



2024

Sustainability Report

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Summary data

Business Model

		2024	2023
	Revenues - Million euros	142,51	135,46
	Raw material used (t)	75.717	70.732

Environment	2024	2023
Policy for Quality, Hygiene, Environment, Safety		
Environmental management system UNI ISO 14001:2015		
Environmental management system EMAS Regulation		
Environmental sustainability and traceability: ISCC Plus		
Climate change		
Energy consumption - MWh	204.829,61	189.105,97
Energy intensity (Consumption MWh / thousands of euros)	1,44	1,40
GHG emissions (Scope 1 + Scope 2 location-based)	42.535,62	39.437,95
Emission intensity index (tCO ₂ /t raw material used)	0,561	0,557
Water and marine resources		
Water withdrawals (m ³)	543.120	562.501
Water consumption (m ³)	331.304	337.501

Water intensity (Water consumption (m ³) / tons of raw material used)	4,38	4,77
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Circular economy and resource use

Raw material used (t)	75.717	70.732
ISCC Plus homopolymer from sustainable supply chain (tons)	235,2	1,38
Circular Renew ISCC Plus terpolymer from sustainable supply chain (tons)	2,75	-
Share of waste sent for recovery	95,7%	94,5%

Social - Human Resources

2024

2023

Policy for Quality, Hygiene, Environment, Safety

Occupational Health and Safety management system ISO 45001:2018

Number of employees as of December 31	255	224
Employees hired with permanent contracts	100%	99,6%
Employees hired with full-time contracts	100%	100%
Gender diversity - female gender in managerial positions	26,7%	28,6%
Training - Average training hours per employee	8,6	6,1
Health and safety – Accident Frequency Index (No. of accidents/worked hours x 1,000,000)	5,08	28,65
Health and safety – No. of serious accidents in the workplace	-	-
Diversity - Share of employees hired under the age of 30	13,2%	33%
Diversity - Share of employees under the age of 50	54,1%	53,6
Average length of service	18 years	

Social - Consumers and Quality

Policy for Quality, Hygiene, Environment, Safety

Quality Management System UNI ISO 9001:2015

Food quality and safety: BRC Issue 6 - Packaging

Governance

Code of Ethics

Organization, Management and Control Model ex. 231

Whistleblowing procedure



Letter to Stakeholders



We are pleased to present to your attention the first sustainability report prepared by our Company.

2024 has been a fundamental year for Manucor S.p.A., which, at the end of April, was fully acquired by the Bulgarian company Plastchim-T, owned by the Faik family, already a leading European player in our specific sector.

With this acquisition, and the consequent entry into the new Group, a long phase of preservation and conservation ends for Manucor S.p.A. and an era of creation and development begins, which, among the key points of the program, places particular focus on the sustainability of our business, especially from a social and environmental perspective.

*In a historical period marked by general geopolitical and economic uncertainties, the new shareholders of Manucor S.p.A. immediately considered it a priority to invest in new production resources, such as an 8.7 m Brückner extrusion line and over **40kt per year** of capacity, and the installation of two large photovoltaic plants for the production of “**clean**” energy.*

*The extrusion line is particularly efficient in the production of films with lower environmental impact as it allows, with equal product quality and performance, the achievement of very reduced thicknesses with the consequent lower **consumption of thermoplastic resins**.*

This also **significantly** reduces the amount of hourly energy consumed in the process.

The ISCC certification then allows us to offer our customers materials extruded both on current operating lines and on the one recently ordered, derived from recycling, both mechanical and chemical, as well as the recovery of self-produced waste.

There is also the full commitment of the R&D department, in close collaboration with the production departments, for the creation of high-barrier monomaterial films. This product, which makes the recycling of plastic products extremely simple and rational compared to those contaminated and made complex by coupling with other supports, is already an integral part of our product catalog and is successfully used by leading international companies in the food sector.

All of the above is made possible by the participation of all Manucor S.p. staff.A., who combine several decades of operational experience with passionate dedication to a company that, both in its operating area and at national and international level, has historically represented an important point of reference for all converters and consumers of BOPP film.

