

Unicalce S.p.A.

Code of Ethics

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6.1 Reports to the Supervisory Body (whistleblowing) **Errore. Il segnalibro non è definito.**

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ART. 1 PURPOSES AND RECIPIENTS OF THE CODE

This Code of Ethics (hereinafter “Code”) defines all of the rights and moral obligations the company intends to draw inspiration from and is aimed at defining the scope of ethical and corporate responsibilities of all those who work on behalf of Unicalce S.p.A. (hereinafter also just “Company”) with the express intent of preventing irresponsible and/or illegal behaviour.

The adoption, distribution and application of the Code constitutes a strategic commitment of the Company first of all for consolidating the image of a transparent, fair and socially responsible Organisation on the market and within the company, as well as, secondly, to create the conditions so that, along with the Organisation, Management and Control Model as per Italian legislative decree 231/01, criminally relevant behaviour is avoided.

In no case, can the pursuit of an interest or an advantage for the Company - or even the conviction to operate in such sense - justify an irresponsible or illegal behaviour. The awareness and compliance with the ethical rules represent an indispensable condition both to maintain the Company’s reputational standards and to instil or maintain any contractual relationship with the same.

1.1 Recipients

The provisions contained in this Code apply to the Company as well as its subsidiaries, considered as the companies controlled in direct or indirect form pursuant to article 2359 of the Italian Civil Code, whose activities must be compliant with the following Provisions.

Unicalce S.p.A. adopts and distributes the Code identifying the following as recipients required to comply with the ethical provisions:

- the Directors, the General Manager, the Managers (with or without power of representation), the Statutory Auditors, the Employees, independent contractors even occasional, the auditors of the Auditing Firm and all of those who perform, including de facto, management, running, administration or control functions in the company sphere;
- external Independent Contractors, considered as subjects that based on a contract act in the name of and/or on behalf of and/or in the interest of and/or to the advantage of the Company;
- business partners, i.e., the external part with whom the Company establishes a commercial and contractual relationship, such as, by means of example, customers, partners in joint ventures, partners in consortia or temporary business associations (Italian “ATT”), suppliers, contractors and subcontractors, consultants, agents, intermediaries, etc.
- the Supervisory Body appointed pursuant to article 6 of Italian Legislative Decree 231/01.

Unless otherwise expressly stated, the Code provisions apply to all Recipients identified in this article.

ART. 2 ADOPTION, DISTRIBUTION AND UPDATING OF THE CODE

The Code becomes effective with approval by the Board of Directors which is solely competent for each modification, integration and update of the same, with consequent immediate distribution and publication to the subjects required to apply it. A copy of the Code is always available and can be consulted by all the recipients as defined in the previous point. The Code of Ethics is considered disclosed to third parties not only by clear reference in contracts, by also by publication in its entirety on the Company's website at the address www.unicalce.it.

The Company provides a suitable training and awareness programme on the conduct principles prescribed by this Code of Ethics, as well as on the Organisation, Management and Control Model pursuant to Italian Legislation Decree 231/01.

ART. 3 FUNDAMENTAL ETHICAL PRINCIPLES

Unicalce S.p.A. considers the following as fundamental: the respect of human rights, physical, cultural and moral integrity, and no discrimination in the workplace based on sex, race, language, religion, political opinions, trade union membership, social and personal conditions. It is committed to everyone being able to express themselves without discrimination.

The Company actively promotes an ethical approach specifically demanding complete compliance with the following fundamental ethical principles:

3.1 Compliance with laws

All of the recipients of this Code agree to comply with all national or EU laws, directives or regulations that are applicable to their activities, and provide for their normative updating.

3.2 Transparency and fairness

All of the operations performed and conduct of each of the Recipients in carrying out company activity are inspired by maximum transparency, fairness, loyalty and to act in good faith. Each subject is required to ensure maximum traceability and possible reconstruction of his/her work.

