

FLAMMA ESG POLICIES

Environment

1. POL-003.00 Flamma Environmental Policy
2. POL-004.00 Flamma Waste Policy
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Flamma Environmental Policy POL-003.00

Policy n°	POL-003.00	Effective Date	1/10/2024	Revision n°	1
Supersedes	None	Next Review Date	1/10/2026	Issue n°	1
Contact Officer	Alessia Galbiati, Corporate HSE Executive Director				

1. Introduction

1.1. Purpose

At Flamma, our purpose is to "embrace challenges to benefit people's lives, pursuing science with a human touch." This Environmental Policy highlights our commitment to sustainability, reflecting our core values of care, openness, simplicity, and accountability. We strive to promote a culture attentive to the environment, respecting ecosystems, and progressively moving towards a zero-emission business model for the common good.

1.2. Material and Legal Scope

Flamma Group (Flamma) adheres to relevant laws and regulations in the states where operating, including but not limited to:

- EU Water Framework Directive (2000/60/EC): Ensures the protection of water resources.
- EU Waste Framework Directive (2008/98/EC): Governs waste management to protect the environment and human health.
- EU Industrial Emissions Directive (2010/75/EU): Sets out rules to prevent and control pollution from industrial activities.
- Seveso III Directive (2012/18/EU): Focuses on the control of major accident hazards involving dangerous substances.
- EU REACH Regulation (EC 1907/2006): Addresses the production and use of chemical substances and their potential impacts on human health and the environment.
- D.Lgs 152/2006 e s.m.i. Testo Unico Ambientale

This policy covers all aspects of environmental management, including air, water, soil pollution, waste management, energy efficiency, and circular economy practices.

1.3. Applicability

This policy applies to all entities within Flamma, including all our subsidiaries. It covers all employees, contractors, and stakeholders involved in our operations.

1.4. Roles & Responsibilities

- Employees: Responsible for understanding and following this policy.
- Management: Tasked in implementing and ensuring compliance with the policy, providing necessary resources and support.
- HSE Corporate Director: Oversees the policy's implementation, updates, and addresses any questions or concerns related to its content.

2. Material Topics

Our double materiality assessment identifies key areas: pollution, energy and climate change, water, waste, and resource use. In line with our purpose, we are dedicated to minimizing our environmental footprint through proactive and comprehensive management of these areas through proactive and comprehensive management of all environmental aspects of our operations.

2.1. Objectives

- **Reduce Environmental Impact:** Implement practices to reduce emissions to air, water, and soil, enhance energy efficiency and move towards net-zero emissions, focus on minimizing waste, including

solvents, and promoting recycling, reduce water usage and improve efficiency of resource consumption through Circular Economy

- **Promote Sustainability:** Foster sustainable practices across our operations and value chain.
- **Ensure Compliance:** Adhere to all relevant environmental regulations and standards.

2.2. Implementation

- **Pollution Control:** Implement technologies and practices to reduce emissions to air, water, and soil.
- **Resource Efficiency:** Enhance energy efficiency, reduce water usage, and promote the use of sustainable materials.
- **Waste Management:** Increase recycling rates, minimize waste generation, and ensure safe disposal of hazardous waste.
- **Sustainable Innovation:** Invest in R&D and in equipment to develop sustainable products and processes.

2.3. Key Performance Indicators

Metric (KPI)	Description	Owner	Purpose
Training Hours per Employee	Tracks the average number of training hours per employee annually, covering all relevant topics.	HR Department	Monitor and promote continuous learning and development in various fields.
Use of Recycled Materials	Measures the amount of recycled materials used in production.	ESG Department	Promote sustainable resource use through recycling.
Water Usage	Monitors total water consumption across operations.	HSE Department	Ensure sustainable water use practices and reduce consumption.
Waste Generation	Monitors total waste generated by the organization.	HSE Department	Track and minimize waste production.
Emissions of Pollutants	Monitors emissions of key pollutants (e.g., NOx, SOx, PM).	HSE Department	Track and reduce air pollution from industrial activities.

