

# CODE OF ETHICS AND CONDUCT

# 01

## INTRODUCTION AND PURPOSE OF THE CODE OF ETHICS

Atar is attentive to the value of corporate social responsibility and is committed to generating a positive impact on society, on the environment and on people. This is a fundamental goal that drives the company to improve.

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The present Code is a tool for defining Atar's ethical, social, and environmental responsibility and it states the rights, duties, and responsibilities of all stakeholders who have business relationships with the company.

# 02

## MISSION AND COMMITMENT

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A real and transparent commitment to sustainable development, through the creation of indicators that allow the monitoring and improvement of the company's economic, social, and environmental impacts:

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Promotion of a conscious and sustainable model of conducting business, through the development of ideas and projects aimed at maintaining the best conditions for the well-being of employees and at attracting and nurturing talented individuals;

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3

Development and creation of products that are safe, ethical and of high quality and incorporate, where possible, features that foster a better environmental impact, with packaging that is sustainable and from a circular economy;

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4

Real commitment to the development of solutions that minimize negative impacts and amplify positive ones on people and the environment, through the creation of products that enhance people's well-being and at the same time are respectful of nature;

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5

Support for social and cultural projects and initiatives through collaboration with other companies, institutions, non-profit organizations and local associations, in order to promote initiatives that generate a positive, cross-cutting impact for people and the various stakeholder groups.

IF YOU CAN DREAM IT, YOU CAN DO IT  
Walt Disney

ATAR BELIEVES IN FUNDAMENTAL HUMAN RIGHTS AND RESPECTS THE DIGNITY OF EVERY INDIVIDUAL, ACCORDING TO THE UNIVERSAL DECLARATION OF HUMAN RIGHTS RATIFIED BY THE UNITED NATIONS. THEREFORE ATAR UNDERTAKES:

- Not to exploit and/or support child labour;
- Not to engage in any form of forced or compulsory labour and to avoid any behaviour involving threats, use of force or any form of coercion, abduction, intimidation, retaliation, or abuse of power for the purpose of exploiting any person;
- To avoid any form of discrimination based on age, ethnic and racial origin, nationality, political opinion, religion, gender, trade union membership or health status. Atar adheres to the principle of providing everyone with access to employment, facilities and services, basing its judgement solely on the person's work skills;
- To comply with the current legislation on working hours and remuneration and with the provisions relating to the minimum national wage and the respective sector contracts, including in terms of overtime and allowances prescribed by law. In addition, the company undertakes to respect the employees' right to join any trade union without the threat of retaliation.

- Atar undertakes to avoid any type of conflict of interest within its decision-making processes; the company prohibits any form of advantage and/or favour that may be considered illegitimate, and it also undertakes to maintain a conduct of utmost loyalty in its competitive dealings with other companies.
- Atar prohibits any form of corruption within its organization; any exchange of favours, goods, money, and/or services that go beyond what can be considered courtesy must be reported to the competent figures within the company and subsequently penalized.
- Atar recognizes the inviolable right to protection of privacy, especially where customers and employees are concerned. To this end, it undertakes to ensure the confidentiality of personal and sensitive data in its possession, in compliance with Regulation (EU) 2016/679.

- ✓ Atar Naive prioritizes the health and safety of its employees.
- ✓ It is agreed within the company environment that every worker must take active responsibility for health and safety matters.
- ✓ As a deterrent to possible accidents in the workplace, the company provides health and safety training for its employees on an annual basis.
- ✓ Atar undertakes to manage and reduce health and safety risks as much as possible, ensuring safe working conditions for the prevention of work-related injuries.

**Atar undertakes to:**

- ✓ Carry out its activities in an environmentally sustainable way, aiming to minimize negative impacts on the local area and community, for example by favouring the use of products of natural origin and with more eco-friendly packaging;
- ✓ Monitor the impacts related to energy, waste and water and undertake to optimize natural resources, without wasting them;
- ✓ Identify and monitor direct and indirect impacts on the environment, including by raising the awareness of its stakeholders;
- ✓ Invest through donations and charitable activities and in the local community and area.

# 06

## SUPPLIER CODE OF CONDUCT

Paragraph 6 of this document provides a list of the duties that all Atar suppliers are subject to. Suppliers must guarantee compliance with these duties and are furthermore encouraged to conduct checks internally and along their supply chain to verify adherence to them.

### **Therefore, suppliers shall:**

- ✓ Comply with the laws and regulations applicable in the country of operation, retaining the authorizations/permits/certificates related to said country's legislation, as well as with the requirements set out in this Code.
- ✓ Comply with the regulations of the country of operation regarding child labour, avoiding any form of forced or otherwise involuntary labour;
- ✓ Ensure that their employees are not subject to harassment or discrimination in the workplace based on ethnicity, caste, religion, age, social origin, sexual orientation, gender, disability, union membership or political opinions;
- ✓ Respect the right of their employees to join or not join any trade union without the threat of retaliation;
- ✓ Comply with applicable laws in their country regarding wages, working hours, allowances, benefits and overtime;
- ✓ Ensure that employees have adequate time for breaks and meals according to legal requirements;



# 06

## SUPPLIER CODE OF CONDUCT

- ✓ Guarantee safe, clean, protected, and healthy work environments, implementing all necessary measures to reduce the risk of accidents, injuries, or exposure to harmful substances, especially in the presence of hazardous materials.
- ✓ Implement established safety procedures and preventive maintenance, and use personal protective equipment (PPE) as required by law. PPE must be readily available to workers, free of charge, as well as maintained in good condition and regularly replaced if necessary;
- ✓ Suppliers must safeguard Atar's intellectual property rights and confidential information. Suppliers must protect such data and any information they come into possession of, in accordance with applicable privacy protection laws in their country.
- ✓ Maintain accurate financial records and hold a regular business license.
- ✓ Not offer money, gifts, discounts, or other payments, illegal compensation or benefits when dealing with public officials or other individuals in the private sector, including Atar's employees or representatives, in order to influence decisions to gain any kind of advantage;
- ✓ Ensure that pollution levels are regularly monitored and controlled in order to comply with the requirements of the law and of the permits held by the supplier;
- ✓ Ensure that chemicals and waste are stored, used, transported, and disposed of in compliance with legal requirements;
- ✓ Where possible, monitor environmental parameters such as energy, air and water quality;
- ✓ Have a waste management system in place that complies with the legislation of the country in which the supplier operates.

*Suppliers must comply with what is set out in paragraph 6 of this document and undertake to promote these principles among their stakeholders and along their supply chain. If local laws impose stricter requirements than those provided for by this Code, suppliers must comply with the provisions applicable in the country where they operate. Suppliers shall promptly report to Atar any violations of the guidelines outlined in this document.*