SUSTAINABILITY

POLICY

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Contents

1. INTRODUCTION

The METLAC Group is a significant international player in the field of paints and inks for metal packaging. The company undertakes to develop "*free by design*" products based on the principles of reducing the environmental and social impacts and ensuring economic sustainability. Specifically, the company plans to make a significant contribution to the circular economy with its products and the packaging used.

The METLAC Group runs its business with a focus on sustainability and its principles and by contributing to the achievement of some of the Sustainable Development Goals (SDGs) in the United Nations' "2030 Agenda for Sustainable Development". The METLAC Group's approach to business considers the principles of sustainable development in all its phases, from its customers to end consumers, through people and processes.

Sustainability represents a huge opportunity for cultural change that allows organisational and production processes to be rethought and reviewed, involving all company functions. It represents the essential *driver* to consolidate social responsibility, looking at innovation and a responsible and resilient business, valuing all Stakeholders, including employees, customers, suppliers and communities.

In view of the above, this Policy is the basis of every METLAC Group company policy.

The METLAC Group's commitment is constant in controlling and monitoring all its activities, and the impacts and effects they may have on:

- *The environment*, that is, for example, atmospheric emissions, energy consumption, waste generation, water use, waste water discharges and rainwater management,
- *Stakeholders*, which include the people employed by the companies in the Group, customers, suppliers of goods and services and anyone who interacts with the organisation,
- *Governance*, a central element of the business model, based on the Organisation, Management and Control Model, MOG 231.

The METLAC Group uses participatory tools to identify and analyse Stakeholders, which are essential for its reporting process. Constructing a relationship of mutual trust with the company's interlocutors begins with considering their interests and expectations, as well as their compatibility with those of the organisation. Inclusiveness, significance and responsiveness guide the METLAC Group in the process of stakeholder involvement.

2. BACKGROUND OF REFERENCE

Over the years, the METLAC Group has managed to maintain its organisational structure, despite constantly increasing sales volumes and the distribution of its products being increasingly aimed at a global market. The tight structure is the characteristic business model that has its strengths in dynamism and greater reactivity due to a compact and, therefore, more flexible organisational structure.

From the beginning, the company chose to focus its activities on a specific sector, that of coatings for *metal packaging*. This choice has allowed the company to achieve high standards of quality and service and to place it among the main players worldwide. The sector is home to few producers, mainly composed of multinationals that share global volumes. The METLAC Group accepts this context of high market competitiveness as an incentive to continuously improve its performance through innovation and by building resilient, inclusive and sustainable infrastructure.

Research and innovation are two of the pillars of the METLAC Group's Business Model. Research focuses on identifying new materials featuring reduced toxicity and lower impact, and on solving problems related to the production, distribution and use of the marketed products. Innovation looks to create new, sustainable products and services that can contribute to improving the conditions of use and product performance, reducing risks for direct and indirect users and ensuring continuity and profitability for the company for compliance and avant-garde aspects.

Human Resources represent a fundamental pillar on which the company is founded. The chemical sector in which it operates requires qualified personnel with specific skills. In addition, the safety of people is a top priority: The METLAC Group is committed to promoting a culture of safety constantly, ensuring a positive, stimulating work environment. Investing in human resources means guaranteeing a sustainable future for the company in terms of long-term growth and competitiveness.

2.1 REGULATORY REFERENCES

The METLAC Group has implemented an Occupational Health and Safety Management System, compliant with ISO 45001:2018 and certified by the Certiquality, with the scope being the Italian companies in the Group. The same companies follow the Organisation, Management and Control Model, pursuant to Italian Legislative Decree no. 231/2001, that has been integrated into the METLAC Group's Governance system since 2021 and this is linked to the Health and Safety Management System through article 30 of Italian Legislative Decree no. 81/2008.
For the Italian Bosco Marengo site, subject to Italian Legislative Decree no. 105/2015 (the so-called Seveso Law), a Management System to Prevent Major Accidents has been adopted, complying with UNI 10617:2019 "Establishments with major-accident hazards - Safety management systems - Essential requirements".

With regard to the products and services offered, the METLAC Group has implemented a Quality Management System in reference to ISO 9001 for which the Group's companies have been certified.

