

# Environmental Policy

## ■ Policy

The *companies* (le società) of A.L.H.A. Group, considering the protection of the environment as essential for the quality of life and sustainable development, hereby intend to:

- to express its desire to reconcile the needs of economic development and value creation with respect for and protection of the environment;
- to explain the company's guidelines for environmental protection;
- to share the relevant management principles with stakeholders (employees, contractors, trade unions, institutions);
- to encourage the participation and collaboration of all interested parties, in the awareness that, in order to achieve the objectives related to environmental protection, their active contribution is crucial;
- to implement, document and maintain an Environmental Management System in compliance with the UNI EN ISO 14001 standard and obtain, at the end of a progressive process, its certification for all the sites of the various Group companies by an *accredited organization* (organismo accreditato).

**The Environmental Policy of ALHA Group** is embodied in the following management principles:

- a. full compliance with current national and European Community legislation (including any other environmental requirements to which the company subscribes), with the relevant regulations and with the company's procedures for environmental protection;
- b. Use of processes and technologies that prevent and/or reduce impacts on the environment;
- c. management of production activities in order to reduce the environmental impacts directly related to it, with particular attention to the management of waste produced and the risks associated with the use of pollutants;
- d. use of means and materials with characteristics that comply with current environmental legislation, low consumption, low environmental impact, recyclability;
- e. identification, for each specific site of the individual Group companies, and for each activity, of the significant environmental impacts, in order to reduce the possible sources of pollution;
- f. constant tendency to eliminate the possibility of accidental spillage or spreading of hazardous substances and/or pollutants on the ground;
- g. Development and implementation of environmental and safety contingency plans, containing measures and procedures necessary to prevent accidents or emergencies and to contain their effects;
- h. dissemination within the company, by means of constant *awareness-raising* (azione di sensibilizzazione), of a culture aimed at implementing forms of correct behaviour in terms of environmental and territorial protection;
- i. development, through training and information, of professional skills and a commitment to working in compliance with prevention and protection procedures;
- j. involvement and participation of staff in the process of continuous improvement and prevention in the field of environmental protection;

- k. continuous verification of the management of environmental protection, through the critical analysis of the results achieved and the review of the above principles and the Environmental Management System;
- l. increase in environmental performance and the consequent levels of physical and intellectual wellbeing of workers, by means of a work organization designed for the purpose and the provision of adequate economic, human and technological resources;
- m. Development of a general awareness that responsibility for environmental protection rests with all workers, at all levels of the company, each according to their skills;
- n. Involvement of *contractors* (imprese appaltatrici) working for ALHA Group in environmental protection, in particular through communication of the policy and objectives, as well as cooperation and coordination at every stage of the contractual relationship;
- o. carrying out periodic checks, inspections and audits, both internal and on significant suppliers, aimed at verifying the correct application of the system, in order to prevent any situations of non-compliance;

This policy is oriented towards the prevention (in particular of all types of pollution) and represents the guide for the continuous improvement of the environmental performance and of the relative management system; it also constitutes the reference framework for the definition, first, and then the review, of the environmental objectives by each company of the ALHA Group and for each production site.

The Departments of the various Group companies are committed to implementing the principles of this policy and the objectives deriving from it: to this end they make available the necessary structure and resources; they also periodically monitor the achievement of the objectives and, where necessary, promote the appropriate corrective or improvement measures.

The environmental policy also has a role as a corporate communication document; in order to give it maximum dissemination, within the company this document is available to employees, both shared on the company intranet and displayed on notice boards; it is formally transmitted to significant suppliers with an explicit invitation to disseminate it to their employees; it is available on the company website for all other interested parties.

It is the responsibility of the Function Managers

- to check that this document is understood by their employees and, if necessary, provide the requested clarifications;
- to take the appropriate measures to ensure that employees operate in a correct manner from an environmental point of view when carrying out their duties.

The Environmental Policy is periodically reviewed and revised, as a rule as part of the management review, to take account of new management intentions, any necessary adjustments to new rules and regulations, and possible changes in the organization.

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### Environmental labelling of packaging D. Lgs. 116/2020

As of 1 January 2023, **environmental labeling on packaging is mandatory for all products placed on the Italian market**, pursuant to **D. Legislative Decree No. 116 of 3 September 2020** transposing EU Directive 2018/851 on waste, and EU Directive 2018/852 on packaging and packaging waste.





ALHA Group, as a company that sells packaging in the B2B (business to business) channel, has adapted to the environmental labeling obligation, favoring digital channels which, in addition to speeding up the updating of information on environmental labels and its transfer to users, contribute to improving the quality of waste collection.

The company includes a website reference on every transport document that accompanies the packaging delivered to the customer.

The following table lists the materials used by the ALHA Group for the packaging of shipped goods, the material they are made of and their numerical identification according to the European Commission Decision 97/129/EC.

PACKAGE	DESCRIPTION	MATERIAL	ABBREVIATION	NUMBERING
	Cardboard corners	Corrugated cardboard	PAP	20
	Wooden pallets	Wood	FOR	50
	Nylon rope	plastic	PL	7
	Wooden case	Wood	FOR	50

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PACKAGE	DESCRIPTION	MATERIAL	ABBREVIATION	NUMBERING
	Film film extensible	Low-density polyethylene density	LDPE	4
	Adhesive tape	Polypropylene	PP	5
	Strapping	Polypropylene	PP	5
	Plastic envelopes	Low-density polyethylene density	LDPE	4