3.3 Fight against conflicts of interest

Specifically, the recipients of this Code must avoid being involved in relationships or situations that could interfere - or be considered as such - with their ability to make impartial decisions in the interest of Unicalce S.p.A.

This principle also applies both in cases where employees or independent contractors pursue an interest different from the mission or personally benefit from business opportunities of Unicalce, and in the case where customer or supplier or Public Administration representatives, act in conflict with the fiduciary duties linked to their position. For example, the following may constitute conflict of interest:

- exploitation of their functional position to realise interests in conflict with those of the Company (both personal and third parties);

- acceptance of cash or any profit or benefit from people or companies that intend to undertake business relations with Unicalce S.p.A.;
- use of information acquired due to their company position so as to create a conflict between personal interests and company interests.

3.4 Prevention and rejection of any form of corruption vis-a-vis public or private subjects

The Company intends to repress every form of corruption, both active or passive, towards public or private subjects or within the same company organisation, confirming the need to not contribute or promise cash or other benefits for the purpose of obtaining unjust advantages, prohibiting that cash or gifts, free products or other forms of favours are given or accepted to obtain unjust benefits that exceed normal hospitality and courtesy rules as defined in detail by the Organisation Model and in the Company's anti-corruption procedures, to use as a reference for the required additional information. The Company intends to also repress all incorrect behaviour that, even if criminally irrelevant, may be associated to phenomena of corruption.

To concretely prevent and fight the occurrence of corruptive illegal acts in performing their jobs, both within and outside the organisation, Unicalce has also adopted and published, a specific “**Anti-corruption policy for consultants, agents and suppliers**”. Compliance with this policy represents the “**conditio sine qua non**” for establishing and maintaining contractual relations with the Company.

The Recipients of this Code who perform any purchasing of goods and services; in the interest of the Company may not in any way: (i) ask for or receive, for themselves or others, cash or other benefits not due, to make or omit an act in violation of the obligations inherent to their office or loyalty obligations vis-a-vis Unicalce S.p.A.; (ii) accept any form of influence from third parties outside the Company, and not authorised to do so, to make decisions related to the selection of suppliers.

The Company encourages the use of whistleblowing procedures for acts of corruption, even if alleged, ensuring that such whistleblowing, if performed in good faith, will not give rise to acts of retaliation, discrimination or disciplinary measures.

3.5 Unfair competition

Unicalce S.p.A. recognises the value of competition and bases its principles of fair and correct competition towards other market operators present, and is committed not to unduly damage the image of Competitors and their services and to conduct its business in compliance with legal requirements on competition and service contracts.

ART. 4 SPECIFIC BEHAVIOUR PRINCIPLES

4.1 Social and environmental sustainability

Unicalce S.p.A. is aware that doing “good business” means respecting the urban and social fabric of the area where it works and is committed to undertaking concrete initiatives regarding:

- cooperation with local agencies and communities aimed at establishing a constructive dialogue with the areas where the Company is present with its plants;
- optimising resources through constant focus on the consumption of natural resources (land, water, fossil fuels);
- reduction of its carbon footprint through planning the maximum commitment to reduce its CO2 footprint and that of its customers;
- promotion of biodiversity and respect for the environment through continuous monitoring and investments to improve infrastructure and industrial processes as well as the creation of environmental restoration of the quarries where it has concluded mining activities;
- proactive integration of the circular economy in the company's business model;
- support for young people through sports and school (for example organising visits to its plants and classroom lessons for students of local schools where it is present);
- development of training and research projects on a national and international scale with the most important Italian universities;
- concrete promotion of initiatives, both on local and national level aimed at fostering best practices in the mining industry.

4.2 Ethics in relations with personnel - duties and responsibilities

Employees are required to comply with the behaviour principles contained in this Code and in internal company rules. Specifically, all employees are required to comply with legal obligations related to fairness, good faith and diligence in performing their jobs. Unicalce S.p.A. is aware that human resources represent an indispensable component for the growth and success of the Company, therefore, it is committed to developing the abilities and skills of its employees, so that their professionalism and commitment become determinant values for achieving company objectives.

