

RESPONSIBLE ARTIFICIAL INTELLIGENCE POLICY

Approved on October 5, 2026

FEDRIGONI
Fedrigoni SpA

Registered office
Piazzale Lodi 3
20137 Milano, Italy
T +39 02 55308151

Operating office
Via Enrico Fermi 13/f
37135 Verona (VR), Italy
T +39 045 8087888
F +39 045 8009015

Share capital
€ 40.000.220 i.v.
VAT number
VAT Code IT Business register
Milano Monza Brianza Lodi
n. 01664630223

fedrigoni.com

**Directing and
controlling by**
Fiber JVCo S.p.A.



FEDRIGONI

INDEX

1. INTRODUCTION	3
2. SCOPE OF APPLICATION	3
3. PRINCIPLES AND COMMITMENTS	3
3.1 Data Privacy	3
3.2 Cybersecurity	3
3.3 Fairness and Human Oversight	3
3.4 Transparency and Explainability	3
3.5 Accountability	3
3.6 Criteria of Selection for AI Technology	4
3.7 Defined Boundaries and Appropriate Use	4
3.8 Environmental Sustainability	4
3.9 Prohibited Uses	4
4. ROLES AND RESPONSIBILITIES	4
5. TRAINING AND AWARENESS	4
6. TRANSPARENCY AND REPORTING	5
7. GRIEVANCE MECHANISM	5
8. POLICY UPDATE	5

FEDRIGONI
Fedrigoni SpA

Registered office
Piazzale Lodi 3
20137 Milano, Italy
T +39 02 55308151

Operating office
Via Enrico Fermi 13/f
37135 Verona (VR), Italy
T +39 045 8087888
F +39 045 8009015

Share capital
€ 40.000.220 i.v.
VAT number
VAT Code IT Business register
Milano Monza Brianza Lodi
n. 01664630223

[fedrigoni.com](https://www.fedrigoni.com)

Directing and
controlling by
Fiber JVCo S.p.A.



FEDRIGONI

1. INTRODUCTION

Fedrigoni recognizes that Artificial Intelligence represents a transformative technology with significant potential to enhance operational efficiency, product innovation and decision-making across the Group; to constantly create and implement added value for our stakeholders.

At the same time, the adoption of AI systems must be guided by principles of responsibility, transparency and respect for human rights.

This Policy sets out Fedrigoni's commitments and governance framework for the responsible use and, where applicable, development of AI systems.

2. SCOPE OF APPLICATION

The Policy applies to all entities, plants, operations and new acquisitions of the Fedrigoni Group.

3. PRINCIPLES AND COMMITMENTS

3.1 Data Privacy

We ensure that AI systems comply with applicable data protection regulations. Personal data used in AI applications is collected, processed and stored properly, with appropriate safeguards in place.

3.2 Cybersecurity

We protect the integrity, confidentiality and availability of AI systems. The Group's information security standards, including the security by design process established at Group level, are being progressively extended to AI-related infrastructure and applications as their adoption develops.

3.3 Fairness and Human Oversight

We are adopting solutions that aim to identify and mitigate potential biases in AI systems that could lead to unfair or discriminatory outcomes, and to ensure meaningful human oversight over AI-supported decisions, in particular where such decisions may have a significant impact on individuals, safety or business. Critical decisions are never delegated entirely to automated systems: human intervention remains always possible and qualified personnel retain final decision-making authority.

3.4 Transparency and Explainability

We are committed to ensuring that AI systems operate in a transparent manner. Where feasible and proportionate, we are working to provide clear information about the use of AI in our processes and to ensure that AI-generated results and recommendations can be understood and explained to relevant stakeholders. Employees interacting with AI tools are informed about the nature and limitations of such systems.

FEDRIGONI
Fedrigoni SpA

Registered office
Piazzale Lodi 3
20137 Milano, Italy
T +39 02 55308151

Operating office
Via Enrico Fermi 13/f
37135 Verona (VR), Italy
T +39 045 8087888
F +39 045 8009015

Share capital
€ 40.000.220 i.v.
VAT number
VAT Code IT Business register
Milano Monza Brianza Lodi
n. 01664630223

[fedrigoni.com](https://www.fedrigoni.com)

Directing and
controlling by
Fiber JVCo S.p.A.



FEDRIGONI

3.5 Accountability

We establish clear lines of responsibility for the outcomes produced by AI systems. For AI applications formally approved, deployed or managed by the Group, Fedrigoni aims to define appropriate ownership and accountability for their intended use, compliance and risk management. Employees creating or configuring AI tools, including agents, are responsible for using them consistently with resources provided by the Company and applicable internal guidance.

3.6 Criteria of Selection for AI Technology

Fedrigoni Group takes its decisions regarding the adoption of AI tools in a responsible manner and based solely on the principle of maximizing value for its stakeholders, starting with its customers. Consequently, the criteria considered in the selection of AI technologies pertain exclusively to technological and business aspects, without any evaluation related to the positioning, including political positioning, of our suppliers.

3.7 Defined Boundaries and Appropriate Use

We define clear boundaries for what AI systems can and cannot do within our organization. AI tools are deployed for specific, pre-approved purposes.

3.8 Environmental Sustainability

Consistent with our broader environmental commitments, Fedrigoni is mindful of the environmental footprint associated with AI infrastructure, including energy consumption of data centers and computational resources.

3.9 Prohibited Uses

Fedrigoni does not use, deploy or procure AI systems that engage in manipulative techniques exploiting individuals' vulnerabilities, social scoring leading to unjustified detrimental treatment, unauthorized biometric surveillance, or any other application classified as a prohibited AI practice under applicable legislation.

4. 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 responsible AI principles into the Group's digital and sustainability strategy. Operational implementation is ensured by the relevant corporate functions, each within their sphere of competence. All employees and collaborators are responsible for using AI tools in accordance with this Policy and for reporting any concerns or incidents related to AI systems through the appropriate channels.

FEDRIGONI
Fedrigoni SpA

Registered office
Piazzale Lodi 3
20137 Milano, Italy
T +39 02 55308151

Operating office
Via Enrico Fermi 13/f
37135 Verona (VR), Italy
T +39 045 8087888
F +39 045 8009015

Share capital
€ 40.000.220 i.v.
VAT number
VAT Code IT Business register
Milano Monza Brianza Lodi
n. 01664630223

[fedrigoni.com](https://www.fedrigoni.com)

Directing and
controlling by
Fiber JVCo S.p.A.



FEDRIGONI

5. TRAINING AND AWARENESS

We promote internal awareness of responsible AI principles through training programs and practical guidelines. Employees who use or manage AI systems receive appropriate training on the ethical, legal and operational aspects of AI.

6. TRANSPARENCY AND REPORTING

We aim to provide our stakeholders with clear and transparent information about our approach to AI governance. Relevant information is included in our annual Sustainability Statement, in accordance with applicable reporting frameworks.

7. 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 misuse of AI systems or negative impacts arising from their deployment, through the Group's reporting channels. The Group Whistleblowing Policy applies to every Recipient.

8. POLICY UPDATE

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

FEDRIGONI
Fedrigoni SpA

Registered office
Piazzale Lodi 3
20137 Milano, Italy
T +39 02 55308151

Operating office
Via Enrico Fermi 13/f
37135 Verona (VR), Italy
T +39 045 8087888
F +39 045 8009015

Share capital
€ 40.000.220 i.v.
VAT number
VAT Code IT Business register
Milano Monza Brianza Lodi
n. 01664630223

[fedrigoni.com](https://www.fedrigoni.com)

Directing and
controlling by
Fiber JVCo S.p.A.

