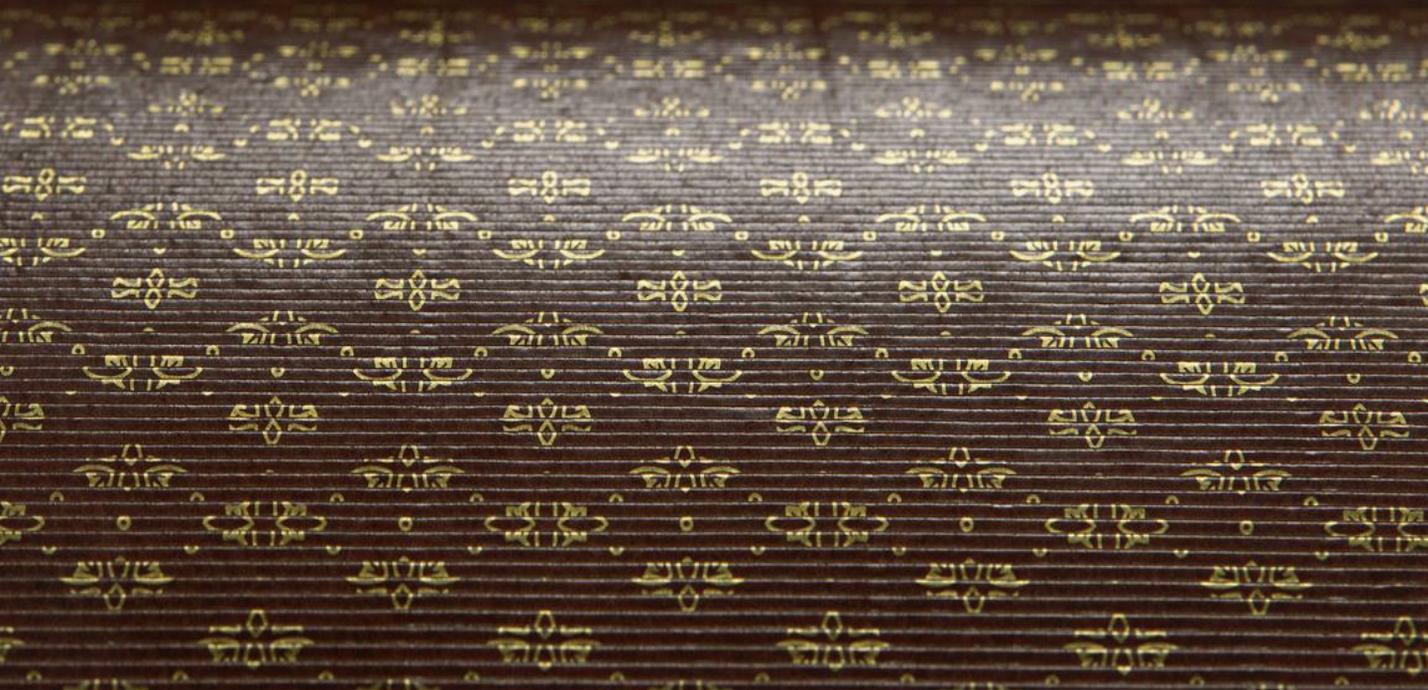


# COMMUNICATION ON PROGRESS

2021-2022

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**ecopack**   
engineered to contain

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To our stakeholders,

We are pleased to confirm that Ecopack Group reaffirms its support to the ten principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture, and daily operations.

We are committed to sharing this information with our stakeholders using our primary channels of communication.

Being extremely proud of the ongoing work carried out to embed fundamentals sustainability principles in our day-to-day operations, we are focused on building a reality that embraces and enhances the latter, properly implementing and supporting the SDGs as well.

We believe that together, even if slowly, things can truly change. We are committed to being part of this great project, respecting our values now and in the future.

Sincerely yours,

Annalisa Ferri & Francesco Ferri



**Ecopack SpA**  
Via della Masolina 24, 10040 Piobesi Torinese (TO) - Italia  
tel. +39 011 9657657 - fax +39 011 9657180  
www.ecopack.com - email: info@ecopack.com  
P.IVA e CF: IT05469550015

[www.ecopack.com](http://www.ecopack.com)

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## ECOPACK IN SHORT

Established in 1939 in Turin, Ecopack is a family-run company, specialized in the production of **baking moulds** and **specific packaging** for the global food industry. With 83 years of experience, more than 400 employees and a range of more than 800 catalogue products, Ecopack is one of the **market leaders** in its industry. Thanks to its **strong company culture** and forward looking mentality, nowadays it counts 5 subsidiaries around the world (Canada, Brazil, Tunisia, Russia and India) other than its Italian headquarter situated in Turin.



From the start, Ecopack projects in-house machineries and moulds for the realization of lighter paper products, in a way that enables the reduction of resources and chemical substances implied in the processes.

The **environmental impact** of our production has always been one of Ecopack's greatest interests, and it is in fact one of the **funding principles** of what nowadays is a full-fledged multinational company.

Annalisa and Francesco Ferri, the two CEOs, are today more committed than ever in guaranteeing **constant innovation**, to foster the optimization of all the production processes, products' sustainability and customers' satisfaction as well.

# UNITED NATIONS' GLOBAL COMPACT TEN PRINCIPLES

## HUMAN RIGHTS

1- Businesses should support and respect the protection of internationally proclaimed human rights.

2- Businesses should ensure that they are not complicit in human rights abuses.

## LABOUR RIGHTS

3- Business should uphold the freedom of association and effective recognition of the right to collective bargaining.

4- Business should uphold the elimination of all forms of forced and compulsory labor.

5- Businesses should uphold the effective abolition of child labor.

6- Businesses should uphold the elimination of discrimination in respect of employment and occupation.

## ENVIRONMENT

7- Businesses should support a precautionary approach to environmental challenges.

8- Businesses should undertake initiative to promote greater environmental responsibility.

9- Businesses should encourage the development and diffusion of environmentally friendly technologies.

## ANTI CORRUPTION

10- Businesses should work against corruption in all its forms, including extortion and bribery.

The background of the image consists of a dense stack of white, fluted paper cups. The cups are arranged in a grid-like pattern, with some rows appearing more prominent than others. The entire scene is set against a solid, warm orange background. The lighting is soft, creating subtle shadows and highlights on the edges of the cups, which adds depth to the composition.

# Human Rights

# EVALUATIONS, POLICIES AND OBJECTIVES

## ECOPACK AND HUMAN RIGHTS

For more than eighty years the company has been committed to the preservation and respect of Human Rights. These are at the basis of the company's culture, establishing the protection of moral integrity and guaranteeing equal opportunities for everyone.

People are the main and constant focus of the company's work, and that is why we respect all the employees, consumers, communities, and suppliers which are involved in our operations, and we seriously consider the impact that our business decisions have on the safeguarding of Human Rights.

With a statement of support contained in the [CSR report](#), Ecopack ensures that the standards laid down in the Universal Declaration of Human Rights are respected in all the company's subsidiaries, proudly identifying itself with these values, considering this text as fundamental and indispensable for the correct maintenance and application of the latter.



## OUR DOCUMENTS AND POLICIES

We demonstrate and explain our pledge in the preservation and respect of Human Rights within the company's [Code of Ethics and Conduct](#), and as well in the 2021 CSR report. In these documents is made explicit that every kind of discriminatory behavior (whether political, religious, racial, age/gender/sexual orientation based, nationality or health based) is strongly forbidden and discouraged inside the company, together with every form of compulsory labor, child labor and irregular work. The Company is also committed to prevent all forms of bullying and work exploitation, whether direct or indirect, and to recognize merit, work performance and professional potential as the determining criteria for salary and career development.

Being Ecopack committed to the complete detachment from Human Rights' abuses, it also

demands the same behavior along all its value chain; when it comes to stipulating contracts with suppliers, we strive to act in line with the principles of fairness and good faith.

Before entering in any working relationship, we always require the countersignature for the acceptance of the quality policy, food safety policy, environmental policy, but also documents concerning ethics and social responsibility. By signing these documents, the supplier agrees to respect and comply to the Universal Declaration of Human Rights and to national and international laws as well. Interested parties are also required to fill out a CSR questionnaire, with which they will be scrutinized: below a threshold defined in the internal evaluation procedure, the supplier is required to take appropriate corrective measures; the ones being awarded with negative scores will not be qualified and trade relations with them will be discontinued.

