

DISCLOSURES ON ORGANIZATION, MANAGEMENT AND SUPERVISION MODEL

Update January 2019

In order to strengthen all the company governance and supervision tools adopted to protect the Company and its shareholders, Radici Chimica S.p.A. considered appropriate to approve the new edition of its Organization, Management and Supervision Model by the Board of Directors on 6th December 2018, implementing the provisions set forth in Gov. Decree no. 231/2001.

The revision of the Model was carried out with the collaboration of the Law Firm directly entrusted by the Company that managed the revision both of the General Part and the Special Part Protocol of the Model, in order to update them to the new specific offences of the administrative liability ex d.lgs. 231/2001 introduced in the meantime and the regulation on whistleblowing (Law 179/2017).

By adopting its updated Model, Radici Chimica S.p.A. intends to firmly state and assure its stakeholders that any unlawful conduct shall be strongly disapproved by the Company, which adopted a suitable policy and supervisory system to prevent any conduct that may refer to the offence occurrences provided by Gov. Decree no. 231/2001 and that, as a consequence, may seriously jeopardize the company uprightness and standing. The Model aims at raising awareness among all those who act on behalf of Radici Chimica, especially in the areas identified as "hazardous" where the offences provided by the Decree might occur, in order to promote the fair, transparent management of corporate activities and the full compliance with the applicable regulations and ethical values in conducting business.

We remind that the standards contained in the Model are added to the ones set in the Code of Ethics adopted by the Company, containing the ethical and legal principles that the Company acknowledges as foundations in the performance of its business activities and that represent the standards of conduct that the employees and contractors cooperating with Radici Chimica S.p.A. must draw upon.

Considering the continuous law and regulation developments on the matter as well as any organizational changes that may occur in the Company, the adopted Model will be subjected to updates and additions.

The Organization, Management and Supervision Model pursuant to Gov. Decree no. 231/2001, adopted by Radici Chimica's Board Resolution on 6th December 2018 can be viewed as follows:

- Through the company Intranet network <http://radicigroupinside/sites/mogc/rcnovara/default.aspx>
- In hard copy format, at the IMS (Integrated Management System) SGI office,

Finally, it is noted that, by resolution of 6th December 2018, the composition of the Supervisory Body was also changed. For the next three years, it will consist of the following members:

- Avv. Luigi Plati, legal counsel (Chairman)
- Dr. Stefano Alini (internal member).
- Mr. Igor Scandalora (external member)



All reports and/or queries on the application of the Model and/or the Code of Ethics and/or reports to the Supervisory Body shall be forwarded:

- to the dedicated e-mail address odv231.radicichimica@radicigroup.com
- by mail to the Supervisory Body's address: Radici Chimica S.p.A. – Organismo di Vigilanza, Via Giacomo Fauser n. 50, 28100 Novara.

Novara, 15 gennaio 2019

Il CdA di Radici Chimica S.p.A.

Radici Angelo

Radici Maurizio

Radici Paolo