

Castelli Calepio, 01/08/2026

OBJECT: GENERAL PACKAGING & SUSTAINABILITY POLICY

Our Company is fully committed to upholding the highest standards of quality, chemical safety, and environmental sustainability across our entire supply chain. In compliance with European Regulation (EU) 2025/40 (PPWR - Packaging and Packaging Waste Regulation), the REACH Regulation (EC No. 1907/2006), and key EU and national directives, all packaging and transport materials used in our production and logistics operations meet strict criteria for recyclability, environmental impact reduction, and chemical safety.

Compliance by Packaging Category

1. Corrugated Cardboard Packaging & Paperboard Components

- **Recyclability & Design for Recycling:** Manufactured entirely using mono-material cellulosic structures engineered for high recyclability within industrial paper recycling streams.
- **Recycled Content & Sustainable Sourcing:** Prioritized use of recycled fibers (with averages equal to or exceeding 75%) and sourcing of virgin raw materials backed by Chain of Custody certifications (FSC) in full alignment with the EU Deforestation Regulation (EUDR No. 2023/1115).
- **Chemical Safety:** Free from harmful mineral oils (MOSH/MOAH) in standard printing inks and fully compliant with legal limits.

2. Stretch Films, Bags & Polymeric Packaging (PE, PP, PET)

- **Design for Recycling & Mono-materials:** All stretch films, industrial bags (PLT), and adhesive tapes feature mono-material polymer structures (predominantly Polyethylene PE) designed for high recyclability (Grades A, B, C) to support mechanical recycling at scale.
- **Integration of Recycled Content (PCR / PIR):** Progressive integration of certified Post-Consumer Recycled (PCR) and Post-Industrial Recycled (PIR) polymers backed by full supply chain traceability.
- **Weight & Volume Optimization:** Continuous reduction of material thickness and weight without compromising protective or mechanical performance.

3. Labels & Self-Adhesive Materials

- **Recycling Compatibility:** Labels and release liners engineered to ensure maximum compatibility with the recycling processes of the primary packaging on which they are applied.
- **Adhesive Safety:** Glue formulations free from volatile substances or hazardous additives that could interfere with recycling processes or release contaminants.

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4. Wooden Packaging & Shipping Pallets

- Phytosanitary Compliance ISPM 15 / FITOK: All solid wood pallets and packaging undergo Heat Treatment (HT) in accordance with the FAO ISPM 15 international standard and display the official IPPC/FITOK mark.
- Circular Economy & Reuse: Made from 100% recyclable timber integrated into established wood recovery networks (Rilegno/CONAI) and suitable for managed open/closed-loop reuse systems.

5. Specialty Paper & Food Contact Materials (FCM)

- Food Contact Suitability: Specialty paper grades intended for direct or indirect food packaging conform with Regulation (EC) No. 1935/2004, Regulation (EC) No. 2023/2006 on Good Manufacturing Practice (GMP), and national food contact standards.
- Contaminant-Free: Fully free from Bisphenol A (BPA), bisphenol derivatives, and hazardous migratable substances.

General Chemical Safety & Traceability Principles

- PFAS-Free (Per- and Polyfluoroalkyl Substances): All packaging materials supplied and utilized are free from intentionally added PFAS or strictly fall below analytical threshold limits.
- Heavy Metals (≤ 100 ppm): Full compliance with Article 5 of the PPWR and Directive 94/62/EC, guaranteeing that the cumulative concentration of Lead (Pb), Cadmium (Cd), Mercury (Hg), and Hexavalent Chromium (Cr VI) is strictly below 100 mg/kg.
- REACH & POPs Compliance: Absence of Substances of Very High Concern (SVHC - Candidate List) above 0.1% w/w under Regulation (EC) No. 1907/2006, strict compliance with REACH Annex XVII restrictions, and adherence to Regulation (EU) 2019/1021 on Persistent Organic Pollutants (POPs).
- Traceability & Quality Management: Full lot traceability across every packaging batch is maintained throughout the chain of custody under our certified Quality Management System (ISO 9001, IATF 16949).

This declaration is based on the official compliance statements and technical documentation received during 2026 from all suppliers of the aforementioned materials and packaging.

ROBERTO ZANINI

Executive Director of Integrated Management Systems,

Corporate QHSE & Compliance Manager

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