

# Code of Ethics



Caltra Nederland BV  
Part of the Kerakoll Group

**kerakoll**



# **Code of Ethics**

## **Organisation, Management and Control Model**

**This version is substantially aligned with the document approved by the Board of Directors of Kerakoll S.p.A. on 30 May 2023 and updated on 13 November 2025.**

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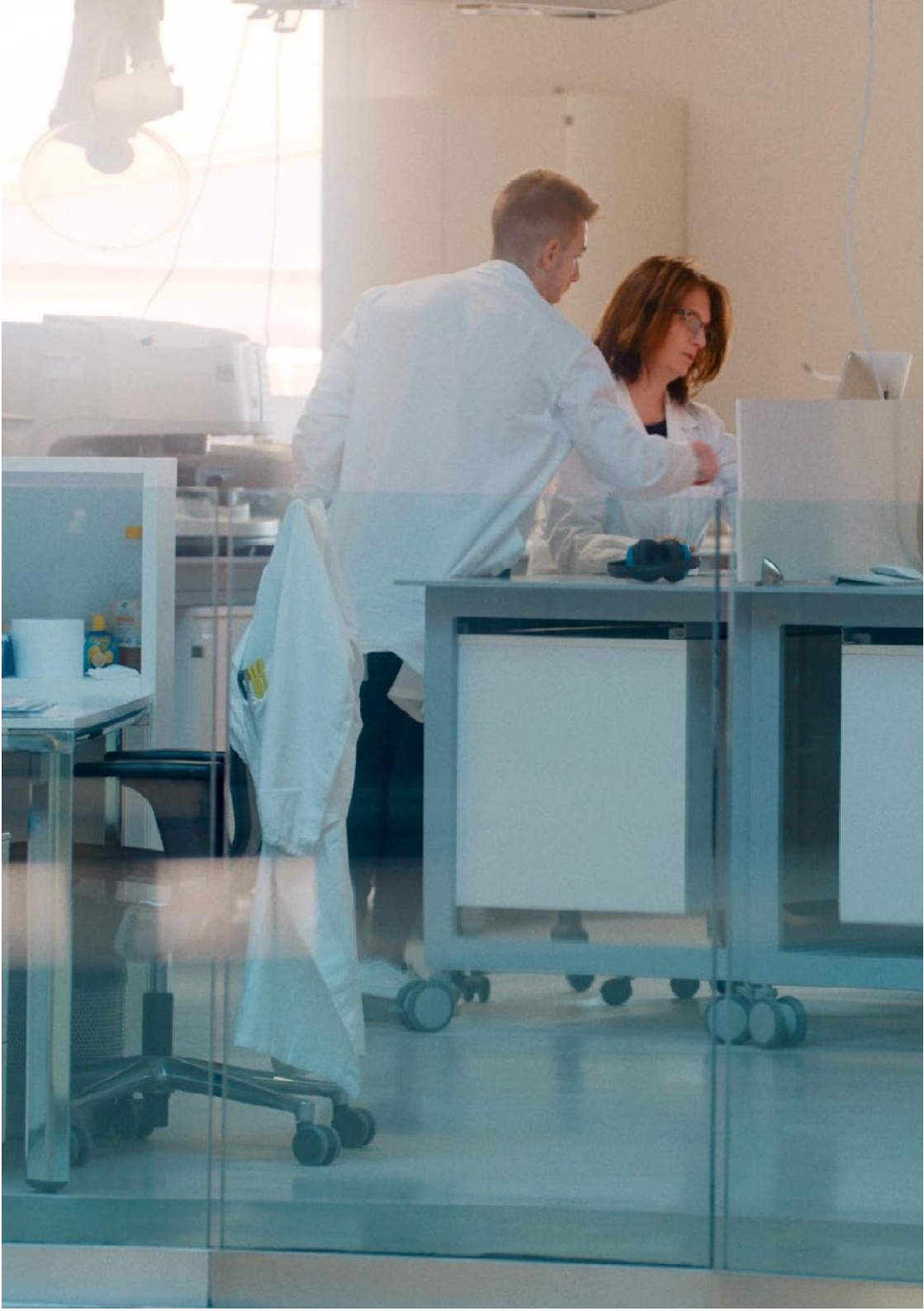


