



CREALIS GROUP
SUSTAINABLE DEVELOPMENT POLICY

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1. Introduction

The success of the Crealis Group (hereinafter also “Crealis” or the “Group”) is closely linked to its ability to operate responsibly, creating value over the long term for its stakeholders while minimizing its environmental impact and fostering a safe, inclusive and ethical working environment.

For this reason, sustainability, understood as the integration of environmental, social and governance (ESG) principles into business activities, represents a fundamental lever for the Group’s competitiveness, resilience and long-term development.

With this in mind, Crealis has defined this Sustainable Development Policy, which outlines the key principles and commitments guiding the Group in managing its environmental impacts, enhancing its human capital, and ensuring responsible and transparent governance, in line with its ethical principles and strategic objectives.

1.1. Aims of the Policy

This Sustainable Development Policy (hereinafter also the “Document”) defines the principles, objectives and general guidelines through which Crealis integrates sustainability into its business model and operations.

It represents a strategic framework aimed at promoting responsible growth, environmental protection, social well-being, and ethical business conduct, ensuring consistency across all Group activities and geographies.

Through this Policy, the Group intends to ensure:

- the integration of environmental, social and governance (ESG) principles into corporate strategy, decision-making processes and daily operations;
- the alignment of sustainability practices with the Group’s values, Code of Ethics and governance framework;
- compliance with applicable national and international laws, regulations, and recognized standards;
- prevention and mitigation of environmental and social risks, while promoting continuous improvement in sustainability performance;
- active contribution to global sustainability objectives, including climate action, circular economy, human rights protection, and responsible business conduct;
- the creation of long-term value for stakeholders, including employees, customers, suppliers, communities and shareholders.

This Policy is part of the Group’s broader governance system and is complemented by specific thematic policies, including the Environmental Policy, Human Resources Management Policy, Circular Economy and Resource Efficiency Policy, Sustainable Procurement Policy, Code of Ethics, and Code of Conduct for Business Partners, which define detailed commitments and operational measures in their respective areas.

1.2. Scope and Addressees

This Policy, adopted by Crealis S.p.A. (hereinafter also referred to as “Parent Company”) applies to all Companies belonging to the Crealis Group, within the limits of compatibility with current local regulations and in compliance with the legal and cultural specificities of the different contexts in which the Group operates. Each Group Company is required to transpose and implement this Policy, supplementing it, where necessary, with specific regulations or operating procedures, provided they are consistent with the principles established here and with the applicable local regulations.

This Document applies to all activities and processes across the Group that may have environmental, social, or governance impacts, and is binding for all employees and collaborators, regardless of role, level, or type of employment.

1.3. Reference Principles

The Group's Sustainable Development Policy is based on shared values and principles formalized in the Group's Code of Ethics and is aligned with internationally recognized frameworks on environmental protection, human rights, responsible business conduct, and sustainable development.

The Group's approach to sustainability is guided by:

Ethical and normative frameworks

- The United Nations Universal Declaration of Human Rights;
- The OECD Guidelines for Multinational Enterprises;
- The United Nations Guiding Principles on Business and Human Rights (UNGP);
- The ILO Declaration on Fundamental Principles and Rights at Work (1998 and subsequent updates);
- The principles of the United Nations Global Compact, to which the Group adheres.

Environmental and sustainability commitments

- The Paris Agreement on climate change;
- The Science Based Targets initiative (SBTi), guiding the Group's greenhouse gas reduction targets;
- The Greenhouse Gas Protocol (GHG Protocol), as the reference framework for measuring and reporting greenhouse gas emissions;
- International standards such as ISO14001 (Environmental Management Systems) and ISO 45001 (Occupational Health and Safety);
- The United Nations Sustainable Development Goals (SDGs)

Regulatory and reporting frameworks

- The European regulatory framework on sustainability, including the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS);
- The Global Reporting Initiative (GRI) Standards, which represent the Group's primary framework for sustainability reporting;
- Applicable European and national legislation on environmental protection, labour rights, health and safety, and equal opportunities.

1.4. Relevant Impacts, Risks and Stakeholders

As part of its materiality assessment process, Crealis identifies and regularly reviews its most significant environmental, social, and governance (ESG) impacts, both positive and negative, actual and potential, arising from its activities across the value chain.

In parallel, the Group assesses the main risks and opportunities associated with these impacts, taking into account the expectations of its key stakeholders, including employees, customers, suppliers, partners, and local communities.

The relevant impacts, risks and opportunities identified form the basis for defining the Group's sustainability strategy, priorities, and objectives, and are regularly monitored and updated to ensure alignment with evolving business, regulatory, and stakeholder contexts.

