

## Quality, Environmental, Worker Safety, and Product Safety Policies

- The company has been working for over 10 years to improve its business processes in quality, environmental impact, and worker safety.
- The management's strategy is geared toward enhancing its position in both the national and international markets through adherence to national, European, and voluntary standards.
- Several integrated management systems have been implemented, including:
  - **ISO 9001:2015** (Quality Management System)
  - **ISO 14001:2015** (Environmental Management System)
  - **ISO 45001:2018** (Workplace Safety Management System)
  - **BRC Packaging** (Food Safety for Packaging Materials)
  - **FSC (Forest Stewardship Council)** (Sustainable Forest Management)
  - **UNI/PDR 125:2022** (Gender Equality Management System)

## Commitment to Stakeholders

- **Customers:** Providing high-quality products and services that comply with regulatory requirements, ensuring transparency, and reliability.
- **Suppliers:** Collaborating to define product requirements and help with compliance.
- **Employees:** Ensuring professional growth, a safe working environment, and promoting employee well-being.
- **Shareholders:** Ensuring business growth and financial stability.
- **Community:** Maintaining environmentally friendly operations and contributing to local employment.

## Ethical Principles

The company adheres to ethical principles that include:

- Respect for national and community labor and safety regulations.
- Rejecting child labor and any form of coercion or intimidation.
- Promoting a positive and inclusive working environment free from discrimination.
- Supporting the professional and personal growth of employees.

## FSC Commitment

The company is committed to using raw materials from sustainably managed forests, ensuring the protection of ecosystems, human rights, and following legal regulations. They support sustainable forest management practices by:

- Choosing FSC-certified suppliers.
- Providing training for employees and ensuring traceability of forest products.

## **Gender Equality Policy**

Rotocalco Mediterranea aims to promote gender equality by focusing on:

- Cultural strategies to ensure a gender-balanced workforce.
- Implementing HR processes that consider gender balance in leadership roles.
- Ensuring equal pay and opportunities, regardless of gender.
- Supporting work-life balance through flexible hours and parental leave.
- Creating an environment free from discrimination, harassment, and abuse.

The company has also created specific policies regarding recruitment, career management, salary equity, and gender-based support for parents. For example, they ensure that recruitment is neutral, career growth is merit-based, and parental leave is fully supported.

## **Health, Safety, and Environmental Policies**

Rotocalco Mediterranea is committed to:

- Minimizing environmental impacts, including reducing emissions and waste.
- Ensuring worker safety and promoting health and safety standards in compliance with national and international regulations.
- Providing training for employees on environmental and safety issues.

Overall, the document presents a clear and comprehensive outline of the company's commitments to maintaining high standards in business operations, environmental protection, gender equality, and worker safety.

## **QUALITY, ENVIRONMENT, WORKERS' SAFETY AND PRODUCT, FSC, GENDER EQUALITY POLICY**

**ISO9001:2015, ISO 14001:2015, BRC-Packaging, FSC (Forest Stewardship Council), UNI/PDR 125:2022**

Rotocalco Mediterranea S.r.l., a company specializing in rotogravure printing of laminated flexible packaging, has been on a continuous improvement path for over 10 years, focusing on enhancing its business processes from the perspectives of quality, environmental impact, and workers' safety.

Rotocalco Mediterranea S.r.l.'s strategy is aimed at improving its position in both the national and international markets by complying with mandatory (national and EU regulations) and voluntary production and hygiene standards.

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

- The Environmental Management System according to the UNI EN ISO 14001:2015 requirements;
- The Quality Management System according to UNI EN ISO 9001:2015;
- The Safety Management System according to ISO 45001:2018;
- The Packaging Safety Management System according to the BRC-Packaging standard;
- The FSC (Forest Stewardship Council) Management System;
- The UNI/PDR 125:2022 Management System.

The primary objective of the management is to ensure a high level of competence, continuity, and quality in its performance in order to pursue a policy that focuses on customer satisfaction, environmental protection, worker safety, and food safety of products.

To fulfill its mission, the company intends to:

