



ENVIRONMENTAL POLICY AND CERTIFICATION

P.E. LABELLERS

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P.E. LABELLERS S.p.A a socio unico

C.F/P.IVA IT 01312480203 - N. Iscr. Reg. Imprese 01312480203 - R.E.A. MN 151469 - Capitale Sociale € 1.920.000 I.V.

Società soggetta ad attività di direzione e coordinamento di Fojal III B.V.

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INTRODUCTION

The Company, in the performance of its activities, pursues the principles of transparency, fairness, loyalty, integrity, and independence, identifying its environmental choices in line with its business objectives. This document is the Environmental Policy (hereinafter also referred to as the "Policy") adopted by the Company to inspire, regulate, and proactively control the behaviors that the Recipients – as defined below – are required to adhere to in environmental matters. The Company promotes the well-being of the local community and its economic, social, and cultural development through a "socially responsible" entrepreneurial activity and sets the creation of value for all its stakeholders as one of its business objectives. In drafting this Policy, the Company has therefore taken into account both the close connection between sustainability and reputational risk, as well as the potential indirect impacts generated by the Company's activities on the territory and community. The principles contained in this Policy complement the rules of conduct that staff are required to follow under current regulations, employment contracts, as well as the procedures, regulations, and provisions issued or to be issued internally by the Company.

OBJECTIVES OF THE ENVIRONMENTAL POLICY

In the context of increasing environmental awareness and rising expectations from customers and regulators, the Company is committed to establishing and pursuing specific, measurable environmental goals. The specific objectives of this Policy are designed to guide our daily actions and ensure that our commitment to sustainability results in tangible, measurable outcomes. The objectives set by the Company include:

- 1. Energy Efficiency:** Improve the energy efficiency of our production operations and company facilities. The goal is to reduce total energy consumption through the adoption of energy-efficient technologies and the optimization of production processes.
- 2. Sustainable Resource Management:** Optimize the use of natural resources, including water and materials, minimizing waste and promoting reuse and recycling. Our goal is to reduce water consumption and increase the percentage of recycled materials in our production process within the next five years.
- 3. Use of Environmentally Friendly Materials:** Prefer and use environmentally friendly and sustainable materials in the production of packaging for our labeling machines. The goal is for the materials used in our products to increasingly come from sustainable sources within the next five years, with continuous improvement in the selection and use of materials with low environmental impact.
- 4. Waste Management:** Improve waste management through reduction, reuse, and recycling. We aim to achieve a reduction in waste produced per unit of product

within five years and implement a comprehensive recycling program for all industrial waste.

5. **Air pollution:** prevent and gradually reduce the emissions of pollutants generated by company production processes, facilities, and vehicles. Adopt the Best Available Techniques (BAT) to reduce gaseous and particulate emissions, optimize ventilation and filtration systems, and promote the use of lower-impact energy sources.
6. **Product use:** evaluate solutions for eco-design, lean use, and functional optimization, taking into account the product's environmental footprint throughout its entire use cycle.
7. **End of product life:** promote the circular economy and shared responsibility throughout the entire product life cycle, including through design for recycling and material separability (easy disassembly).

These objectives have been defined taking into account industry best practices and current environmental regulations. Their achievement will be monitored through clear and measurable performance indicators, with the aim of ensuring continuous improvement of our environmental performance and making a positive contribution to global sustainability..

RECIPIENTS AND SCOPE OF APPLICATION

This Policy outlines the set of guidelines that enable the implementation of the values contained within it, in accordance with the operational conduct characterized by honesty, professionalism, and transparency that distinguishes the Company. The values and principles outlined below are binding for the Recipients of this Policy, particularly:

- members of corporate's administrative body , executives, financial promoters, employees, collaborators;
- individuals whose services are available to and under the control of the Company, and who participate in the provision of services and investment activities offered by the Company, including but not limited to, collaborators of any kind, consultants, suppliers, business partners, etc.;
- all individuals involved in outsourcing agreements related to the provision of services and investment activities by the Company;
- individuals who represent the Company before companies, entities, organizations, etc., including but not limited to, subsidiaries, associative bodies, trade associations, etc.;
- third parties with whom the Company has relationships, in accordance with the law or the agreements entered into by the individual companies and within the limits established by this Policy.

Those who provide goods or services for the Company's use are also required to comply.