The mission of Manucor S.p.A., as well as that of the entire Plastchim Group, is to present itself to the market as an innovative company that respects the necessary attention that the urgent environmental preservation now requires of us.

We also feel, as our indispensable civil and moral duty, the respect for diversity and the enhancement of gender equality, which are carefully considered and monitored within our organization.

We are well aware of the challenging tasks ahead of us, but we are prepared and motivated to face them rationally and effectively, also for the benefit of all our stakeholders.

Luigi Scagliotti
Chief Executive Officer

01

General disclosure





Reporting criteria

ESRS STANDARDS

ESRS 2 BP-1, BP-2

➤ The first sustainability report of Manucor

The Sustainability Report of Manucor S.p.A. (hereinafter also the “Company” or “Manucor”) for the year ended December 31, 2024, represents the **first document published by Manucor** for the reporting of sustainability topics. Manucor has decided to publish the **first sustainability report** considering the strategic relevance of sustainability topics as an essential component of its business model.

The objective of the Sustainability Report is to enable stakeholders to understand the significant impacts of the company on people and the environment and the significant effects of sustainability issues on the development, results, and situation of the company.

The 2024 Sustainability Report was prepared **on a voluntary basis, with reference to the European Sustainability Reporting Standards (ESRS)**, European sustainability reporting criteria, **reporting selected ESRS, or parts of their content**, indicated in the various paragraphs of the document and summarized in the ESRS Content Index.

The document, as part of the process of progressive and gradual adaptation to current regulations and improvement of accountability towards its stakeholders, is not and does not intend to be fully compliant with the ESRS. The choice to refer to the ESRS as drafting criteria is also **consistent and preparatory with respect to the upcoming sustainability reporting obligations** provided for by Directive (EU) 2024/2464 Corporate Sustainability Reporting Directive (CSRD), transposed into Italian law with Legislative Decree 125/2024, which prescribes the adoption of the ESRS as

reporting criteria.

Based on the regulatory framework in force at the date of drafting this document, the obligation to apply the CSRD should fall to the **parent company Plastchim-T AD**, based in Bulgaria, as a large company not listed on regulated markets of the European Union, starting from the company reporting for the 2027 financial year. The approval by the European Parliament of Directive EU 2025/794 has postponed the entry into force of the CSRD by 2 years compared to the original 2025 deadline.

The obligation to publish the Sustainability Reporting requires the adoption of the European Sustainability Reporting Standards (ESRS) as drafting criteria. It should be noted that the scope of application of the CSRD, with particular reference to the size thresholds of companies, as well as the contents of the ESRS, are currently under review by the European Commission.

General criteria

The ESRS define the information that a company must disclose regarding its **impacts, risks and opportunities** in relation to relevant **environmental, social, and governance sustainability issues**. The relevance of sustainability topics, deriving from direct and indirect business relationships in the upstream and/or downstream value chain, is assessed based on the application of the “double materiality” principle (*DMA Double Materiality Assessment*).

The ESRS and the related reported indicators (disclosure requirements) are those representative of the sustainability topics assessed as relevant, consistent with Manucor's activities and related impacts, risks, and opportunities. The process of analysis, identification, evaluation, and

prioritization of material topics, as described in the chapter *Material Topics*, was carried out as required by the ESRS. This process is updated and progressively developed over time, as part of the Company's sustainability reporting (accountability) journey.

This document, based on the results of the double materiality (DMA) analyses, covers the entire upstream and downstream value chain.

The summary index of information relating to the various areas covered (ESRS Content Index), published in the appendix to the Sustainability Report and an integral part of it, allows for the traceability of the data, indicators, and other quantitative and qualitative information presented.

Manucor has not made use of the option to omit specific information corresponding to intellectual property, know-how, or results of innovation or any ongoing negotiations. The presentation of the data was carried out in such a way as to guarantee the confidentiality of sensitive information, particularly avoiding the disclosure of industrial secrets relating to production processes, such as yields, formulas, or other distinctive technical parameters.

