

## Responsible Lobbying Practices Policy

### Our approach to Responsible Lobbying Practices

The F.I.L.A. Group is one of the leading global enterprises devoted to the research, design, manufacture, and sale of tools for creative expression. The Group designs, makes and packages tools and supports for drawing, colouring and painting, modelling, for use by children, youths and adults. Our product range includes more than 25 well-known brands and thousands of products sold on all continents.

We are engaged to a responsible behavior towards all our relevant stakeholders in operating business, combining respect of people, natural environment, and communities, and sustainability is therefore embedded with our Purpose, Vision, Mission, Values set out in our Ethics Code, and day-to-day operations.

This policy, together with our Ethics Code and the Corporate Governance Model, should be adopted by all Group companies and form part of the Group Organization, Management and Control Model, in accordance with the principles and objectives of the Organization, Management and Control Model as per Italian Legislative Decree 231/2001.

Institutional Relations are all those communication activities implemented by an organization towards political bodies and public, private or international administrations. It is a professional activity that consists of defending the legitimate interests of groups and companies before public or private administrations and communicating information about a particular sector, activity or group in a transparent manner. Institutional Relations contribute to the creation of business value through an articulated and stable system of external relations. All the activities are based on criteria of legitimacy, fairness and transparency, with regard to both the information disseminated in public agencies and to the relationships established directly with institutional stakeholders.

This Policy intends to regulate the institutional relations of the Group and, in particular, corporate lobbying activities, in order to ensure that they are being performed in observance of the principles of our Ethics Code and in accordance with the laws and regulations in force in the countries where the F.I.L.A. Group operates.

The Directors, Statutory Auditors, executives, employees of the F.I.L.A. Group and all those who work in Italy and abroad or on behalf of the F.I.L.A. Group, particularly if they have relations with institutional representatives, are called upon to observe the principles and requirements of this Policy within the scope of their duties and responsibilities.

We are committed to maintaining the highest possible ethical standards and to complying with all applicable laws in all countries in which we do business. We firmly believe to have the responsibility to operate in compliance with the rules of the countries where we have a presence, distinguishing ourselves as an enterprise capable of exporting the values that permeate our actions, by promoting them in the communities where we operate.

### Scope of this Policy

This Policy applies to F.I.L.A., its subsidiaries, the entities in which it holds a majority interest, and the facilities that it manages. We are committed to working with and encouraging our business partners to uphold the principles in this Policy and to adopt similar policies within their businesses.

Locally each company should adopt more stringent rules and procedures, as needed and in accordance with local laws and regulations. While conducting its management, coordination and supervision activities, F.I.L.A. S.p.A. respects management autonomy of each affiliate within its Group, managing and controlling the overall business, as per legitimate interests of majority and minority shareholders, considering confidentiality requirements and local applicable laws.

We firmly believe to have the responsibility to operate in compliance with the rules of the countries where we have a presence, distinguishing ourselves as an enterprise capable of exporting the Values that permeate our actions, by promoting them in the communities where we operate. The purpose of this Policy is to provide guidance to F.I.L.A.'s directors, officers, employees, agents, consultants, intermediaries, controlled joint ventures, and other third-party representatives to ensure compliance with applicable regulation and our Values and Policies.

The F.I.L.A. Group is committed to a continuous improvement of its policies and its programs, facilitating the adoption at local level of all procedures, rules, and instructions needed to have the principles set in this Policy applicable and monitored, in order to make an impact. By adopting this Policy, we believe to contribute to a better condition of existing and of next generations, providing tools for a better quality of life.

## General principles

Our Ethics Code is the basis of all our behaviors. Corporate lobbying is one of the Institutional Relations initiatives through which the Group participates in a public decision-making process by means of specific actions to protect its related company interests. This is performed through the transfer of detailed information and through qualified public decision-making bodies, in order to complete the cognitive framework of reference and contribute to creating guidance in reaching a decision.

The key principles to consider when conducting Corporate lobbying are:

- **Legality:** All Institutional Relations initiatives are to be conducted within the confines of the law, the regulations in force, the Ethics Code, and our Group Anti Bribery & Anti Corruption Policy,
- **Fairness:** Relations with institutional representatives are based on respect for the prerogatives, skills and decision-making autonomy of those involved and are conducted without exerting undue influence in the pursuit of corporate interests. F.I.L.A. does not tolerate activities aimed at pursuing personal and / or unrelated interests to those of the company.
- **Transparency and disclosure:** Where applicable, F.I.L.A. also adheres to the registers established by national and/or international institutions to ensure conditions of observance of the law and transparency, with specific reference to the activity of corporate lobbying. The F.I.L.A. Group staff convey the company's corporate role and the nature of the interest represented using relevant and up-to-date information.

In any case, it is forbidden for any F.I.L.A. Group staff to conduct corporate lobbying activities in any other country in which F.I.L.A. Group operates without these activities having previously been evaluated and approved by the F.I.L.A. Headquarter as well as to make reference to the possible involvement of any third-party professionals in support of the institutional activities of F.I.L.A. Group in the countries in which it operates.

The F.I.L.A. Group does not impede private participation/for own account of employees and associates in initiatives of a political nature, or similar. We exert no pressure on employees and partners to support any political bodies.

Employees engaging in personal political activity must do so as private citizens, not during paid work hours, and without using company resources for political purposes.

Employees must comply with all applicable laws in this regard, and those individual efforts must not in any way suggest F.I.L.A. Group support. Any employee who believes that there is a conflict between applicable law and our policies, or who feels that a violation of a policy has occurred may report such through the F.I.L.A. Group procedures.

Any political donations and/or lobbying expenditures made by the F.I.L.A. Group is to be disclosed.

However, prior approval from F.I.L.A. Group CEO or Risk Committee is required before any F.I.L.A. Group funds might be used for lobbying purposes; F.I.L.A. Group complies with all applicable laws that require reporting on lobbying and related activities.

F.I.L.A. Group does not make contributions, directly or indirectly, to political parties, or to their representatives or candidates.

F.I.L.A.'s Top Management has a strategic role in the full implementation of this Policy ensuring the involvement of all personnel and of those who collaborate with F.I.L.A. and the consistency of their behavior with the values embodied in this Policy.

This Policy is communicated within the organization and made available online to all stakeholders on the web site [www.filagroup.it](http://www.filagroup.it).

F.I.L.A. encourages anyone who becomes aware of facts or behaviors contrary to the Company's Code of Ethics, policies and internal rules, laws or regulations, to make a report in the utmost confidentiality. Assuring confidentiality of the whistleblower's identity, F.I.L.A. offers the following channels to file a report:

- E-mail: [whistleblowing.fila@gmail.com](mailto:whistleblowing.fila@gmail.com)
- Mail to: [odv@fila.it](mailto:odv@fila.it) Organismo di Vigilanza, F.I.L.A. Fabbrica Italiana Lapis ed Affini S.p.A. Via XXV Aprile, 5 20016 Pero (MI).

October 2021

GROUP CEO – Massimo Candela