# Premise

**This Code of Ethics (hereinafter also the "Code") was adopted by resolution of the Board of Directors of Kerakoll S.p.A. (hereinafter also the "Company") and is applied throughout the Kerakoll Group.**

**As part of the Kerakoll Group, Caltra Nederland B.V. applies this Code of Ethics.**

**With this document, it is important to define with the utmost clarity the set of values and principles that Kerakoll S.p.A. and the Kerakoll group of companies recognizes, shares and promotes and that are an integral part of its corporate culture, a source of inspiration for people's daily behaviour.**



# Target audience and scope

The Kerakoll Code of Ethics is applicable to all those who, directly or indirectly, permanently or temporarily, establish, for any reason, working relationships and partnerships - however named - with Kerakoll Spa. These will be referred to as addresses through the Code and are defined as:

- employees (whether permanent or temporary, including managers),
- members of management and control bodies
- temporary workers
- collaborators
- consultants
- suppliers of goods and services
- as well as any other person who establishes, for any reason, relationships or relations with Kerakoll Spa and the Kerakoll group of companies and/or who acts in the interests of the same.

It is everyone's responsibility to act in a manner consistent with our principles.

It is everyone's responsibility to report any non-compliance in accordance with the procedures set out in this Code.

## Respect for human rights

The Kerakoll Group recognises respect for human rights as a fundamental principle in the conduct of all its activities, in line with the "UN Guiding Principles on Business and Human Rights", the "International Bill of Human Rights" and the "International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work".

The company is committed to supporting and promoting universally recognised human rights and requires its employees, collaborators, suppliers, business partners and stakeholders to comply with these principles.

The Kerakoll Group also undertakes to monitor the presence of and actively contribute to the remediation of any negative impacts on human rights that it has caused or contributed to, promoting effective and transparent remediation processes.



# The principles of the Code of Ethics

## → Honesty

The Kerakoll Group is fundamentally committed to complying with the laws and regulations in force in all countries in which Kerakoll operates.

In all relationships, both internal and external, the Addressees of this Code as detailed above, are required to behave with transparency, integrity and honesty, refraining from pursuing personal and/or company interests in violation of any collective agreements, applicable laws, and this Code,

The Kerakoll Group rejects and combats any type of corruption aimed at obtaining advantages for itself and for others.

## → Loyalty and fair competition

Loyalty towards colleagues, as well as with business partners, competitors and institutions, translates into correct, transparent behaviour that respects the principles of fair competition.

The Kerakoll Group is committed to operating in full compliance with national and international regulations protecting free and fair competition, rejecting any anti-competitive practices. Therefore, any behaviour that violates these principles is prohibited.

## → Responsibility

Kerakoll Group promotes the utmost responsibility in the execution of all activities and in the development of corporate objectives and is attentive to the repercussions, implications and consequences of its actions on the community, consumers, colleagues, stakeholders and civil society.

## → Stakeholder trust and protection

It is important that the working relationship between employees and collaborators and the company is based on respect and mutual trust.

The Kerakoll Group considers the protection of its stakeholders to be fundamental and complies fully with current legislation. The Kerakoll Group is committed to implementing commercial practices that comply with applicable legislation, allowing business partners to make decisions and engage in economic behaviour that compliant.

# The principles of the Code of Ethics

## → Correctness

The behaviour and activities of the Recipients must be inspired by the utmost fairness, also in the relationship with colleagues, suppliers, customers and, more generally, with all those with whom they come into contact due to the functions performed. This principle, in addition to compliance with the procedures set out in company policies, implies that situations of discrimination and conflict of interest must be avoided.