- Maintain a Quality/Safety/Environment Management System and Food Safety for packaging as a tool to achieve objectives, meet commitments, promote continuous improvement of business processes, and ensure compliance with mandatory product and service requirements;
- Adopt an integrated system for all production phases to manage risks, with a risk management policy tailored to the various levels of danger;
- Define, within the company's context, the risks and opportunities the company must address for continuous improvement;
- Focus every activity to ensure compliance with product specifications and customer requirements in order to deliver products that meet their expectations ("customer satisfaction");
- Ensure the necessary human and financial resources for the effective implementation of the quality management processes and product safety program;
- Monitor activities affecting both the quality and hygiene safety of products and services, as well as environmental performance, collecting and analyzing data to define and implement appropriate preventive actions to eliminate the causes of potential non-conformities;
- Comply with relevant laws and regulations concerning Environment, Occupational Safety, and Food Safety;
- Make every effort to eliminate or minimize pollutant emissions into the atmosphere, waste production, and energy resource consumption;
- Assess potential business risks within the Environmental Analysis by defining environmental aspects;
- Assess the environmental aspects of activities, products used, and services provided, and adopt management procedures to ensure maximum environmental protection;
- Conduct training and awareness-raising activities for all employees to increase competence and a sense of position, as well as to encourage initiatives aimed at environmental protection/food safety;
- Strengthen partnerships with technical partners to ensure customers receive higher-value, safe, reliable, and high-quality products at competitive prices;
- Provide products and services that comply with all requirements imposed by applicable legislation, ensuring the safety and health of users, particularly regarding food safety regulations;
- Foster a culture and methodologies within the organization to ensure everyone working there is capable of delivering the best service expected by customers;
- Ensure a high level of satisfaction among all employees through loyalty and a sense of responsibility;
- Maintain a high level of workplace safety for workers;
- Implement a control system for business performance to increase competitiveness in the industrial packaging production sector;
- Increase business revenue by acquiring new clients and investing in new production sites and more advanced technological machinery.

In carrying out its mission, Rotocalco Mediterranea is committed:

- Toward customers, to providing products and services that meet mandatory requirements and high quality, demonstrating transparency and reliability, ensuring product quality at competitive prices through cost analysis and containment;

- Toward suppliers, to foster a productive "alliance" to actively participate in defining product performance and characteristics, and to provide the necessary support for understanding and defining the needs of customers and mandatory product requirements;
- Toward employees, to encourage initiative, professional growth, ensuring productive and peaceful professional relationships, and guaranteeing a safe work environment where everyone can be satisfied;
- Toward shareholders, to foster the growth of the company, ensuring adequate profitability and financial stability, which are essential for the success of this policy;
- Toward the local Syracuse community, to avoid environmental pollution and offer employment in the region.

## **ETHICAL PRINCIPLES**

Rotocalco Mediterranea S.r.l. has assimilated and adopted the following principles: a. Respect for national and EU labor and safety regulations; b. Rejection of child labor; c. Actions to prevent coercion and intimidation among staff, as well as incidents of racism towards non-Italian employees; d. Respect for union rights and freedom of movement as stipulated in the collective labor agreement; e. Non-discriminatory conditions based on gender, age, language, race, religion, or political ideology during recruitment and throughout employment; f. Promotion of a peaceful work environment; g. Commitment to fostering professional and personal growth through training accessible to all based on competence and language; h. Awareness-raising activities on ethical principles for all company collaborators.

## **FSC (Forest Stewardship Council)**

The management of Rotocalco Mediterranea has established this policy to apply the requirements of FSC reference standards and their principles and criteria, aiming to use raw materials from sustainable environmental, social, and economic management.

Rotocalco is committed to:

- Compliance with current forestry legislation;
- Choosing suppliers of raw materials/semi-finished products that are FSC certified;
- Raising awareness among suppliers on sustainable forestry management;
- Periodic training of employees on controls to ensure the traceability of wood products;
- Prioritizing the sourcing of wood products from sustainably managed forests, ensuring such products do not come from illegal logging or areas designated by environmental/government authorities as strictly protected without proper cutting permits.

Rotocalco is also committed to meeting the CoC, social, health, and safety requirements defined by FSC standards and national laws, including:

1. Ensuring workers' freedom of association and collective bargaining rights, including work contracts that allow workers to join/participate in labor organizations and collective bargaining;
2. Prohibiting forced labor within the organization;

3. Ensuring the minimum age for hiring employees (18 years);
4. Ensuring equal employment opportunities, covering recruitment, promotion, work division, and dismissal;
5. Ensuring workplace health and safety, including documentation and reporting.

Additionally, management commits to raising awareness of responsible forestry management among employees, clients, and suppliers.

## **GENDER EQUALITY POLICY**

The purpose and efforts of our organization are to ensure gender equality regarding the presence and professional growth of women within the organization.

The organization intends to enhance diversity in roles across the company and maintain processes that foster female empowerment in business activities.

The organization's focus to achieve and maintain this goal emphasizes the following areas, based on UNI 125:2022 practices:

- Culture and Strategy
- Governance
- HR Processes
- Opportunities
- Equal Pay
- Parenthood

The organization believes that developing a cultural model that promotes gender equality generates "social value" appreciated in the European economic and institutional context and represents a factor of business development.

For this reason, the organization aims to ensure gender equality through concrete actions that are compliant with the requirements/indicators established in the areas mentioned and are genuinely appreciated by the women in the organization.

The organization, with the intention of focusing on the satisfaction of women at any moment and in any circumstance throughout their working life in the organization, has chosen to view this "life cycle" through the following aspects:

- Selection and hiring (recruitment)
- Career management
- Pay equità
- Parenthood, care
- Work-life balance
- Prevention of abuse and harassment

For each of these aspects, the organization has defined more specific policies, which are listed below. To each policy that expresses the principles the organization follows, specific and measurable gender equality goals have been associated, as outlined in the strategic plan.