Material topic	Impacts	Risks	Opportunities
Climate Change & Energy (E1)	Greenhouse gas emissions from operations and value chain (Scope 1, 2 and 3) contributing to climate change	Regulatory pressure, carbon pricing, energy cost volatility, and risk of not achieving emission reduction targets	Energy efficiency improvements, increased use of renewable energy, and development of low-carbon solutions
Pollution (E2)	Emissions to air, water and soil, including hazardous substances from industrial processes	Stricter environmental regulations and compliance risks related to emissions and substances	Adoption of cleaner technologies, substitution of hazardous substances, and improved environmental monitoring
Circular Economy & Resource Use (E5)	Consumption of raw materials and generation of waste, including hazardous and non-recyclable waste	Regulatory changes (e.g. PPWR, EPR), material scarcity, and increased costs of sustainable materials	Sustainable product design, increased use of recycled and bio-based materials, and enhanced waste recovery and circular practices
Working Conditions & Health & Safety (S1)	Employee well-being, safe working conditions, and occupational health management	Workplace accidents, non-compliance with labour standards, and psychosocial risks affecting employees	Safer working environments, improved well-being, and increased employee engagement and productivity
Diversity, Inclusion & Talent (S1)	Workforce diversity, equal opportunities, and employee development	Talent attraction and retention challenges, skills gaps, and potential discrimination risks	Inclusive culture, talent development, improved performance, and innovation
Communities & Local Impact (S3)	Contribution to local social and economic development and community engagement	Reputational risks linked to insufficient engagement with local communities	Strengthened stakeholder relationships and local acceptance
Customers & Product Responsibility (S4)	Product quality, safety, and contribution to anti-counterfeiting solutions	Product compliance risks and potential reputational impacts	Innovation, enhanced customer trust, and market differentiation
Business Conduct & Ethics (G1)	Promotion of ethical behaviour, transparency, and compliance across the organisation	Corruption risks, legal sanctions, and reputational damage	Strengthened governance framework, increased trust, and improved stakeholder confidence
Responsible Supply Chain (S2 / G1)	Influence on environmental and social practices across the value chain through supplier engagement	Supplier non-compliance with ESG standards, supply disruptions, and reputational exposure	Responsible sourcing, enhanced supplier engagement, and improved traceability and transparency

The impacts, risks and opportunities presented above are further detailed and managed through the Group's thematic policies, including the Environmental Policy, Human Resources Management Policy, Circular Economy Policy, and Sustainable Procurement Policy, which define specific commitments, processes, and control mechanisms for each area. Based on the results of the 2025 materiality assessment, water and biodiversity are not currently considered material topics at Group level. This conclusion reflects the limited direct impact of the Group's operations on these areas. In particular, water use is minimal and limited to specific processes at a single site (Crealis Top Closures, Portugal), where it is effectively managed through controlled systems and external treatment, ensuring no direct discharge to the environment. Nevertheless, Crealis remains committed to monitoring these topics over

time and to managing any site-specific impacts in accordance with applicable regulations and best practices.

2. Group Sustainability Commitments

The material topics identified through the Group's materiality assessment represent the foundation of Crealis Group's sustainability strategy. In response to these priorities, the Group defines and implements commitments and actions aimed at preventing and mitigating negative impacts, enhancing positive contributions, and managing related risks and opportunities across its operations and Supply chain.

2.1. Environmental Commitments

Crealis is committed to reducing its environmental footprint and contributing to global sustainability goals through responsible resource management, emissions reduction, and the promotion of circular economy principles. The Group measures its greenhouse gas emissions in accordance with the Greenhouse Gas Protocol and defines its emission reduction targets in line with the Science Based Targets initiative (SBTi). Crealis translates its environmental sustainability commitments into concrete and measurable objectives, aligned with its key ESG priorities and designed to support long-term value creation.

Area	Objective
Climate & Emissions	Reduce absolute Scope 1 and 2 GHG emissions by 42% by 2030 (baseline: 2023), in line with Science Based Targets initiative (SBTi)
Climate & Emissions	Reduce absolute Scope 3 GHG emissions (purchased goods and services and fuel- and energy-related activities) by 25% by 2030 (baseline: 2023)
Energy	Increase the share of renewable electricity to more than 20% by 2026
Environmental Management	Achieve ISO 14001:2015 certification across 100% of European plants by 2030
Circular Economy	Ensure a product portfolio aligned with evolving regulatory requirements (e.g. PPWR) and customer sustainability expectations by 2030
Circular Economy	Conduct Life Cycle Assessments (LCA) for 100% of product lines by 2028
Waste	Increase the recovery of post-industrial waste in the EU, reaching 97% by 2026 and 100% by 2028, including waste to energy recovery.

