

STATEMENT OF COMPANY POLICY FOR QUALITY, ENVIRONMENT, HYGIENE, SAFETY AND HEALTH IN THE WORKPLACE, FOOD SAFETY AND PEFC AND FSC® CHAINS OF CUSTODY

ICIS S.p.A. intends to maintain, on the market, its position of absolute importance in terms of product and service quality, through their continuous development and improvement. This development will allow it to continue to meet the constantly evolving expectations of Customers.

ICIS S.p.A. is aware that the environment, sustainability, social responsibility, ethical principles, social health and safety requirements, safety and health in the workplace, good GMP manufacturing practices and food safety of its products are essential elements and must be part of the principles on which to base its activity and its organization.

ICIS S.p.A. is aware that the values mentioned above are among the most important values for the economic development of the company and responsible and sustainable development, therefore policies, procedures, plans and programs are established in order to be able to carry out the activity in compliance with the environment, ethical principles, social requirements, health and safety, social responsibility, physical and moral integrity as well as the health of its workers, hygiene and food safety of the product.

ICIS S.p.A. is aware that to achieve the objectives it is necessary for its organization to have as a reference a modern setting of Management Systems that enhances a process-based approach, identifying and managing also the related and external processes while maintaining full responsibility for them, and extending the concept of continuous improvement to each activity.

The general guiding principles to be referred to throughout the company organization are the following:

- Comply with and apply all current and future applicable laws and regulations relating to employment contracts, the environment, safety and health in the workplace, the legality of forest-based materials/products and which together with other materials/products fall within the scope of the EUDR in the fight against deforestation, hygiene and food safety, as well as the requirements of the latter mutually agreed with customers by adopting adequate management systems including GMP, developing careful and continuous monitoring in order to ensure legislative compliance with all aspects including environmental, worker safety and food safety.
- Comply with and implement the mandatory social, health and safety requirements related to health, safety and social aspects that are based on the ILO Declaration on Fundamental Principles and Rights at Work, 1998, as also provided for by the PEFC Standard. In particular: workers are not hindered in their free association, in the choice of their representatives and in collective bargaining with the Employer. Forced labor is not used. Workers below the minimum legal age or who are of compulsory school age are not employed. Equal employment opportunities and treatment are not denied to workers. Working conditions do not jeopardize the safety or health of workers. ICIS S.p.A. confirms its commitment not to employ workers under the age of 18.
- Respect and implement the FSC® fundamental labor rights requirements for its activities and keep the “FSC® Self-assessment of fundamental labor rights requirements” updated, which describes how the fundamental labor rights requirements are applied to its activity.
- Operate a Due Diligence System (DDS) in accordance with the PEFC Standard, in order to help ensure that the activities conducted comply with all applicable timber legality laws, including trade and customs laws, and to minimize the risk that the material purchased comes from “controversial sources”. ICIS SPA hereby undertakes not to use and not to place on the market non-PEFC certified forestry and tree-based materials/products from “controversial sources”.
- Respect and implement the provisions of the “Policy for the Association of Organizations to FSC® and in particular not to be directly or indirectly involved in the following unacceptable activities:
 - a. Illegal logging and trade in illegal timber or forest products
 - b. Violation of traditional and human rights in forestry operations
 - c. Destruction of high conservation values in forestry operations
 - d. Significant transformation of forests into plantations or other non-forestry uses
 - e. Introduction of genetically modified organisms in forestry operations
 - f. Violation of any ILO fundamental convention as defined in the ILO Declaration on Fundamental Principles and Rights at Work as better specified in the “Fundamental Labour Rights Policy”
- Analyze the context in which ICIS operates, define the stakeholders, understand their needs and expectations also in relation to climate change, assess risks and opportunities including risks caused by climate change, assess environmental aspects / impacts, risks to workers’ health and safety, hygiene and food safety and risks and opportunities for the organization’s activity, both during the production of products and services and also preventively as in the development of new activities and products also evaluating sustainability, life cycle and future disposal, providing adequate communication about the disposal of the product in order to minimize the environmental impact.

