Cielle Imballaggi S.r.l., operating in the flexographic printing of flexible packaging, has for over 15 years undertaken an organisational path aimed at the continuous improvement of its business processes in terms of quality, safety of products in contact with food, environmental impact, worker safety and energy efficiency.

The strategy of Cielle Imballaggi S.r.l. is oriented towards improving its position in the national and international market through compliance with production and hygienic-assurance standards, both mandatory (national and EU legislation) and voluntary.

With this in mind, the Company Management, in the person of Dr. Vittorino Loreto, has established:

- the Environmental Management System in accordance with the requirements of UNI EN ISO 14001:2015;
- the Quality Management System in accordance with UNI EN ISO 9001:2015;
- the Occupational Health and Safety Management System in accordance with UNI ISO 45001:2018;
- the Packaging Safety Management System in accordance with the BRCGS-Packaging Materials standard;
- the Energy Management System in accordance with UNI CEI EN ISO 50001:2018;
- the Gender Equality Management System in accordance with the UNI/PdR 125:2022 standard;
- the SA 8000 Ethical Management System (the *system is implemented but not certified).*

Top Management sets as its main objective that of ensuring a high degree of competence, continuity and quality in its performance, in order to pursue a policy that places customer satisfaction, environmental protection, worker safety, product food safety and the efficient and responsible use of energy at the centre of its activities. The principle of ethical responsibility in company management is also considered non-negotiable, ranging from personnel management in all its aspects, to the selection of suppliers, up to raising customer awareness.

In order to fulfil its mission, Cielle Imballaggi S.r.l. intends to:

- Develop and maintain a Management System for Quality/Worker Safety/Ethics/Environment/Energy/Food Safety of packaging as a tool to achieve objectives, honour the commitments undertaken, promote the continuous improvement of business processes, and ensure compliance with the mandatory requirements for products and related services;
- Adopt an integrated risk-management system for all production stages, with a management policy commensurate with the various degrees of hazard;
- Define, within the company context, the risks and opportunities that the company will have to address in order to achieve continuous improvement, including opportunities to improve energy performance;
- Focus every activity on ensuring compliance with product specifications and with its customers' specifications, in order to create products that meet their expectations ("customer satisfaction");

- Ensure the human and financial resources necessary for the effective implementation of the quality-management system processes, of the product-safety programme and for the achievement of environmental and energy objectives;
- Monitor the activities that affect both the quality and hygienic safety of products and services and environmental and energy performance, collecting and analysing the data that make it possible to define and implement appropriate preventive actions aimed at eliminating the causes of potential non-conformities;
- Comply with the mandatory laws and regulations concerning the Environment, Human Rights, Occupational Safety, Food Safety and energy use;
- Assess, as part of the Environmental analysis, the potential company risks through the definition of environmental and energy aspects;
- Carefully assess the environmental and energy aspects of the activities carried out, the products used and the services provided;
- Carry out training and awareness activities aimed at all employees, to increase their competence and sense of their role, as well as to encourage every initiative aimed at protecting the environment, the efficient use of energy, safety and food safety;
- Consolidate relationships with technical partners in order to provide customers with higher-value, safe, reliable, high-quality products at competitive prices, favouring energy-efficient technological solutions;
- Provide products and services compliant with all the requirements imposed by the legislation in force, so as to guarantee the safety and health of users, with particular regard to the provisions relating to food safety;
- Spread appropriate culture and methodologies throughout the organisation so that anyone who works there is constantly able to deliver the best service expected by the customer;
- Ensure a high level of satisfaction among all employees through the pursuit of the utmost loyalty and sense of responsibility;
- Always maintain a level of absolute occupational safety for workers;
- Implement a system for monitoring company, environmental and energy performance in order to increase its competitiveness in the industrial-packaging production sector;
- Increase company turnover through the acquisition of new customers and by investing in the expansion of production sites and in technologically ever more advanced and energy-efficient machinery.
- In carrying out its mission, Cielle Imballaggi S.r.l. undertakes:

- Towards customers, to provide products and services that meet mandatory requirements and are of high quality, to demonstrate transparency and reliability, and to ensure product quality at competitive prices, through the analysis and containment of costs, including energy costs;
- Towards suppliers, to foster a fruitful "alliance" so as to be able to play an active part in defining product performance and characteristics and to provide the support needed to understand and define the Customer's needs and the mandatory requirements relevant to the product. Selecting its suppliers on the basis of principles of ethical respect and human rights, as well as of compliance with mandatory environmental-protection and energy-efficiency standards and worldwide agreements;
- Towards employees, to foster their professional growth and the removal of cultural, social and physical barriers where necessary, promoting a healthy, safe and energy-conscious working environment;
- Towards Shareholders, to foster the growth of the Company, ensuring adequate profitability and financial stability, essential elements for the affirmation of the Policy under consideration;
- Towards the local community, by promoting actions with a reduced environmental and energy impact, offering employment opportunities and promoting social activities in the area.

