



Environmental, Social, Governance (ESG) Policy

Status of Changes

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1. INTRODUCTION

1.1. *Purpose and scope of application*

The Board of Directors firmly believes to high Environmental, Social, and Governance (ESG) standards represents a value for the company and all its stakeholders, with its ESG Policy Lumson intends to establish commitments and strategies aimed at positively and innovatively contributing to environmental, social, and economic progress across operational activities and business relationships of the Society.

The ESG Policy applies to all employees, collaborators, suppliers, and business partners of Lumson S.p.A. who also act as operator of its subsidiaries Lumson France S.a.S., Lumson USA Corp., Lumson Iberia S.L., and Lumson Deutschland GmbH (hereinafter also referred to as “Lumson” or “Group”), without any exceptions and/or exclusions in the conduct of business and professional activities, regardless of geographic area, country of operation, and/or stakeholder groups involved.

In addition, Lumson is committed to promoting the adoption of the principles outlined in this Policy throughout the entire value chain, encouraging all partners and collaborators to adhere to the same standards of responsibility and conduct.

1.2. *Reference standards and regulations*

In defining its ESG Policy, Lumson was inspired by the principles outlined in the main internationally recognized frameworks, including, but not limited to:

- The United Nations 2030 Agenda and the Sustainable Development Goals (SDGs);
- The Ten Principles of the United Nations Global Compact;
- The United Nations Guiding Principles on Business and Human Rights;
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct;
- The Conventions of the International Labour Organization (ILO);
- The United Nations Convention against Corruption (UNCAC);
- The Corporate Sustainability Reporting Directive (CSRD);
- The United Nations Women’s Empowerment Principles (WEPs);
- The ISO 45001 standard for a certified occupational health and safety management system;
- The ISO 14001 standard for a certified environmental management system;
- The ISO 9001 standard for a certified quality management system;
- The ISO 37001 standard for a certified anti-bribery management system;
- The ISO 27001 standard for a certified Information security management system;
- The ISO 50001 standard for a certified energy management system

1.3. *Governance, roles and responsibilities*

Lumson’s ESG strategy is defined and overseen by the Board of Directors in collaboration with the Sustainability Committee, which ensures its implementation at all operational levels. The Committee, composed of two to five members selected from among Lumson’s directors, employees, and collaborators with appropriate expertise for the tasks assigned, has preparatory, advisory, and consultative functions for the Board of Directors in relation to processes, initiatives, and activities carried out by the Group in its efforts to promote and implement sustainable development.

Alongside the Sustainability Committee, the Sustainability & ESG function plays a key role in managing operational aspects and ensuring the Group’s compliance with ESG-related regulations. This function is responsible for coordinating sustainability initiatives and reporting, fostering effective communication among departments, and working closely with Top Management and Department Heads.

The Board of Directors of Lumson is responsible for the approval, implementation, and periodic review of this Policy, with the support of the Group’s Sustainability & ESG function and the relevant departments designated to ensure its effective application.

2. GOVERNANCE

2.1. *Business ethics and anti-corruption*

Lumson conducts its business in accordance with the highest standards of integrity, transparency, and ethical behavior. The Group promotes a culture of "zero tolerance" toward any form of unlawful conduct, including corruption.

Specifically, through the adoption of the Group's *Code of Ethics*, *Anti-Corruption Policy*, and *Whistleblowing Policy*, as well as through the implementation of the *Organizational, Management and Control Model pursuant to Legislative Decree 231/01*, and the Anti-Bribery Management System in compliance with UNI ISO 37001 by Lumson S.p.A., the Group is committed to:

- Ensuring ethical business conduct in all operations and business relationships, acting according to principles of fairness and transparency in the conduct of commercial negotiations;
- Acting in full compliance with applicable laws in all jurisdictions where the Group operates, diligently acquiring the necessary knowledge of applicable regulations and standards in carrying out its activities;
- Condemning any form of corruption, in line with the United Nations Convention against Corruption (UNCAC) and the OECD Guidelines for Multinational Enterprises;
- Maintaining integrity, transparency, and legality in all interactions with public administrations, regulatory authorities, international organizations, and other similar bodies, both nationally and internationally;
- Ensuring the presence of an effective whistleblowing system, which protects the anonymity and confidentiality of whistleblowers and guarantees timely, impartial handling of reports in full compliance with applicable legislation.

2.2. *Supplier relationship management*

Lumson aims to build and maintain strong, transparent relationships with its suppliers, whom it recognizes as key players in conducting its business activities according to environmental, social, and governance (ESG) sustainability criteria. Suppliers are required to adhere to the principles outlined in Lumson's *Code of Ethics* and to comply with the provisions set forth in its *Purchasing Policy*, which governs the Group's relationships with its business partners.