REFERENCE REGULATIONS AND LEGISLATION

The Company's commitment to complying with this Policy is based on conventions, standards, principles, guidelines, and recommendations generally accepted at the international level. In particular, it is inspired by:

- **Legislative Decree 152/2006 (Environmental Code)** and subsequent amendments, which constitute the general regulatory framework for environmental protection and waste management in Italy;
- **Regional laws and regulations** in the environmental field, which complement and detail national legislation based on territorial specificities;
- **Regional Waste Management Plan (PRGR)** applicable, which establishes the guidelines and methods for waste management in the region;
- **Local regulations of individual municipalities and provinces** which may complement the general and regional provisions (e.g.: Water Protection Plan of the Municipality of Mantua);
- **International conventions** ratified by Italy in the environmental field, such as:
 - **Basel Convention** (on the control of transboundary movements of hazardous wastes and their disposal);
 - **Stockholm Convention on POPs** (Persistent Organic Pollutants);
 - **Rotterdam Convention** (on the prior informed consent for certain hazardous chemicals and pesticides in international trade).
- **Law 68/2015 (Environmental Crimes)**, introduction of new environmental crimes in the Penal Code (e.g.: **Environmental pollution** (Art. 452-bis of the Penal Code); **Environmental disaster** (Art. 452-quater of the Penal Code); **Illicit trafficking of waste** (Art. 452-quaterdecies of the Penal Code); **Crimes against public safety through the release of hazardous substances** (Art. 452-quinquies of the Penal Code))"
- **Community legislative sources**
 - **Directive 2010/75/EU on industrial emissions** (on the prevention and reduction of pollution arising from industrial activities, with particular focus on the management of emissions to air and water);
 - **Directive 2018/851/EU on waste** to promote reduction, reuse, and recycling.
- **Environmental certifications:** (ISO 14001, an internationally recognized standard for environmental management, ensuring the adoption of optimal and sustainable environmental practices);

Legislative Decree 231/2001

- The provisions contained within this Policy are integrated with those set out in other existing procedures and guidelines of the Company that address similar topics, such as, by way of example:
- **Organization, Management, and Control Model pursuant to Legislative Decree 231/2001;**
- **Ethical Code.**

PRINCIPLES

MANAGEMENT OF NATURAL RESOURCES

The company is committed to using natural resources (water, raw materials, soil) sustainably, promoting reuse and reducing waste. Production techniques are adopted to minimize environmental impact and encourage internal recycling.

RICICLO WASTE MANAGEMENT AND RECYCLING

Responsible waste management is promoted throughout all stages of the production cycle, reducing the amount of waste generated and encouraging reuse and recycling. Specific programs are implemented for the proper disposal of hazardous waste.

ENERGY EFFICIENCY AND EMISSION REDUCTION

The company promotes energy efficiency in its operations through the use of low-consumption technologies and the transition to renewable energy sources. The goal is to reduce greenhouse gas emissions and improve overall environmental performance.

PRODUCT SUSTAINABILITY

Product sustainability is promoted throughout its entire life cycle, from design to production, distribution, and end of life. The development of low environmental impact, durable, and easily recyclable products is encouraged.

ENVIRONMENTAL SAFETY AND RISK MANAGEMENT

The company implements risk management systems to prevent environmental incidents and minimize negative impacts. Environmental risks are identified and assessed at all operational stages, and preventive measures are taken to mitigate potential damage.

TRAINING AND INFORMATION

The Company recognizes training and information for employees as essential tools for the implementation of this Policy. The Company is committed to distributing this document to all Recipients in order to ensure proper information for the relevant parties. The Company is also committed to providing periodic training on this Policy and the issues it addresses.

MONITORING AND CONTINUOUS IMPROVEMENT

To ensure the effective implementation of this Policy and the achievement of the established objectives, a structured system for monitoring and continuous improvement has been adopted. This process allows the Company to regularly assess environmental performance and make necessary adjustments to optimize sustainable practices.

REPORTING

The company promotes a positive approach to the issues addressed in this Policy to ensure and protect the freedom of expression and reporting by the recipients regarding non-compliance, critical/unwanted situations, or other environmental protection-related issues. Any suspected violations of this Policy by recipients should be reported in writing and can be forwarded to their hierarchical contacts. If the report concerns the Company's Code of Ethics, it should be sent to the Supervisory Body through email or internal mail. Reports regarding possible violations by the Supervisory Body can be addressed to the Board of Directors, so that one of its members can be delegated to conduct the necessary and/or appropriate investigations. The utmost confidentiality will be maintained on all reports received.