To manage and monitor the organisation's environmental impacts, the METLAC Group has implemented an Environmental Management System based on the *Plan-Do-Check-Act* cycle, or a continuous process of planning, implementation, verification and improvement that leads the system to self-correct, improving it over time. Documented procedures have been adopted to ensure that the main activities, which generate significant impacts on the environment, are monitored. This is done following ISO 14001 for which the Italian companies in the METLAC Group have been certified.

The Procurement Policy for the goods and materials needed for the METLAC Group's operations is based on the guiding principles described in the Code of Conduct for business partners. In line with its Code of Ethics and the Organisation, Management and Control Model, pursuant to Italian Legislative Decree no. 231/2001, the METLAC Group complies with the regulatory requirements, laws and standards in effect covering environmental and social matters. It undertakes to reduce its environmental impact and to protect the data and information exchanged through regular monitoring and training of its employees in order to implement the established objectives and ensure that environmental and social factors are taken into account when making purchasing decisions.

2.2 SCOPE OF APPLICATION

This Policy is applicable to all METLAC Group companies. The parent company is the Italian company, METLAC SPA, whilst the subsidiaries or investee companies are based domestically and in Mexico. With regard to the latter, applying the principles laid out herein is conditioned on these companies complying with the dictates, laws, regulations and regulatory aspects which are valid and applicable in the countries in which they operate.

3. MISSION and VISION

Mission. To produce paints and inks for metal packaging, undertaking to guarantee that the general public has the pleasure of consuming food, beverages and food by keeping them fresh, tasty and flavourful at all times.

Vision. To become a company of excellence in its industrial sector, focusing, in particular, on the innovative creation of products, developing new formulas based on the principles of reducing its ecological footprint and of a lower use of raw materials from fossil sources.

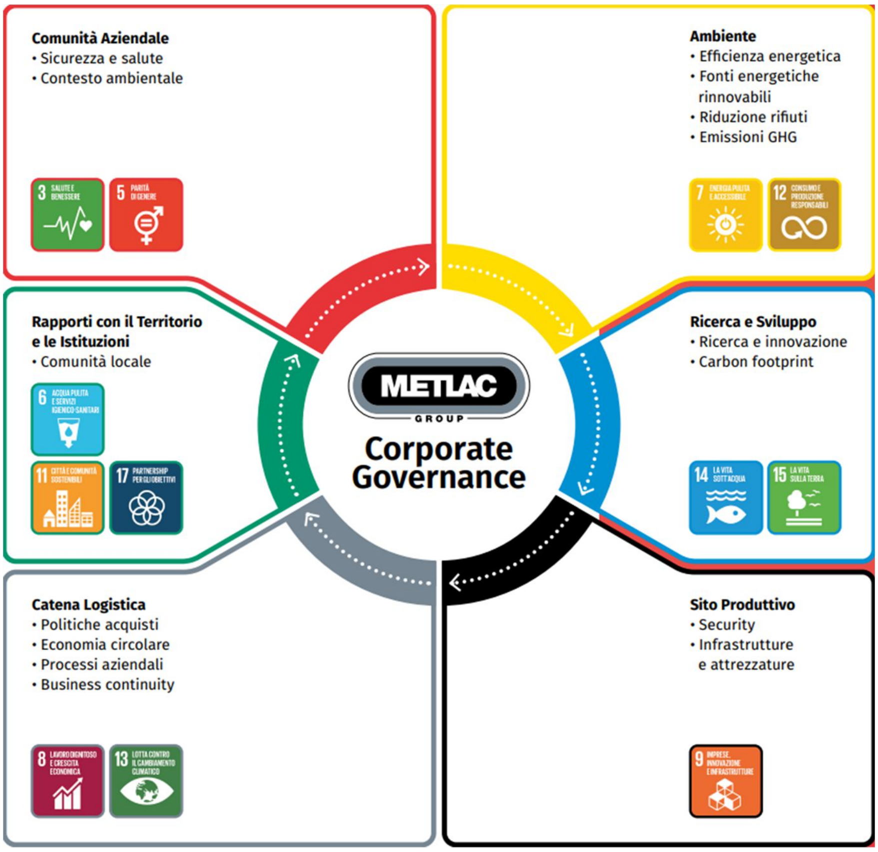
The METLAC Group firmly believes in the importance of maintaining its leadership position in the specialist sector of metal packaging. This will be achieved by continuing to invest in research and development, with particular attention being paid to creating innovative products that respect the principles of reducing environmental impacts and respecting human health.