The questions concerning Human Rights contained in the form are divided by areas, and the first one aims at ensuring that the respondent company has an internal Code of Ethics that regulates corporate behavior. Then, Ecopack is interested in knowing if the supplier checks for eventual discriminatory situations, based on country of origin, ethnicity, gender, religion, political orientation, disability, trade union membership, health, or other forms of discrimination. It is very important for us knowing if workers' rights and protection are guaranteed at the suppliers' production sites, and if policies aimed at improving these rights have been introduced.

Many of the suppliers are EcoVadis certified; EcoVadis is a platform which with the help of accredited auditors, assigns scores and evaluates companies' performances in terms of

CSR. Submitting this report means explicitly showing one's performance, and in this case it is very useful, since it means that companies which participate are monitored also for what concerns performance in terms of Human Rights.

The cited documents show the Company's commitment in the promotion and preservation of the internationally recognized Human Rights and all the related issues, demonstrating management's interest and effort in promoting a CSR culture, through the sharing and disclosure of common principles and values.

Ecopack assures the diffusion and maintenance of these documents together with all the preventive measures adopted; all the rules must be observed by every employee as well.

## HUMAN RIGHTS RELATED RISK EVALUATION AND MANAGEMENT

Ecopack has adopted a series of protocols/management systems procedures to protect against specific risks in relation to various areas, and it engages in continuous improvement measures which aim at their efficient management.

The main risks concerning Human Rights identified in the activities that Ecopack carries out, are risks associated with personnel management and their rights (e.g., risks associated with loss of talent appeal, risk of non-compliance with regulations, risk of discrimination of various kinds).

Ecopack has developed a standard set of procedures for managing risks concerning Human Rights. The company promotes the dissemination of the documents containing these measure and the full understanding of all the internal procedures and regulations, while condemning every behavior that does not comply with the laws in force.

The same behavior and regulations apply to the company's foreign subsidiaries, which must be compliant with all the regulations applicable in the countries in which they are based; also, the existing organizational structure and internal policies must be compliant and coherent with the latter.

## IMPLEMENTATION OF HUMAN RIGHTS BASED POLICIES

Not only Ecopack developed specific standard procedures to address and preserve Human Rights based policies, but it also implemented concrete actions, aimed at consistently supporting the latter, so that connected risks and violations can be avoided. The Human Resources function of our company is responsible for the Human Rights policies management, and for managing their eventual violations as well.

A measure that Ecopack adopts to increment the consciousness of Human Rights in the work environment is sending out to every newly recruited employee the Code of Ethics, so that it can be properly read and understood, leaving it available to everyone for eventual consultations. Ecopack shows its commitment to the Human Rights preservation also by implementing specific training programs according to eventual needs, such as training in ethics and more generally on CSR.

An important initiative which is annually carried out by the HR department is the Administering of an anonymous survey to every employee, with questions concerning the job position and its general characteristics, the way colleagues are perceived, leaving the possibility of declaring eventual discriminatory situations, all with the aim of receiving suggestions that the employees might have towards the organization. In this way, a detailed analysis can be carried out, and eventual corrective measures can be implemented.

## SPECIFIC FUTURE OBJECTIVES

Ecopack cares about the maintenance of the goals achieved concerning Human Rights, and it aims at improving processes where considered necessary.

Our commitment in the preservation of Human Rights is carefully addressed; in the last three years there has not been any reported event of Human Rights violations.

For the years to come, our goal consists in maintaining this trend.



**zero cases of Human Rights violations in the story of the company**

---

# MEASUREMENT OF RESULTS

## HOW DO WE MONITOR OUR PERFORMANCE?

In 2020 Ecopack developed specific Key Performance Indicators, aiming at collecting, monitoring and evaluating data and results. These KPI are related to internally adopted policies, and some of them were designed for keeping track of employees' management. Many sections are connected to Corporate Social Responsibility and are addressed and reported in tables within the FY21 CSR report.

Concerning Human Rights, the KPI addressed is the following:

- **Number of discrimination or harassment cases/average number of annual employees**

The number of discrimination or harassment cases was stable and equal to zero during FY18, FY19, FY20 and FY21 among all Ecopack Group's subsidiaries.

Concerning the number of female employees at Ecopack, the company registered the following data among FY18, FY19 and FY20 for each subsidiary respectively:



## FEMALE WORKERS

in our company are on average around 50% of the total staff or more. Ecopack proudly promotes the exclusion of discriminatory conducts on the grounds of gender, ensuring that job selection criteria are linked exclusively to professional performance.

## UNDERAGE EMPLOYMENT

is not even an option at Ecopack. Concerning the number of underage employed per average number of employees, the percentage remains at 0 for every subsidiary of the group.

FEMALE EMPLOYEES/ AVERAGE TOTAL EMPLOYEES	2018	2019	2020	2021
ECOPACK ITALIA	50%	42%	43%	44%
ECOPACK CANADA	78%	80%	74%	67%
ECOPACK RUSSIA	62%	62%	62%	70%
ECOPACK BRAZIL	48%	45%	48%	44%
ECOPACK TUNISIA	73%	69%	71%	76%
ECOPACK INDIA	9%	12%	11%	14%

## VIOLATIONS' MANAGEMENT

Other than all the preventive measures which Ecopack adopts for ensuring a collaborative and peaceful working environment, we are also prepared for managing the possible arising of discriminatory/harassment situations. Ecopack is prepared to face Human Rights' violations through a standardized set of measures. In case of reported events, the General Management is called upon to take immediate action as described in the Code of Ethics.

Employees who claim they were subject to behaviors that have or could

have hurt their sensibility (for example sexual or discriminatory ones) are invited to report these issues to the manager, who will be in charge to oversee and verify together with the HR function the actual presence of this kind of behavior. If the Code of Ethics has been violated, the case must be reported to the senior management, which will provide the correct handling of the situation, engaging in applying the correct and needed measures so that the harassed worker's integrity can be restored.

## MONITORING

Our Senior Management is always informed and aware of dynamics concerning discrimination, possible harassment cases and more generally Human Rights issues inside of the company. The policies that we adopt are revised every three months, and data resulting from the KPI analysis is continuously monitored.

## CERTIFICATIONS

From 2020, Ecopack adheres to the EcoVadis monitoring system, as well as many of its suppliers and clients. The aim of this platform is observing companies and assigning them useful scorecards aimed at evaluating their sustainability performance; it provides useful guidelines, verifying through accredited auditors compliance and coherence between what is publicly declared, and the work carried out.

This method is especially useful for the comparison of companies operating in the same industry.

In 2021, Ecopack was rated as a Golden Medalist for its CSR performance, and specifically concerning Human Rights it obtained a score of 70/100, which corresponds to an advanced level of sustainability performance.





# Labour Rights

# EVALUATIONS, POLICIES AND OBJECTIVES

## ECOPACK AND LABOUR RIGHTS

Ecopack was born in 1939, and to this day it has been led by the same family for three generations. Respecting people and their rights in the workplace while carrying out an impeccable behavior are two of the many founding principles of the company, which have contributed to the development of strong and unchanged corporate values to which we are strongly committed. In Ecopack, the **preservation and implementation of Internationally recognized Labour Standards** is considered essential, and it is carried out appropriately in every subsidiary of the Group. The company engages in the exclusion of conducts that could be considered discriminatory on the grounds of every condition; all the other obstacles that could limit equality in access to employment, training, promotion and professional development are banned as well, ensuring that the selection criteria are linked exclusively to professional performance.

The elimination of every form of child labor is actively supported, as well as forms of forced or compulsory labour. Support to the **freedom of association** of workers and the **recognition of all trade union rights** are also at the basis of our company's culture and policies.



## OUR DOCUMENTS AND POLICIES

Our company aims at rising awareness and sharing good practices in regard of certain issues.

That is why in the years we adopted many policies for the encouragement of a responsible approach to the managing of operating activities in various corporate contexts. Regarding Labour Rights and Standards, we engage in promoting a working environment and behavior based on the respect of the dignity of every individual, together with the professional growth of every employee and the promotion of equal opportunities. Protecting the life and health of the workers in the venues where company's activities are carried out is also a topic of utmost importance for Ecopack. The documents containing these policies and procedures are the Code of Ethics and Conduct, the [CSR report](#), the [Company Policy](#) and the

Management System procedures.

