no business practices are carried out that violate competition law.

#### Privacy and data protection.

The European decree (EU 2016/679) and local regulations govern the protection of personal data and confidential information. Ma-ter is committed to respecting the right to privacy of our workforce, customers, business partners, other individuals and legal entities, as well as to putting in place appropriate control measures to safeguard personal data and adequate training and updates to our resources in this area.

#### Bribery of private individuals.

In addition to prohibiting the bribery of public officials (see the anti-corruption provision below), Ma-ter also prohibits bribery between private individuals, i.e., the receipt of gifts, invitations, benefits or payments between private individuals in accordance with the provisions of the relevant policy. All members of the workforce must ensure that any gifts or invitations offered are appropriate and reasonable, so as not to inappropriately influence the judgement or conduct of any external party.

#### Cooperation with public authorities

#### Providing information.

All information provided to public authorities must be correct and truthful and respond appropriately to requests from those authorities. Each member of our workforce may be required to retain information related to pending or reasonably foreseeable government investigations or litigation.

#### Anti-corruption.

Each member of the workforce must reject all forms of bribery. It is strictly prohibited to offer, promise or give gifts, payments or anything else of value to public officials, either directly or through intermediaries, for the purpose of inducing such officials to act in violation of their duties in order to secure an improper benefit or advantage for the Company.

#### Lobbying and political contributions.

No company funds or assets may be used to financially support political parties or candidates in political elections. Members of our workforce are free to conduct party political activities in a personal, private capacity and outside working hours. On such occasions, however, they may not represent the Company or give the impression that they are acting on behalf of the Company.

### EXTERNAL RELATIONS

# Avoid situations of conflict of interest

#### PRINCIPLE: Avoiding situations of conflict of interest

Our workforce is required to maintain the highest degree of integrity at all times in dealing with our business partners and to act solely in the best interests of the Company. A conflict of interest arises when an employee's personal interests compromise his or her ability to perform his or her duties for the benefit of the Company. Situations that give rise to this type of conflict usually arise from a desire to obtain personal or family benefits, or to pursue outside benefits that conflict with the Company's business interests or reputation. Our workforce must disclose the actual or potential conflict of interest to the Company so that the Company can assess the situation.

# MANAGING OUR RESOURCES AND INFORMATION

- Communicate effectively
- Protect our assets
- Regularity of records

#### **PRINCIPLE: Communicate effectively**

Ma-ter recognises the importance of clear and effective communication to its workforce, customers, all other stakeholders and the communities in which it operates. We are committed to providing customers with accurate and reliable information about our products and services. To ensure accurate and effective information, only designated spokespersons are authorised to speak on behalf of the Company. We expect our workforce to comply with policies regarding confidential information and the use of social media.

#### PRINCIPLE: Protect our assets

Members of the workforce are responsible for the protection and proper use of Company assets and must work to safeguard them from damage, theft or unauthorised use. This principle covers all types of assets - tangible, intangible and financial - and intellectual property rights represented by patents, trademarks, copyrights and trade secrets. Ma-ter's workforce must protect non-public confidential information, the disclosure of which would damage the Company, as well as third parties' confidential information in our possession.

#### **PRINCIPLE: Regularity of records**

The orderly running of our business requires that every member of the workforce properly maintain the records of the company relied upon by customers, investors, business partners and government agencies. The proper maintenance of accounting records is an essential aspect of our business. Ma-ter ensures that accounting records and financial statements provide a reliable picture of the company's situation, in compliance with applicable laws and accounting regulations.