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POLITICA PER LA QUALITA', LA SICUREZZA DEI LAVORATORI, L'AMBIENTE, LA SICUREZZA ALIMENTARE

PRINCIPI ETICI E RESPONSABILITA' SOCIALE – PARITÀ DI GENERE

ISO 9001 - BRC-P - ISO 45001- ISO 14001 - UNI PDR 125:2022

All. 02 Rev. 4 del 30/03/2023

Cielle Imballaggi S.r.l., operating in the flexible packaging flexographic printing sector, has been on a continuous improvement journey for over 10 years, focusing on enhancing its business processes in terms of quality, safety of food contact products, environmental impact, and worker safety.

Cielle Imballaggi S.r.l.'s strategy is aimed at improving its position in both national and international markets by aligning with production and hygiene standards, both mandatory (national and EU regulations) and voluntary.

In this regard, the company's management, represented by Dr. Vittorino Loreto, has defined:

- Environmental Management System according to the UNI EN ISO 14001:2015 standard;
- Quality Management System according to UNI EN ISO 9001:2015;
- Occupational Health and Safety Management System according to ISO 45001:2018;
- Packaging Safety Management System according to the BRC Packaging standard;
- Ethical Management System SA 8000*;
- Gender Equality Management System according to UNI-PDR125:2022.

Top management's main goal is to ensure a high level of competence, continuity, and quality in its performance, in order to pursue a policy focused on customer satisfaction, environmental protection, worker safety, and food safety. Additionally, ethical responsibility in business management is non-negotiable, including personnel management, supplier selection, and customer awareness.

To fulfill its mission, Cielle Imballaggi S.r.l. intends to:

- Develop and maintain a Quality/Safety/Ethics/RS/Environment/Food Safety Management System as a tool to achieve goals, meet commitments, promote continuous improvement, and ensure compliance with mandatory product and service requirements;
- Adopt an integrated risk management system for all production stages, with a risk management policy proportionate to varying levels of danger;
- Define the risks and opportunities in the company's context to drive continuous improvement;
- Focus every activity on ensuring compliance with product specifications and customer expectations to achieve customer satisfaction;
- Provide the necessary human and financial resources for the effective implementation of the quality management system and product safety program;
- Monitor activities influencing both product quality and hygiene safety, as well as environmental performance, collecting and analyzing data to define and implement appropriate preventive actions aimed at eliminating the causes of potential nonconformities;
- Comply with laws and regulations on Environment, Human Rights, Occupational Health and Safety, and Food Safety;
- Assess potential business risks in the Environmental Analysis through the definition of environmental aspects;
- Evaluate the environmental aspects of activities, products, and services provided;

^{*}The system is implemented but not certified.



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POLITICA PER LA QUALITA', LA SICUREZZA DEI LAVORATORI, L'AMBIENTE, LA SICUREZZA ALIMENTARE

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- Conduct training and awareness activities for all employees to enhance competence and environmental protection, safety, and food safety awareness;
- Strengthen partnerships with technical partners to provide customers with valuable, safe, reliable, and high-quality products at competitive prices;
- Deliver products and services that meet all legislative requirements, ensuring user safety and health, especially concerning food safety regulations;
- Promote a work culture within the organization that ensures all employees can consistently deliver the best service expected by customers;
- Ensure a high level of employee satisfaction through loyalty and a sense of responsibility.

Cielle Imballaggi S.r.l. is committed to:

- Ensuring absolute workplace safety for employees;
- Implementing a performance control system to enhance competitiveness in the industrial packaging production sector;
- Increasing revenue by acquiring new customers and investing in the expansion of production sites and advanced technological machinery.

In pursuing its mission, Cielle Imballaggi S.r.l. is committed to:

- Providing products and services that meet mandatory requirements and high quality standards, demonstrating transparency and reliability, ensuring product quality at competitive prices through cost analysis and containment;
- Fostering a beneficial "alliance" with suppliers to actively define product specifications and provide necessary support to understand customer needs and relevant regulatory requirements, selecting suppliers based on ethical principles and respect for human rights, environmental protection, and global agreements;
- Promoting professional growth, eliminating cultural, social, and physical barriers where necessary, and fostering a healthy and safe work environment for employees;
- Ensuring company growth by maintaining adequate profitability and financial stability for the success of the stated policy;
- Promoting actions with a low environmental impact in the local community, offering employment opportunities, and supporting social activities.