Citing Ecopack's code of Ethics: "In all the countries where it operates, Ecopack is committed to spreading its corporate values: respect for the law and, more generally, for all the concretely applicable regulations, respect for the environment, transparency, honesty, respect for free competition, innovation, protection of human rights, workers' rights and protection of health and safety in the workplace. In more than eighty years, the Company has proudly identified itself with these values, already inherent in the entrepreneurial style of its founders, making them part of its fundamental resources."

In defining labour values Ecopack considers fundamental the *International Labour Conventions* and Recommendations issued by the ILO (International Labour Organization).

In line with these, the company does not tolerate any form of exclusion or discrimination, bullying or work exploitation (whether direct or indirect), and it engages in recognizing merit, work performance and professional potential as the determining criteria for salaries and career development. The company is committed to complying with the existing legislation and collective bargaining agreements, in cooperation with freely elected union representatives, and in accordance with the third principle of the UN Global Compact.

## WHAT WE EXPECT FROM OUR PARTNERS

Ecopack only engages in working relationships with suppliers that guarantee proof of compliance with the principles and standards adopted by the company. A CSR questionnaire is sent out before the negotiation takes place, and the relevant supplier must fill it in and sign it as well. In this way, Ecopack knows that the party concerned is compliant with the company's beliefs and standards of behavior.

Different questions concerning Labour Standards are addressed in the questionnaire, here some examples:

- 
- > Do you feel that workers' rights, rights of association and collective bargaining are respected in your company?
  - > Do you have a payroll policy at all production sites to ensure that workers and their families are fairly paid according to the hours they work, as well as adequate payment times?
  - > Are workplace safety requirements guaranteed at all production sites in accordance with current regulations and are there systems in place to detect, assess, prevent, and act on potential risks to workers' health and safety?
  - > At all production sites, are workers informed about their rights, responsibilities and working conditions, including working hours, remuneration and payment terms, before they start working?
- 

## RISK EVALUATION AND MANAGEMENT

The company in the years has adopted a risk and opportunity analysis model, which is compliant with the ISO 9001:2015 standard, that considers all risk factors related to stakeholders. This model was extended to every Ecopack's subsidiary so that risks associated with corporate activities could be properly identified, monitored, and addressed in the countries where Ecopack Group operates.

The main risks associated with Labour Standards are the ones concerning Personnel Management: risks

associated with **loss of talent appeal**, risk of **noncompliance with regulations** and **discrimination**, risks related to **Health and Safety** at work.

Ecopack elaborated two specific documents which describe procedures for managing risks concerning Labor Rights. These are the "Reporting of Offences and Irregularities" and "Personnel Management".

The most important health and safety risks identified for every Ecopack subsidiary are the following:

- Risks arising from handling chemicals
- Risks arising from the use of machinery
- Risks arising from excessive noise and vibration
- Risks of manual handling of loads
- Risks of emergencies not being managed promptly and appropriately
- Risks of fire and explosion
- Risks of work-related stress
- Risks from night work

An Emergency Management team is present on every work shift, assuring an appropriate handling of eventual situations of unexpected and immediate risk. All the procedures are periodically tested and adjusted during simulations of accidental events. A careful analysis of accidents and near misses is carried out on a regular basis; in this way, continuous improvements can be developed, with the aim of minimizing dangerous scenarios and situations.

## IMPLEMENTATION OF LABOUR RIGHTS BASED POLICIES

Ecopack group considers the health and safety of its collaborators as a fundamental matter and guarantees a working environment compliant with the regulations in force. Those regulations are always respected, and the right measures are taken to avoid accidents that may compromise employees' safety.

Prevention is key, and in this way, awareness can be reached among all internal and external players, avoiding noncompliance with safety and hygiene measures. This happens thanks to periodical training hours for the employees, structured based on the previous year's trainings, and increased in the sites where new staff is hired.

The company policy describing health and safety measures is always shared with Ecopack's subsidiaries, since it also includes the description and information for the correct employment of more

## SPECIFIC FUTURE OBJECTIVES

As a goal, for the years to come, the Italian headquarter aims at pursuing an Occupational Health and Safety Management System (OHSMS) in compliance with the ISO 45001 standard, for receiving the original certification from an accredited third party.



advanced technologies (which are usually built and developed in the Italian headquarter) that can reduce related risks due to eventual misusages.

Also risks and measures for the reduction of hazardousness of the chemicals used in the processes are addressed in the aforementioned documents.

Ecopack has in the years developed a constructive and positive dialogue with trade union representatives in all the countries where it operates, so that best solutions both in the employees' and company's interest can be found, and a good company climate can be preserved. All these relations are managed with complete fairness and transparency, always according to the laws in force. These negotiating processes are conducted in complete cooperation, and episodes of protest never occurred.

Another measure that the company implemented regarding Labour Rights is the creation of an inbox called [help@ecopack.com](mailto:help@ecopack.com), aimed at helping employees in reporting eventual situations of noncompliance with labour rights policies or every other kind of abuse with complete privacy.

Ecopack ensures that salaries are adequate to the tasks performed by each worker; any differences in the ratio of average salary between women and men are linked and can be traced exclusively to a differentiation of tasks with a direct impact on payroll.

The function which has direct responsibility on Labour Rights management in our company are the Human Resources, which together with trade unions are committed to rendering and maintaining appropriate the working life of Ecopack's employees.

Inside the Company Policy document, is explicated that Ecopack will condemn every discriminating behavior, which will be punished following the disciplinary measures of the CCNL, together with every applicable civil or criminal measure.

## MEASUREMENT OF RESULTS MEASUREMENT THROUGH KPIs

Our internally developed Key Performance Indicators are fundamental for the personnel management analysis. Thanks to this corporate tool we can conduct demographical analysis concerning employees' management in every subsidiary, focusing on different factors such as gender, ethnicity, and age.



**Ecopack established a constructive and positive dialogue with trade union representatives**

For what concerns health and safety measures, the tables below show the rate of accidents, the frequency, and the severity index for the six subsidiaries among FY2018, FY2019 and FY2020.

ECOPACK ITALY	FY2018	FY2019	FY2020	FY2021
LTI – N° ACCIDENTS	5	3	1	2
AFR- FREQUENCY INDEX	11.78	7.53	4.17	8,03
ASR SEVERITY INDEX	0.53	0.60	0.04	0,24

ECOPACK BRAZIL	FY2018	FY2019	FY2020	FY2021
LTI – N° ACCIDENTS	0	1	5	1
AFR- FREQUENCY INDEX	0	8.63	40.55	7,47
ASR SEVERITY INDEX	0	0.13	3.46	2.38

Concerning Ecopack's Canadian, Indian, Tunisian and Russian plants, no accident cases were reported in the years considered.

## MONITORING

Our general and senior management is always informed on the situation concerning labor rights and their eventual violations.

Ecopack Group continuously monitors and evaluates accidents through KPIs, as demonstrated in the table above.

Reference is made to the number of accidents, divided by production site, frequency, and severity.



## VIOLATIONS' MANAGEMENT

Ecopack has developed a set of procedures for the correct management of Labour Rights' violations. These measures are contained in the Code of Ethics and in our specific document "Reporting of offences and irregularities."

Two email inboxes were created, [help@ecopack.com](mailto:help@ecopack.com) and [segnalazioni@ecopack.com](mailto:segnalazioni@ecopack.com).

The first inbox is managed by the Human Resources function, while the second one is only visible and manageable by the two CEOs. The aim of this measure is making easier the denunciation of Labour Rights violations.

This is the first step an employee should take for signaling an eventual offence or irregularity concerning labor rights and standards. Every worker has free access to this plan of action, and everyone can confidentially contact the company's management.

After the report is submitted to one of the specific email addresses, management evaluates the information received, and verifies if the fact reported truly happened.

Clarifications can be requested if considered necessary.



The reported event can be used to identify critical areas of the company, so that improvements can be implemented.