ETHICAL PRINCIPLES AND LABOUR PRACTICES

Cielle Imballaggi S.r.l. has assimilated and adopted the following principles:

- Full application of human-rights policies;
- Compliance with national and EU directives on labour and safety;
- Full awareness and implementation of the principles of corporate social responsibility (human rights, labour, environment, anti-corruption) established by the Global Compact (Davos, 1999);
- Control actions to ensure that no acts of coercion and intimidation occur among staff, nor episodes of racism towards non-Italian employees;
- Full implementation of the workplace-safety legislation (Legislative Decree 81/2008);
- Compliance with and full implementation of the National Collective Labour Agreement (CCNL);
- Respect for the freedom of association and freedom of movement provided for by the CCNL;
- Ongoing dialogue with staff representatives and trade unions on issues of safety, healthiness of the working environment and work-related stress factors;
- Not to impose discriminatory conditions based on sex, age, language, race, religion and political ideology, either during recruitment or throughout the employment relationship;
- To penalise any act of discrimination linked to factors of sex, age, language, race, religion and political ideology, both during recruitment and throughout the duration of the employment relationship;

- Respect for the individual in the practice of their religious rites;
- Vigilance against acts of harassment and mobbing;
- Absence of child labour;
- Implementation of a procedure for reporting acts contrary to this policy and full protection of the whistleblower;
- Promotion of a harmonious working environment;
- Commitment to promoting the professional and personal growth of its employees through training activities accessible to all according to their skills and language;
- To foster initiative, encourage professional growth and ensure fruitful and harmonious professional relationships;
- Awareness-raising activities on ethical principles towards all the company's staff;
- Awareness-raising activities on ethical principles towards suppliers and Customers.

ENVIRONMENTAL PROTECTION

Cielle Imballaggi S.r.l. implements and plans a programme of actions designed to align its production activity with the safeguarding of the environment and with respect for the socio-environmental context in which it operates. Specifically, the following aspects are subject to permanent monitoring and evaluation:

- Assess the environmental aspects of the activities carried out, the products used and the services provided, and adopt management procedures capable of ensuring actions to mitigate climate change;
- Make every effort to eliminate or minimise emissions of pollutants into the atmosphere, waste production and the consumption of energy resources;
- Energy consumption and optimisation of production processes;
- Greenhouse-gas emissions: implementation of the controls required by the F-Gas legislation;
- Volumetric reduction of packaging;
- Use of 100% recyclable materials, where possible;
- Annual monitoring of diffuse emissions in accordance with legislation;
- Optimisation of water resources;
- Chemical products (solvents and inks) all compliant with Reg. 10/2011 and with REACH legislation;
- Total recyclability of the product by the end user, where possible;

- Continuous training on waste management, for which disposal under category R13 or energy recovery is preferred;
- Policy of reducing all production waste and a 100% separate-collection rate.

ENERGY MANAGEMENT (UNI CEI EN ISO 50001:2018)

Purpose and commitment of the organisation

Cielle Imballaggi S.r.l. recognises energy as a strategic and non-renewable resource and undertakes to manage it in an efficient and sustainable manner, compliant with the requirements of the UNI CEI EN ISO 50001:2018 standard, integrating energy objectives into the company's strategic and operational planning.

To this end, Management undertakes to:

- Continuously improve the organisation's energy performance, reducing specific consumption and the energy impact of production processes;
- Ensure the availability of the information and of the human, technical and financial resources necessary to achieve the energy objectives and targets;
- Comply with all mandatory legal requirements and other requirements subscribed to by the organisation regarding energy use, consumption and efficiency;
- Define, monitor and periodically review energy objectives, targets and energy-performance indicators (EnPIs), comparing them with the relevant energy baseline;
- Support the procurement of energy-efficient products, services, plant and equipment, taking energy performance into account in purchasing decisions and investments;
- Support the design and redesign of activities, plant and production processes aimed at improving energy performance;
- Promote the use of renewable energy sources and low-energy-impact technologies, where technically and economically sustainable;
- Raise awareness, train and empower all staff, including external collaborators operating on behalf of the organisation, regarding the rational and efficient use of energy;
- Communicate this energy policy at all levels of the organisation and to interested parties, making it available to the public;
- Periodically review the Energy Management System, during the Management Review, in order to ensure its adequacy, effectiveness and continuous improvement over time;

- Consider, in the context of new projects, refurbishments or modifications of plant, machinery and systems, the criterion of energy efficiency as a decision factor.

This commitment fully integrates with what is already provided for environmental protection, of which energy management constitutes a substantial part, in line with the principle of continuous improvement of company performance.

GENDER EQUALITY POLICY

The purpose and efforts of our organisation

Our organisation, as established in the scope of the management system, intends to ensure gender equality with regard to the presence and professional growth of women within the organisation.

In this sense, it intends to enhance the diversity present in the roles operating within the organisation and to maintain processes capable of developing female empowerment in business activities.