ETHICAL PRINCIPLES AND LABOR PRACTICES

Cielle Imballaggi S.r.l. has embraced and follows the following principles:

- Full adherence to human rights policies;
- Compliance with national and EU labor and safety directives;
- Full awareness and implementation of corporate social responsibility principles (human rights, labor, environment, anti-corruption) as stated in the Global Compact (Davos, 1999);
- Control actions to prevent coercion, intimidation, or racism among employees, especially non-Italian staff;
- Full compliance with workplace safety laws (D.Lgs. 81/2008);
- Respect for union rights and the freedom of movement stipulated in the CCNL (National Collective Bargaining Agreement);



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POLITICA PER LA QUALITA', LA SICUREZZA DEI LAVORATORI, L'AMBIENTE, LA SICUREZZA ALIMENTARE

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- Ongoing dialogue with employee representatives and unions on safety, health, and workplace stress issues;
- Non-discriminatory hiring based on gender, age, language, race, religion, or political ideology;
- Sanctioning any act of discrimination based on gender, age, language, race, religion, or political ideology during hiring or throughout employment;
- Respect for individuals' religious practices;
- Vigilance against harassment and mobbing;
- No child labor;
- Reporting procedures for violations of this policy, with full protection for whistleblowers;
- Promoting a peaceful work environment;
- Supporting professional and personal growth through accessible training for all, based on individual skills and language;
- Encouraging initiative, professional growth, and maintaining productive and peaceful professional relationships;
- Raising awareness of ethical principles among all employees, suppliers, and customers.

ENVIRONMENTAL PROTECTION

Cielle Imballaggi S.r.l. implements and plans actions to align its production activities with environmental protection and respect for the socio-environmental context. Permanent monitoring and evaluation include:

- Assessing environmental aspects of activities, products, and services and adopting management procedures to guarantee the highest possible environmental protection;
- Efforts to eliminate or minimize pollutant emissions, waste production, and energy resource consumption;
- Optimizing energy consumption and production processes;
- Monitoring greenhouse gas emissions in compliance with F-Gas regulations;
- Reducing packaging volume;
- Using 100% recyclable materials;
- Annual emission monitoring according to regulations;
- Preparing an annual PGS (Environmental Protection Plan);
- Optimizing water resources;
- Ensuring chemical products (solvents and inks) comply with Reg. 10/2011 and REACH regulations;
- Ensuring total product recyclability by end-users;
- Evaluating noise impact both environmentally and under D.Lgs. 81/2008;
- Ongoing waste management training, prioritizing disposal under R13 category or energy recovery;
- A policy of reducing production waste and maintaining a 100% differentiation rate.



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GENDER EQUALITY POLICY

Our organization aims to ensure gender equality in terms of the presence and professional growth of women within the organization, focusing on empowering women in business roles. Key focus areas include:

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

We believe promoting gender equality not only generates social value but also contributes to business development. The organization ensures gender equality through concrete actions that meet specific requirements and are appreciated by women in the organization. The lifecycle of women in the workforce is considered through aspects such as recruitment, career management, pay equity, parenthood, work-life balance, and prevention of abuse and harassment. The organization has established policies and measurable gender equality objectives.

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

- Recruitment and hiring
- Career management
- Pay equity
- Parenthood, caregiving
- Work-life balance
- Prevention of abuse and harassment

For each of the following aspects, the organization has established more specific policies, outlined below. To each policy expressing the principles the organization follows, the organization has associated specific and measurable gender equality objectives indicated in the strategic plan.

POLICIES

RECRUITMENT AND HIRING

Our organization, in the recruitment and hiring of personnel for business activities, respects the following principles, with a perspective on improvement:

- The selection of candidates must be carried out in a gender-neutral manner.
- Selection criteria must take into account personal qualities such as professionalism, competence, specialization, and experience.
- The selection process should not involve questions related to marriage, pregnancy, or family responsibilities.