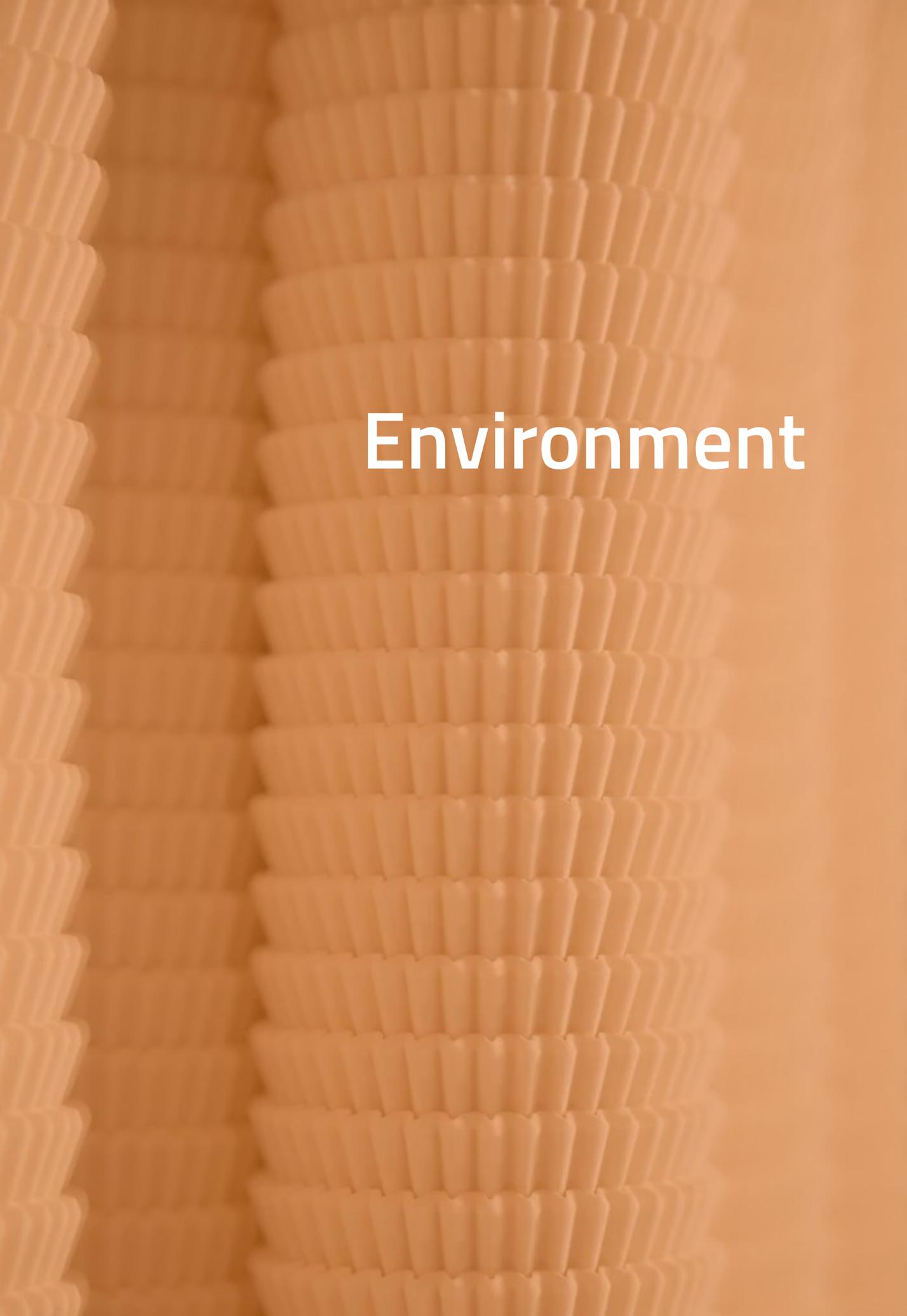
In case of confirmation, management will be able to determine with the Human Resources Function and the Head of Department if taking disciplinary action is necessary, and if the signaling of the event to external third parties like Judicial Authorities is needed. The identity of the reporting person is protected in every phase of the process, and the signaling can only

be addressed in presence and with the consent of the reporter. Ecopack Group commits to protect the reporting agent from any retaliation, discrimination or penalty, for reasons related directly or indirectly to the reporting.

## CERTIFICATIONS

In 2021 Ecopack obtained a Golden Medal from the EcoVadis platform, which aim is observing, measuring, and assigning a score to companies' CSR performance through the submission of a specific report and a consequent audit.

Furthermore, in 2021, Ecopack Tunisia was acknowledged by the National Ministry of Health as an example of effective Covid Emergency Management in its country.

The background of the image consists of a dense stack of white, fluted paper cups. The cups are arranged in a grid-like pattern, with some rows being more prominent than others. The entire scene is set against a solid, warm orange background. The lighting is soft and even, highlighting the texture of the paper cups.

# Environment

# EVALUATIONS, POLICIES AND OBJECTIVES

## ECOPACK AND THE ENVIRONMENT

Since 1939, **environmental preservation** and **sustainability** have been central and fundamental aspects for Ecopack, whose aim has always been safeguarding the planet and the well-being of present and future generations.

From the company's establishment in fact, Ecopack has shown its effort in reducing the environmental impact of its production, together with a conscious materials' consumption and a respectful end-of-life products' management.

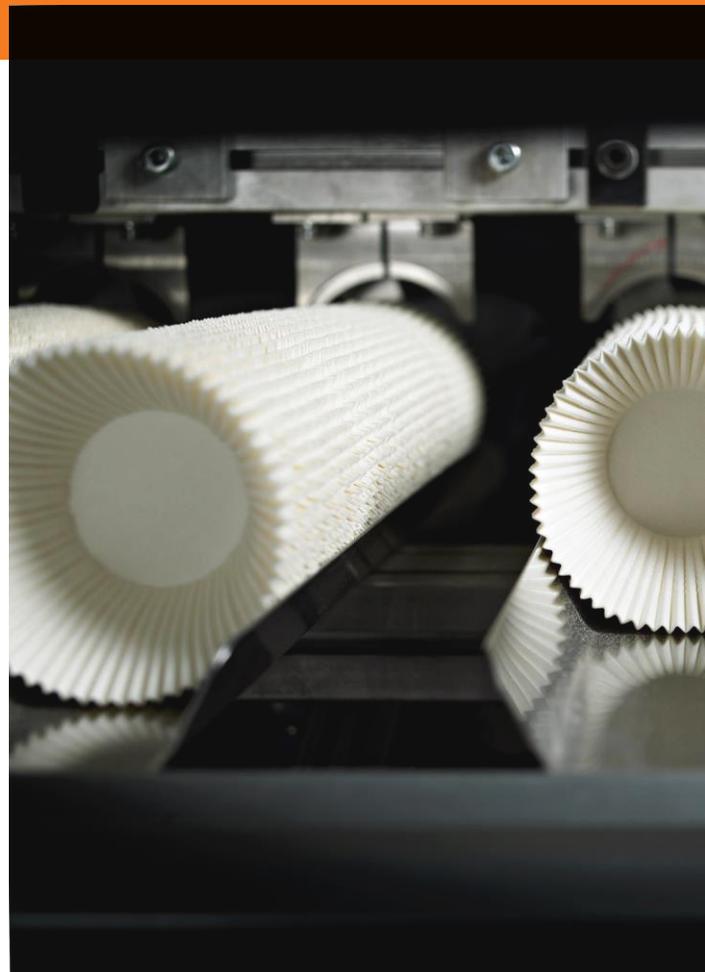
At the top of Ecopack commitment there has always been **respect for the earth ecosystem** and **sustainable development** of the territories where the company operates. These aspects have become essential in our company culture and are part of the characteristics that make us stand out on the market.

We demonstrate our **commitment to environmental sustainability starting from our products**. We engage in an ongoing effort in research and development, aiming at improving our technologies and making our processes more efficient; moreover, we are on a mission for developing and using sustainably advanced materials, so that our impact on the environment is minimized.

## OUR DOCUMENTS AND POLICIES

The policies concerning Environmental Sustainability at Ecopack are described inside the [Company Policy](#), the [Code of Ethics](#), and the Management System Procedures. Ecopack is committed to always being compliant with the current environmental legislation, and to take the most appropriate measures to preserve the environment, that we respect as a source to be protected, for the benefit of both the local communities and future generations.

Through **research and innovation**, two of the dearest topics for us, we aim at promoting technological investments so that our impact on the environment can be reduced and environmental protection preserved; this also concerns the process of reducing energy consumption and the chemicals used in our production processes.



## WHAT WE EXPECT FROM OUR PARTNERS

Ecopack requests to all its suppliers the counter-signature of the Quality Policy, with which they agree to respect all the principles of the Code of Ethics of the company. Other than that, in order to understand and analyze suppliers' behavior towards specific topics which are considered essentials inside our company, Ecopack monitors their actions, verifying products' quality and compliance with the existing regulations.

Suppliers are then evaluated with a CSR questionnaire, where their answers will be analyzed; if these do not match with the threshold defined, they must take appropriate corrective measures; with the suppliers who do not qualify, working and trade relationships will be ceased.