EXTERNAL COMMUNICATION AND TRANSPARENCY

We suggest describing how the company communicates its environmental commitments and results to external stakeholders. This can include the publication of the sustainability report, sharing environmental goals, and committing to transparency in business practices. Also, explain how environmental performance is communicated to customers and the community. For example, we report the following:

To ensure that our environmental commitments and results are well understood by external stakeholders, the Company has adopted a clear and transparent approach to communication. This includes the following practices:

1. Sustainability Report: Every year, a detailed sustainability report is published, summarizing progress towards environmental goals, achieved performance, and areas for

improvement. This report is available on the website and is distributed to customers, investors, and other stakeholders through dedicated channels.

2. Sharing of Environmental Goals: Environmental goals are proactively communicated through the company website and periodic newsletters. We inform stakeholders about our initiatives and specific goals, such as reducing emissions and improving energy efficiency, to demonstrate our ongoing commitment to sustainability.

3. Transparency in Business Practices: A constant commitment to transparency in business practices is maintained. Regular updates are provided on progress towards environmental goals and actions taken to address any challenges. This transparency is essential for building and maintaining trust with customers, suppliers, and the community.

4. Communication to Customers and the Community: Direct communication with customers is encouraged through dedicated channels, such as social media platforms, to respond to inquiries and gather feedback on environmental practices.

Through these initiatives, the Company is committed to ensuring that environmental performance is transparent and that external stakeholders are continuously informed and engaged in sustainability activities.

REVISION AND UPDATE OF THE POLICY

We suggest establishing a mechanism for the periodic review of the environmental policy, defining the frequency with which the policy will be updated (e.g., annually or based on regulatory changes). Explain who will be responsible for the review and how results will be evaluated to improve the effectiveness of the policy. For example, we report the following:

To ensure that this Policy remains effective and compliant with current regulations, a structured process for review and update will be adopted. This process includes the following steps:

1. Review Frequency: The Policy will be reviewed and updated annually to ensure it continues to reflect best practices and evolving regulatory requirements. Additionally, in the event of significant changes in environmental legislation or the company's operational conditions, an extraordinary review will be conducted to ensure alignment with new regulations or needs.

2. Responsibility for Review: The responsibility for reviewing the environmental policy is assigned to the management team, which is tasked with coordinating the review, ensuring that changes are appropriate, and approving the necessary modifications.

3. Evaluation of Results: During the review process, the management team evaluates the results of the company's environmental activities, including progress towards set goals and recorded performance. Data and feedback gathered through continuous monitoring, employee reports, and sustainability reports are analyzed to identify areas for improvement and opportunities to optimize the policy.

4. Implementation of Changes: Changes to the environmental policy are implemented through official documented updates and communicated to all relevant employees and stakeholders. The new versions of the Policy are distributed, and the changes are integrated into business processes and training programs to ensure proper implementation.

Through this review and update process, we are committed to keeping our environmental policy current and relevant, thereby ensuring the continuous improvement of our environmental practices and compliance with applicable regulations.



Certificate
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kiwa

Valid from 2025-11-25 Last change date 2025-11-25
First issue date 2025-11-25 Valid until 2028-11-24
IAF Sector 18

ISO 14001:2015

Environmental Management System Certificate

We certify that the Environmental Management System of the Organization:

P.E. LABELLERS S.p.A.

is in compliance with the standard UNI EN ISO 14001:2015 for the following products/services:

Design and manufacture of automatic and semi-automatic labeling machines, rotary and linear, for cold glue, self-adhesive, hot melt, standard roll-fed and pre-glued linerless labels application. Installation and on-demand maintenance services at customer sites.

Kiwa Cermet Italia S.p.a.
Business Assurance & Sustainability
Director
Stefano Bertoncini

The maintaining of the certification is subject to annual surveillance and dependent on the observance of Kiwa Cermet Italia contractual requirements.

This certification has been granted in compliance with the Accredia technical regulation RT-09.

This certificate is composed of 2 pag. The following technical sheet provides details of the scope of certification.

P.E. LABELLERS S.p.A.
Registered Headquarters
Via Industria, 56 46047 Porto Mantovano (MN)

Certified sites

For details on the sites, please refer to the attached Technical Data Sheet

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Certificate
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**Data sheet attached to the Certificate
ISO 14001:2015**

Certified sites:

Via Industria, 56 46047 Porto Mantovano (MN)

Via Industria, 50 46047 PORTO MANTOVANO (MN)