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- The organization must ensure that the presence of women and men in the workforce is balanced in proportion to the total workforce.
- Positions such as managers, business unit leaders, and those with responsibility for budgeting and reporting to the top must be distributed in a balanced way.
- The job position, as defined during hiring, must provide a salary based on the tasks and responsibilities and not be influenced by gender.
- The selection process must ensure that the proportion of women and men whose contract includes variable pay is balanced.

CAREER MANAGEMENT

Our organization is aware that the economic results achieved depend also on the human resources working there, and all career development opportunities are intended to be based solely on individual results and merit, regardless of gender.

Our organization manages the careers of internal staff respecting the following principles:

- Role and task assignments should consider a balance of gender leadership.
- Career paths and their presentation must be offered regardless of gender.
- Career paths for staff are accessible to all individuals, who can transparently verify the maintenance of gender equality.
- The work environment in which employees spend most of their day must ensure the technological and physical possibility for all individuals to express themselves and ensure well-being in terms of safety and comfort.
- Training for skill development and awareness is a fundamental process aimed at removing career obstacles and restoring leadership gender balance.
- Considering career progression linked to the Board of Directors, at least 1/4 of our Board must be represented by women.
- Staff departure phases, in case of dismissal, are strictly examined to verify gender-based turnover.
- Promotions always consider gender balance according to functional level.

PAY EQUITY

Our organization, during the hiring phase and throughout the career of the staff, intends to ensure pay equity regardless of gender. The organization does not asymmetrically consider the costs of compensating people of different genders. When determining, paying, and modifying salaries, the organization adheres to the following principles:

- Employee remuneration is based on the role and responsibilities, with any additional benefits and bonuses based solely on the results produced and recognized.
- Remuneration, bonuses, and benefits are documented and accessible to all staff for transparency.
- Salary, bonus, and benefit criteria are documented and accessible to all staff.
- Any staff member is recognized with the right to report any disparities.

PARENTHOOD, CAREGIVING

Our organization intends not to create any obstacles to parenthood, supporting maternity and paternity through activities designed to meet the needs of individuals who, due to their parental status, must balance their commitment between work and new responsibilities. The organization supports this intention based on the following principles:



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- Maternity and paternity are supported through training, information, and reintegration programs.
- Maternity is assisted before, during, and after childbirth.
- Paternity leave must be promoted so that all potential beneficiaries take advantage of it for the entire legally provided period.
- Return from leave is supported by specific re-orientation initiatives.
- The organization takes an active role in supporting caregivers through concrete initiatives (caring for newborns).
- Support for fathers and mothers is expanded through the provision of child-related services, such as vouchers for sports
 activities.

WORK-LIFE BALANCE

Our organization aims to provide its staff with the ability to manage time dedicated to both life and work through a balance that considers both business objectives and the psychological and physical well-being of employees, resulting from greater freedom of self-determination. The principles behind work-life balance are as follows:

- Work-life balance measures are aimed at all staff, regardless of gender.
- The organization adopts part-time, flexible working hours, and remote working.
- The organization allows telecommunication with all staff working externally (regardless of the contract), for work operations and participation in meetings.

PREVENTION OF ABUSE AND HARASSMENT

Our organization repudiates all forms of abuse and harassment and carries out a prevention and zero-tolerance policy. The organization implements prevention through concrete actions based on the following principles:

- Identifying risks related to abuse and harassment.
- Planning preventive actions in relation to these risks.
- Providing the possibility to report suspicions or incidents of abuse and harassment.
- Ensuring absolute protection of whistleblowers from any subsequent retaliation.
- Analyzing and understanding any abuse and harassment incidents.
- Developing gender-neutral and kind communication.

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- Occupational Health and Safety Management System according to ISO 45001:2018;
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- Ethical Management System SA 8000*;
- Gender Equality Management System according to UNI-PDR125:2022.