To achieve these objectives, the Group focuses on improving energy efficiency, increasing the use of renewable energy, optimising resource use, and promoting circular economy principles across its operations and products.

2.2. Social Commitments

Crealis Group is committed to creating a positive social impact across its operations and value chain by fostering a safe, inclusive, and engaging working environment, respecting human rights, and supporting the well-being and development of its employees. The Group also strives to contribute positively to the communities in which it operates, ensure the safety and quality of its products for customers and end-users, and promote responsible practices throughout its supply chain. Crealis translates its social sustainability commitments into concrete and measurable objectives, aligned with its key ESG priorities and designed to support long-term value creation.

Detailed commitments relating to labour rights, human rights, diversity and inclusion, employee well-being, occupational health and safety, and training are further defined in the Group Human Resources Management Policy.

Area	Objective
Health & Safety	Achieve ISO 45001:2018 certification across all European entities by 2030, and across all Group entities worldwide by 2035

Health & Safety	Reduce the Accident Frequency Index through continuous year-on-year improvement
Diversity & Inclusion	Achieve UNI/PdR 125:2022 Gender Equality Certification at Italian sites by 2026
Talent Development & Retention	Identify, develop, and retain key talent by strengthening succession planning, leadership development, career growth opportunities, and internal mobility, ensuring a resilient and future-ready workforce.
Employee Engagement & Retention	Foster a positive and engaging employee experience, and commit to reducing voluntary employee turnover to 7% in Europe and 9% outside Europe by 2030.
Training	Ensure a minimum of 16 hours of professional development training per employee per year by 2030
Performance Management	Conduct annual performance reviews for 100% of office-based employees by 2027, with a progressive roll-out to the operational workforce towards 2030.
Employee Engagement	Achieve a positive Employee Net Promoter Score (eNPS) by 2028, reflecting a workforce with more promoters than detractors.

To achieve these objectives, the Group invests in employee development, promotes a strong health and safety culture, fosters diversity and inclusion, and supports employee engagement and well-being across all operations. This includes the implementation of structured succession planning and talent development programs for key roles, enhanced training and career development opportunities, and regular performance and feedback processes. Together, these initiatives contribute to strengthening employee satisfaction and supporting long-term retention across the Group.

2.3. Governance Commitments

Crealis Group is committed to ensuring robust governance practices based on integrity, transparency, and accountability. The Group promotes ethical conduct, prevents corruption and misconduct, and integrates ESG considerations into decision-making processes and relationships with business partners across the supply chain. Crealis translates its governance sustainability commitments into concrete and measurable objectives, aligned with its key ESG priorities and designed to support long-term value creation.

Area	Objective
Responsible Supply Chain	Ensure 100% of strategic key material suppliers are signatories to the Group's Code of Conduct by 2027
Responsible Supply Chain	Engage and assess at least 20 strategic suppliers on ESG criteria by 2026 and implement a harmonized ESG supplier assessment framework by 2028.
Ethics & Compliance	Reinforce the consistent application of the Group's Code of Ethics and anti-corruption principles by further developing and rolling out a structured training program across all employees from H2 2026 onwards.
Ethics & Compliance	Maintain effective whistleblowing mechanisms, in line with applicable legal requirements, and ensure the timely assessment and follow-up of reported cases.

To achieve these objectives, the Group strengthens its governance framework, promotes ethical conduct, enhances risk management processes, and integrates ESG considerations into decision-making and supplier management practices.

3. Implementation, control and monitoring

3.1. Roles and responsibilities

Promoting sustainable development requires a transparent governance model grounded in a strong corporate culture of environmental stewardship, social responsibility, and ethical business conduct.

The Group ensures a clear allocation of roles and responsibilities, supported by appropriate awareness, training, and internal communication, particularly in functions and business areas with the most significant environmental, social, and economic impacts.