## → Transparency and completeness of information

In order to avoid improper practices and conduct, which must not be encouraged in any way, Kerakoll Group considers transparency to be a fundamental principle. To this end, the truthfulness, completeness and accuracy of the information provided both within and outside the company are considered essential for the conduct of its business and corporate life. The Kerakoll Group guarantees that its accounting records are kept in accordance with the principles of fairness, precision, accuracy and traceability, in compliance with current legislation. It remains understood that the principle of transparency must be harmonised with the equally essential principle of confidentiality and protection of company data: all confidential company information, especially that of a strategic, commercial and technical nature, must be treated in compliance with legal and contractual obligations and internal company policies.

## → Health & Safety

As part of its activities, Kerakoll Group is committed to ensuring the safety and health of workers, collaborators, users of the products and the communities affected by the activities themselves and to pursuing the improvement of health, safety, prevention and protection conditions in the workplace.

## → Environment

Kerakoll Group pursues the constant reduction of the environmental footprint of products, production and logistics processes and the supply chain, including the extraction of resources, the use of energy sources, the use of toxic substances, the generation of waste and greenhouse gas emissions.

## → Centrality of people

Kerakoll Group supports initiatives aimed at achieving a healthy and dynamic work environment, inspired by motivation and involvement, favouring teamwork, encouraging the acquisition of new skills and able to measure, recognise and reward the contribution of each individual. To enhance the skills and safety of workers, Kerakoll Group provides them with training, updating and professional development tools. Kerakoll Group seeks excellence not only in its supply system, but also in its people, pursuing criteria of merit, professionalism and competence.

## **The principles of the Code of Ethics**

### **→ Equal opportunities, impartiality and inclusion**

**Kerakoll Group condemns all forms of physical and psychological discrimination and, in particular, any discrimination based on ethnicity, nationality, gender, age, physical disabilities, sexual orientation, political opinions, trade unions or religious beliefs. This principle is applied to all aspects of the working relationship, ensuring that work within the company is carried out in full compliance with all applicable laws and regulations on working hours and with a view to balancing business needs with the right to rest and leisure. Wages, bonuses, benefits, overtime and other payments provided for by law are paid to workers on time and to an adequate level to ensure a decent subsistence for the worker and their family. Diversity enriches and creates value: through the enhancement of differences, Kerakoll Group promotes integration and inclusion.**

### **→ Promotion of mental and physical wellbeing**

**Kerakoll Group is attentive to the psychological wellbeing of each colleague. It is everyone's responsibility to co-create an environment that facilitates wellbeing. The organization is particularly attentive to the protection of physical health. Kerakoll Group has been guaranteeing and maintaining safe working conditions for years and provides workers with all the most advanced tools useful for their protection.**

### **→ Separation of roles and responsibilities**

**Kerakoll Group develops and improves its organizational system in order to guarantee the principle of separation of roles and responsibilities of those who execute, those who verify and those who approve. The operating procedures are planned and described in job descriptions, procedures and, more generally, in company policies that must be observed by all those who collaborate in any capacity within and/or with the Company.**



# Rules of conduct

## → Conduct in business activities

Kerakoll Group is inspired by the principles of loyalty, fairness, transparency, efficiency, sustainability and personal wellbeing.

All Addressee of the Code must behave correctly in the business activities of interest to Kerakoll Group and in relations with the Public Administration, regardless of the competitiveness of the market and the importance of the business handled.

Corrupt practices, illegitimate favours, collusive behaviour, illicit influence, solicitations directly and/or through third parties, promises of personal and career advantages for oneself or others, are prohibited.

Kerakoll Group's collaborators are required to avoid all situations and activities in which there may be a conflict with the Company's interests or that may interfere with their ability to take impartial decisions in the best interests of the Company and in full compliance with the provisions of the Code.

## → Relations with collaborators

Kerakoll Group plays its entrepreneurial role both in the protection of working conditions and in the protection of the psycho-physical integrity of the workers, respecting their personality means preventing it from suffering any unlawful conditioning or undue inconvenience.

