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FSC® and PEFC CHAIN OF CUSTODY POLICY

The management of Transpack s.p.a. has decided to guarantee its customers the production of wooden and heavy cardboard packaging made from PEFC (licence no. PEFC/18-31-1170) and FSC (licence no. FSC-C160306) by implementing and maintaining a chain of custody management system for the use of wood raw materials that come from environmentally, socially and economically sustainable management.

In this context, Transpack s.p.a., certified according to the FSC and PEFC Chain of Custody (CoC) FSC and PEFC standards, wanted to offer its customers a guarantee regarding the origin of the raw materials used for its products and thus demonstrate, in a correct, transparent and controlled manner, its active contribution to responsible forest management, in compliance with the rigorous environmental, social and economic standards of the globally recognised FSC and PEFC forest certification schemes.

This document describes the CoC certification policy adopted by Transpack S.p.a. and is implemented by undertaking and pursuing the following commitments and objectives:

- ❖ To comply with the CoC, social, health, safety and workers' rights requirements defined in the FSC® and PEFC standards required by the current and binding laws of the Italian State.
- ❖ To constantly verify that it is not directly or indirectly involved in or connected with:
 - in illegal logging or illegal trade in timber or forest products derived from it;
 - any forestry practice that may harm the rights and 'tradition', understood as the set of customs and related values, of every human being;
 - any forestry practice that may destroy areas and environments of high conservation value, the environment and biodiversity in general;
 - any practice involving the significant conversion of forest areas and environments into plantations or other non-forest uses;
 - the introduction of genetically modified organisms into forestry operations
 - the violation of the ILO Convention, as defined in the 1998 Declaration on Fundamental Principles and Rights at Work.
- ❖ Check the certification of purchased raw materials (cardboard sheets, wood and plywood) and their suppliers;
- ❖ Select suppliers who operate in compliance with the specifications defined by Transpack S.p.A.;
- ❖ Train and raise awareness among staff directly involved in the Chain of Custody System, particularly those involved in supply management;
- ❖ Suspend the application of FSC and PEFC sales if the product does not comply with the requirements of the standard applicable to the company as defined in the Chain of Custody Manual;
- ❖ Use the FSC and PEFC logos only in association with products that meet the minimum requirements of the respective reference standards.

Quality

COMIECO
PEFC - FSC®
AEO
FITOK
ISO 9001
ISO 14001

Hub

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- ❖ Ensuring compliance with the "Fundamental Labour Rights" requirements set out in the FSC and PEFC standards
 - Transpack s.p.a. does not employ minors, only adults who are qualified and selected for their professional skills.
 - At Transpack S.p.A., employment relationships with all employees are voluntary and based on mutual consent, without any form of direct or indirect threat from the employer to the staff. All working conditions are set out in the employment contract (Ref. CCNL LEGNO INDUSTRIA), which is signed by the employee at the time of hiring, of their own free will and with full knowledge of the terms. Transpack S.p.a. has never been involved in lawsuits, disputes or settlements for physical and sexual violence, forced labour, withholding of wages/including the payment of employment taxes or the payment of a deposit to start work, restriction of mobility/movement, withholding of passports and identity documents, or threats to report employees to the authorities.
 - Transpack S.p.A. is opposed to any ideology or behaviour involving discrimination based on gender, race or age. In fact, it guarantees equal treatment in hiring and dismissal, promotion and workload distribution;
 - Transpack S.p.A. guarantees its workers' freedom of association, understood as the free exercise of the right to join legally recognised trade unions and the free exercise of trade union activities.

With regard to the company's traceability system, it is a deliberate choice on the part of the company to establish, promote and disseminate an FSC and PEFC traceability control system aimed at achieving the above objectives, assigning each company function the task of ensuring the traceability of the final product, checking the correct and effective application of processes and the achievement of product objectives.

This mechanism is verified through process records made by company personnel involved in monitoring the traceability system.

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The management of Transpack S.p.A. has designated the Chain of Custody Managers as the reference persons for the implementation of this policy.

Transpack S.p.A. is committed to disseminating these principles at every level within its organisation, to its customers/suppliers and stakeholders, understood as all parties interested and involved in the activities of Transpack S.p.A., through training courses, promotional activities and communication within the scope of the chain of custody policy.

Pontelongo, 10/09/2025

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