Integrity in the way we operate, the satisfaction of direct customers and consumers, the passion that is reflected in every project developed and every product supplied, the enhancement of a work environment based on collaboration and mutual respect, the topic of sustainability on which daily work is based: these are the main values of the METLAC Group.

4. INTEGRATING SUSTAINABILITY INTO THE BUSINESS MODEL

The definition of the METLAC Group's Business Model comes from observing the processes, practices and relationships within the company and which were there before the path of sustainable development was taken. A new interpretation has been given to the corporate management body that, over time, has become *Corporate Governance* which, as illustrated in the image below, is central to the Business Model and develops around it the fundamental concepts with a view to sustainable development, namely:

- The six areas of sustainability: The environment, Research and Development, Production sites, the logistics chain, Relationships with the territory and institutions, the business community, as illustrated in the image below.
- The Sustainable Development Goals with the 169 sub-goals associated with them that form the vital core of the 2030 Agenda.



The business model highlights the relationship between business areas and the Goals in the 2030 Agenda to which the METLAC Group contributes by adapting its governance and organisational structure to the new paradigm of sustainable development. The SDGs and sub-goals have been analysed and an assessment was done on which ones to consider in the Business Model and the Strategic Plan, adapting them to the business reality.

5. THE GROUP'S PRIORITIES IN TERMS OF ESG

For the six areas considered priorities, specific objectives, aimed at sustainable development, have been identified and set in consideration of the environment and the protection and development of human capital:

1. **The environment**: Reduce the company's environmental impact through energy efficiency, the optimisation of transport, reducing waste and, therefore, waste materials. A particular focus is on protecting soil and water resources, which are fundamental for life on the planet, by always keeping an eye on greenhouse gas emissions and the fight against climate change, as supported by the Environmental Policy.

2. **Research and Development**: Extend the product catalogue to include those products which, on the basis of technological innovation, entail a reduction in environmental and social impacts, creating *partnerships* with customers and suppliers to achieve the shared objectives of reducing impacts on the environment and on the health and safety of operators and consumers, ensuring product compliance with the laws and regulations relating to the safety of the substances used and the regulations on food contact, as supported by the Quality Policy.

3. **Production sites**: Reduce the vulnerability of production sites and improve safety conditions for people and business continuity. Maintain high standards of safety, develop new technologies and processes to improve efficiency and productivity and reduce any environmental impact, and reduce the consumption of resources, as supported by the Quality Policy, the Policy on Health and Safety, and the SGS-PIR Policy.

4. **The logistics chain**: Make procurement from the supply chain constant and sustainable. Develop a responsible production chain through the careful selection of suppliers with whom to share the principles and policies of sustainable development, as supported by the Quality Policy.

5. **Relationships with the territory and institutions**: Increase transparency and dialogue with Stakeholders and strengthen the company's market position. Assess and manage the impacts generated on the economy and local communities, the protection of local resources and the collaboration with local communities.

6. **The business community**: Increase employee engagement in the business strategy. Promote practices and initiatives aimed at safeguarding the rights and well-being of the Group's employees, developing their skills and a systemic approach in full compliance with

the Code of Ethics and regulations on health and safety, as supported by the Policy on Health and Safety.

6. COMMITMENTS: SUSTAINABILITY BECOMES STRATEGY

In line with the SDGs and its Business Model, the METLAC Group undertakes to:

- Plan new LCA (*Life Cycle Assessment*) analyses based on product development priorities and customer requests; carry out an energy diagnosis to complete the monitoring of consumption and analysis of *Scope 3* emissions; seek solutions to create value from the waste generated by operations; reduce CO_2 emissions through research into alternative sources and an actionable decarbonisation plan [SDG 7 - Affordable and clean energy, SDG 12 - Responsible consumption and production].

- Complete the *PTFE Free* (free of polytetrafluoroethylene) and *BPANI* (Bisphenol A Non-Intent or with no Bisphenol A intentionally added) product catalogue; develop new product formulas with an increase in materials from renewable, biological or recycled sources; extend the LCA studies to all families in the product catalogue; obtain certification of the LCA studies through the creation of the Environmental Product Declaration (EPD) for the Carbon Footprint [SDG 14 - Life below water, SDG 15 - Life on land].