## **POLICIES**

### **SELECTION AND HIRING (RECRUITMENT)**

Our organization, in the selection and hiring activities for the personnel to be employed in business activities, adheres to the following principles in the perspective of improvement:

- Candidate selection should be carried out in a gender-neutral manner;
- The selection criteria should consider personal qualities such as professionalism, competence, specialization, and experience;
- The selection process should not involve questions regarding marriage, pregnancy, or family responsibilities;
- Selection should ensure that the presence of women and men within the workforce is balanced relative to the total number of employees;
- Roles such as executives, business unit managers, direct reports to top management, and those with budget delegation should be distributed equally;
- The position during hiring should include a salary related to the duties and responsibilities, not influenced by gender;
- The selection process should ensure the balance between the percentages of men and women who have a variable pay contract.

### **CAREER MANAGEMENT**

Our organization acknowledges that economic results depend on the human resources working within it, and all career development opportunities are intended to be based solely on the individual's results and merit, regardless of gender. The organization, in the perspective of improvement, manages the careers of internal employees by adhering to the following principles:

- The assignment of roles and tasks should consider a balance of gender leadership;
- Career path design and presentation should be gender-neutral;
- Career paths for employees are accessible to all, with transparent verification of gender equality balances;
- The working environment, where employees spend most of their day, should ensure the possibility (both technologically and physically) for everyone to express themselves, with well-being seen as safety and comfort;
- Training for skills development and awareness is a key process aimed at removing career difficulties and restoring gender leadership balances;
- Considering the career transition related to the Board of Directors, at least 1/4 of our Board of Directors should be represented by women;
- Employee departures from the organization due to termination are closely examined to verify turnover based on gender;
- Promotions always consider gender balance at the functional level.

### **PAY EQUITY**

Our organization, at the time of hiring and throughout an employee's career, ensures pay equity regardless of gender. The organization does not consider gender asymmetry in the costs of compensating individuals. In determining, paying, and modifying salaries, the organization follows these principles:

- Employee compensation is based on role and responsibility, and any bonuses or benefits are exclusively based on results produced and recognized;
- Salary, bonus payments, and the allocation of benefits are documented and accessible to all staff for transparency;
- The criteria for compensation, bonuses, and benefits are documented and accessible to the entire staff;
- Any staff member has the right to report any disparities.

### **PARENTHOOD, CARE**

Our organization does not intend to create any obstacles to parenthood, supporting both maternity and paternity through activities aimed at meeting the needs of individuals who, due to their parental status, must balance their work commitments with new responsibilities. The organization supports this intention under the following principles:

- Maternity and paternity are supported by training, information, and reintegration programs;
- Maternity is supported before, during, and after childbirth;
- Paternity leave must be promoted to ensure all potential beneficiaries take full advantage of it, for the entire period established by law;
- Return from leave is supported by specific reorientation initiatives;
- The organization plays an active role in supporting caregiver activities (caring for the newborn);
- Support for fathers and mothers is extended through services dedicated to children, such as vouchers for sports activities.

### **WORK-LIFE BALANCE**

Our organization aims to provide its employees the possibility of managing the time dedicated to both life and work through a balance that takes into account both business objectives and the well-being of employees, as a result of greater freedom of self-determination. The principles underlying work-life balance are as follows:

- Work-life balance measures are available to all employees, regardless of gender;
- The organization adopts part-time work, flexible hours, and remote working;
- The organization allows remote access to all employees working outside (regardless of their contract) for work operations and meeting participation.

### **PREVENTION OF ABUSE AND HARASSMENT**

Our organization rejects any form of abuse and harassment and engages in activities aimed at preventing and eliminating such phenomena with a zero-tolerance policy. The organization implements its prevention through concrete actions based on the following principles:

- Identifying risks related to abuse and harassment;

- Planning preventive actions related to such risks;
- Providing the possibility to report suspected abuse and harassment;
- Ensuring absolute protection for whistleblowers from any subsequent retaliation;
- Analyzing and understanding any instances of abuse or harassment;
- Developing gender-neutral and kind communication.

Any worker can file complaints related to occurrences of abuse, harassment, offense, or illegality within the workplace, which go against the principles of gender equality. Workers can also submit complaints through the Gender Equality Committee and/or the PdR125 Certification Entity. Complaints may be submitted anonymously. Rotocalco Mediterranea S.r.l. ensures the utmost confidentiality of reported issues, within the limits of the investigative freedom. The company also commits to investigating anonymous reports. Complaints concerning the gender equality system are gathered by the relevant committee. Additionally, in order to facilitate communication with workers and all stakeholders regarding PdR 125, the company has set up a reporting system where suggestions and concerns can be sent to: segnalazioni@rotomed.com.

This document serves as the guideline for achieving the objectives and milestones for which Rotocalco Mediterranea S.r.l. commits to implementing economically sustainable actions while always respecting the aforementioned principles.

## The Management

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