

## Sustainable Procurement Policy

Pozzoli's commitment to corporate social responsibility, pursued through its packaging solutions for the luxury, cosmetics, entertainment, and food sectors, extends beyond its direct operations to include the entire supply chain of materials and services provided by third parties.

Over the years, Pozzoli has developed a responsible approach to procurement processes in line with the requirements of the **ISO 20400:2017 "Sustainable Procurement – Guidance"** standard, in alignment with the United Nations Sustainable Development Goals (in particular SDGs 5, 8, 12, and 13), and in response to international principles aimed at promoting and protecting Human Rights as recognized by the United Nations Global Compact (as defined by the Universal Declaration of Human Rights) and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

To consolidate its commitment and pursue its **Corporate Social Responsibility (CSR) objectives**, Pozzoli has implemented the following activities:

- Selection of suppliers through a sustainability performance assessment process, including the acquisition of voluntary certifications (e.g., ISO 14001, EMAS, ISO 45001, SA8000, etc.) and participation in sustainable development programs (e.g., EcoVadis);
- Requiring full compliance with minimum ethical and social standards from suppliers and subcontractors;
- Promoting a culture of sustainability and raising awareness among suppliers regarding CSR topics;
- Giving priority to suppliers that have integrated ethical and sustainable practices into their operations and that strictly comply with environmental legislation and occupational health and safety regulations, including international obligations related to climate change and sustainable development;
- Giving priority to suppliers that proactively manage diversity and inclusion within their workforce;
- Prioritizing the purchase of goods and services with a reduced environmental impact throughout their lifecycle, with a preference for those bearing environmental labels compliant with UNI EN ISO 14024 (e.g., EPD, EU Ecolabel, Nordic Ecolabel, Blue Angel, etc.);
- Purchasing energy-efficient goods, where applicable, bearing the Energy Star label;
- Where applicable, purchasing goods that preserve biodiversity and the conservation of species and, more broadly, natural habitats, and that are certified FSC, PEFC, SFI, or equivalent;
- Purchasing only goods that, at the end of their lifecycle, offer potential for reuse or high recycling and recovery potential;
- Choosing, when alternatives exist, products that are not hazardous to health and the environment according to CLP classification (EU Nr. 1272/2008), and prohibiting the supply of products containing SVHC according to the criteria set out in Article 57 of the REACH Regulation (EU Nr. 1907/2006);
- Purchasing, where possible, products and services from the local market in order to reduce environmental impacts from transportation.

Pozzoli's targets for 2030 (with reference to year 2024):

- Provide 16 hours of training on environmental and social topics within the supply chain to each employee in the purchasing department;
- Engage 100% of critical<sup>1</sup> suppliers and subcontractors<sup>1</sup> through the signing of the Supplier Code of Conduct;
- Evaluate and qualify 100% of critical suppliers and subcontractors in accordance with CSR principles;
- Audit 25% of active and critical suppliers and subcontractors annually;
- Involve 20% of critical suppliers and subcontractors in training activities on CSR/sustainability topics;
- Ensure that 50% of total procurement of products and services comes from local suppliers (< 500 km);
- Procure 100% of wood-based materials—such as paper, cardboard, pallets, and similar—from FSC or PEFC certified sources;
- Purchase 100% of plastics from biological or bio-based sources;
- Reduce hazardous waste production by 30%;
- Eliminate the purchase of chemical products hazardous to health or the environment (target: 0).

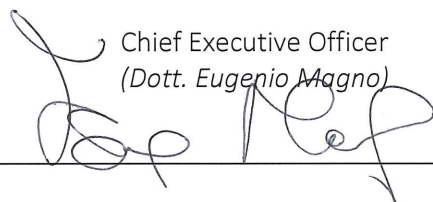
Using a **multi-level risk-based approach**, Pozzoli has developed and implemented a structured procurement process to evaluate and continuously monitor its suppliers and subcontractors in accordance with the sustainability principles outlined above. This is achieved through specific qualitative and quantitative questionnaires and second-party audits.

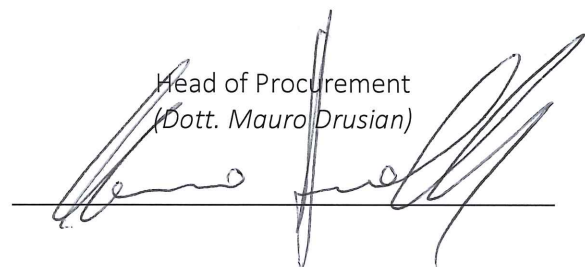
To support the **management of sustainable procurement**, Pozzoli has also developed specific tools to objectively and periodically assess and monitor its suppliers and subcontractors, ensuring operational compliance with the principles and targets outlined in this policy.

Pozzoli shares its Policies and the Supplier Code of Conduct with its supply chain in order to promote a common and unified approach to **sustainability and ethics throughout the procurement process**.

This Policy is integrated with the Quality, Environment, Health and Safety at Work, and Food Safety Policy.

Inzago (MI), date 09.05.2025

  
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<sup>1</sup> Critical suppliers and subcontractors are those essential for achieving the defined Corporate Social Responsibility goals.