Top management's main goal is to ensure a high level of competence, continuity, and quality in its performance, in order to pursue a policy focused on customer satisfaction, environmental protection, worker safety, and food safety. Additionally, ethical responsibility in business management is non-negotiable, including personnel management, supplier selection, and customer awareness.

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- Focus every activity on ensuring compliance with product specifications and customer expectations to achieve customer satisfaction;
- Provide the necessary human and financial resources for the effective implementation of the quality management system and product safety program;
- Monitor activities influencing both product quality and hygiene safety, as well as environmental performance, collecting and analyzing data to define and implement appropriate preventive actions aimed at eliminating the causes of potential nonconformities;
- Comply with laws and regulations on Environment, Human Rights, Occupational Health and Safety, and Food Safety;
- Assess potential business risks in the Environmental Analysis through the definition of environmental aspects;
- Evaluate the environmental aspects of activities, products, and services provided;
- Conduct training and awareness activities for all employees to enhance competence and environmental protection, safety, and food safety awareness;
- Strengthen partnerships with technical partners to provide customers with valuable, safe, reliable, and high-quality products at competitive prices;
- Deliver products and services that meet all legislative requirements, ensuring user safety and health, especially concerning food safety regulations;
- Promote a work culture within the organization that ensures all employees can consistently deliver the best service expected by customers;
- Ensure a high level of employee satisfaction through loyalty and a sense of responsibility.

Cielle Imballaggi S.r.l. is committed to:

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- Ensuring company growth by maintaining adequate profitability and financial stability for the success of the stated policy;
- Promoting actions with a low environmental impact in the local community, offering employment opportunities, and supporting social activities.

ETHICAL PRINCIPLES AND LABOR PRACTICES

Cielle Imballaggi S.r.l. has embraced and follows the following principles:

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- Compliance with national and EU labor and safety directives;
- Full awareness and implementation of corporate social responsibility principles (human rights, labor, environment, anti-corruption) as stated in the Global Compact (Davos, 1999);
- Control actions to prevent coercion, intimidation, or racism among employees, especially non-Italian staff;
- Full compliance with workplace safety laws (D.Lgs. 81/2008);
- Respect for union rights and the freedom of movement stipulated in the CCNL (National Collective Bargaining Agreement);
- Ongoing dialogue with employee representatives and unions on safety, health, and workplace stress issues;
- Non-discriminatory hiring based on gender, age, language, race, religion, or political ideology;
- Sanctioning any act of discrimination based on gender, age, language, race, religion, or political ideology during hiring or throughout employment;
- Respect for individuals' religious practices;
- Vigilance against harassment and mobbing;
- No child labor;
- Reporting procedures for violations of this policy, with full protection for whistleblowers;



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- Promoting a peaceful work environment;
- Supporting professional and personal growth through accessible training for all, based on individual skills and language;
- Encouraging initiative, professional growth, and maintaining productive and peaceful professional relationships;
- Raising awareness of ethical principles among all employees, suppliers, and customers.

ENVIRONMENTAL PROTECTION

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- Optimizing energy consumption and production processes;
- Monitoring greenhouse gas emissions in compliance with F-Gas regulations;
- Reducing packaging volume;
- Using 100% recyclable materials;
- Annual emission monitoring according to regulations;
- Preparing an annual PGS (Environmental Protection Plan);
- Optimizing water resources;
- Ensuring chemical products (solvents and inks) comply with Reg. 10/2011 and REACH regulations;
- Ensuring total product recyclability by end-users;
- Evaluating noise impact both environmentally and under D.Lgs. 81/2008;
- Ongoing waste management training, prioritizing disposal under R13 category or energy recovery;
- A policy of reducing production waste and maintaining a 100% differentiation rate.

GENDER EQUALITY POLICY

Our organization aims to ensure gender equality in terms of the presence and professional growth of women within the organization, focusing on empowering women in business roles. Key focus areas include:

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



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Parenthood

We believe promoting gender equality not only generates social value but also contributes to business development. The organization ensures gender equality through concrete actions that meet specific requirements and are appreciated by women in the organization. The lifecycle of women in the workforce is considered through aspects such as recruitment, career management, pay equity, parenthood, work-life balance, and prevention of abuse and harassment. The organization has established policies and measurable gender equality objectives.