3. Policy, Review, Sanctions and Approval

3.1. Policy Review

This policy will be reviewed every 2 years to ensure it remains relevant and effective. The contact officer will conduct the review and implement necessary updates.

3.2. Sanctions

Non-compliance with this policy may result in disciplinary action in accordance with our Code of Ethics.

3.3. Supporting Documents

- Flamma Purpose and Values
- Flamma Code of Ethics
- Sustainability Policy
- Environmental procedures

3.4. Policy Approval

This policy has been approved by the management of Flamma.

Name	Date	Position	Signature
GianPaolo Negrisoni	22/10/2024	CEO	
GianMarco Negrisoni	22/10/2024	Executive Director, Corporate Development	
Anne-Lise Kopp	22/10/2024	Corporate ESG Director	
Alessia Galbiati	22/10/2024	Executive Corporate HSE Director	

Flamma Waste Policy POL-004.00

Policy n°	POL-004.00	Effective Date	1/10/2024	Revision n°	1
Supersedes	None	Next Review Date	1/10/2026	Issue n°	1
Contact Officer	Alessia Galbiati, Corporate HSE Executive Director				

4. Introduction

4.1. Purpose

At Flamma, we strive to embrace challenges that benefit people's lives, always pursuing science with a human touch. This Waste Management Policy reflects our dedication to sustainability and our commitment to integrating eco-friendly practices into our operations. Our core values of care, openness, simplicity, and accountability guide us in minimizing waste and promoting a circular economy

4.2. Material and Legal Scope

We adhere to relevant EU laws and regulations, including:

- EU Waste Framework Directive (2008/98/EC): Governing waste management to protect the environment and human health.
- EU Industrial Emissions Directive (2010/75/EU): Setting rules to prevent and control pollution from industrial activities.
- EU REACH Regulation (EC 1907/2006): Addressing the production and use of chemical substances and their potential impacts.
- D.Lgs 152/2006 Testo Unico ambientale
- Delibera 105/21 Linee guida per la classificazione dei rifiuti

This policy covers all aspects of waste management, including reduction, recycling, and disposal

4.3. Applicability

This policy applies to all entities within Flamma Group (Flamma), including all our subsidiaries. It covers all employees, contractors, and stakeholders involved in our operations.

4.4. Roles & Responsibilities

- Employees: Understand and follow this policy.
- Management: Implement and ensure compliance, providing necessary resources and support.
- Executive HSE Corporate Director: Oversee implementation, updates, and address questions or concerns related to the policy

5. Material Topics

We are committed to sustainable waste management to minimize our environmental impact.

5.1. Objectives

- Reduce Waste: Implement practices to minimize waste generation in operations.
- Enhance Recycling: Increase recycling rates and promote the use of recycled materials.
- Ensure Safe Disposal: Ensure the safe disposal of hazardous waste in compliance with regulations.

5.2. Implementation

- Conduct regular waste audits to identify reduction opportunities.
- Implement waste segregation systems to enhance recycling.
- Partner with waste management companies to ensure safe disposal of hazardous materials.
- Educate employees on waste reduction and recycling practices.

- Investigate potential suppliers that can recover and revalue waste

5.3. Key Performance Indicators

Metric (KPI)	Description	Owner	Purpose
Waste Generation	Monitors total waste generated by the organization.	HSE Department	Track and minimize waste production.
Recycling Rates	Measures the percentage of waste recycled across operations.	HSE Department	Improve recycling rates and reduce landfill waste.
Hazardous Waste Disposal Compliance	Ensures hazardous waste is disposed of safely and in compliance.	HSE Department	Prevent environmental contamination through safe disposal.

6. Policy, Review, Sanctions and Approval

6.1. Policy Review

This policy will be reviewed every 2 years to ensure it remains relevant and effective. The contact officer will conduct the review and implement necessary updates.

6.2. Sanctions

Non-compliance with this policy may result in disciplinary action in accordance with our Code of Ethics.