Fonction/organisme corporatif	Rôles et responsabilités en ressources humaines
Board of Directors of the Parent Company	• Approves the Group Sustainable Development Policy. • Ensures alignment between the Policy and the Group's overall strategy, including financial and sustainability objectives. • Oversees the definition and monitoring of measurable ESG (Environmental, Social, Governance) objectives, in line with the Group's international commitments.
Group Sustainability Manager	• Coordinates the implementation of the Sustainable Development Policy across the Group. • Supports the definition, monitoring, and reporting of ESG KPIs in collaboration with relevant functions. • Promotes the integration of sustainability principles into business processes and decision-making. • Drives internal and external awareness through training, communication, and stakeholder engagement initiatives.
Purchasing team	• Integrates environmental, social, and ethical criteria into sourcing decisions, alongside quality, safety, reliability, and cost efficiency requirements. • Promotes responsible supply chain practices, ensuring supplier alignment with the Group's Code of Ethics and sustainability standards. • Supports initiatives aimed at reducing environmental and social impacts across the supply chain, including sustainable materials and logistics optimization.
R&D team	• Develops products and solutions aligned with sustainable development principles, ensuring: ◦ Compliance with applicable safety and quality standards; ◦ Technical feasibility and reliable performance; ◦ Reduction of environmental impacts across the product life cycle; ◦ Consideration of social, regulatory, and customer expectations; ◦ Preservation of efficiency, performance, and economic value. • Integrates life cycle thinking and sustainability criteria into product and process development. • Explores innovative materials, technologies, and design approaches that contribute to improved environmental and social outcomes.
HR team	• Integrates sustainable development principles and the Code of Ethics into HR policies and processes across the employee lifecycle. • Promotes a corporate culture aligned with the Group's sustainability objectives through communication, engagement, and leadership initiatives. • Defines and delivers training programs to ensure employee awareness and capability on sustainability-related topics.

	• Integrates, where relevant, sustainability objectives into performance management and incentive systems. • Supports diversity, equity, and inclusion, ensuring a safe, respectful, and compliant working environment. • Contributes to the definition and monitoring of social KPIs (e.g., training, diversity, employee engagement indicators such as eNPS), in coordination with the Sustainability function.
Operations Team	• Implements sustainable development principles in day-to-day operations, ensuring alignment with the Group's sustainability objectives. • Optimizes the use of resources (energy, water, raw materials) and promotes waste reduction, reuse, and recycling. • Identifies and implements initiatives to reduce environmental impacts, including emissions and resource consumption. • Ensures compliance with applicable environmental, health, and safety regulations and internal standards. • Promotes safe and responsible working practices across all operational activities. • Contributes to the definition and monitoring of operational ESG KPIs (e.g., energy consumption, emissions, waste), in coordination with the Sustainability function.
Compliance/ Internal Audit Team	• Monitors adherence to the Sustainable Development Policy and the Code of Ethics. • Assesses the effectiveness of internal controls and processes related to ESG risks and compliance. • Conducts audits and reviews to identify gaps, risks, and areas for improvement. • Supports the identification, evaluation, and mitigation of sustainability-related risks. • Ensures the availability and proper management of reporting and escalation mechanisms (e.g., whistleblowing channels). • Reports findings to management and recommends corrective actions, following up on their implementation.

3.2. Reviewing and Updating the Policy

This Policy is subject to periodic review to ensure its effectiveness, its alignment with the Group's values and sustainable development objectives, and its continued compliance with applicable regulations and recognized ESG (Environmental, Social, Governance) standards and best practices at national and international level.

Extraordinary reviews may be carried out in the event of:

- significant regulatory developments related to ESG matters;
- major organisational or strategic changes within the Group;
- findings from internal or external audits highlighting material risks or areas for improvement;

- relevant reports received through reporting or grievance mechanisms concerning ethical, environmental, or social issues.

Proposals for amendments are prepared by the Group Sustainability Manager, in coordination with relevant functions, and shared with the Managing Director of the Parent Company. They are then submitted to the Board of Directors for approval.

Once approved, updates are implemented across Group companies in accordance with applicable local regulations and, where necessary, supplemented by specific procedures adapted to local contexts.

3.3. Policy Sharing and Dissemination

The Group ensures effective dissemination of this Policy across all organizational levels and to relevant stakeholders through appropriate internal and external communication channels, in line with principles of transparency and accessibility.

The Policy is made available to employees, collaborators, and external stakeholders via the Group's institutional website and other relevant communication tools, to promote awareness and understanding in compliance with applicable laws and regulations.

3.4. Reporting and Grievance Mechanisms

Any conduct inconsistent with the principles of this Sustainable Development Policy or the Code of Ethics may result in disciplinary action, in accordance with applicable laws and collective and individual agreements.

The Group promotes a culture of responsibility, transparency, and continuous improvement by enabling employees, collaborators, and stakeholders to report, in good faith, any conduct that may be inconsistent with the Policy's principles or broader ESG commitments.

To ensure effective and consistent handling of reports, all Group companies adopt the EQS Integrity Line platform, which is secured through appropriate technical and organizational measures, including encryption, to ensure the confidentiality of the reporting party, the individuals concerned, and the information provided.