- Improve the management of access to sites and internal traffic for people and vehicles; adapt the work equipment on the basis of developments in safety standards and specific process needs; identify the greatest risks related to the activities performed in sites according to the weather and the possible mitigation actions by following the Emergency Plan and by developing business continuity issues; consolidate the application of the SGS-PIR, i.e. the Prevention of Major Accidents Management System [SDG 9 - Industry, innovation and infrastructure].

- Monitor the Policy on Sustainable Procurement and the commitment of suppliers to adopt sustainable development principles, in particular for the environment and human rights; increase internal awareness of the subject; consolidate the use of the SynESGy platform (CRIF) to increase supplier mapping; optimise transport to reduce CO_2 emissions [SDG 8 - Decent work and economic growth, SDG 13 - Climate action].

- Implement projects to support the dissemination of a culture of sustainability with schools and for the community; increase internal awareness of these issues through active participation in events such as the Sustainable Factory (an event organised by Confindustria aimed at virtuous companies in the field of sustainability); implement tools aimed at a dialogue with Stakeholders by reducing distances with the interlocutor and organising targeted meetings; work on effective communication by using documents such as the summary of the Sustainability Report [SDG 6 - Clean water and sanitation, SDG 11 - Sustainable cities and communities, SDG 17 - Partnerships for the goals].

- Train internal Stakeholders (employees) on the Business Model, policies and Governance issues. Intervene on organisational well-being, improving comfort for employees; improve the methods of assessing the skills and performance of staff for recognition in terms of remuneration policies; offer employees incentives to encourage the use of vehicles that have a reduced environmental impact; extend the staff development path through training and both general and specific information to all functions; develop a welfare plan, adopting widespread practices to help staff balance their work/private life; carry out interventions designed to improve the health and safety conditions of staff aimed at the prevention of harassment, training and awareness, safeguarding staff who travel through *Travel Risk Management* practices; develop policies in favour of the protection of diversity, inclusion and gender equality [SDG 3 - Good health and well-being, SDG 5 - Gender equality].

- Disseminate the approach based on listening to Stakeholders (*Stakeholder driven*) to all levels of the company.

- Regularly publish the Sustainability Report, integrating the new ESRS (*European Sustainability Reporting Standards*) and the European Taxonomy, and continuing the process of progressively aligning with the CSRD (*Corporate Sustainability Reporting Directive*).

- Adopt a business approach based on *Risk Management* that allows companies to analyse business processes and to assess business-related risks, and to progressively improve their "resilience", using ISO 22301 (*Business Continuity Management*) and ISO 31000 (guidelines for *Risk Management*) tools, increasing the awareness of area and function managers in risk management.

- Reinforce the *Corporate Governance* structure, based on the Organisation, Management and Control Model (MOG 231), providing it with the necessary specific resources.

- Enhance the Ratings obtained from the platforms used to assess the METLAC Group's level of sustainable development and that of its supply chain (SynESGy), and that issued by the platforms and voluntary programmes to which the company has adhered (Responsible Care, Ecovadis, CDP and Sedex).

- Integrate the assessment of corruption into the *Risk Assessment* tool, reviewing the related policies, providing for staff training to increase the level of knowledge and awareness of the subject, policies and internal protocols.

- Extend digitisation to all business processes, accompanied by a Data Processing Impact Assessment (DPIA) and involving all staff.

7. PLAN OF INTERVENTION

7.1 SUSTAINABILITY REPORTING

In June 2023, the METLAC Group published its first voluntary Sustainability Report relating to the activities carried out in 2022 and referring to the sites in Italy. In October 2024, the second Sustainability Report was prepared and referred to the activities carried out in 2023, the scope of which is the Group's Italian companies, the second step towards the preparation and publication of the mandatory information on the basis of the new European regulations.

The METLAC Group considers the Sustainability Report as a strategic tool necessary for the measurement, assessment and disclosure of its ESG performance. The metrics chosen for the preparation of the paper are the ESRS and GRI standards as relevant and specific to the sector, in addition to the SASB and other specific indicators related to corporate experience and specificities.

7.2 STRATEGIC PLAN

Thanks to tools such as Materiality Analysis, the definition of actions aimed at Sustainable Development, the assessment of Sustainability Performance through the definition of *KPIs*, the use of *Tools* provided by Trade Associations or through the third-party Ratings, the METLAC Group defines its Strategic Plan by identifying the strategic lines, the related actions and priority levels. This is made possible thanks to discussions with the Operations Committee and with the managers of the services regarding the feasibility of the actions identified and their priorities. The heads of departments are also urged to define specific objectives and related improvement actions. The recommendations arising from the individual assessment methodologies employed, which are, in many cases, convergent, are grouped by scope and used as a support to outline the development strategies to which the company is committed in the short and medium term.