The Company rejects every form of reduction or maintenance in a state of intimidation of people through violence, threats, abuse of authority or exploitation of situations of physical or mental inferiority and pursues a culture of equal opportunity, without any discrimination, promoting the adoption of objective criteria for recruitment, hiring and compensation of employees.

4.2.1 Work environment

Unicalce S.p.A. is actively committed to safeguarding the moral integrity of employees, ensuring the right to working conditions respectful of human dignity. For this reason, it safeguards workers from acts of psychological violence or harassment opposing any harassment or attitude and/or behaviour harmful to dignity, convictions or personal inclinations. All of the employees of Unicalce S.p.A, at every level, will avoid establishing an intimidating, hostile or isolating work environment and are required to actively collaborate to maintain a collaborative environment respectful of the dignity, honour and reputation of everyone.

Lastly, notwithstanding compliance with company procedures regarding the acceptable use of company assets, it is completely prohibited to:

- use psychotropic drugs or other substances with similar effects in the workplace;
- keep pornographic or child pornographic material in computers or any other place that is in any way related to the Company.

4.2.2. Policy for gender equality and the fight against harassment in the workplace

The values of gender equality, non-discrimination and inclusion characterize every strategic action of Unicalce, which sees every new resource as a real opportunity for growth for both parties and an added value that can help the organization achieve its objectives, without neglecting the values on which it is based.

For this reason, in line with its mission and strategic vision, Unicalce has decided to adopt a Gender Equality Management System (SGPG) compliant with UNI/PdR125:2022, concretely implementing its Strategic Plan for gender equality and requiring maximum commitment from all its managers, employees and stakeholders in ensuring compliance with the relevant policies and procedures.

4.2.3 Fight against illegal work

The Company does not tolerate any form of illegal work or employment of people who are not legal residents of Italy (without a permit to stay or expired or revoked permit) and ensures monitoring of the legal residence of its Personnel from third party countries (non-EU).

4.3 Ethics in relations with the Public Administration

Unicalce S.p.A. is committed, in all its relations with the Public Administration (by means of example, at the time of requests for authorisations, inspections, participation in public procedures), to only allow authorised and delegated subjects intervene, in the absence of any conflict of interest, aware of the applicable rules and trained on the normative contents of this document according to specific prevention protocols as per the Organisation Model.

Specifically, the Company:

- in undertaking relations with the Public Administration, cannot be represented by subjects who can be found in any conflict of interest situation with the public agency or who have been sentenced for crimes against the Public Administration with the exception of the effects of rehabilitation in the forms and ways stated in the Criminal Code;
- may not take or confer professional engagements (consultation and/or project-based engagement) to subjects, former employees of the Public Administration or private agencies under public control that, in the previous three years have exercised authoritative and/or negotiation powers in favour of Unicalce S.p.A. or its subsidiaries (see the contents of the Anti-corruption Policy)

The Recipients agree to report to the Company any situations, including potential, of conflicts of interest in relations undertaken with the Public Administration, informing the Supervisory Body in the event of violation - or reasonable suspicion of violation - of the principles as per this Code.

4.3.1 Fight against illegal pressure and requests

It is completely prohibited to exercise any type of pressure or undue influence or maintain any other non-transparent behaviour in management and relations with the Public Administration to induce public officials or public service employees to undertake abetment in favour of the Company. Likewise, all subjects who are the recipient of pressure, extortion or requests from public officials or public service employees to illegally obtain cash or any other benefit, shall not in any way comply with such illegal demands and implement all countermeasures contained in the prevention protocols prepared by the Company.

