



# **Index**

1.	Overview	3
2.	Scope of application	4
3.	Statement of commitment	4



# 1. Overview

Coesia<sup>1</sup> is the holding company of a private industrial group that specializes in the production of highly innovative industrial and packaging solutions.

Coesia works to create long-term value for all its internal and external stakeholders<sup>2</sup> and promote the well-being of all its Employees. Likewise, Coesia is committed to improving working conditions for all individuals, while supporting and actively promoting the fundamental principles of internationally recognized Human Rights<sup>3</sup>.

Coesia upholds, without limitation, the following fundamental principles:

- 1. Respect for freedom and human dignity;
- 2. Rejection of child labor, forced labor, modern slavery, or servitude;
- 3. Prohibition of cruel, inhumane, or degrading treatment or punishment;
- 4. Prohibition of any form of discrimination;
- 5. Freedom of association and the right to collective bargaining.

Coesia has adopted a Code of Ethics that sets out the values and principles all Employees are required to comply with, recognizing the importance to promote an ethical and responsible work environment that is free from discrimination or abuse. The Code of Ethics is a fundamental resource to guide the behaviour and decisions of all Coesia stakeholders and promote a transparent, safe, and respectful work environment.

If the applicable national or international laws and regulations differ from the standards outlined in this Policy, COESIA shall apply the more stringent requirements and standards that establish the most favorable conditions for its Employees.

<sup>&</sup>lt;sup>1</sup> For the purposes of this Policy, the name "Coesia" refers to Coesia S.p.A. and each of its Companies jointly and/ or separately; the term "Company" refers to any entity in which Coesia S.p.A. owns, directly or indirectly, more than 50% of the voting shares or otherwise exercises control; and by "control" is meant the direct or indirect possession of authority to determine or exercise a controlling influence over the affairs, management, or policies of any entity (as consistent with the meaning of the verb "to control").

<sup>&</sup>lt;sup>2</sup> According to the Code of Ethics, Coesia's stakeholders are: its clients, employees, the shareholder, the Board of Directors, its suppliers, labor unions, competitors, the environment and community, including end users, universities, research centers and schools, institutions, public administration, and Control Bodies.

<sup>&</sup>lt;sup>3</sup> As stated in the Universal Declaration of Human Rights and the conventions that developed from it, such as the ILO Declaration on the Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, and the United Nations Conventions on the Rights of the Child (UNCRC), as well as all applicable Human Rights laws, rules, and regulations in the territorial jurisdictions in which Coesia operates.



# 2. Scope of application

This Policy is Group-wide and applies to Coesia, its directors, officers, and Employees, any company, joint venture or partnership controlled by Coesia, and their directors or Employees in general.

This Policy also directly applies to Coesia's suppliers, consultants, and external Employees who, as a necessary condition to engage in a work relationship with Coesia, are expected to endorse its content and align their conduct with Coesia's standards and principles regarding contract management, human rights, health and safety, equal opportunity and treatment, anti-corruption, integrity, data protection, and confidentiality, as per its Code of Ethics.

# 3. Statement of commitment

Coesia is committed to respecting and upholding the fundamental rights of all individuals involved across its value chain, whether they are direct employees or employed by suppliers, subcontractors, or other organizations involved in the production cycle.

### Health, safety, and well-being

Coesia is committed to developing and promoting a strong culture of health, safety, and well-being to provide a work environment that is free from any hazards, encouraging safety behaviors to prevent risks. All Employees are trained on workplace health and safety regulations and are encouraged to report any risk or threat to health and safety in their workplace.

#### Harassment-free work environment

Coesia is committed to maintaining a work environment that is free from violence, abusive treatment, or harassment and does not tolerate any form of physical, verbal, psychological, discriminatory, or sexual harassment. All Employees have equal rights to freedom of opinion and expression.



# Equal opportunity and non-discrimination

Coesia is committed to providing equal opportunities to all Employees, in line with the principles of non-discrimination and equal treatment, providing appropriate information and training on their rights and duties. Coesia is committed to ensuring fair and transparent competition for professional opportunities or collaborations with or within the company. Selection criteria are based solely on merit, such as qualifications, experience, and abilities. Remuneration, working hours, and benefits are determined in line with local and national laws and regulations as well as prevailing market standards and practices.

## **Diversity and inclusion**

Coesia fosters diversity and inclusion, rejecting any form of discrimination or harassment including, but not limited to, offensive acts or discrimination on the basis of gender, sexual orientation or preferences, ethnic origin, race, age, religion, opinions or political beliefs. Coesia values the diversity of cultures within the communities in which it operates, and takes into consideration the health, safety, environment, human rights, and well-being of such communities across all areas of its business.

## **Data protection**

During the course of its activities, Coesia processes the data of its Employees, visitors, clients, suppliers, or any other parties it engages with, in line with the principles outlined in the Code of Ethics and privacy regulations, making it a priority to protect their privacy when handling personal data.

## Rejection of child labor and slavery

Coesia strongly condemns any practice that exploits or harms children. At the same time, Coesia collaborates with local schools and social organizations to promote education and training for minors, supporting work-study training programs that provide learning and professional development opportunities for young people.

Coesia prohibits any form of forced labor, modern slavery, and human trafficking, and shall not hold Employees against their will.

Coesia respects the diversity of cultures within the communities in which it operates and takes into consideration the health, safety, environment, human rights, and the well-being of the communities involved in its activities.



Coesia requires that stakeholders share the values set forth in this Policy and does not tolerate any adverse conduct on the part of any of its Employees, suppliers or third parties.

Coesia shall inform and train its Employees to understand and comply with this Policy and invites them to contact the relevant departments (e.g., HR, Legal Department, Internal Audit) for questions and guidance on how to interpret and implement this Policy or deal with any situation relating to it.

Coesia encourages the use of the Whistleblowing channel to report any possible or suspected violation or breach of this Policy.