8. THE ROLES AND RESPONSIBILITIES OF THE PARTIES INVOLVED

8.1 APPROVAL AND REVIEW

This Policy document was prepared by HSE&S in October 2024 in collaboration with the main METLAC Group corporate functions on the Operations Committee. The structure of the document complies with the requirements of European standards (the *CSRD*).

This version has been approved by the METLAC Group's Board of Directors. This document may be revised or amended in the event of a change or update to the Strategic Plans, as a result of mandatory regulatory aspects or organisational needs. Any new documents, in order to be considered valid, shall be submitted to and approved by the Board of Directors.

8.2 DISSEMINATION

This Policy is published in the Sustainability section of the METLAC Group's institutional website, together with the Sustainability Report within which the company's social, environmental and economic performance is reported transparently [https://www.metlac.com/sostenibilita/].

CEO	*General Manager Italy*	*CRO*
Pier Ugo Bocchio	Enrico Buriani	Guido Chiogna

9. GLOSSARY

Business Continuity: the business process through which the continuity of all business activities is guaranteed and potential interruptions of systems and activities in the company are prevented (page 8).

Operations Committee: a working group made up of and represented by the main heads of the company's functions. It is assigned the tasks of analysing, implementing and reviewing the main operational processes within the organisation and suggesting continuous improvements (page 10).

Corporate Governance: the set of tools, regulations and mechanisms aimed at achieving the best implementation of the decision-making process in a company in the interests of the various categories of parties that have a stake in corporate life (pages 6-9).

Corporate Sustainability Reporting Directive (CSRD): the new European Commission Directive. Its objective is to establish a new framework for non-financial reporting by companies on their environmental, social and governance impacts (pages 9-10).

Driver: understood as a company that guides and promotes other parties towards common business objectives (page 3).

European Sustainability Reporting Standards (ESRS): new European standards for corporate reporting on sustainability, definitively adopted in July 2023 by the European Commission. The ESRS represent a new step towards the sustainability of the European economy and corporate sustainability (pages 9-10).

Free by design: the development of products which are free of substances of concern for consumer health (page 3).

Greenhouse gases: gases emitted as a result of an industrial activity or process that has properties which are harmful to the ozone layer (page 7).

Global Reporting Initiative (GRI): an independent international organisation that has developed one of the most widely used standards in the world for preparing Sustainability Reports (page 10).

GB: Governing Body (page 10).

HSE: meaning *Health, Safety and the Environment* (page 10).

HSE&S: the acronym for the *Health, Safety, the Environment & Sustainability* function (page 10).

KPI: *Key Performance Indicator* (page 10).

Rating: an assessment of the performance received from an external body, in this specific case, with reference to ESG (environment, social and governance) aspects (9-10).

Risk Assessment: one step in the broader risk management process. It is used to identify and analyse risks to understand what the priorities for intervention should be and to then produce strategic actions to contain or mitigate them (page 9).

Sustainability Accounting Standards Board (SASB): a specific industry standard that guides companies in disclosing financially relevant sustainability information to investors and other Stakeholders (page 10).

Scope 3: greenhouse gas (GHG) emissions generated by indirect operations such as the supply chain, transport, use or disposal of products etc. (page 8).

SGS-PIR: the Prevention of Major Accidents Management System. The Bosco Marengo plant, where the METLAC SPA and CERITEC SRL are based, due to its characteristics, is subject to this system (pages 7-8).

Stakeholder: a natural or legal person who interacts directly or indirectly with the organisation. Employees, customers, suppliers, etc. are Stakeholders (pages 3-7-8-9).

SynESGy: a web rating platform developed by, among others, CRIF and CRIBIS, which is designed to analyse the supply chain in terms of sustainability performance (page 8).

European Taxonomy: the common classification, at the EU level, of economic activities that can be considered environmentally sustainable (page 9).

Tool: an IT tool used to evaluate sustainability performance (page 10).

Travel risk management: managing the risk related to protecting employees who travel, from the beginning of their trip to the end (page 9).

Welfare: the set of all goods and services provided by the employer on the basis of a collective agreement or by a unilateral choice in favour of its employees (page 9).