4.3.2 Relations with the Courts and Regulatory Authorities

The Company actively collaborates with the Courts and criminal investigation departments, or any other public official for inspections, audits, investigations and court or administrative proceedings. The recipients of this document will not exercise any type of pressure or undue influence - and avoid situations that can even just appear as aimed in such sense - on the person called to make statements before the court, to induce them to not make statements or to make false statements. It is furthermore completely prohibited to help or aid people accused of criminally relevant acts to elude searches and investigative activities of the police or court.

In relation to relations with the Regulatory Authorities the recipients ensure maximum availability and collaboration, above all at the time of inspections and audits as well as the most thorough production of data, information and documentation to meet the Authority's requests, in compliance with the fundamental principles outlined in this Code.

4.4 Ethics in relations with political parties, trade unions and non-profit associations

The Company, despite the awareness that the Policy represents a fundamental participatory instrument of citizens, intends to prohibit any direct and/or indirect financing for parties, movements and political and trade union committees and organisations or their representatives and candidates. Therefore, the recipients of this Code shall refrain from any behaviour aimed at unduly influencing, including through the media, political exponents.

Any sponsorships and/or donations can be authorised - in full compliance with accounting, statutory and tax laws and regulations - solely in compliance with the procedure contained in the Organisation, Management and Control Model and the Company's "Management of donations and sponsorships"

procedure. The rules in this article cannot be eluded by using different forms of aid or contributions that, under another guise, have the same purposes as those prohibited by this document.

4.5 Ethics in relations with suppliers and customers

The Company does not tolerate any undue use or exploitive abuse of the intellectual property or industrial rights of others. It is absolutely prohibited to undertake any attitude of illegal mediation or, through one's own exploitive intervention abets eluding of the law, rules or other specific contractual obligations with suppliers or customers.

Specifically, during performance of the procurement process, it is specifically mandatory to:

- scrupulously follow the organisational procedures and authorisation profiles for selection and management of relations with suppliers;
- comply with the selection criteria of company procedures according to objective and transparent procedures;
- verify that suppliers constantly ensure compliance with their contractual obligations with particular reference to compliance with ethical commitments;
- concretely apply all the fairness and good faith principles in correspondence and dialogue with suppliers and customers.

4.6 Fairness of social communications and administrative-accounting transparency

All of the accounting administrative activities and social communications must be prepared scrupulously complying with applicable accounting principles, applicable statutory and fiscal rules as well as the accounting administrative procedures (including computerised) of the Company in order to clearly, fairly and truthfully represent the Company's financial situation.

Unicalce intends to ensure maximum accounting transparency and, therefore, requires that every operation and/or transaction is reported and accompanied by suitable supporting documentation, even in the absence of a specific legal requirement, allowing an easy and accurate reconstruction of the transactions, relative reasons and performed authorisation and control path.

All Personnel must collaborate in performing every type of audit and review of corporate operations that are required by law or internal control bodies. It is absolutely prohibited for anyone to impede or obstruct by any means (concealing documents or other fraudulent means), including omission, the regular performance of audit activities of the company bodies, control bodies and Shareholders.

All corporate bodies shall comply with and actively collaborate so that the specific provisions of the Organisation Model are complied with that are aimed at preventing the occurrence of illegal behaviour in the corporate, tax and customs sphere.

4.7 Fight against money laundering, self-laundering or the use of cash, assets or benefits from an illegal source

The Company demands the most rigorous compliance with money laundering legislation and prepares adequate administrative-accounting procedures to ensure compliance with relevant legislative provisions. Therefore, the recipients may not in any case and for any reason, acquire, replace or transfer cash, assets or other benefits aware of their illegal source and must refrain from performing any transaction suitable - or that can appear as such - for hindering the identification and/or illegal source (e.g., reuse proceeds from a crime in other legal activities).

The Company is committed to asking its administrative personnel - preventively - for available information (including financial information) on counterparties, trade partners and suppliers to verify their reliability. The Administration Department promptly complies with money laundering requirements in current legislation, ensuring constant updating on the evolution of legal provisions.

