



INTEGRATED MANAGEMENT SYSTEMS POLICY

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50001)

Rev.	Description	Approved
00	Issue	Approved by the Board of Directors on 24/06/25
01	Revision for compliance to ISO 50001	Approved by the Board of Directors on 07/09/26

Lumson S.p.A., a leading company in the design and production of Primary cosmetic Packaging, adopts an integrated approach that combines ethical, technical and organisational principles and sees the quality of its products and services, protection of the environment and of the health and safety of workers and ethical integrity as essential in all areas of activity. This policy hinges on an Integrated management system in line with the main international standards, which is the tool used to ensure continuous improvement of its corporate, environmental, safety and behavioural performance.

Quality is at the basis of a relationship of trust with customers and partners. Lumson S.p.A. works to provide packaging solutions that meet all needs concerning design, functionality, innovation, reliability and compliance with the contractual terms. The company's Quality System, **ISO 9001** certified, is founded on customer centricity and a constant attention to improving processes. The work of collaborators, enhanced through continuous training, is considered strategic to increase customer satisfaction and consolidate Lumson's position in national and international markets.

Lumson S.p.A. acts in compliance with the Good Manufacturing Practices (GMP) and integrates the principles of the Code of Ethics into its activity, as the Code is an integral part of the corporate culture. Strict compliance with the Code principles goes hand in hand, of course, with the obligation for all Recipients to conform their behaviour to all applicable laws and regulations.

Workplace health and safety are non-negotiable priorities. Lumson S.p.A. undertakes to ensure safe and healthy working conditions, preventing professional injuries and illnesses through risk assessment and the systematic application of preventive and protective measures. Active involvement of the staff and their representatives is strongly encouraged in all safety-related activities, with a view to collaboration and continuous improvement.

All corporate processes are managed consistently with the Workplace Health and Safety Management System, **ISO 45001** certified, as we are aware that each person in the company has a key role in promoting a healthy and responsible working environment. Moreover, Lumson S.p.A. acts in compliance with the applicable legislation on health and safety, as well as in accordance with the guiding principles laid down in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, including freedom of association, elimination of forced and child labour, non-discrimination and protection of safety at the workplace.

Lumson S.p.A. acknowledges the protection of the environment as a strategic commitment and a shared responsibility. The Environmental Management System, **ISO 14001** certified and applying to all offices of the company, is an integral part of the industrial strategy, aimed at progressively reducing the environmental impacts associated to the production activities and at mitigating and adjusting to climate change. Environmental management extends throughout the product lifecycle, with a particular focus on efficient use of resources, waste minimisation and prevention of pollution. Environmental objectives are defined in a measurable way, regularly reviewed and shared at all organisational levels.

Lumson S.p.A. recognizes energy as a strategic resource and considers its efficient use a key factor for business competitiveness and environmental sustainability. Through **ISO 50001** Energy Management System, the Company promotes the continuous improvement of energy performance, with a strong focus on energy efficiency and the decarbonization of consumption through the systematic planning, monitoring, and analysis of its energy needs.

Lumson S.p.A. is committed to ensuring the availability of the information, expertise, and resources necessary to achieve its defined energy objectives and targets, prioritizing the adoption of high-efficiency technologies and the increased use of renewable energy sources. Particular attention is devoted to the identification and management of Significant Energy Uses (SEUs), as well as to the definition and monitoring of Energy Performance Indicators (EnPIs) that are consistent with the Company's activities, products, and services. This

approach supports data-driven decision-making and fosters the continuous improvement of energy performance. Lumson S.p.A. is aware of the negative effects of corruptive practices on the economic and social development in the context in which it operates and it adopts a strict approach of absolute prohibition of any form of corruption. As well as a legal obligation, the prevention of corruptive practices is therefore one of the principles on which the company's actions are based.

As a practical expression of its commitment in this matter, Lumson S.p.A. has adopted, in addition to this policy, a Code of Ethics that defines the values and principles on which our business is built, and with which it commits to comply in pursuing its mission; a Management System for the Prevention of Corruption in accordance with **ISO 37001** and the Organisation and Management Model under Italian Legislative Decree 231/2001.

Accordingly, Lumson S.p.A., punishes any corruptive behaviour, demands compliance with the law and undertakes to adopt and ensure compliance with the Management System for the Prevention of Corruption, also in order to improve awareness of all interested Parties regarding the rules and the behaviour to be maintained. All activities must be characterised by transparency, fairness, loyalty and compliance with the law. No one acting on behalf of Lumson S.p.A. is allowed to accept, offer or promise undue benefits or personal advantages, whether direct or indirect. A whistleblowing system is in place, which allows reporting suspected breaches in a protected and confidential manner, so as to ensure the confidentiality of the whistleblower's identity and protect the same against any form of retaliation.

Lumson S.p.A. undertakes to constantly improve its Management System for the Prevention of Corruption and ensures its binding nature, through the responsibilities assigned to the department and made known to all the company staff, and its independence, by excluding the involvement in the activities of the Conformity Department for the prevention of corruption identified as at risk.

In a global scenario, where cyberthreats are increasingly sophisticated and legal requirements grow exponentially, Lumson S.p.A. undertakes to integrate the Information Safety Management System, **ISO 27001** certified and applying to all the company offices, as an industrial strategy and a cornerstone for the organisation's resilience. Therefore, integration of cybersecurity in the corporate processes is today an essential prerequisite to ensure operational continuity, protect the business value and respond to the increasing expectations concerning environmental, social and governance responsibilities (ESG).

In this context, Lumson S.p.A. has initiated a structured process of reinforcement of its cybersecurity measures. This process is based on a systemic approach that includes risk analysis, operational continuity management, access control and protection of information, incident monitoring and management, awareness, training and technological evolution.

For all ESG areas, Lumson S.p.A. has defined and formalised medium-term objectives in the Sustainability Plan. Lumson S.p.A. undertakes to annually publish the results achieved in the Sustainability Report. These objectives are pursued through direct involvement of staff, use of innovative technologies and strict compliance with applicable legislation. Both documents are available on the company's [website](#).

The Senior Management of Lumson S.p.A. undertakes to support the implementation and continuous improvement of the Integrated Management System. It takes efforts to ensure that this Policy is understood and implemented by all staff, also through specific training, the effectiveness of which will be assessed by means of internal audits and possibly by external parties. To ensure maximum diffusion of the Policy, the same is posted on the company's bulleting boards, published on the intranet and on the [company's website](#), so that it is also accessible to all interested Parties.

The Policy will be regularly reviewed to ensure that it is adjusted to regulatory development, corporate needs and expectations of the interested parties. The Top Management oversees the application of the principles expressed and fosters a corporate culture based on accountability, ethics and continuous improvement.