

FEDRIGONI

SUSTAINABLE RAW MATERIALS POLICY

Introduction

Raw materials are at the core of Fedrigoni's business. The origin and sustainability profile of the fibres, chemicals and other inputs we use directly influence both product performance and our impact on the environment and communities. Fedrigoni recognizes the responsibility to source raw materials in a way that minimizes negative impacts, protects biodiversity and supports the transition towards a more circular economy.

This Policy builds on and complements the Supply Chain and Responsible Sourcing Policy, the Supplier Code of Conduct and the Environmental Policy.

Scope

This Policy applies to all entities, plants, operations and new acquisitions of the Fedrigoni Group. It covers the sourcing and use of all raw materials across the Business Units of the Group.

Principles and Commitments

1. Minimizing Negative Sustainability Impacts

We are committed to continuously reducing the environmental and social impacts associated with our raw materials throughout their life cycle. We integrate sustainability criteria into procurement decisions, prioritizing materials with a lower environmental footprint as assessed through life cycle analysis. Through our proprietary LCA tool, we measure and monitor the environmental footprint of products, enabling informed material selection and eco-design choices.

2. Collaboration with External Stakeholders

We actively collaborate with certification bodies, industry associations, suppliers, customers and research institutions to develop and promote best practices for sustainable raw materials sourcing. We work with global certification schemes such as FSC® to advance more effective and risk-based certification approaches. We engage our strategic suppliers through periodic ESG joint goal-setting and shared improvement plans.

3. Third-Party Verified Raw Materials

We are committed to progressively increasing the share of raw materials covered by recognized third-party certification schemes.

4. Recycled and Secondary Raw Materials

We promote the use of recycled raw materials and production by-products where this demonstrably reduces environmental impacts on a life cycle basis. Material substitution decisions are guided by our LCA

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methodology: we adopt recycled or secondary inputs when their overall environmental footprint, including collection, processing and reprocessing phases, is lower than that of the equivalent virgin material. This evidence-based approach ensures that our circularity efforts translate into real environmental gains.

5. Biodiversity and Deforestation-Free Sourcing

We are committed to avoiding raw materials sourced from sites containing globally or nationally important biodiversity areas, including UNESCO World Heritage Sites, IUCN Category I-IV protected areas, Key Biodiversity Areas, Ramsar Wetlands and High Conservation Value (HCV) areas.

In line with the EU Deforestation Regulation, we do not source commodities or derived products linked to land that has been subject to deforestation or forest degradation after 31 December 2020

Roles and Responsibilities

The Board of Directors of Fedrigoni is responsible for approving, adopting and supervising compliance with this Policy. The Executive Committee is responsible for integrating sustainable raw materials principles into the Group's procurement and sustainability strategy. Operational implementation is ensured by the relevant corporate functions each within their sphere of competence.

Transparency and Reporting

Relevant data and progress on the sustainability performance of our raw materials sourcing are disclosed in our annual Sustainability Statement, in accordance with applicable reporting frameworks including GRI Standards.

Grievance Mechanism

All Group representatives, employees, collaborators, consultants, business partners and members of local communities can report any situation where there is evidence of potential non-compliance with this Policy through the Group's reporting channels. The Group Whistleblowing Policy applies to every Recipient.

Policy Update

This Policy is reviewed and updated as needed to reflect changes in the internal and external context, including regulatory developments, market evolution and the Group's strategic priorities.

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