6.3. Supporting Documents

- Flamma Purpose and Values
- Flamma Code of Ethics
- Flamma Environment Policy
- Flamma SOP

6.4. Policy Approval

This policy has been approved by the management of [company name].

Name	Date	Position	Signature
GianPaolo Negrisoni	22/10/2024	CEO	
GianMarco Negrisoni	22/10/2024	Executive Director, Corporate Development	
Anne-Lise Kopp	22/10/2024	Corporate ESG Director	
Alessia Galbiati	22/10/2024	Executive Corporate HSE Director	

Flamma Water Stewardship Policy POL-005.00

Policy n°	POL-005.00	Effective Date	1/10/2024	Revision n°	1
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Contact Officer	Alessia Galbiati, Corporate HSE Executive Director				

7. Introduction

7.1. Purpose

At Flamma, we embrace challenges to benefit people's lives, pursuing science with a human touch. This commitment extends to our water stewardship practices, ensuring sustainable water use and conservation. Reflecting our core values of care, openness, simplicity, and accountability, this policy outlines our approach to responsible water management and our commitment to promoting an internal culture attentive to the environment, respecting ecosystems, and evolving towards a zero-emission business model for the common good

7.2. Material and Legal Scope

Flamma Group (Flamma) adheres to relevant laws and regulations, including the EU Water Framework Directive, and other applicable ESG guidelines. This policy covers all aspects of water use, including sourcing, consumption, treatment, and discharge.

7.3. Applicability

This policy applies to all entities within Flamma, including all our subsidiaries. It covers all full-time and part-time employees, interns, contractors, and subcontractors across all locations.

7.4. Roles & Responsibilities

- Employees: Understand and follow this policy.
- Management: Implement and ensure compliance, providing necessary resources and support.
- HSE Executive Director: Oversee implementation, updates, and address questions or concerns related to the policy

8. Material Topics

Flamma is committed to sustainable water management to minimize environmental impact and promote water conservation. We strive to continually improve our performance in water stewardship through innovative practices and technologies.

8.1. Objectives

- Reduce Water Consumption: Implement practices to minimize water use in operations.
- Enhance Water Quality: Ensure discharged water quality meets regulatory standards.
- Promote Water Conservation: Encourage water-saving practices among employees and in the supply chain.

8.2. Implementation

- Conduct regular water diagnosis.
- Upgrade water treatment systems.
- Launch water conservation awareness initiative.

8.3. Key Performance Indicators

Metric (KPI)	Description	Owner	Purpose
Water Usage	Monitors total water consumption across operations.	HSE Department	Ensure sustainable water use practices and reduce consumption.
Water Quality	Ensures that water discharged meets regulatory standards.	HSE Department	Ensure compliance with water discharge standards.
Water Conservation Initiatives	Tracks and promotes internal and external water conservation efforts.	HSE Department	Promote water-saving practices internally and among suppliers.

9. Policy, Review, Sanctions and Approval

9.1. Policy Review

This policy will be reviewed every 2 years to ensure it remains relevant and effective. The contact officer will conduct the review and implement necessary updates.

9.2. Sanctions

Non-compliance with this policy may result in disciplinary action in accordance with our Code of Ethics.

9.3. Supporting Documents

- Flamma Purpose and Values
- Flamma Code of Ethics
- Flamma Environment Policy
- Specific SOP

9.4. Policy Approval

This policy has been approved by the management of Flamma.

Name	Date	Position	Signature
GianPaolo Negrisoni	22/10/2024	CEO	
GianMarco Negrisoni	22/10/2024	Executive Director, Corporate Development	
Anne-Lise Kopp	22/10/2024	Corporate ESG Director	
Alessia Galbiati	22/10/2024	Executive Corporate HSE Director	



Flamma Energy Management and Climate Change Policy POL-006.00

Policy n°	POL-006.00	Effective Date	1/10/2024	Revision n°	1
Supersedes	None	Next Review Date	1/10/2025	Issue n°	1
Contact Officer	Anne-Lise Kopp, Corporate ESG Director				

10. Introduction

10.1. Purpose

At Flamma, our purpose is to "embrace challenges to benefit people's lives, pursuing science with a human touch." This policy reflects our dedication to efficient and sustainable energy use and climate change mitigation, aligning with our core values of care, openness, simplicity, and accountability. We are committed to fostering a culture that respects the environment and moves towards a zero-emission business model for the common good.