In this questionnaire the supplier must evaluate himself with a score from 1 to 10 for every question asked.

The questions are divided in macro areas. Environmental policies and certifications is the main one, where companies are requested to attach specific related documents.

Then, we are curious to know if there are any circular economy initiatives or other activities for the involvement of stakeholders concerning sustainability issues.

Energy efficiency is another fundamental topic, and we require our suppliers to communicate if they have taken steps to improve it in their sites and if they did the same for their products and services as well.

---

## ENVIRONMENTAL RISK EVALUATION AND MANAGEMENT

Ecopack has adopted a risk and opportunity analysis model which has been distributed and extended to all our overseas subsidiaries. It makes it possible to identify, assess and manage the main risks associated with the performance of all corporate activities, and to monitor them by defining specific and dedicated mitigation plans. This risk management model was also implemented for promoting and creating long term value for our stakeholders, and it always supports management's strategic decision-making choices.

In case of environmental risk situations, following the assessment activities, **risk mitigation measures** are introduced and defined, together with action plans; the results are then monitored and analyzed by the Quality Department.

In the Risk Management HSE analysis, Ecopack developed a list of all the possible risks related to Health & Safety and the environment. Two are the main environmental risks which were identified: the first concerns **emissions coming from production implants and the combustion processes**; the second one is related to the **environmental impact concerning the possible spilling of dangerous liquids** with the consequent poisoning of the soil, together with waste management. The measures for avoiding these risks are similar, and both consist in keeping under control all the related parameters and registers by monitoring machineries' performances.

## IMPLEMENTATION OF ENVIRONMENTAL POLICIES

Ecopack's paper products have demonstrated throughout the years their advantages compared to other moulds that are typically used in the sector. The utilization of low impact materials in our production and the continuous R&D, are the demonstration that **we truly believe in the environmental challenge**, and that we engage in continuously improving our supply chain.

Along the years we strived in studying ways for developing new sustainable materials, collaborating with entities such as the University of Torino.

We are constantly looking for new ways of innovating our production, testing new types of paper, inks and glues, aiming at improving the environmental sustainability of our products, while always preserving their usual performance, complying with market requests and environmental standards.

Thanks to a careful research and interest in the preservation of the company's founding principles, we strive in reducing our environmental impact along all the supply chain.

After generations in the industry, we can affirm that our paper food packaging is better than other materials solutions (like plastic or aluminum) in terms of health, but also for energy reduction, since the raw materials used allow a faster oven cooking with a consequent energy saving.

For the implementation of the deeply rooted environmental conservation principles, we developed some processes which have become fundamental for producing our sustainable packaging solutions.

The first one is **Less Raw Materials**. Ecopack is committed to developing and building new technologies for the realization of lighter paper products, having therefore a raw material reduction while maintaining resistance and performance unchanged. The "less raw material" concept is important not only for the product per se, but also because fewer chemical agents are involved, and GHG emissions linked to transportation are reduced. Also, the end-of-life of our products is optimized, being most of them highly recyclable or completely biodegradable.

The second principle is **Raw Materials Selection**. Our team is constantly looking for innovative and performing materials, which can satisfy in the same way market requests and environmental standards. The raw materials utilized are carefully chosen and of top quality. The paper used in the production of our packaging solutions is a certified renewable resource, coming from certified forests which are controlled through chain of custody. Most of our paper suppliers are in fact FSC certified.

In 2018 Ecopack launched on the market an innovative product range in "Cocoa Paper", a new kind of paper composed of shells coming from cocoa processing facilities. The paper obtained is composed by 40% of cocoa shells, and its texture, quality and design are unique and loved by our customers. This is a great example of circular economy, since industrial waste and scrap are used for value creation instead of being disposed.

The **Development of New Technologies** is a fundamental pillar for our business: innovation is a key competitive advantage in our sector, and it is essential for the development of new materials and the improvement of already used ones.

A **Sustainable End-of-Life** management is important as well for Ecopack's engagement in the environmental conservation. Most of our paper molds are either recyclable or

biodegradable/compostable. We are studying for improving the end-of-life characteristics of other products, for example, as already cited above, we are searching on the market for inks compatible with our compostable production line.

A **Less Waste** principle is at the basis our business model, thanks to a correct planning of the supply chain and a well-engineered production cycle. The packaging containing our finished products is tailored to their dimension, so that the number of boxes is optimized. All the steps in the product industrialization stage are optimized in a way that reduces waste in production. Paper scraps are re-used, transforming it in a secondary raw material. Furthermore, every process from the purchase of raw materials to the products' shipment is studied so that the number of travels and consequently of GHG emissions is reduced. The palletization process is optimized as well, designed to occupy space in the transportation facilities in a way that reduces the number of necessary trips.

Concerning the consumption of chemicals and the production of waste, during the years many technological solutions have been implemented. A closed circuit for the boiler's diathermic oil was installed, and another closed circuit is now utilized for the washing of printer components. Two distillers are implied for the recovery and recycling of solvent from ink distillation; the dirty solvent is recovered and part of it is cleaned and reused, with a consequent reduction of the exhausted solvent.

In December 2020 Ecopack carried out a LCA study for comparing the Environmental Sustainability of the Paper Pan food tray-PET with other solutions such as plastic or aluminum trays. For our study we used the CONAI "EcoD Tool", a tool used for product packaging with the aim of carrying out environmental assessments of the packaging made by companies and suggesting appropriate improvements in term of environmental sustainability. The results obtained through this analysis showed that most of the derived Environmental Sustainability values proved to be more advantageous for the Paper Pan made of CA-PET than the plastic and aluminum alternatives.

In September 2022 in collaboration with Innovhub, (a national research, innovation and technology transfer center operating in different industrial fields) we carried out another LCA study for different types of food packaging easily findable on the market; the objective of the study was to assess the environmental impact of the newly proposed solution, in order to understand the environmental sustainability of a bagasse pulp tray compared to other materials.

We used a cradle-to-grave system, with an environmental footprint method.

Ecopack constantly works for reducing the amount of waste produced, and to increase its recoverable percentage. To reduce the amount of packaging waste, it has been agreed that the supplier will take back the empty glue cans.

Being paper the main raw material used in our production process, it is very difficult to achieve its related waste reduction, together with cardboard waste. Despite that, we are thriving to reduce the production of plastic packaging, also by asking our paper reel suppliers to reduce their paper or plastic primary packaging.

Other measures that have helped in reducing Ecopack's environmental impact have been a series of investments which aimed at significantly improving its energy efficiency.

In November 2020, our company signed a contract for the supply of green electricity, which allows us to purchase energy produced 100% from renewable sources.

In November 2020 we also introduced a High-Pressure Flame Reversing Steam Generator with an efficiency of 90% to 96%, fueled by methane gas, which produces the steam for the corrugating machines in the semi-finished product department. This new machinery substituted the old one, which was oil-fueled, and it allows a better energy performance and a greater flexibility in terms of operation.

All the production equipment is designed with sustainability and efficiency in mind, and in fact, in order to reduce consumption, the machinery with electric heating is fitted with insulating materials to minimize heat loss.

Also, the IT infrastructure energy consumption is reduced by using cloud-based servers, which means lower consumption with the same efficiency.

Concerning GHG emissions, the company utilizes for both air conditioning and production departments the latest generation of refrigerant gases, which are subject to periodic efficiency checks.

To reduce greenhouse gases emissions deriving from transport activities, the company, which mainly uses external couriers, has launched a campaign to collect data and raise awareness amongst transporters by sending an informative questionnaire to obtain information on the fleet of vehicles used, with policies and programs for updating and improving them. Also, the adoption of smart working after the COVID-19 pandemic helped in reducing emissions coming from employees' mobility.

At Ecopack we only use municipal drinking water. Our production cycle only consumes water for cooling down the corrugating machines in the rotary press department; the other activities for which water is implied are the humidification of the various locals, cleaning services, the cleaning of certain operating machines and the creation of glues utilized in the production processes. In 2021, we installed a water controlling system, which permits to measure the actual consumption of water implied for the steam generation, so that during the process of water re-integration inside the generator eventual wastes of the latter can be avoided.

In order to reduce the quantity of packaging waste, it is agreed that empty tanks of glue will be withdrawn by the supplier; from January 2022, also empty tanks previously containing inks, solvents and paint are withdrawn too. In this way the tanks can be re-utilized for serving other manufacturers while waste is reduced.