In order to allow for the comparison of data over time and the evaluation of the Company's performance, comparative data relating to the previous year are presented, even if not required for the first year of reporting according to ESRS standards.

Reporting scope

The reporting scope for data and qualitative and quantitative information is represented by Manucor's performance, consistent with the financial statements as of December 31, 2024, for the entire reference period (from January 1, 2024 to December 31, 2024).

Disclosure relating to specific aspects

Time horizons – Manucor defines medium-term time horizons in line with its own strategic sustainability objectives, consistent with what is provided by the ESRS (6.4 Definition of short, medium, and long term for reporting purposes).

Estimates regarding the value chain - The metrics subject to reporting do not include estimated data regarding the value chain.

Causes of uncertainty in estimates and results - The process of reporting ESG performance data on certain topics requires the use of estimates by the Directors. The estimates are formulated based on historical experience, leading and authoritative external sources, and through the use of external specialists and consultants, as well as on other information considered reasonable under the circumstances. The possible use of estimates and the related methodologies adopted are directly referenced in the various paragraphs relating to the reporting of relevant topics, to which reference is made for further details.

The quantitative metrics that are subject to uncertainty in estimates and results refer in particular to the following topics and reporting areas:

Main topics / reporting areas subject to estimates (quantitative data)	Description and impact
Water and marine resources (E3-4)	Water discharges - Uncertainties inherent to the lack of measurable data regarding water discharges. Potential impact: Low

In order to mitigate the risk of errors in relation to estimated ESG performance data, and with specific reference to those characterized by uncertainty, internal controls and validation processes for the reported data and information are provided.

Changes in the drafting and presentation of information – As this is Manucor's first Sustainability Report, no recalculation or restatement of quantitative data was necessary. Starting from the reports of the coming years, any corrections due to errors, changes in measurement methodologies, or changes in the nature of the activity will be appropriately highlighted in the relevant chapters and paragraphs, with an indication of the criteria adopted and the effects on the data.

Disclosures required by other regulations or by provisions on sustainability reporting - Supplementary disclosures with respect to what is prescribed by the ESRS, required by other regulations containing obligations to communicate sustainability information or by provisions on sustainability, are reported in the chapters and paragraphs relating to the relevant topics.

Inclusion by reference – There are no inclusions by reference, as the Sustainability Report is prepared as a separate document from the Management Report to the Financial Statements. Consequently, all disclosures are reported in full within this Report, without references to other sections of corporate documents.



Strategy and business model

↳ Manucor S.p.A.

ESRS STANDARDS

ESRS 2 SBM-1

Manucor S.p.A. is a company active in the production and marketing of **biaxially oriented polypropylene film for flexible packaging, for labels and adhesive tapes**.

Through its products, Manucor aims to offer the best **packaging solutions** for food and for the various uses available on the market, to meet the diverse needs of its customers.

Manucor devotes great **commitment to research and innovation** and to **quality** of products with the aim of optimizing the quality-price ratio.