10.2. Material and Legal Scope

Flamma Group (Flamma) adheres to relevant EU laws and regulations, including but not limited to:

- EU Renewable Energy Directive (2009/28/EC): Promotes the use of energy from renewable sources.
- EU Energy Efficiency Directive (2012/27/EU): Aims to improve energy efficiency by 20% by 2020 and more by 2030.
- Paris Agreement: A global framework to avoid dangerous climate change by limiting global warming to well below 2°C.

This policy covers all aspects of energy management and climate change mitigation and adaptation practices across our operations.

10.3. Applicability

This policy applies to all entities within Flamma, including all our subsidiaries. It covers all full-time and part-time employees, interns, contractors, and subcontractors across all locations.

10.4. Roles & Responsibilities

- Employees: Responsible for understanding and following this policy.
- Management: Ensures implementation and compliance, providing necessary resources and support.
- ESG Director: Oversees the policy's implementation, updates, and addresses any questions or concerns related to its content.

11. Material Topics

Flamma is committed to responsible energy management and climate change mitigation. We recognize the critical importance of improving our energy efficiency, increasing the use of renewable energy, and promoting energy conservation practices. Our efforts contribute to reducing our carbon footprint and aligning with global sustainability goals.

11.1. Objectives

- Improve Energy Efficiency: Implement practices to reduce energy consumption and enhance efficiency.
- Increase Use of Renewable Energy: Transition to renewable energy sources to reduce our carbon footprint.
- Promote Energy Conservation: Encourage energy-saving practices among employees and in our supply chain.
- Reduce GHG Emissions: Aim to reduce greenhouse gas emissions across all scopes (1, 2, and 3).

11.2. Measures

- Conduct regular energy audits to identify areas for efficiency improvements.
- Develop a roadmap for transitioning to renewable energy sources.
- Launch energy conservation awareness campaigns and training programs for employees.
- Collaborate with major suppliers to promote energy-saving practices throughout the supply chain
- Implement energy-saving technologies and practices

11.3. Key Performance Indicators

Metric (KPI)	Description	Owner	Purpose
Carbon Footprint (Scope 1, 2, 3)	Measures Scope 1, 2, and 3 greenhouse gas emissions.	ESG Department	Reduce overall carbon footprint through emissions tracking.
Energy Efficiency	Measures improvements in energy efficiency and reductions in energy consumption.	ESG Department	Improve energy efficiency and move towards net-zero emissions.
Renewable Energy Usage	Tracks the percentage of purchased electricity derived from renewable sources.	ESG Department	Increase renewable energy usage to reduce carbon emissions.
Energy Audits	Monitors the number of energy audits conducted.	ESG Department	Ensure compliance with energy-saving practices and identify areas for improvement.
Employee Training Sessions	Tracks the number of energy conservation training sessions conducted.	ESG Department	Promote awareness and skills development on energy conservation.
Supplier Engagement in Energy Saving	Monitors the number of major suppliers engaged in energy-saving practices.	ESG Department	Collaborate with suppliers to reduce energy consumption.

12. Policy, Review, Sanctions and Approval

12.1. Policy Review

This policy will be reviewed annually to ensure it remains relevant and effective. The contact officer will conduct the review and implement necessary updates.

12.2. Sanctions

Non-compliance with this policy may result in disciplinary action in accordance with our Code of Ethics.

12.3. Supporting Documents

- Flamma Purpose and Values
- Flamma Code of Ethics
- Flamma Sustainability Policy

12.4. Policy Approval

This policy has been approved by the management of Flamma.