The organisation's attention, along the path that ensures the achievement and maintenance of this purpose, focuses its efforts on the following areas set out by the UNI/PdR 125:2022 practice:

- Culture and strategy
- Governance
- HR processes
- Opportunities
- Pay equity
- Parenthood

The organisation believes that developing a cultural model that promotes gender equality, in addition to generating "social value" appreciated in the European institutional economic context, constitutes a development factor for the business that the organisation carries out.

The organisation, with the intention of paying attention to this satisfaction at any time and in any circumstance of a woman's working life within the organisation, has chosen to view this "life cycle" through the following aspects:

- Selection and hiring (recruitment)
- Career management
- Salary equity
- Parenthood, care

- Work-life balance
- Prevention of abuse and harassment

Selection and hiring (recruitment)

§ The selection of the candidate must be carried out in a gender-neutral manner;

§ The selection criteria must take into account requirements relating to personal qualities such as professionalism, competence, specialisation and experience;

§ The selection must not involve questions relating to marriage, pregnancy and family responsibilities;

§ The selection must consider that the presence of women and men in the workforce must be balanced relative to the total number of people present;

§ Roles relating to executives, business-unit managers, those reporting to top management and those with budget authority must be distributed in a balanced manner;

§ The job position envisaged at the hiring stage must provide for remuneration related to duties and responsibilities and not influenced by gender;

§ The selection must ensure that the percentages of women and men whose contracts provide for variable remuneration are balanced.

Career management

§ The assignment of roles and duties must take into account a gender balance in leadership;

§ The design of career paths and their presentation must be directed regardless of gender;

§ Staff career paths are accessible to all people, who can transparently verify the maintenance of the balances relating to gender equality;

§ The working environment in which most of the day is spent must ensure the possibility (technological and physical) for all people to express themselves, and well-being understood as safety and comfort;

§ Training for the development of skills and awareness represents a fundamental process aimed at removing any career difficulties and restoring any gender balance in leadership;

§ The stages of staff separation from the organisation in the event of dismissal are closely examined, verifying turnover by gender;

§ Promotions always take gender balance into account with reference to functional level.

Salary equity

- § People's remuneration is granted in relation to their role and responsibilities and, any additions in the form of benefits and bonuses to that remuneration are understood to be based exclusively on the results produced and recognised;
- § Remuneration, the payment of bonuses and the assignment of benefits are, for the sake of transparency, documented and accessible to the entire staff;
- § The criteria for remuneration, bonuses and benefits are documented and accessible to the entire staff;
- § Every member of staff is granted the right to report any disparities.

Parenthood, care

- § Maternity and paternity are supported by training, information and reintegration programmes;
- § Maternity is supported before, during and after birth;
- § Paternity leave must be promoted so that all potential beneficiaries take advantage of it for the entire period provided for by law;
- § Returns from leave are supported by specific reorientation initiatives;
- § The organisation takes an active role in supporting, with concrete initiatives, caregiving activities (caring for the newborn);
- § Support for fathers and mothers is expanded through the provision of services dedicated to children, such as vouchers for sporting activities.

Work-life balance

- § Work-life balance measures are aimed at all staff regardless of gender;
- § The organisation adopts part-time work, flexible hours and remote working (smart working);
- § The organisation allows remote connection with all staff who work off-site (regardless of contract), for work operations and participation in meetings.

Prevention of abuse and harassment

Our organisation repudiates every form of abuse and harassment; to this end it carries out zero-tolerance prevention and suppression of the phenomenon. The organisation implements its prevention through concrete actions whose principles provide for:

- § That the risks relating to abuse and harassment are identified;
- § That the organisation plans prevention actions in relation to that risk;
- § The possibility of reporting suspicions and/or facts relating to abuse and harassment;

- § Absolute protection, on the part of the organisation, of whistleblowers from any subsequent retaliation;
- § That the organisation analyses and understands any episodes of abuse and harassment;
- § The development of kind and gender-neutral communication.

Every worker may lodge complaints in relation to facts and events of an abusive, harassing, offensive or unlawful nature occurring in the workplace or connected to it and in conflict with the principles of gender equality. The worker may also bring complaints through the Gender Equality Committee and/or the PdR125 Certification Body. The complaint may be anonymous. Cielle Imballaggi S.r.l. guarantees the utmost confidentiality regarding the facts reported or highlighted, within the limits of freedom of investigation, and undertakes to investigate even in the case of anonymous reports.

Complaint reports submitted by one or more interested parties, concerning matters relating to the Gender Equality system, are collected by the designated Committee. Furthermore, in order to guarantee workers and all interested parties (stakeholders) easy communication of remarks and suggestions regarding the aspects relating to PdR 125, the company has set up a reporting system through which reports may be sent to the following mailbox: segnalazioni@ciellesrl.com.

This Policy is made available to all company functions and interested parties through publication on the company website.

The Management
Dr. Vittorino Loreto