- Not provide for any derogation regarding the lack of the necessary requirements to conduct one's production and service activity in compliance with the laws and regulations in force, the environment, the safety and health of workers, the hygiene and food safety of the product and ethical principles.
- Plan, implement, make operational, maintain active and update an integrated management system that highlights and considers the qualitative, environmental, safety and health of workers, hygiene, food safety of the product and the PEFC, FSC® chains of custody aspects, ensuring that the responsibilities and authorities are defined and communicated within the organization and ensuring the necessary resources in order to be able to effectively maintain and conduct the integrated management system.
- Pursue continuous improvement as a permanent objective of the entire organization in all processes and for all aspects relating to quality, the environment, hygiene, food safety and technological suitability of packaging and worker safety, considering technological progress, scientific knowledge, the expectations of workers, the community, customers and end consumers.
- Analyze and understand customer needs, satisfying their requirements and tending to exceed their own expectations, promoting actions aimed at monitoring and improving the level of customer satisfaction in order to increase customer loyalty, increase sales volumes and identify new business opportunities and outlet markets.
- Prevent, reduce to a minimum and monitor the aspects that have a negative impact on the environment by operating through responsible management and monitoring of the use of raw materials, natural and energy resources, through waste management by optimising their differentiation and favouring materials destined for recovery, through the reduction of processing waste and non-conformities, through monitoring of emissions into the atmosphere and water discharges, through the improving process efficiency, using innovative technologies and environmentally friendly products and promoting greater environmental awareness among employees and all interested parties.
- Maintaining and implementing certification schemes according to PEFC and FSC® standards, keeping the relevant documentation and raising awareness among customers, suppliers and staff on the issue of sustainable and responsible forest management.
- Preventing, reducing and monitoring risks to workers' health and safety and in particular reducing accidents and occupational diseases through risk prevention at source, i.e. in the choice of materials and substances, in identifying and adopting the best technologies and working methods available and economically sustainable.
- Protecting workers' health through the health plan drawn up by the competent doctor, the constant commitment to eliminating dangers and reducing risks to workers' health and safety.
- Ensuring that work environments and systems are suitable and safe for carrying out the activity
- Encouraging worker participation and consultation.
- Develop and implement a Hygiene Management System to ensure compliance with its obligations to produce safe products.
- Prevent, reduce and monitor risks to hygiene and food safety by adopting and maintaining precise standards and controls (PRP - GMP, operational PRP, CCP) paying particular attention to aspects relating to the cleaning of environments, systems and those relating to personal hygiene and providing adequate communication to all parties involved in order to ensure that all food safety hazards are identified and adequately controlled without ever reaching the critical limits beyond which the product is unacceptable.
- Activate effective accident prevention measures, develop, implement, make operational and update plans to deal with emergencies, whether they are environmental, relating to the safety and health of workers or related to the food safety of the product, and contain the harmful consequences for workers, the environment, the health of the population and consumers.
- Analyze data and information in order to establish effective decisions.
- Promote aspects of social responsibility.
- Promote the integration of foreign workers and ensure equal opportunities for all workers without discrimination based on gender and origin.

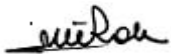
- Promote and stimulate professional growth, awareness and motivation for work aspects by ensuring adequate internal communication, adequate means and structures.
- Prevent interpersonal conflicts by acting actively so that organizational and management aspects are clear and defined.
- Establish relationships with Trade Unions and Workers' Representatives in a responsible and constructive manner, promoting a climate of mutual trust and dialogue, in the continuous search for profitable industrial relations.
- Inform, train, train, raise awareness, motivate, make aware and involve all workers with the aim of achieving the skills in the assigned role and achieving the pre-established objectives in order to obtain responsible conduct of their actions in compliance with the environment, their health and safety and to guarantee the quality, hygiene and food safety of the products and services provided to customers.
- Maintain and develop relationships with suppliers based on a shared and common vision of the way of operating, while respecting their role, also raising their awareness of the commitments of the Policy and in particular on the ethical aspects, quality, the environment, worker safety, hygiene and food safety.
- Require maximum attention regarding the work of external companies that work within the company, especially for their assumption of responsibility in the execution of the work both as a guarantee of maximum safety intended as safety and health of workers and food safety and for compliance with environmental regulations.
- Maintain active communication and involvement with all interested parties: the responsible bodies, the competent authority, the local community, customers, suppliers and employees

The implementation and achievement of the objectives listed above will be monitored through a series of indicators and verification activities (audits) that will highlight the efficiency of the good functionality of the processes considered in the system.