In terms of energy conservation and efficiency related to heating implants, in October 2021 we introduced a new high efficiency condensing boiler, dedicated to the heating of the new office building, changing rooms and refreshment area. We obtained different benefits in terms of consumption and in terms of sustainability as well.

During July-August 2022 we installed solar panels over the roof of our Italian facility, and we are currently in the process of activating them. Regular training sessions are held for workers to educate them and make them aware of the sensible use of water and energy. In September 2022 we organized a meeting concerning environmental sustainability, with a focus on anti-corruption for the sales department. By 2022 we intend to send an updated sustainability policy attached to the paycheck of every employee, so that it can reach everyone. An internal measure that was implemented in our Italian office to promote daily sustainability is the one of positioning waste collection bins outside of our offices, so that the ones under the working desks containing general waste could be eliminated; in this way we successfully incentivized recycling.



IT infrastructure energy consumption is reduced by using **cloud-based servers**, which means lower consumption with the same efficiency. Out of the 6 servers, 3 are physical and 3 are cloud-based, the latter managing the ERPs of some subsidiaries. Physical servers are of the latest generation and the server room is also monitoring and accounting for electricity consumption.

To improve our energetic efficiency, environmental impact,

technological innovation and safety on the job, in 2022 we invested a total of 113 thousands of Euros in new CRC rotary screw KTC "BISTADIO" compressors DCT 2S 220 VSD, with air-cooled oil injection moulding for our Italian plant. The compressors which were previously utilized in the Italian production site will be soon relocated in our Tunisian facility so that they can still be exploited.

## SPECIFIC FUTURE OBJECTIVES

Being **environmental safety and sustainability** two of **Ecopack's main pillars**, we are constantly trying to improve our performance so that our impact on the world can be lowered.

For the years to come, Ecopack is working for adopting in its Piobesi Torinese Plant an ISO14001:2015 certified environmental management system.

Despite our production being nearly water free, with usage of the cited resource only to cool down the corrugating machines in the rotary press department, and to wash certain parts of the equipment, one of the future company's objectives is to **reduce water consumption** over the next few years. The layout of water outlet and inlet points has been updated in this regard in 2020 and meters were installed to account and monitor for partial consumption from 2021.

Another goal in terms of environmental sustainability is related to our production, and concerns directly our primary materials. Ecopack's products are compliant with international regulations and characterized by high quality and carefully selected raw materials.

We are proud to share that the paper used in our production process is a certified renewable source, coming from well managed forests controlled by chain of custody. Our suppliers are FSC certified, and we always prefer using in our value chain ISO14001, ISO9001 and BRC/IFS certified paper mills. Since November 2020, most of the paper orders are for FSC certified raw materials. In the next few years, we **plan to shift to a 100% FSC certified buying process**, in order to only produce and sell 100% of finished products composed of certified paper.

our production, and we are on a constant research for improving our products' performance in these terms. Ecopack wants in fact to achieve an important goal concerning inks: we want to **transform our printed products** in compostable ones; ink is what is preventing us in doing that, since it is not biodegradable. Many trials have already been made, but the adhesion characteristics are not satisfactory yet; plus, solvents and acetates were still present, and still affected compostability. We are confident that thanks to the constant innovation that characterizes our sector, a solution will soon be found.

In the years to come we also plan to install an internal weighing system, in order to have more detailed data on waste production to be used for studying areas of intervention.



**Compostability** is another essential feature of

## MEASUREMENT OF RESULTS

Ecopack measures its environmental performance especially through appositively developed Key Performance Indicators, which permit us to monitor and compare our performance through the years.

Concerning responsibility towards energy consumption, these are the data from 2018 to 2020.

### 1. Energy consumption data and energy performance indicators

INDICATOR - KPI	RESULT YEAR 2018	RESULT YEAR 2019	RESULT YEAR 2020	RESULT YEAR 2021
Quantity in tons of finished product	2,836	2,744	2,541	3171,33
MWh of electrical energy consumed	4,939	4,719	4,565	4742,66
SCM of consumed gas	374,494	354,564	270,734	243305
Toe consumed	1,256	1,201	1,096	1105,00
Toe consumed/t of finished product	0.44	0.44	0.43	0,35
IPG Power (MWh/t product)	1.74	1.72	1.8	1,50
IPG Methane gas (CMS/kg of product)	0.1320	0.1292	0.1065	0,0767

### 2. Type 1 and Type 2 GHG emissions data and indicators

INDICATOR - KPI	RESULT YEAR 2018	RESULT YEAR 2019	RESULT YEAR 2020	RESULT YEAR 2021
Refrigerant greenhouse gas leakage (kg)	0	0	0	0
Thermal energy produced (Mwht)	3,640	3,447	2,632	2,364
CO <sub>2</sub> emissions (tons) from thermal energy produced	739	700	535	480
CO <sub>2</sub> emissions (tons) from fuel consumption of company vehicles	62	68	51	51,20
CO <sub>2</sub> emissions (tons) from greenhouse gas leakage	0	0	0	0
Total gross amount of Type 1 GHG	800	769	586	531,20
Total gross amount of HG type 2 CO <sub>2</sub> (purchased electricity)	1,393	1,268	1,179	1,222

Type 1 emissions relate to the company's direct emissions from fuels for air conditioning, energy production, fuels for company vehicles, fuels for the production process; type 2 emissions are the "indirect" ones.

## DATA ON WATER CONSUMPTION

- **Ecopack Italy**

INDICATOR - KPI	2018	2019	2020	2021
Quantity of consumed water (Lt)	1,235,000	1,258,000	1,184,000	1.829.000

- **Ecopack Brasil**

INDICATOR - KPI	2018	2019	2020	2021
Quantity of consumed water (Lt)	885,120	923,670	1,057,490	1096,000

- **Ecopack Canada**

INDICATOR - KPI	2018	2019	2020	2021
Quantity of consumed water (Lt)	1,002,000	1,453,000	1,013,000	883,000

- **Ecopack India**

INDICATOR - KPI	2018	2019	2020	2021
Quantity of consumed water (Lt)	6,000	6,000	6,000	n/a

- **Ecopack Russia**

INDICATOR - KPI	2018	2019	2020	2021
Quantity of consumed water (Lt)	640,000	544,000	484,000	482,000

- **Ecopack Tunisia**

INDICATOR - KPI	2018	2019	2020	2021
Quantity of consumed water (Lt)	140000	158000	175000	210,000

## RAW MATERIAL CONSUMPTION DATA AND SUSTAINABLE PACKAGING INDICATORS (\*)

INDICATOR – KPI *	2018	2019	2020	2021
Paper consumption (in tons)	4107	3755	3333	3906
Ink consumption (in tons)	37.5	29.9	25.6	29,962
Solvent consumption (in tons)	46.4	41.7	32.5	33,66
Glue consumption (in tons)	147.2	150.2	146.7	197,705
Quantity of FSC paper consumed (in tons)	790.00	841.00	891.00	3633.00
% of FSC paper consumed compared to total paper	19.22	22.41	26.71	93
Quantity of cocoa paper consumed (in tons)	3.40	15.00	30.26	187
% of cocoa paper consumed compared to total paper	0.08	0.08	0.91	4,7

Paper consumption is a very important data for the KPI analysis of our company, since it is our primary and essential raw material, and because our aim is the one of giving our products a greater lightness, using less raw material but maintaining performance unchanged. We are succeeding in this direction since as shown in the KPI table the numbers from 2018 to 2021 are diminishing. It is the same for ink, solvent, and glue consumption, which due to the diminishing tons of paper are less used as well. Increasing numbers are shown in the "Quantity of FSC paper consumed", justified by the intention of extending FSC paper to more and more lines of our production.

Also, the KPI indicating Cocoa Paper consumed in tons compared to total paper is increased compared to previous years, because we extended our production of this line.

## DATA ON AIR EMISSIONS AND HEAT GENERATOR EFFICIENCY

INDICATOR – KPI *	RESULT YEAR 2018	RESULT YEAR 2019	RESULT YEAR 2020	RESULT YEAR 2021
COT value found in post-combustion emissions analysis (compared to authorized limit 20 mg/Nm <sup>3</sup> )	4.27	3.75	5.82	11,15
Dust emission value (three years) (compared to authorized limit 10 mg/Nm <sup>3</sup> )	1.3 (in 2016)	1.12	Not applicable	N.A.
Efficiency % of diathermic oil thermal plant	93.2	93.4	94.7	N.A.