The Recipients shall ensure that all collaborators maintain a climate of mutual respect for the dignity and reputation of each one and will therefore intervene to prevent abusive or defamatory interpersonal attitudes.

## → Personnel selection policies

The selection of collaborator is carried out exclusively on the basis of the candidates' skills and professional skills, taking into account the roles that, according to the Company's needs, require suitable coverage. With this in mind, candidates are selected in full compliance with the principle of equal opportunities, without discriminating in any kind and avoiding any form of favouritism or clientele.

Another crucial element within the selection process is the cultural fit and adherence to corporate values.

# Rules of conduct

## → Health & Safety

Kerakoll Group is committed to creating and maintaining a working environment that protects the physical integrity and dignity of its colleagues through compliance with current legislation on safety and risks at work. To this end, constant monitoring of safety and health conditions in the workplace is carried out, carrying out the appropriate technical and organisational interventions that may be necessary to ensure the best working conditions. All colleagues are required to use company assets appropriately and safely in order to maintain an environment as free as possible from health or safety hazards. Colleagues have a duty to comply with safety regulations and to immediately report accidents, dangerous conditions or behaviour and potentially harmful work situations to those responsible.

## → Fairness in interpersonal relations and prohibition of harassment

The Kerakoll Group does not permit any harassment in internal and external business relationships, or example as the non exhaustive examples below:

- creating an intimidating, hostile or isolating work environment for individuals or groups of workers;
- unjustified interference with the performance of the work of others;
- block the personal development of others out of own interests
- undesirable behaviour, carried out for reasons related to sex, having the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating or offensive climate;
- undesirable conduct with a sexual connotation, expressed in physical, verbal or non-verbal form, having the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating or offensive climate;
- the subordination of decisions affecting the addressee's working life to the acceptance of requests or favours of a sexual nature;
- proposals for private interpersonal relationships, conducted despite an express or reasonably evident dislike, which have the ability, in relation to the specificity of the situation, to disturb the serenity of the recipient with objective implications on his or her work expression.

## → Violence

Violent acts or threats of violence will be sanctioned.

It is also strictly forbidden to introduce weapons or other dangerous or offensive objects into the workplace, with the exception of specially and previously authorized personnel.

## → Child labour

The Company refrains from the use of child or forced labour and any other form of intellectual, social and moral exploitation, nor has it entered into or enters into contracts with suppliers or subcontractors who use them.

The minimum age for colleagues is 16 years and 18 years for dangerous and/or night work, unless the country where the addressee operates may have set higher limits.

# Rules of conduct

## → Conflict of interest

The target audience ensures that there is no conflict of interest, personal or professional, that may affect any relationship with Kerakoll Group, informing the latter promptly if they are aware of situations that may generate actual or potential conflicts.

## → Bribery, bribery and money laundering

The Company rejects corruption in all its forms, including bribery, extortion, and money laundering, ensuring maximum transparency in business dealings. The target audience undertake not to offer or grant any type of payment, gift, entertainment or other form of gift with the aim of influencing the business or commercial decisions of the people who collaborate with Kerakoll Group.

Only gestures of courtesy, reciprocity and hospitality are allowed, as long as they have a symbolic value with respect to existing business relationships.

## → Prohibition of fraud

Kerakoll Group prohibits any kind of manipulation of documents and false transactions. Every worker is invited to proceed with a report even in the presence of suspected fraud. What Kerakoll Group expects is a clear, responsible and transparent attitude. The target audience must act in the interest of the company in compliance with local and international law.

## → Fair competition

The Kerakoll Group conducts its business activities with fairness, integrity and transparency, in full compliance with current competition and antitrust legislation, both nationally and internationally.

The Kerakoll Group refrains from adopting practices or behaviours that could constitute illegal agreements, abuse of a dominant position or any other practice that could harm free competition and the proper functioning of the market.