4.8 Protection of personal data and confidentiality

The Company intends to ensure maximum confidentiality of the information in its possession and provides data controllers, whether Recipients or third parties, a complete and updated policy on data processing - both ordinary and possibly sensitive - acquired by the Company or which will be acquired and/or processed in the course of its business requesting, if necessary and in required cases, issue of their informed consent.

In any case, the Company ensures a high level of security in its management systems concerning personal data processing and confidential information.

Consequently, the Recipients of this Code:

- must process personal data in complete compliance with current legislation concerning personal data protection, according to the instructions given to them by competent company representatives;
- must avoid using confidential information for purposes unrelated to the performance of their job;
- agree to only process data necessary for performing their function, to carefully retain it preventing its disclosure unless specifically authorised and verification of the lawfulness of the activity;
- must maintain complete confidentiality of the information they learn of based on performance of their function and/or in accomplishing the engagement assigned to them.

Therefore, personal data processed by the Recipients must be:

- processed legally and based on fairness, subject to specific authorisation of the data subject;
- collected and recorded for certain, explicit and legitimate purposes;
- exact and updated;
- pertinent, complete and do not exceed the purposes for which they were collected and later processed;
- retained in a form that permits identification of the data subject for a period not longer than necessary for the purposes for which the data were collected and later processed.

The Recipients who process personal data must adopt all the most adequate measures to prevent the risks of destruction or loss, including accidental, of the aforesaid personal data, unauthorised access to the same or processing that is not allowed or not consistent with the purposes of their collection.

4.9 Protection of the security of company assets

Unicalce S.p.A.'s property, plant and equipment and intangible assets are assigned to personnel based on their job, they must be stored with utmost care and cannot be transferred or inappropriately made available to third parties.

It is mandatory to comply with company rules regulating the use of such assets, with particular reference and attention to rules regarding the use of email, telephones, IT resources and company vehicles that may be assigned. In relation to the company IT system, each employee and/or independent contractor is required to:

- scrupulously comply with policies related to cyber security;
- comply with laws and regulation concerning copyright avoiding illegal downloading and/or installing of software not adequately licensed through company IT resources.

4.10 Occupational health and safety

Unicalce S.p.A. considers occupational health and safety a mandatory duty, recognises it as its own and pursues as specific objectives all the fundamental principles generally recognised concerning occupational health and safety and is committed, through specific occupational health management system procedures, to:

- avoid risks, assess risks that cannot be avoided and fight risks at the source;
- adjust work to the person, particularly concerning the concept of the work place and selection of work equipment and work and production methods, above all to mitigate monotonous jobs and repetitive jobs and to reduce the effects of these jobs on health;
- take into account the degree of technical evolution;
- replace what is hazardous with what is not hazardous or which is less hazardous;
- plan prevention, aiming at a coherent whole that integrates technique, work organisation, working conditions, social relations and influence of work environment factors;
- place priority on collective protection measures rather than individual protection measures;
- give adequate instructions to workers.

The Company makes available all of the human, instrumental and economic resources necessary for pursuing continuous improvement objectives of occupational health and safety as an integral part of its activity and as a strategic commitment in relation to the more general company purposes. In order to

improve the performance of the occupational health and safety management system the Company is formally and publicly committed to:

- comply with current legislation, internal rules and procedures concerning occupational health and safety;
- provide healthy and safe work places, safety equipment, safe work procedures and best practices based on an accurate and weighted risk assessment;
- analyse and monitor occupational accidents and diseases in order to identify the cause and define actions and experiences to use to prevent them from reoccurring;
- train and inform employees on health and safety issues so they perform their jobs safely;
- regularly perform internal audits and check the work areas and behaviour in order to ensure compliance with legal requirements and internal rules;
- monitor, assess and review objectives and performance of processes in order to improve the safety management system and maintain system certification compliant with the standard ISO 45001:2018;
- provide conduct and safety rules to contractors and third parties that interact with our activities in order to prevent occupational accidents;
- improve both work conditions and environment in order to mitigate risks and increase the internal satisfaction of workers.