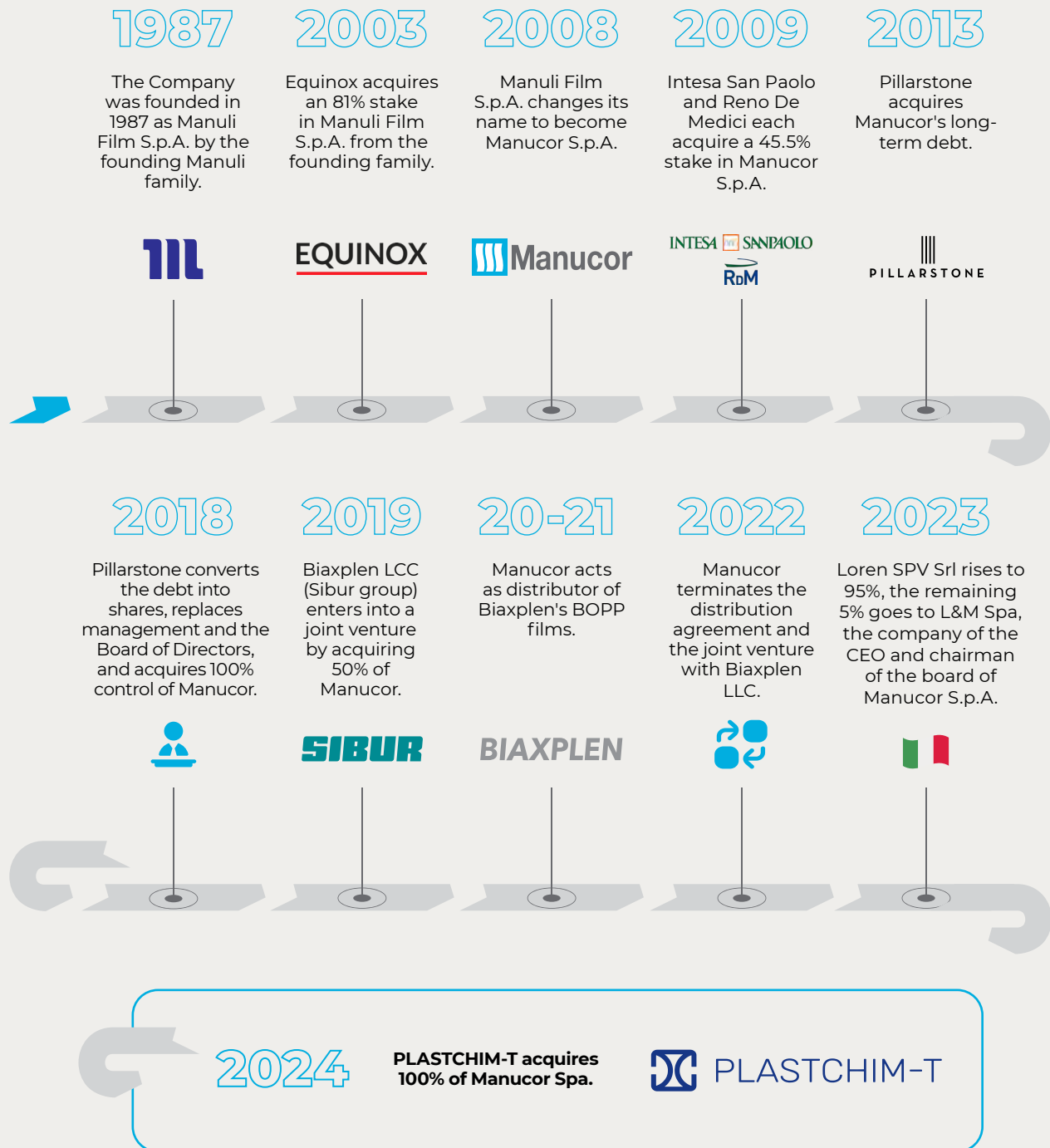
As of December 31, 2024, the Company achieved **revenues** of euro **142.51 million**, with a workforce of **255 employees**.

Manucor is wholly owned by **Plastchim-T**, one of the leading European producers of biaxially oriented polypropylene film (BOPP), cast polypropylene film (CPP), and flexible packaging products.

The acquisition, announced on April 29, 2024, is part of Plastchim-T's long-term growth strategy and aims to create an integrated production and logistics platform covering Europe, the Middle East, and Africa, with the possibility of further expansion.

Following the acquisition by Plastchim-T, Manucor has become, on a consolidated level, **the largest European producer of BOPP (biaxially oriented polypropylene)**.

The history



The acquisition represents a new phase for Manucor, which can benefit from the synergy with a consolidated international entity. Plastchim-T aims to integrate Manucor's technical and production expertise to strengthen its position in the European market.

The current corporate context positions Manucor as a strategic element within the Plastchim-T group, ensuring continuity in product quality and innovation, as well as an increasingly competitive approach in a constantly evolving sector.

