

## POLICY FOR QUALITY, ENVIRONMENT, WORKER AND PRODUCT SAFETY, FSC, AND GENDER EQUALITY

ISO 9001:2015, ISO 14001:2015, BRCGS-Packaging Materials, FSC® (FSC-C155329), UNI/PdR 125:2022

Rotocalco Mediterranea S.r.l., operating in the gravure printing sector for laminated flexible packaging, has been committed for over 10 years to an organizational path aimed at continuous improvement of its business processes in terms of quality, environmental impact, and worker safety.

The strategy of Rotocalco Mediterranea S.r.l. is aimed at strengthening its position in both the national and international markets, by aligning with production and hygiene assurance standards that are mandatory (national and EU regulations) and voluntary.

In this context, the Management, under the leadership of Dr. Vittorino Loreto, has implemented:

- An Environmental Management System in accordance with UNI EN ISO 14001:2015;
- A Quality Management System in accordance with UNI EN ISO 9001:2015;
- A Health and Safety Management System in accordance with ISO 45001:2018;
- A Product Safety Management System for packaging materials based on the BRCGS-Packaging Materials standard;
- An FSC® Chain of Custody Management System (FSC-C155329);
- A Gender Equality Management System based on UNI/PdR 125:2022.

The main goal of the Management is to ensure a high level of competence, continuity, and quality in performance, pursuing a policy that puts at the center:

- Customer satisfaction,
- Environmental protection,
- Worker safety, and
- Food product safety.

To fulfill its mission, our organization is committed to:

- Maintaining an Integrated Management System (Quality / Safety / Environment / Food Safety for Packaging) as a tool for achieving objectives, fulfilling commitments, promoting the continuous

improvement of business processes, and ensuring compliance with regulatory and customer requirements for products and services;

- Adopting an integrated risk management system across all production phases, with a management policy tailored to different risk levels;

- Identifying risks and opportunities within the organizational context to support continuous improvement;

- Focusing all activities on ensuring compliance with product and customer specifications to produce items that meet expectations (customer satisfaction);

- Ensuring the necessary human and financial resources for the effective implementation of the quality management system and product safety program;

- Monitoring activities that impact product quality, hygiene, and environmental performance, collecting and analyzing data to define and implement preventive actions aimed at eliminating the causes of potential non-conformities;

- Complying with laws and mandatory regulations concerning Environment, Occupational Health and Safety, and Food Safety;

- Striving to eliminate or minimize pollutant emissions, waste production, and energy consumption;

- Evaluating environmental risks through the identification of significant environmental aspects;

- Assessing the environmental impact of performed activities, used products, and provided services, and adopting management procedures to ensure maximum environmental protection;

- Providing training and raising awareness among all employees to enhance their competence and sense of responsibility, and to encourage initiatives aimed at protecting the environment and ensuring food safety;

- Strengthening relationships with technical partners to ensure customers receive products of greater value—safe, reliable, and of high quality—at competitive prices.

- To provide products and services in compliance with all requirements set forth by current legislative regulations, ensuring the safety and health of users, with particular attention to food safety regulations;

- To promote a culture and implement appropriate methodologies within the organization so that everyone working in it is consistently able to deliver the highest level of service expected by the customer;

- To ensure a high level of employee satisfaction by fostering loyalty and a strong sense of responsibility;

- To always maintain an absolute level of workplace safety for all employees;

- To implement a performance control system aimed at increasing competitiveness in the industrial packaging production sector;

- To increase company revenue by acquiring new clients and investing in new production facilities and technologically advanced machinery.

IN FULFILLING ITS MISSION, ROTOCALCO MEDITERRANEA COMMITS TO:

Toward clients to provide products and services that meet legal and high-quality standards, to demonstrate transparency and reliability, and to ensure product quality at competitive prices through cost analysis and control.

Toward suppliers to foster a productive “alliance” that allows them to play an active role in defining product performance and characteristics, and to provide support in understanding and defining the customer’s needs and legal requirements.

Toward employees to promote initiative, encourage professional growth, ensure positive and respectful working relationships, and guarantee a safe working environment where everyone can feel satisfied.

Toward shareholders to foster the company’s growth while ensuring adequate profitability and financial stability—key elements for affirming this policy.

Toward the Siracusa community to avoid polluting the environment and to offer local employment opportunities.