Name	Date	Position	Signature
GianPaolo Negrisoni	22/10/2024	CEO	
GianMarco Negrisoni	22/10/2024	Executive Director, Corporate Development	
Anne-Lise Kopp	22/10/2024	Corporate ESG Director	
Alessia Galbiati	22/10/2024	Executive Corporate HSE Director	

Flamma Circular Economy Policy POL-007.00

Policy n°	POL-007.00	Effective Date	1/10/2024	Revision n°	1
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Contact Officer	Anne-Lise Kopp, Corporate ESG Director				

13. Introduction

13.1. Purpose

At Flamma, our purpose is to "embrace challenges to benefit people's lives, pursuing science with a human touch." This Circular Economy Policy underscores our commitment to maintaining the value of products, materials, and resources for as long as possible, enhancing their efficient use, and minimizing waste. This approach is part of our broader commitment to promoting a culture that respects the environment, in line with our goal of transitioning to a zero-emission economy.

13.2. Material and Legal Scope

This policy adheres to relevant EU directives, including the EU Circular Economy Action Plan and Directive 2008/98/EC (Waste Framework Directive). It covers all aspects of resource use, including renewable and non-renewable resources, and aims to decouple economic growth from material use.

13.3. Applicability

This policy applies to all entities within Flamma Group (Flamma), including all our subsidiaries. It covers all full-time and part-time employees, interns, contractors, and subcontractors across all locations.

13.4. Roles & Responsibilities

- Employees: Responsible for understanding and following this policy.
- Management: Ensures implementation and compliance, providing necessary resources and support.
- ESG Director: Oversees the policy's implementation, updates, and addresses any questions or concerns related to its content.

14. Material Topics

Flamma is committed to transitioning from a linear to a circular economic model. This involves reducing resource consumption, increasing the use of secondary materials, and promoting sustainable product design. Progress includes increased recycling rates and the development of circular business practices. This policy complements our waste management efforts and reinforces our commitment to sustainability

14.1. Objectives

- Increase Resource Efficiency: Optimize the use of materials and resources.
- Enhance Circular Product Design: Promote the durability, reparability, and recyclability of products and all resources used for production cycle
- Promote Sustainable Sourcing: Use renewable resources sustainably and increase the use of recycled materials.

14.2. Measures

- Conduct material flow analyses to identify areas for improvement.
- Implement eco-design principles to enhance product durability and recyclability.
- Increase the use of secondary raw materials in production.
- Establish take-back and recycling programs for end-of-life goods used by the company
- Collaborate with suppliers and stakeholders to promote circular economy practices.

14.3.

Key Performance Indicators

Metric (KPI)	Description	Owner	Purpose
Use of Recycled Materials	Measures the amount of recycled materials used in production.	ESG Department	Promote sustainable resource use through recycling.
Sustainable Sourcing	Monitors the total weight of secondary reused materials.	ESG Department	Promote the use of secondary materials in production.

Policy, Review, Sanctions and Approval

14.4.

Policy Review

This policy will be reviewed annually to ensure it remains relevant and effective. The contact officer will conduct the review and implement necessary updates.

14.5.

Sanctions

Non-compliance with this policy may result in disciplinary action in accordance with our Code of Ethics.

14.6.

Supporting Documents

- Flamma Purpose and Values
- Flamma Code of Ethics
- Flamma Sustainability Policy

14.7.

Policy Approval

This policy has been approved by the management of Flamma.

Name	Date	Position	Signature
GianPaolo Negrisoli	22/10/2024	CEO	
GianMarco Negrisoli	22/10/2024	Executive Director, Corporate Development	
Anne-Lise Kopp	22/10/2024	Corporate ESG Director	
Alessia Galbiati	22/10/2024	Executive Corporate HSE Director	

Flamma Pollution Policy POL-008.00

Policy n°	POL-008.00	Effective Date	1/10/2024	Revision n°	1
Supersedes	None	Next Review Date	1/10/2025	Issue n°	1
Contact Officer	Alessia Galbiati, Corporate HSE Executive Director				

15. Introduction

15.1. Purpose

At Flamma, we're dedicated to embracing challenges that benefit people's lives, all while pursuing science with a human touch. This commitment drives our focus on reducing environmental impact through comprehensive pollution management. Our Pollution Policy reflects our core values of care, openness, simplicity, and accountability, and aligns with the EU Action Plan "Towards a Zero Pollution for Air, Water and Soil".