All the recipients of this Code are required to fully comply with legal obligations and company Occupational Health and Safety Management System procedures. Maximum availability and collaboration with the working personnel of competent authorities must be ensured during their inspections on occupational health and safety.

4.11 Protection of environment

The Company pays particular attention and care to the environment and is committed to identifying company policies that improve the environmental impact of its activities in line with relevant best practices and technical-scientific evolution. Unicalce S.p.A. views sustainable development of strategic importance for its business and considers compliance with legal obligations and requirements concerning the environment as a mandatory requirement for all its activities.

For these reasons the Company is formally and publicly committed to:

- Progressively applying an Environmental Management System to the entire organisation, certified according to the standard EN ISO 14001:2015 and extend EMAS registration to all operating sites with the aim of identifying, assessing and monitoring the environmental aspects connected with its activities and services, ensuring compliance with the conformity obligations and searching for continuous improvement of its environmental performance;
- Perform a measurement of the processes and environmental aspects associated to them, through identification of indicators and assess their risks and correlated opportunities;

- Control and, when possible, reduce the environmental impacts with the application of the best technologies available in designing and upgrading production plants;
- Manage the company's production plants in order to improve, when possible, environmental performance, including in consideration of the needs and expectations of Stakeholders;
- Optimise the use of natural resources, in particular by placing priority on the use of renewable energy sources;
- Plan and manage mining activities so as to protect biodiversity and local ecosystems;
- Train personnel on environmental issues, searching for the necessary and convinced collaboration;
- Make suppliers and contractors aware and qualify them with particular reference to environmental protection and compliance with environmental legislation;
- Communicate the results obtained in the environmental field to Stakeholders as well as the environmental performance of the EMAS registered sites.

ART. 5 COMPLIANCE WITH THE CODE OF ETHICS AND SUPPLIERS CODE OF CONDUCT BY THIRD PARTIES

Subjects outside the Company that work, directly or indirectly, to pursue the company objectives and interests (consultants, suppliers, etc.) are obliged to comply with the ethical provisions contained in this Code of Ethics and in the Supplier Code of Conduct dedicated to them.

For this purpose, contracts, letters of assignment and/or trade agreements contain certain clauses aimed at requiring the third party subject to fully comply with these ethical requirements contained in this Code as well as to comply with those contained in Suppliers Code of Conduct, punishing any violations with the contractual instruments dedicated to this purpose (such as, by means of example, but not limited to, warning to comply, application of penalties or termination of the contract in more serious cases).

ART. 6 SUPERVISION AND CONTROL

The Company has planned and implemented different channels for reporting any violations, diversified in relation to the subject of the report and the competence of the various internal bodies responsible for supervision. For the operating procedure to be followed to correctly submit reports of any violations, please refer to the detailed provisions contained in the following policies:

- DIR 07 Management of reports of any unlawful acts pursuant to Legislative Decree 24/2023;
- SGPG/ HR04 – Policy for combating harassment in the workplace, letter F “Reports”.

ART. 7 PENALTIES

Any discovered infringements to the ethical principles of this Code may give rise to the application of penalties, in compliance with the disciplinary system contained in the Organisation Model of Unicalce S.p.A., current normative provisions and contractual rules applicable between the parties.

In particular:

- the members of corporate bodies (administrative bodies, delegated bodies, board of statutory auditors) and personnel (employees and contract workers) of the Company who violate the Code provisions can be liable for the penalties codified by article 5 of the disciplinary system of the Organisation, Management and Control Model adopted by the Company pursuant to Italian Legislative Decree no. 231/01;
- third parties (suppliers, consultants, agents, etc.) that violate the present Code of Ethics provisions as well as Suppliers Code of Conduct provisions are liable for the penalties codified in the respective contractual regulations, in consideration of the disciplinary system provisions of the Organisation, Management and Control Model adopted by the Company pursuant to Italian Legislative Decree no. 231/01.