## → Relations with customers and end users

Kerakoll Group fully complies with the regulations for the protection of customers and end users and undertakes to implement commercial practices that are compliant and not prohibited by the applicable legislation, which allow them to make undistorted economic decisions and behaviour.

## → Relationships with suppliers and other third parties

The Kerakoll Group pays particular attention to establishing relationships with third parties. Decisions relating to suppliers or contractual counterparties, as well as the formulation of contractual conditions, are based on fairness, impartiality, equitable pricing

## Rules of conduct

and quality of goods and/or services. Applicable legislation prohibits unlawful agreements aimed at unreasonably altering the proper functioning of the market. Any agreement with competitors, whether formal or informal, direct or indirect, aimed at determining prices and the provision of services in violation of national and international legislation is therefore prohibited.

### → Relations with Statutory Auditors and Supervisory Bodies in general

All relations with Statutory Auditors and Supervisory Bodies in general, where they exist, must be based on the utmost professionalism, diligence, transparency, collaboration and availability, recognising the institutional role of these subjects. The target audience guarantee full and punctual execution of the required obligations and rules, issuing and providing the necessary information in a clear, timely and exhaustive manner.

### → Relations with the Public Administration and the Judicial Authorities

Relations with the Public Administration are conducted with the utmost transparency and fairness and in accordance with the principles of impartiality. Illegal payments/gifts made the company or their employees, as well as illegal payments/gifts made through persons acting on behalf of such entities, anywhere the Kerakoll Group operates, are considered acts of corruption.

In relations with the Public Administration, Addressees are not permitted, either directly or indirectly, or through an intermediary, to offer or promise money, gifts or compensation in any form, nor to exert unlawful pressure, nor to promise any object, service or benefit to managers, officials and employees of the Public Administration, or to persons in charge of public services and their relatives or cohabitants, for the purpose of inducing them to perform an act in accordance with or contrary to the official duties of the Public Administration, except in the case of gifts or benefits of modest value. When participating in tenders with the Public Administration, we must operate in compliance with the law and fair commercial practices. The Kerakoll Group cannot be represented in its dealings with the Public Administration by consultants or 'third parties' that have a conflict of interest, even potential ones, performing the role held. The Kerakoll Group requires its consultants and collaborators to behave with the utmost transparency, fairness and impartiality. During negotiations, requests or, in general, any commercial relationship with the Public Administration, employees, consultants, collaborators and third parties acting in the name, on behalf or in the interest of the Kerakoll Group are expressly prohibited from carrying out (directly or indirectly) the following actions:

- examining or proposing employment and/or commercial opportunities that may benefit employees of the Public Administration on a personal basis;
- offering or in any way providing gifts, including in the form of company promotions reserved for employees only or through, for example, the payment of travel expenses;
- soliciting or obtaining confidential information that could compromise the integrity or reputation of either party. The requirements set out in the preceding points may not be circumvented in any way by resorting to forms of aid and contributions that are formally

## Rules of conduct

different (assignments, consultancy, advertising, etc.) but aimed at pursuing purposes similar to those prohibited by this paragraph.

### → Relations with trade unions and political parties

Relations with trade unions and political parties are reserved only for the company functions authorised to establish and manage them on the basis of the provisions of company procedures. The Recipients are prohibited from promising or offering to colleagues or members of political parties, trade unions and associations in general payments or other benefits in order to promote or favour the interests of Kerakoll Group

### → Relations with organizations and associations

The Kerakoll Group may accept requests for donations, contributions and sponsorships from non-profit organisations, foundations, third sector entities, sports clubs, religious organisations and local communities that are involved in projects aimed at caring for people, the environment and cultural heritage. When evaluating and selecting proposals, the Kerakoll Group adopts criteria of transparency and consistency with its corporate values, paying particular attention to the prevention of personal or corporate conflicts of interest. However, it is prohibited to make donations, contributions or other forms of generosity if there are situations, even potential ones, of conflict of interest (i.e. when the donations could be interpreted as instrumental in obtaining undue advantages or favours).