15.2. Material and Legal Scope

We adhere to relevant EU laws and regulations to ensure our pollution management practices are robust and effective. This includes:

- EU Water Framework Directive (2000/60/EC): Ensures the protection of water resources.
- EU Waste Framework Directive (2008/98/EC): Governs waste management to protect the environment and human health.
- EU Industrial Emissions Directive (2010/75/EU): Sets out rules to prevent and control pollution from industrial activities.
- Seveso III Directive (2012/18/EU): Focuses on the control of major accident hazards involving dangerous substances.
- EU REACH Regulation (EC 1907/2006): Addresses the production and use of chemical substances and their potential impacts.

15.3. Applicability

This policy applies to all entities within Flamma Group (Flamma), including all our subsidiaries. It covers all employees, contractors, and stakeholders involved in our operations across all locations.

15.4. Roles & Responsibilities

- Employees: Understand and comply with pollution management practices.
- Management: Implement and ensure adherence to pollution control measures.
- HSE Director: Oversee the implementation and continuous improvement of this policy.

16. Material Topics

We are committed to minimizing our environmental footprint by actively managing pollution in all its forms.

16.1. Objectives

- Air Pollution Management: We aim to reduce emissions and improve air quality.
- Water Pollution Management: We focus on preventing contamination and improving water quality.
- Soil Pollution Management: Our goal is to prevent soil contamination and promote soil health.
- Management of Substances of Concern: We aim to reduce the use and impact of hazardous substances.
- Pollution related policies: Disclosure of whether and how policy addresses avoiding incidents and emergency situations, and if and when they occur, controlling and limiting their impact on people and environment

16.2. Measures

- Air Quality Controls: Implementing technologies and processes to reduce air emissions.
- Water Treatment: Utilizing advanced treatment methods to ensure water discharges meet regulatory standards.
- Soil Protection: Adopting practices to prevent soil contamination.
- Substance Management: Phasing out substances of very high concern and minimizing the use of hazardous materials
- Avoid / Reduce / Restore

16.3. Key Performance Indicators

Metric (KPI)	Description	Owner	Purpose
Water Quality	Ensures that water discharged meets regulatory standards.	HSE Department	Ensure compliance with water discharge standards.
Emissions of Pollutants	Monitors emissions of key pollutants (e.g., NOx, SOx, PM).	HSE Department	Track and reduce air pollution from industrial activities.
Water Pollution	Monitors the quality of water discharges (e.g., BOD, COD).	HSE Department	Ensure compliance with water quality standards.
Soil Pollution	Monitors contaminant levels in soil.	HSE Department	Prevent soil contamination and promote soil health.
Substances of Concern	Tracks the usage and substitution rate of hazardous substances.	HSE Department	Reduce hazardous substances and promote safer alternatives.

17. Policy, Review, Sanctions and Approval

17.1. Policy Review

An annual review will be carried out by the DPO to ensure the continued validity and accuracy of this policy. Goals and measures will be revised closely, particularly if significant changes occur in Flamma's operations.

17.2. Sanctions

Non-compliance with this policy may result in disciplinary action in accordance with our Code of Ethics.

17.3. Supporting Documents

- Flamma Purpose and Values
- Flamma Code of Ethics
- Sustainability Policy
- Sustainability Procedures

17.4. Policy Approval

This policy has been approved by the management of Flamma.

Name	Date	Position	Signature
GianPaolo Negrisoni	22/10/2024	CEO	
GianMarco Negrisoni	22/10/2024	Executive Director, Corporate Development	
Anne-Lise Kopp	22/10/2024	Corporate ESG Director	
Alessia Galbiati	22/10/2024	Executive Corporate HSE Director	