The platform is accessible via the following link:
<https://www.crealisgroup.com/en/international/whistleblowing-2/>

The Group ensures that reporting parties are protected against retaliation, in accordance with applicable laws and recognized standards on whistleblowing and grievance mechanisms.

4. Appendix

4.1. Appendix A - Correspondence with ESRS Standards

The European Sustainability Reporting Standards (ESRS), adopted under the Corporate Sustainability Reporting Directive (CSRD), provide a comprehensive framework for the disclosure of environmental, social, and governance (ESG) information.

In line with these standards, this Policy contributes in particular to the following disclosure requirements:

Normes ESRS	Informations	Section	Page	Commentaires
ESRS 2 MDR-P		1 Introduction	3	

	65 (a) a description of the key contents of the policy, including its general objectives and which material impacts, risks or opportunities the policy relates to and the process for monitoring;	1.1 Aims of the Policy	3	
		1.4 Relevant impacts, risks and opportunities	4	
ESRS 2 MDR-P	65 b) a description of the scope of the policy, or of its exclusions, in terms of activities, upstream and/or downstream value chain, geographies and if relevant, affected stakeholder groups;	1.2 Scope and Addressees	3	
ESRS 2 MDR-P	65 (c) the most senior level in the undertaking's organization that is accountable for the implementation of the policy;	3.1 Roles and responsibilities	7	
ESRS 2 MDR-P	65 (d) a reference, if relevant, to the third-party standards or initiatives the undertaking commits to respect through the implementation of the policy;	1.3 Reference Principles	4	
ESRS 2 MDR-P	65 (e) if relevant, a description of the consideration given to the interests of key stakeholders in setting the policy;	1.4 Relevant impacts, risks and opportunities	4	
ESRS 2 MDR-P	65 (f) if relevant, whether and how the undertaking makes the policy available to potentially affected stakeholders, and stakeholders who need to help implement it.	3.3 Policy sharing and dissemination	10	
ESRS E1	Policies related to climate change mitigation and adaptation	2.1 Environmental Commitments	6	
ESRS E5	Policies related to resource use and circular economy	2.1 Environmental Commitments	6	
ESRS S1	Policies related to own workforce (e.g., working conditions, training, diversity and inclusion)	2.2 Social Commitments	6	
ESRS S4	Actions to address impacts on consumers and end-users	2.2 Social Commitments	6	

ESRS G1	Policies related to business conduct, ethics, and compliance	2.3 Governance Commitments	7	
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4.2. Appendix B - Definitions

- **Code of Ethics:** Code of Ethics A formal document that defines the principles, values, and rules of conduct guiding the activities of the Group, its employees, and stakeholders.
- **Sustainable Development:** Development that meets the needs of the present without compromising the ability of future generations to meet their own needs, integrating environmental, social, and economic considerations.
- **ESG (Environmental, Social, Governance):** A set of criteria used to evaluate the Group's performance and impact in environmental, social, and governance areas.
- **Stakeholders:** Individuals or groups that can affect, or are affected by, the Group's activities, products, or services, including employees, customers, suppliers, investors, and communities.
- **Supply Chain:** The network of entities, activities, resources, and business relationships involved in the sourcing of goods and services used by the Group, extending from direct (Tier 1) suppliers to indirect suppliers (Tier 2). It encompasses all upstream procurement processes and related operations that contribute to the production or delivery of the Group's products and services.
- **Human Rights:** Fundamental rights and freedoms inherent to all individuals, as defined by internationally recognized standards.
- **Diversity, Equity and Inclusion (DEI):** Principles and practices aimed at ensuring fair treatment, equal opportunities, and an inclusive working environment for all individuals.
- **Environmental Impact:** Any change to the environment, whether adverse or beneficial, resulting from the Group's activities, products, or services.
- **Circular Economy:** An economic model that aims to maintain the value of products, materials, and resources for as long as possible, minimizing waste and promoting reuse, repair, and recycling.
- **Eco-design:** The integration of environmental considerations into product and process design to reduce impacts throughout the life cycle.
- **Report (Whistleblowing Report):** Any written or oral communication submitted through established reporting channels concerning potential violations of this Policy, the Code of Ethics, or applicable laws.
- **Reporting and Grievance Mechanisms:** Formal channels that enable employees and stakeholders to report concerns or violations confidentially and without fear of retaliation.
- **eNPS (Employee Net Promoter Score):** An indicator used to measure employee engagement and satisfaction, based on their likelihood to recommend the Group as a place to work.
- **Scope:** The extent of activities, operations, entities, and stakeholders covered by this Policy.