### → Gifts, giveaways, or benefits

Any gifts given by the Kerakoll Group are intended solely to promote cultural, sporting or humanitarian initiatives or the image of the Kerakoll Group. The Addressees of this Code may not offer, promise, pay, solicit or accept, directly or indirectly, sums of money, benefits or advantages of any kind, even as a result of unlawful pressure, in order to obtain an improper advantage for themselves or for the Kerakoll Group. No form of gift is permitted that could be interpreted as exceeding normal commercial or courtesy practices, or in any case aimed at obtaining favourable treatment in the conduct of any activity connected with the Kerakoll Group.

Gifts offered, except those with a value equal to or less than €100.00 (one hundred), must be adequately documented to allow for verification, must be authorised by the department manager and HR and reported to the General Manager.

Addressees of this Code of Ethics who receive gifts or benefits that do not fall within the permitted categories are required to report them to the General Manager & HR.

### → Correct use of computer systems

Kerakoll Group pursues the objective of the correct use of IT or telematic services, in order to guarantee the integrity and genuineness of the data processed, to protect the interests of the Company and third parties, with particular reference to public authorities and institutions. To this end, Kerakoll Group adopts appropriate measures to ensure that access

# Rules of conduct

to telematic and IT data takes place in absolute compliance with current regulations and the privacy of any parties involved and in such a way as to guarantee the confidentiality of the information and ensure that its processing is carried out by expressly authorized parties, preventing undue intrusion.

In particular, the Company prohibits:

- the unlawful introduction into computer or telematic systems protected by security measures;
- the destruction, deterioration, deletion or alteration of information, data or computer programs belonging to others, of the State or of other public bodies;
- the production of false electronic documents, both private and public, with probative value;
- the installation of equipment designed to intercept, prevent or interrupt communications relating to a computer or telematic system or between several systems;
- the illegal removal, reproduction, dissemination or delivery of codes, keywords or other means suitable for access to a computer or telematic system protected by security measures.

Addressees commit to strictly comply with all legal provisions and regulations contained in the Regulations in force concerning the use of IT systems and devices.

## → Confidentiality and protection of intellectual property

The Recipients undertake to guarantee the confidentiality of confidential information received in any form by the Company in the course of business relations, including personal data of collaborators and business partners, financial information, commercial and industrial secrets, business plans, in accordance with applicable laws and regulations. The Recipients are required to always preserve all confidential information of the company and maintain absolute confidentiality with regard to information, such as confidential information, patents and know-how, in accordance with the provisions of the applicable law/regulation on data protection and confidentiality. It is strictly forbidden to have relations with competitors that could jeopardize the interests of Kerakoll Group.

## → External communication

Kerakoll Group's external communication policy is based on the principles of freedom and dignity of people.

Kerakoll Group's relations with the mass media and its presence on social media are managed by the corporate functions delegated to it.

Kerakoll Group colleagues are required not to disclose company information without the authorization of the competent departments.



# Health, Safety & Environment

As part of its activities, Kerakoll Group is committed to contributing to the development and wellbeing of the communities in which it operates, pursuing the objective of guaranteeing the safety of services and the health of colleagues, external collaborators, customers and the communities affected by the activities themselves and reducing the environmental impact.

Kerakoll Group actively contributes to the promotion of technological development aimed at guaranteeing the quality and safety of its services and goods sold.

The Company complies with all EU and national legislation on environmental protection and pays constant attention to the evolution of the relevant regulations in order to promptly adapt to the requirements that gradually arise.

Operational management must refer to advanced criteria of environmental protection and energy efficiency, pursuing the improvement of health, safety at work, prevention and protection conditions in the workplace, in order to safeguard the health and safety of all those who work in Kerakoll Group or collaborate with it.