INDICATOR – KPI *	RESULT YEAR 2018	RESULT YEAR 2019	RESULT YEAR 2020	RESULT YEAR 2021
Amount of non-hazardous waste produced (in tons)	1,885	1,674	1,569	1250,05
Amount of hazardous waste produced (in tons)	3.08	2.54	4.46	16,20
% Of produced waste dispatched for recovery compared to total	99	99	99	99

## MEASUREMENT OF RESULTS - LCA ANALYSIS ECODESIGN

The results obtained through this analysis showed that most of the derived Environmental Sustainability values proved to be more advantageous for the Paper Pan made of CA-PET than the plastic and aluminum alternatives. A reduction of 53.3% in CO<sub>2</sub> emissions of the Paper Pan compared to the aluminum tray and a reduction of around 6% in emissions compared to the CPET tray was observed. Using our Paper Pan will also result in an improvement on the environmental performance on the life cycle aspect of the production process according to all three environmental indicators (GER; GWP and H<sub>2</sub>O) compared to aluminum or C-PET trays.

The end-of-life aspect of the Paper Pan has allowed us to make assessments of its possible future improvements considering the whole life cycle and thus ensuring a further improvement with respect to the current value of the GWP indicator which is acknowledged to be 14% higher than the end-of-life of the aluminum tray. If we compare the environmental impact of this stage of the production cycle between the Paper Pan and the C-PET tray, we can still report a 7.6% reduction in GWP from the Paper Pan compared to the C-PET tray.

## CERTIFICATIONS AND AWARDS

### FSC

Ecopack is FSC CoC multi-site certified. Most of our products are in fact made of FSC certified paper.

Sustainability has always been one of Ecopack's assets. We are market leaders in developing and manufacturing paper baking moulds. We use our resources to support the sustainability of paper as raw material, reducing the environmental impact along the entire supply chain. Our commitment is shown and supported by our baking moulds, which are made from renewable and recyclable sources.

To manufacture our sustainable products, we carefully choose our provisions sources through an accurate suppliers' selection. Ecopack prefers suppliers that can provide raw materials from responsible and controlled sources, which respect both the environment and the people.



### OK COMPOST

In 2021 Ecopack received the "OK Compost" certification released by TÜV Austria. This certification attests that the company has developed a range of compostable paper moulds compatible with industrial production.

Our OK Compost certified products are the festive season moulds: the Colomba, the Panettoncino, the Panettone, the Panettone Basso, and our Special Panettone moulds, all of them in Natur or Brown Paper.



### ATICELCA

Ecopack Italia tested the recyclability of its products according to the Aticelca methodology 501/19. Aticelca is an association which provides an evaluation methodology with the aim of determining the recyclability level of materials and products prevalently made of cellulose. Paper pans, salad bowls and pie range tested positive for being disposed in paper waste.



## CONAI - ECODESIGN

In 2020 Ecopack participated in a CONAI CONTEST for ECODESIGN on product sustainability, and won with our Lotus product in Cocoa Paper, which was awarded for saving raw materials. Candidates were analyzed with the Eco Tool Conai, which through a simplified LCA analysis calculated the effects of eco-design actions on packaging comparing the "before and after" of the products in energy, water, and CO<sub>2</sub> emissions reduction.

The results obtained through this analysis showed that most of the derived Environmental Sustainability values prove to be more advantageous for the Paper Pan made of CA-PET than the plastic and aluminum alternatives. A reduction of 53.3% in CO<sub>2</sub> emissions of the Paper Pan compared to the aluminum tray and a reduction of around 6% in emissions compared to the CPET tray could be observed. Using Paper Pan will also result in an improvement on the environmental performance on the life cycle aspect of the production process according to all three environmental indicators (GER; GWP and H<sub>2</sub>O) compared to aluminum or CPET trays.



## ECOVADIS

In 2021 Ecopack received a gold medal certification from EcoVadis, a platform which aims at evaluating companies' CSR performance assigning them a score, so that a rating is created. For what concerns the environmental sustainability section, Ecopack Group scored 70/100, and thanks to that we have been awarded with an advanced level of performance. EcoVadis audits the companies that submit on the website their CSR report, but further verifications are made during following audits, which in our case was carried out in 2022 by INTERTEK.

The aim of the platform is to make easier for companies comparing and correctly choosing their suppliers, creating more and more sustainable supply chains.



The background of the image consists of a dense stack of white, fluted paper cups. The cups are arranged in a grid-like pattern, with each cup slightly offset from the one below it, creating a sense of depth and repetition. The entire scene is set against a solid, warm orange background. The lighting is soft and even, highlighting the texture of the paper cups.

# Anti-Corruption

## EVALUATIONS, POLICIES AND OBJECTIVES



### ECOPACK & ANTI-CORRUPTION

Ecopack Group is strongly committed to collaborating in the elimination of Corruption in all its forms, and it is inspired by the principles contained in the relevant legislation and in the international best practices.

The company shows commitment to ethical behavior towards its stakeholders by declaring **adherence to the international anti-corruption standards** and to the company Code of Ethics. We respect all the values that characterize our company, and we are committed to always act professionally, honestly, and with utmost responsibility and fairness, condemning wrongful behaviors in every form.

### OUR DOCUMENTS AND POLICIES

Inside the Code of Ethics are included the Mission, the Ethical Principles and the rules of conduct. The main directives contained in these documents concern proper and transparent behavior, not only in terms of human rights and labour standards, but especially on anti-corruption.

The most important values and standards of behavior are for Ecopack the duty of bringing to the attention of the company potential conflicts of interest, the duty of refraining from giving, promising, receiving or accepting money, gifts, or benefits of any kind, and the **traceability and transparency** of every transaction of activity.

In the company's specific policy, all the roles and responsibility functions concerning anti-corruption are described and reported, together with eventual corruption-related risk situations and general anti-corruption management procedures.

## WHAT WE EXPECT FROM OUR PARTNERS

Ecopack applies an anti-corruption *due diligence* program and requires the commitment of all parties collaborating with it to comply with anti-corruption regulations.

With the compulsory signature of our Policy and Code of Ethics, suppliers declare their compliance with our company culture and beliefs.

This also includes the anti-corruption policy, and it means that our partners are compliant with our CSR principles. In the CSR questionnaire distributed before entering in working relationships, Ecopack asks questions concerning anti-corruption: it is needed to know if respondents follow specific procedures for containing the risk of corruption inside their company.

Ecopack Group terminates every type of relationship with third parties that do not comply with the international law on anti-corruption, including the rules described in the company's specific Anti-Corruption Policy.

## RISK EVALUATION AND MANAGEMENT

Following the internationally proclaimed standards, Ecopack Group has identified a set of corruption-related risks:

- Risk of fraud and corruption relating to the purchasing process
- Risk of fraud and corruption related to the sales and marketing process
- Risk of fraud in invoicing operations

For managing the operating processes related to the above-mentioned situations, Ecopack follows specific rules; firstly, it applies **segregation of responsibilities**: the person responsible for a certain operational activity must always be a different person from the one who supervises and authorizes that activity.

Of utmost importance are **signing powers**: they must be properly formalized and clearly defined and must be attributed in close connection with the spending needs of the social signature.

Another rule is the **impartiality and absence of conflicts of interest**, where the staff, in compliance with this policy must operate with professionalism, transparency, impartiality and must promptly report every situation from which a conflict of interest may arise.

**Traceability** is fundamental, and all the activities conducted with the related checks must be traced and verifiable; the produced documentation must be correctly archived and readily available.

For an efficient contrast to corruption, **respect for administrative and accounting procedures** is requested, so that payments and operations are correctly registered and accounted.

## IMPLEMENTATION OF ANTI-CORRUPTION POLICIES

Our company aims at spreading information and awareness concerning corruption and anti-corruption measures and does that through different activities.

We offer our employees **trimestral courses** concerning internal and external corruption measures, and our Anti-corruption Policy is published on the company's intranet, so that knowledge and comprehension of all the rules concerning this matter can be maintained and consulted whenever needed.

The code of ethics is promptly sent to our employees whenever eventual updates are made, and this action is usually followed by staff training courses, aiming at informing personnel about procedures concerning all the related issues.

All the employees are requested to adopt a **correct moral behavior**, compliant with the regulations in force, and to refer to the Code of Ethics by always being honest, loyal and integer. Ecopack's core values are communicated to our employees and are accessible on our company portal.