With regards to its supplier relationships, Lumson is committed to:

- Ensuring compliance with contractual terms established during negotiations, including payment conditions;
- Adopting principles of honesty, fairness, transparency, and non-discrimination in all commercial dealings;
- Carefully selecting suppliers based on their performance in terms of product safety and quality, environmental impact, and social responsibility, as well as compliance with applicable laws and regulations;
- Ensuring and promoting respect for human rights, as defined by the United Nations Global Compact and the ILO core labour standards, throughout the entire Group supply chain;
- Not tolerating any form of child labour, forced or compulsory labour, human trafficking for slavery or sexual exploitation, corruption, extortion, or embezzlement throughout the supply chain;
- Carrying out assessments and monitoring of suppliers' environmental and social performance, particularly regarding their commitments to energy and climate change, waste management and circular economy, working conditions, and human rights — including third-party audits.

3. ENVIRONMENT

3.1. *Energy and climate change*

Lumson recognizes the fight against climate change and the responsible management of energy as key elements for sustainable development. In a context of growing environmental challenges and increasing awareness among stakeholders, Lumson is committed to adopting solutions that promote the reduction of climate change impacts throughout the entire value chain.

The provisions set out in the Lumson's *Integrated Management Systems Policy*, in the ISO 14001 certified management system and in the ISO 50001 are strengthened and integrated with the following commitments in the fight against climate change:

- Ensure and promote compliance with national and international regulations, applicable in the jurisdictions where the Group operates, governing energy use and greenhouse gas (GHG) emissions;
- Implement investments aimed at sourcing and internally producing energy from renewable sources;
- Optimize the use of resources through energy planning and the implementation of efficiency initiatives;
- Measure and monitor performance indicators related to GHG emissions, in both the Group's own operations and across the value chain, in order to guide improvement actions;
- Limit GHG emissions by setting reduction targets and identifying key decarbonization levers;
- Evaluate the Group's performance through sustainability ratings, ensuring accountability and commitment regarding climate-related impacts;
- Guide the planning and construction of new plants, as well as the management and maintenance of existing ones, according to climate adaptation principles.

3.2. *Resources, waste and circular economy*

Lumson is committed to integrating the principles of the circular economy into product design and its production processes, to contribute to environmental sustainability, optimize resource use, and reduce waste. The adoption of these principles not only promotes responsible production, but also strengthens Lumson's competitiveness, supporting long-term revenue growth and enhancing its reputation.

The provisions outlined in Lumson's *Integrated Management Systems Policy* and its ISO 14001-certified management system are reinforced and complemented by the following commitments concerning resources' responsible management and circular economy:

- Progressively replace virgin raw materials with recycled secondary raw materials in product manufacturing, where applicable and in compliance with current product safety regulations;
- Optimize and streamline the product portfolio, progressively integrating more recyclable materials and adopting a strategy focused on monomaterial solutions;
- Incorporate end-of-life considerations during the product design phase, investing in research, innovation, and circular solutions—such as refillable products and separable components—to encourage reuse, recovery, and recycling practices;
- Adopt sustainable sourcing and consumption criteria for renewable raw materials used in products and secondary packaging;
- Promote the adoption of responsible circular economy policies across the entire value chain, through the establishment of partnerships and collaborations within the packaging and cosmetics industries;
- Align activities and decision-making processes with emerging circular economy regulations, proactively using such regulations as a tool for monitoring and continuous improvement;
- Ensure continuous monitoring and full compliance with current waste management and disposal regulations;
- Minimize the amount of hazardous waste, while ensuring its responsible management in accordance with applicable laws;
- Reduce the volume of waste sent to disposal, through proper separation of waste streams and by promoting the recovery and recycling of industrial scraps.

4. SOCIAL

4.1. *Own workforce*

Lumson recognizes that human capital development and social responsibility are fundamental pillars of its corporate culture. In this regard, the Group is committed to creating conditions that foster personal and professional growth, ensure equal opportunities, and promote a safe, inclusive, and stimulating work environment, in full respect of the fundamental rights of every individual. This commitment is realized through Lumson's *Code of Ethics*, *Human Rights Policy*, *Human Resources Policy*, *Anti-Harassment Policy*, *Pay Transparency Policy*, Lumson's *Integrated Management Systems Policy*, and ISO 45001-certified occupational health and safety management system.