## Health, Safety & Environment

The following are the fundamental principles and criteria on the basis of which decisions must be taken, of all types and at all levels, in the field of health and safety at work:

- eliminate risks and, where this is not possible, minimise them in relation to the knowledge acquired on the basis of technological progress;
- assess all risks that cannot be eliminated;
- reduce risks at source;
- to respect ergonomics and health principles in the workplace, in the organization of work, in the design of workplaces and the choice of work equipment, in the definition of working and production methods, in particular with a view to reducing the health effects of monotonous and repetitive work;
- replace what is dangerous with what is not dangerous or which is less dangerous;
- plan the measures deemed appropriate to ensure the improvement of safety levels over time, including through the adoption of codes of conduct and good practices;
- prioritise collective protection measures over individual protection measures;
- give appropriate instructions to workers.

These principles are used by the company to take the necessary measures for the protection of the safety and health of workers, including the prevention of occupational risks, information and training, as well as the establishment of an organization and the necessary resources.

Research and technological innovation must be dedicated in particular to the promotion of services and processes that are increasingly compatible with the environment and characterised by increasing attention to the safety and health of operators and end customers.

## Health, Safety & Environment

The colleagues, department heads and managers of Kerakoll S.p.A. and the Kerakoll Group are committed to maintaining and improving safety, the quality of services and the working environment.

In relation to activities with a possible environmental impact, the Company has focused its efforts on compliance with environmental legislation and on implementing preventive measures to avoid or at least minimize, as far as possible, the environmental impact and to this end it also requires this commitment from other parties unrelated to Kerakoll S.p.A., linked to the company by contractual and commercial relationships.

In particular, the Company undertakes to:

- take appropriate measures to limit and - if possible - eliminate the negative impact of economic activity on the environment not only when the risk of harmful or dangerous events is demonstrated (preventive action principle), but also when it is uncertain whether and to what extent the business activity exposes the environment to risks (precautionary principle);
- give priority to the adoption of measures to prevent possible damage to the environment, rather than waiting for the time to repair damage that has already been done;
- plan an accurate and constant monitoring of scientific progress and regulatory developments in environmental matters;
- promote the values of training and sharing the principles of the Code among all those working in Kerakoll Group's top management or subordinates, so that they comply with the established ethical principles, in particular when decisions must be taken and, subsequently, when they must be implemented.

## Control activities

The Kerakoll Group is committed to promoting and embedding a corporate culture at all levels of the organisation, based on full awareness of individual and collective responsibilities, compliance with applicable regulations and the importance of control systems. This culture is based on processes and operating methods aimed at verifying corporate compliance, preventing risks and continuously promoting corporate efficiency.

The Kerakoll Group recognises the added value of controls, which are useful for the timely identification of risks and the strengthening of compliance and organisational efficiency. Internal controls are defined as all the tools necessary or useful for directing, managing and verifying the company's activities, with the aim of ensuring compliance with laws and company procedures, protecting company assets, managing activities efficiently and providing accurate and complete accounting and financial data. Within the scope of their respective responsibilities, managers and supervisors are required to participate in the company's control system and to involve their colleagues in it.

All control activities will always be carried out in compliance with the law and with respect for the confidentiality, freedom and dignity of individuals.

## **Monitoring and implementation of the Code of Ethics**

Kerakoll S.p.A. and the Kerakoll group is committed to ensuring:

- the maximum distribution of the Code to the Recipients;
- the in-depth study and updating of the Code, in order to adapt it to the evolution of the reference values and regulations of relevance to the Code itself;
- the provision of cognitive and clarification tools on the interpretation and implementation of the rules contained in the Code;
- carrying out checks on any notice of violation of the provisions of the Code or of reference;
- the assessment of the facts and the consequent implementation, in the event of ascertained violation, of appropriate sanctioning measures;
- the absence of any form of retaliation against those who, in good faith, report alleged violations of this Code of Ethics and the laws in force.
- the confidentiality of the identity of whistleblowers in accordance with applicable legislation.