## ETHICAL PRINCIPLES

Rotocalco Mediterranea S.r.l. upholds and adopts the following principles:

- a. Compliance with national and EU labor and safety regulations;
- b. Rejection of child labor;
- c. Monitoring actions to prevent coercion, intimidation, and racist behavior toward non-Italian employees;
- d. Respect for union membership and freedom of movement as provided by the National Collective Labor Agreement (CCNL);
- e. No discriminatory practices based on gender, age, language, race, religion, or political ideology during recruitment or employment;
- f. Promotion of a positive and respectful work environment;
- g. Commitment to promoting the professional and personal growth of employees through training accessible to all, based on skills and language;
- h. Awareness-raising activities on ethical principles for all company collaborators.

## FSC POLICY (Forest Stewardship Council)

The Management of Rotocalco Mediterranea has established this policy to ensure the application of FSC (Forest Stewardship Council) scheme requirements and the related principles and criteria, with the aim of using raw materials sourced from environmentally, socially, and economically sustainable forest management.

The company is committed to:

- Complying with current forest-related legislation;
- Selecting raw material/semi-finished product suppliers that are FSC certified;
- Raising supplier awareness on the importance of sustainable forest management;
- Providing periodic employee training on the controls required to ensure traceability of wood products;

· Prioritizing the procurement of wood products from sustainably managed forests and ensuring that such products do not originate from:

- Illegally harvested timber,
- Forests officially declared by governmental/environmental authorities as areas soon to be legally protected (without a proper harvesting permit),
- Forest areas where civil or traditional rights of local populations have been violated,
- Forests with high conservation value,
- Genetically modified trees,
- Natural forests converted into plantations or other non-forest uses.

ROTOCALCO also commits to complying with the CoC, social, health, and safety requirements as defined by the FSC standard and required by national laws, including:

1. Ensuring workers' freedom of association and rights to collective bargaining. This includes employment contracts that do not prevent workers from joining/participating in workers' organizations or engaging in collective bargaining; access to union representatives; transparent procedures for termination; and negotiation with representatives of legally recognized trade unions;
2. Prohibiting the use of forced labor within the organization;
3. Ensuring a minimum hiring age of 18 years;
4. Guaranteeing equal treatment in employment, covering recruitment, promotion, job assignment, and termination;
5. Ensuring workplace health and safety, including proper documentation and reporting.

Furthermore, Management is committed to raising awareness among employees, customers, and suppliers regarding issues related to responsible forest management.

## GENDER EQUALITY POLICY

Our organization's purpose and efforts

As stated in the purpose of its management system, our organization is committed to ensuring gender equality in terms of women's presence and professional growth within the company.

In this sense, it aims to enhance diversity in the roles operating within the organization and maintain processes capable of fostering female empowerment in business activities.

The organization focuses its efforts, as outlined in the UNI/PdR 125:2022 guidelines, on the following areas to achieve and maintain this goal:

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

The organization believes that developing a cultural model that promotes gender equality not only creates “social value” appreciated within the European institutional and economic context, but also serves as a driver of business development.

For this reason, the organization seeks to ensure gender equality through concrete actions that both comply with the specific requirements and indicators established in the above areas, and are genuinely meaningful and appreciated by the women within the organization—who are the key stakeholders in relation to the outcomes of the management system.

In order to ensure ongoing attention to the needs and satisfaction of women throughout every phase and circumstance of their working life within the organization, the company has chosen to consider this “lifecycle” through the following aspects:

- Recruitment and Selection
- Career Management
- Pay Equity
- Parenthood and Caregiving
- Work-Life Balance
- Prevention of Abuse and Harassment

For each of these areas, the organization has established more specific policies (reported below). To each policy—which expresses the guiding principles the organization follows—specific and measurable gender equality objectives have been associated, as outlined in the strategic plan.

## POLICIES

### RECRUITMENT AND SELECTION

In the context of continuously improving our personnel recruitment and selection activities for business roles, our organization adheres to the following principles:

- Candidate selection must be conducted in a gender-neutral manner;
- Selection criteria must take into account personal qualities such as professionalism, competence, specialization, and experience;
- Selection processes must not include questions related to marital status, pregnancy, or family responsibilities.
  