The provisions set forth in the aforementioned policies are reinforced and complemented by the following commitments pursued by Lumson:

- Ensure secure employment, appropriate working hours, and competitive compensation through the application of national labor contracts and remuneration policies that promote both economic and professional satisfaction for employees;
- Protect and uphold the freedom of association, encouraging dialogue with labor unions and ensuring rights to information, consultation, and participation;
- Provide and ensure a healthy and safe working environment through the adoption of procedures and management systems aimed at preventing and minimizing injuries and occupational illnesses, as well as promoting a workplace culture rooted in health and safety;
- Respect and promote human rights in accordance with the principles established by the United Nations Global Compact and the ILO core labour standards, including the prohibition of child labor, forced or compulsory labor, and human trafficking in all companies within the Group;
- Combat all forms of discrimination and harassment based on race and ethnic origin, skin color, sex, sexual orientation, gender identity, disability, age, religion, political opinions, national ancestry or social background, as well as any other form of discrimination prohibited under EU, national, and international law;
- Promote and ensure pay equity and the absence of favoritism based on gender or any other form of diversity or minority status;
- Provide communication channels that allow for the reporting of any violations of the above principles, ensuring whistleblower anonymity and the implementation of appropriate remedial actions;
- Apply merit- and competence-based criteria in employment relations, promoting continuous learning through personalized training paths focused on technical, personal, and relational development. Conduct performance evaluations to define new objectives, plan training, and manage pay and career advancement fairly;
- Foster a company culture centered on innovation, encouraging a proactive approach to change, creative thinking, and the development of new ideas, while supporting the contribution of human capital to decision-making processes.

4.2. *Community and society*

Local communities play a key role in Lumson's activities and in its relationship with society at large. As part of its commitment to sustainable development, Lumson strives to build and maintain strong relationships with local communities, with the aim of positively contributing to their development and protection.

Specifically, with regards to local communities and society in general, Lumson is committed to:

- Promoting the respect of human rights in the communities where the Group's companies operate, in accordance with the principles set forth by the United Nations Global Compact, the United Nations Charter of Human Rights, the Charter of Fundamental Rights of the European Union, and the OECD Guidelines for Multinational Enterprises;
- Contributing to the growth and protection of local communities by establishing collaborations with public bodies, local institutions, and other relevant stakeholders;
- Implementing social and humanitarian charitable initiatives for the benefit of the community;
- Fostering dialogue with affected communities and their representatives and ensuring the presence of communication channels that allow for the collection of feedback or concerns, as well as the management of any remediation actions.

4.3. *End users*

Lumson places the highest priority on the quality and safety of its products, operating in full compliance with cosmetic packaging regulations and adopting advanced control systems that ensure high standards without compromising design, functionality, or aesthetics. The Group attaches great importance to the protection and satisfaction of the end user at every stage of the process, from design and production to the distribution of the finished product, ensuring full adherence to the highest standards of quality and safety.

Through the adoption of the Lumson's *Integrated Management Systems Policy* and the operational procedures established for the implementation of the ISO 9001-certified management system and for the protection of the end user, Lumson is committed to:

- Ensuring compliance with local and international regulations on product safety, by adopting dedicated procedures and conducting appropriate controls;

- Effectively and promptly managing customer reports, implementing corrective actions to resolve them and to prevent or limit recurrence;
- Communicating product information clearly and transparently, providing client companies with complete and timely information regarding products' technical and safety characteristics;
- Ensuring respect for end users human rights, as defined by the United Nations Global Compact, the United Nations Charter of Human Rights, the Charter of Fundamental Rights of the European Union, and the OECD Guidelines for Multinational Enterprises;
- Listening to the needs of end users through dialogue with client companies, monitoring customer satisfaction, and addressing any complaints.

POLICY COMMUNICATION AND MONITORING OF PROGRESS

The Lumson Group's ESG Policy is shared with all the Group's stakeholders and is publicly available on the [company's website](#). Lumson is moreover committed to training its employees and encourages all collaborators to disseminate the Policy's contents, promoting awareness and proper adherence throughout the organization.

The Group's ESG Sustainability function, supported by the departments responsible for each area covered by this Policy, is tasked with overseeing its implementation, ensuring that all Lumson operations align with the stated principles, and reporting any non-compliance to the Sustainability Committee and the Board of Directors.

As part of its commitment to continuous improvement, the Group pledges to implement robust monitoring systems and conduct regular audits and due diligence processes to prevent, identify, and address any non-compliance with the ESG Policy.

To facilitate the reporting of potential violations without fear of retaliation and to promote shared responsibility on ESG matters, the Group provides a secure and confidential reporting mechanism for both internal and external stakeholders, available on the [company website](#). In the event of non-compliance, the Group is committed to promptly and effectively implementing the necessary corrective actions.

UPDATES AND REVIEW

This ESG Policy is subject to periodic reviews and updates to ensure its adequacy and effective implementation in line with the evolution of international standards and regulatory requirements. All updates shall be submitted for approval by the Board of Directors to ensure alignment of the Policy with the core principles and strategic vision of Lumson.