

Information Notice – Organization, Management and Control System pursuant to Legislative Decree 231/2001

SCL Italia SpA (SCL) operates in accordance with principles of legality, integrity, protection of workers' health and safety, and environmental protection, integrating these values into its governance system and business processes.

Within this framework, SCL has adopted an Organization, Management and Control System pursuant to Italian Legislative Decree of 8 June 2001 no. 231, aimed at preventing the offences contemplated by the legislation and consistent with the Company's organizational structure and the activities carried out.

The 231 System forms an integral part of a broader internal control system and is aligned with the Company's Code of Ethics, which sets out the principles of conduct to be observed by directors, employees, collaborators and business partners in the performance of their respective activities.

SCL has also implemented and maintains an Occupational Health and Safety and Environmental Management System, compliant with UNI EN ISO 45001, UNI EN ISO 14001 and EMAS III standards, adopting a structured approach based on:

- identification and assessment of risks and environmental impacts
- definition of roles, responsibilities and operational procedures
- control of sensitive activities and operating conditions
- training, information and involvement of personnel
- performance monitoring and continuous improvement.

The 231 System, the Code of Ethics and the HSE Management System are coordinated and mutually consistent, sharing common principles of prevention, control and accountability, including with reference to predicate offences related to occupational health and safety and environmental protection.

Finally, SCL has established a Supervisory Body (Organismo di Vigilanza), vested with autonomous powers of initiative and control, tasked with overseeing the effective implementation of the 231 System, in coordination with the competent corporate functions and in compliance with the defined information flows.