The Human Resources function of the company is responsible for monitoring and managing the current anti-corruption policy inside the company, and more generally it is also responsible for guaranteeing conformity to the regulations developed for anti-corruption behavior preservation.

## MONITORING

Ecopack's management is always informed about Anti-Corruption policies and related issues inside of the company.

Every situation is therefore monitored and controlled, so that it can be managed in the best way and eventual repercussions can be avoided.

## SPECIFIC FUTURE OBJECTIVES

No cases of corruption or other violations of Ecopack's code of ethics have been reported in recent years, and Ecopack's goal for the years to come is maintaining this trend, together with a continuous training of its employees, aimed at developing and conserving a correct behavior coherent with the company's culture.



## VIOLATIONS' MANAGEMENT

Employees who are found to be involved in a corruptive act, facilitating its commission, or acting against the regulatory provisions and/or the rules dictated by the company's IS30 Anti-Corruption Policy, are subject to **disciplinary measures** in accordance with the provisions contained therein.

The type and level of penalties are defined considering the level of recklessness, fault and behavior put in place, by the recidivism of the conduct, the working activity performed, and by all the other circumstances that could have characterized the situation.

Ecopack terminates every kind of relationship with third parties which do not respect norms related to anti-corruption, also the ones contained in the company policy, as foreseen and described in the contracts.

Ecopack has developed a **set of internal procedures** for correctly addressing eventual situations of corruption or other violations of the Code of Ethics.

Every company's employee and all the parties that collaborate with Ecopack Group can report illicit situations or irregularities.

The report must contain the data of the reporting person, which will be treated with utmost privacy. The dynamics of the reported situation must be explained clearly, and the time and place of the event must be carefully communicated.

The two inboxes cited in the previous sections ([segnalazioni@ecopack.com](mailto:segnalazioni@ecopack.com) and [help@ecopack.com](mailto:help@ecopack.com)) are the ones that must be used in cases of Code of Ethics' violations and therefore for corruption related violations as well. Reports can also be expressed through ordinary mail.

Management, upon receipt of the report, evaluates the information and arranges the necessary checks to ascertain whether, based on the elements in its possession, a violation of the anti-corruption policy has occurred.

Clarifications can be asked if considered strictly necessary; the content of the reports can be used to identify critical issues within the company, aiming at improving the quality and effectiveness of the corruption prevention system.

For any disciplinary procedure, the alert may be used only if the signaler has given his consent to the disclosure of his identity.

The complainant may not be subject to direct or indirect pressure or discrimination affecting working conditions based on the complaint.

Ecopack S.p.A. undertakes appropriate actions to protect the reporting agent from any retaliation, discrimination or penalty, for reasons related, directly or indirectly, to the reporting.

# Ecopack supports the United Nations' Sustainable Development Goals






The Sustainable Development Goals offer a positive vision for the future, which Ecopack chooses to support. To reach those goals is in the interest of everyone, and as a multinational company we hope we are trying to do our best in regard.

We have identified some key areas in which our company has more influence, given the nature and scale of our business.

## 5 GENDER EQUITY



### GENDER EQUITY

We firmly believe in **gender equity**, and at Ecopack we are committed to building the most inclusive culture possible, while breaking all the barriers to which women are still nowadays subject.

#### NEXT TARGETS

We are considering to acquire an official certification on Gender equity, to concretely demonstrate our effort.

#### CORPORATE COMMITMENTS

- Women represent the 50% or more of our total global employee base; our management base is also evenly distributed among 45% women and 55% men.
- We ensure equal payment amongst men and women holding the same role inside the company
- We respect all the laws in force concerning maternity leave, condition for which women are never discriminated or penalised.

## 7 AFFORDABLE AND CLEAN ENERGY



### AFFORDABLE AND CLEAN ENERGY

**Clean energy** is a very important topic for Ecopack, and that is why we are committed to imply more and more energy coming from green sources in our production processes. We firmly believe that energy should be affordable for everyone, and in our own small we are doing our best to support this SDG.

#### CORPORATE COMMITMENTS

In November 2020, our company signed a contract for the supply of green electricity, which allows us to purchase energy produced 100% from renewable sources.



## DECENT WORK AND ECONOMIC GROWTH

**Decent working conditions** are essential at Ecopack, and this principle is well eradicated in our company's culture. We only engage in working relationships with companies who support and share our vision in regard. Health, Safety and adequate pay are at the basis of our business model, and we believe that it should be the same for every business reality.

### CORPORATE COMMITMENTS

- At Ecopack we always guarantee adequate pay, without discrimination of any kind
- We guarantee safe and decent economic conditions, in every department and in every Ecopack Group's subsidiary



## INDUSTRY, INNOVATION AND INFRASTRUCTURE

Since always, Ecopack is involved in projects that aim at improving and fostering innovation, keeping in mind inclusivity and sustainability.

Being worldwide manufacturers, we strive in improving our processes, constantly innovating our technologies and materials.

### CORPORATE COMMITMENTS

At Ecopack we continuously innovate our processes and materials.

We are always looking for new technologies, and this year for example we bought new compressors, much more efficient in terms of energy consumption.



## RESPONSIBLE CONSUMPTION AND PRODUCTION

Our business is based on the production of disposable food packaging, but we are extremely committed to sustainability and to the preservation of the environment in which we operate. We are constantly working for innovating our technologies for ensuring the best sustainable features for our products and for our entire supply chain. Responsible consumption and production are for Ecopack the basis of a sustainable future.

### CORPORATE COMMITMENTS

We are constantly working to improve our production processes, both in terms of materials and energy consumption.

We are implying in our production materials such as Cocoa paper, which is a perfect example of circular economy and responsible production.

## OTHER PROJECTS WE CARE ABOUT

### DELOITTE'S BEST MANAGED COMPANIES 2022

In October 2022 Deloitte awarded Ecopack with an important prize: we are amongst **the 79 ITALIAN BEST MANAGED COMPANIES in 2022**. We have been evaluated based on different factors:

- 1) **STRATEGY** – BMC use structured methodologies for the development of their company strategy.
- 2) **COMPETENCES AND INNOVATION** – we distinguished ourselves for our effective partnership and innovative technologies.
- 3) **EFFORT AND COMPANY CULTURE** – SINCE 1939 we are focused on creating a strong company culture.
- 4) **GOVERNANCE AND MEASUREMENT OF PERFORMANCE** – Ecopack's governance is able to support our business in the best way possible, and thanks to it we were and will be able to reach important objectives.
- 5) **CSR** – we are strongly committed to sustainability, and we want to have a positive impact on both the environment and the people.
- 6) **INTERNATIONALIZATION** – part of our turnover proudly comes from foreign markets, as well as many of our suppliers and clients.



### WE SUPPORT THE LOCAL COMMUNITY

Ecopack is deeply connected to the area in which it was established, that has seen the company, and the family behind it, growing from 1939 to this day.

FAI (Italian environmental and cultural heritage trust) is the natural answer to Ecopack's desire to support the area: the company subscribed to the corporate membership program as a Corporate Golden Donor.

Ecopack shows recognition to the city of Turin by supporting its main theater, Teatro Regio



## ECOPACK & TREEDOM

In December 2021, Ecopack decided to join Treedom.

We created a forest called “**Green Thoughts**”, and as a Christmas gift we gave a tree to our clients.

Our forest is situated in Kenya, and it will contribute to both absorb CO2 and help local communities' economies. This choice contributes to the commitment our company has towards the environment and towards the building of a greener future.



## ECOPACK & SOLIDARITY

Ecopack proudly sponsors a **volunteering initiative** organised by Colombatto Hotel School, to offer free meals to people experiencing economic disadvantage, while supporting sustainability and circular economy avoiding and reducing food waste. We provided **free food containers and lids** for delivering the meals prepared in the project from the alumni of the school, destined to the less fortunate.



## ECOPACK & INTESA SANPAOLO

Ecopack collaborates with the Circular Economy Lab for a project called **#Call4Circular Packaging – The Value of Vegetal Fibers**. The objective is finding innovative materials for the realization of packaging for the food sector. The project is coordinated by Intesa Sanpaolo Innovation Center and Cariplo Factory. With this project Ecopack wants to incentivize its “thinking outside the box” mentality, following a structured research.

160 realities were chosen, and after a careful analysis, 10 solutions were finally selected for preparing important projects for collaborations between the company and these innovative start-ups.



**ecopack**   
engineered to contain