The General Manager, in collaboration with the Human Resources Department, promotes and monitors periodic training initiatives on the principles of this Code. This includes differentiating activities according to the role and responsibility of the target audience concerned, i.e. through the provision of more intense training and a higher degree of in-depth analysis for those who qualify as 'top management', as well as for those operating in areas that qualify as 'at risk'.

In the contracts with stakeholders, the introduction of clauses and/or the signing of declarations aimed both at formalizing the commitment to comply to the Code of Ethics, and at regulating contractual sanctions, in the event of violation of this commitment, is also envisaged.

# **Registration, authorization, verifiability, legitimacy, consistency and fairness of transactions**

**All actions and operations must be properly recorded and it must be possible to verify the decision-making, authorisation and execution process.**

**For each operation there must be a suitable documentary support to allow, at all times, the carrying out of checks that attest to the characteristics and reasons of the operation and identify who authorized, carried out, registered, verified the operation itself.**

# Violations of the Code of Ethics, related reports, disciplinary system, duties of the General Manager & HR - Whistleblowing

Violation of the provisions of this Code constitutes breach of contract and, if committed by employees, also constitutes a disciplinary offence punishable under disciplinary proceedings in accordance with the provisions of local law and, where applicable, the disciplinary section of applicable national collective labour agreements, a copy of which has been made available to each employee and is to be considered fully incorporated and transcribed in this document.

Addressees may be held liable for compensation for damages caused by violations of this Code. Addressees should report violations or suspected violations of the Code.

In particular, if a person required to comply with this Code of Ethics becomes aware of a fact and/or circumstance that could constitute a violation, they are required to report it promptly to the General Manager and HR.

The Company has activated the appropriate dedicated communication channels in order to facilitate the reporting process. Reports can be made in writing by sending a specific communication, including anonymously, to Caltra Nederland B.V., Communicatieweg 21, P.O. Box 306, 3640 AH Mijdrecht (The Netherlands), for the attention of the managers of the whistleblowing channel.

In addition, reports may be submitted through a dedicated whistleblowing channel at <https://caltra.whistlelink.com/>, where any reports regarding non-compliance with this Code may be sent. This channel is used to receive reports and to ensure the confidentiality of the whistleblower's identity.

Signed and detailed reports of violations of the Code based on precise and consistent factual elements will be taken into consideration.

Anonymous reports may also be taken into consideration, provided that they meet the above requirements.

Caltra Nederland B.V. and the Kerakoll Group guarantee maximum protection of the whistleblower's data and oppose any form of direct or indirect retaliation or discrimination against the whistleblower that is directly or indirectly related to the report.

Retaliation, discrimination, or direct or indirect sanctions against persons who, in good faith, report violations of this Code of Ethics are expressly prohibited. Any discriminatory, retaliatory, or punitive conduct towards the reporting person will be investigated and, if confirmed, will lead to disciplinary proceedings in accordance with local law. Likewise, reports made with malice or gross negligence that are clearly unfounded or misleading will be sanctioned, subject to verification of liability.

The General Manager and HR, in particular, will have the following tasks, among others:

- to monitor compliance with the Code and its dissemination to all Addressees;
- verifying any reports of violations of the Code and informing the relevant company bodies and departments of the results of the investigations for the adoption of any disciplinary measures;
- proposing changes to the content of the Code to adapt it to the context in which the Kerakoll Group operates and to the needs arising from the evolution of the Kerakoll Group;
- providing information in case of doubts about the conduct to be adopted.

## Final provisions

### → Conflict with the Code

In the event that even one of the provisions of this Code conflicts with provisions of internal regulations or procedures, the Code shall prevail over any of these provisions.

### → Changes to the Code

Any amendments and/or additions to this Code must be made in the same manner as those adopted for its initial approval.

This Code of Ethics is – at least annually – subject to verification and possible updating by Kerakoll S.p.A. and Caltra Nederland B.V. of Directors, also on the proposal of the Supervisory Board.





**Caltra Nederland BV**  
Part of the Kerakoll Group

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