Everyone is required to respect the principles of this policy, committing to its daily application in the constant search for opportunities for improvement. Without prejudice to the fact that the primary responsibility for the entire Integrated Management System lies with the undersigned, for operational reasons, the RES is designated as the Management representative, who will ensure that the processes necessary for the integrated management system are established, implemented and kept up to date, report to senior management on the performance of the system and on any need for improvement and ensure the promotion and awareness of customer and mandatory requirements throughout the organization. The RES will directly refer to the undersigned for problems that cannot be resolved through the normal organizational structures provided for.

In support of the Policy and on the basis of the evolution of the Integrated System, the Procedures and the Technical Operational Instructions adopted, an Objectives Program is formulated every year for the continuous improvement of the System to integrate the objectives stated previously.

Mozzo , 06/24/2024



Managing Director
MarioGiacomo Ratti

ICIS COMMITMENT - FUNDAMENTAL LABOR RIGHTS REQUIREMENTS POLICY

ICIS Spa (represented in the Top Management by the President and Managing Director MarioGiacomo Ratti) is committed to the protection and improvement of human resources used as a fundamental asset of the company. For this reason, ICIS promotes a correct and transparent management of human resources in compliance with the principles of Ethical, Social and Environmental Responsibility established in international conventions and recommendations, including the resolutions of international organizations such as the ILO - International Labour Organisation and the principles established by the ETI - Ethical Trading Initiative.

The principles that are respected are the following:

- employment relationships are voluntary and based on mutual consent, without the threat of punishment;
- the application of the legislation most favorable to the worker, in the event that national laws, other local laws in force on labor matters and prevailing industry standards, regulate the same matter;
- the rejection of practices that violate human rights in general (according to the United Nations Guiding Principles on Business and Human Rights) and those of the worker in particular (disciplinary procedures that include corporal punishment and/or mental or physical coercion, physical and sexual violence, child labor, forced labor, discrimination in the workplace, deposit of sums of money) and the adoption of procedures and behavioral methods that are open and respectful towards such rights (freedom of association and the right to collective bargaining, fair pay, respect for working hours including rest periods and holidays, protection of health and safety);
- the removal of discriminatory practices and unequal treatment (in hiring, in wages, in access to training, in career promotions) based on issues of race, nationality, religion, handicap, sex, sexual preference, membership of trade unions or political affiliation;
- the promotion and improvement of the health and safety conditions and physical and mental well-being of its collaborators through the creation of healthy and comfortable working environments;
- In compliance with national and international laws supporting the protection and safeguarding of the psycho-physical development of children, ICIS Spa does not employ minors nor does it support the use of child labor. ICIS SPA excludes a priori the hiring of workers under the age of 18.
- all actions, operations and transactions relating to the Company must be undertaken and pursued in full compliance with legality, impartiality and the principles of fair competition; they must be managed with the utmost correctness, must be inspired by the completeness and transparency of information, must be supported by documentary evidence and must be subject to checks and controls;
- relations with the Authorities must be based on maximum transparency and collaboration, in full compliance with their institutional functions;
- the periodic monitoring and continuous improvement of the general conditions of management and enhancement of human assets.

This Policy, documented, implemented, kept active, communicated and made accessible to company personnel and all interested parties, is a public document that is periodically verified and reviewed, in order to take into due consideration any changes that have emerged over time with reference, for example, to current legislation or to the requirements of corporate conduct.

Mozzo , 06/24/2024



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