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

- Recruitment and hiring
- Career management
- Pay equity
- Parenthood, caregiving
- Work-life balance
- Prevention of abuse and harassment

For each of the following aspects, the organization has established more specific policies, outlined below. To each policy expressing the principles the organization follows, the organization has associated specific and measurable gender equality objectives indicated in the strategic plan.

POLICIES

RECRUITMENT AND HIRING

Our organization, in the recruitment and hiring of personnel for business activities, respects the following principles, with a perspective on improvement:

- The selection of candidates must be carried out in a gender-neutral manner.
- Selection criteria must take into account personal qualities such as professionalism, competence, specialization, and experience.
- The selection process should not involve questions related to marriage, pregnancy, or family responsibilities.
- The organization must ensure that the presence of women and men in the workforce is balanced in proportion to the total workforce.
- Positions such as managers, business unit leaders, and those with responsibility for budgeting and reporting to the top must be distributed in a balanced way.
- The job position, as defined during hiring, must provide a salary based on the tasks and responsibilities and not be influenced by gender.
- The selection process must ensure that the proportion of women and men whose contract includes variable pay is balanced.

CAREER MANAGEMENT

Our organization is aware that the economic results achieved depend also on the human resources working there, and all career development opportunities are intended to be based solely on individual results and merit, regardless of gender.



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- The work environment in which employees spend most of their day must ensure the technological and physical possibility for all individuals to express themselves and ensure well-being in terms of safety and comfort.
- Training for skill development and awareness is a fundamental process aimed at removing career obstacles and restoring leadership gender balance.
- Considering career progression linked to the Board of Directors, at least 1/4 of our Board must be represented by women.
- Staff departure phases, in case of dismissal, are strictly examined to verify gender-based turnover.
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- Remuneration, bonuses, and benefits are documented and accessible to all staff for transparency.
- Salary, bonus, and benefit criteria are documented and accessible to all staff.
- Any staff member is recognized with the right to report any disparities.

PARENTHOOD, CAREGIVING

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- Maternity and paternity are supported through training, information, and reintegration programs.
- Maternity is assisted before, during, and after childbirth.
- Paternity leave must be promoted so that all potential beneficiaries take advantage of it for the entire legally provided period.
- Return from leave is supported by specific re-orientation initiatives.
- The organization takes an active role in supporting caregivers through concrete initiatives (caring for newborns).
- Support for fathers and mothers is expanded through the provision of child-related services, such as vouchers for sports activities.

WORK-LIFE BALANCE



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- Work-life balance measures are aimed at all staff, regardless of gender.
- The organization adopts part-time, flexible working hours, and remote working.
- The organization allows telecommunication with all staff working externally (regardless of the contract), for work operations and participation in meetings.

PREVENTION OF ABUSE AND HARASSMENT

Our organization repudiates all forms of abuse and harassment and carries out a prevention and zero-tolerance policy. The organization implements prevention through concrete actions based on the following principles:

- Identifying risks related to abuse and harassment.
- Planning preventive actions in relation to these risks.
- Providing the possibility to report suspicions or incidents of abuse and harassment.
- Ensuring absolute protection of whistleblowers from any subsequent retaliation.
- Analyzing and understanding any abuse and harassment incidents.
- Developing gender-neutral and kind communication.

Any employee can file complaints regarding abuse, harassment, insult, or illegal acts that occur in the workplace or are related to it, contrary to gender equality principles. The employee may submit complaints through the Gender Equality Committee or the Certification Entity PdR125. Complaints may be anonymous. Cielle Imballaggi S.r.l. ensures maximum confidentiality on reported or highlighted incidents, within the limits of investigative freedom, and is committed to investigating anonymous reports as well. Complaints related to gender equality issues are collected by the designated committee. Furthermore, to guarantee easy communication of feedback and suggestions related to the PdR 125 aspects, the company has established a reporting system, which can be sent to the following email: segnalazioni@ciellesrl.com.

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