- The selection process must consider that the presence of women and men within the workforce should be balanced in relation to the total number of employees;
- Leadership roles—such as executives, business unit managers, direct reports to top management, and those with budgetary authority—must be distributed in a balanced way;
- The job position, defined during the hiring phase, must offer a salary based on the duties and responsibilities involved, and not be influenced by gender;
- The selection process must ensure a balanced percentage of men and women receiving performance-based compensation;

### CAREER MANAGEMENT

Our organization recognizes that economic success also depends on the human resources who contribute to it, and therefore all career development opportunities are intended to be based solely on individual merit and performance, regardless of gender. In a continuous improvement perspective, career

management within our organization adheres to the following principles:

- The assignment of roles and responsibilities must consider a balanced distribution of gender leadership;
- Career path planning and communication must be equally addressed to all genders;
- Career progression is accessible to all employees, who must be able to transparently verify that gender balance is being maintained;
- The work environment, where most of the day is spent, must provide (both technologically and physically) opportunities for everyone to express themselves and ensure well-being in terms of safety and comfort;
- Training aimed at developing skills and awareness is a fundamental process intended to remove potential career barriers and restore leadership balance across genders;
- When it comes to career advancements involving the Board of Directors, at least one quarter (¼) of our Board must be represented by women;
- Cases of employee termination are carefully examined, with gender turnover being monitored;
- Promotions always take into account gender balance at each functional level;

## PAY EQUITY

At the time of hiring and throughout the employee's career, our organization is committed to ensuring pay equity, regardless of gender. The organization does not treat the cost of compensating different genders asymmetrically. In determining, granting, and adjusting salaries, the organization follows these principles:

- Compensation is based on role and responsibilities, and any additional benefits or bonuses are strictly based on the results achieved and recognized;
- Salary, bonus payments, and benefits are transparently documented and accessible to all staff;
- The criteria for salary, bonuses, and benefits are documented and accessible to all staff;
- All employees have the right to report any pay disparities;

## PARENTHOOD AND CAREGIVING

Our organization seeks to ensure that parenthood is never an obstacle to professional life, supporting both motherhood and fatherhood through activities designed to meet the needs of those who must balance work with new caregiving responsibilities. This commitment is supported by the following principles:

- Maternity and paternity are supported through training programs, informational initiatives, and reintegration efforts;
- Maternity is supported before, during, and after childbirth;
- Paternity leave must be actively promoted so that all eligible employees take full advantage of the period provided by law;
- Return from leave is supported through specific re-orientation initiatives;
- The organization takes an active role in supporting caregiving activities through concrete initiatives;
- Support for mothers and fathers is enhanced 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 opportunity to manage their time between life and work through a balanced approach that considers both the company's business objectives and the employee's physical and mental well-being, derived from greater freedom of self-determination. The principles underlying work-life balance are as follows:

- Work-life balance measures are addressed to all staff regardless of gender
- The organization adopts part-time work, flexible hours, and smart working
- The organization allows telematic connection with all staff working remotely (regardless of contract type), for work-related activities and participation in meetings.

## PREVENTION OF ABUSE AND HARASSMENT

Our organization rejects all forms of abuse and harassment and, to this end, adopts a zero-tolerance policy through prevention and suppression measures. Prevention is implemented through concrete actions based on the following principles:

- Risks related to abuse and harassment must be identified
- The organization plans prevention actions in relation to these risks
- The possibility to report suspicions and/or incidents of abuse and harassment
- Absolute protection by the organization of the whistleblower against any potential retaliation
- The organization analyzes and seeks to understand any cases of abuse and harassment
- The promotion of respectful and gender-neutral communication

Every employee has the right to file complaints regarding incidents of abuse, harassment, offense, or illegality that have occurred in the workplace or are connected to it and that violate the principles of gender equality.

Employees may also file complaints through the Gender Equality Committee and/or the PdR 125 Certification Body. Complaints may be submitted anonymously.

Rotocalco Mediterranea S.r.l. guarantees the utmost confidentiality regarding the reported or disclosed facts, within the limits of the freedom of investigation. Furthermore, the company is committed to investigating even anonymous reports.

Complaints concerning topics related to the Gender Equality System submitted by one or more stakeholders are collected by the designated Committee.

To ensure easy communication for employees and all stakeholders regarding comments and suggestions related to the PdR 125 standard, the company has set up a reporting system that can be reached via the following email address: [segnalazioni@rotomed.com](mailto:segnalazioni@rotomed.com).

The same email can also be used for communications related to food safety management.

This document represents the guidelines for achieving the goals and objectives that Rotocalco Mediterranea S.r.l. is committed to pursuing through all economically sustainable actions, always in compliance with the aforementioned principles.

The company management

*Rotocalco Mediterranea S.r.l.*  
*Imballaggi Flessibili Accoppiati*  
 Sede Legale e Direzione  
 Via Stenioso, 11 - Zona Md.1e - C.da Targia  
 96100 SIRACUSA - P.IVA: 01150380896