Strategies - commitments

ESRS STANDARDS

ESRS 2 SBM-1

The sector: scenarios and market trends

Manucor S.p.A. operates in the ATECO business sector relating to the **Manufacture of plates, sheets, tubes, and profiles in plastic materials** and the **Manufacture of packaging in plastic materials**.

The packaging sector

In recent years, the packaging market has been at the center of a significant transformation, driven by the growing emphasis on the **circular economy** and **environmental sustainability**. European regulations such as the **SUP Directive - Single-Use Plastics** (EU Directive 2019/904) or the European Union Regulation on packaging and packaging waste (**PPWR**), are radically changing the rules of the sector. These regulations not only impose restrictions on the use of plastic, but also encourage companies to find **innovative solutions** that are in line with sustainability principles, while at the same time creating new growth opportunities.

Plastic has maintained a central role in food packaging due to its properties of lightness, versatility, and efficiency. However, the future of polymer packaging depends on the adoption of more sustainable solutions. **Biodegradable** and **compostable** polymers are emerging as alternatives to traditional plastics, as they offer the possibility of reducing environmental impact without compromising packaging performance. At the same time, **eco-design** is emerging as a fundamental strategy to improve the

sustainability of materials, using renewable resources and ensuring that packaging is easily **recyclable** or **reusable**.

The packaging sector in Europe - PPWR Regulation

The new Regulation (EU) 2025/40 on packaging and packaging waste (PPWR), which entered into force on February 11, 2025, aims to **minimize the amount of packaging and waste generated**, reducing the use of raw materials and promoting a **circular, sustainable**, and **competitive** economy.

Replacing the previous Directive 94/62/EC (PPWD), the PPWR further harmonizes national measures, strengthening the internal market, particularly for **recycling, reuse**, and **the use of secondary materials**.



Objectives

- Prevent and reduce packaging waste, in particular through reuse and refill systems
- Make all packaging recyclable, in a way that is economically sustainable, by 2030
- Safely increase the use of recycled plastic in packaging
- Reduce the use of virgin materials and move the sector towards climate neutrality by 2050

The Regulation establishes a new set of requirements, in line with European waste legislation, covering the entire life cycle of packaging, from product design to waste management.

By 2030, it is estimated that these measures will significantly reduce greenhouse gas emissions and the use of water resources, alongside the prevention and reduction of the negative impacts of packaging on the environment and health.

The new packaging rules include:

- **Restrictions** on certain **single-use plastics**;
- Minimization of the **weight and volume** of packaging;
- Targets for 2030 and 2040 for a **minimum percentage of recycled content** in packaging;
- **Minimization of substances of concern**, including restrictions on packaging containing **PFAS**.

The new Regulation represents a new opportunity for European producers of **BOPP**. The PPWR encourages the reduction of packaging and incentivizes the shift from rigid solutions to flexible formats, creating favorable conditions for the use of BOPP.

A further growth opportunity comes from the development of packaging solutions in **BOPE** ("*b-oriented polyethylene*"), which present greater technical challenges but also represent a more **sustainable** solution. Hybrid BOPP/BOPE lines and adapted BOPP lines are already operational and, although large-scale adoption has not yet begun due to the difficult economic scenario, it is estimated that the PPWR will lead to an acceleration in the adoption of BOPE solutions¹.

The packaging sector in Italy

In 2024, the packaging sector in Italy showed **signs of recovery** although lower than expected. According to the report *Imballaggio in Cifre 2024*² (Italian Packaging Institute), two main factors influence this trend: the contraction of Italian manufacturing (-0.9%) and the increase in imports of empty packaging.

Despite these difficulties, packaging production is expected to increase by 1%, exceeding **17.7 million tons**, thanks to the recovery of the food sector (+0.8%), mass consumption (+4%), and the strong increase in cosmetics (+10%). The sector's turnover is expected to once again exceed 40 billion euros (+2%).

Foreign **trade** does not show positive signs for Italy, with the trade balance remaining negative and continuing to worsen, reaching a deficit of about 309,000 tons. Imports are expected to increase by about 9%, while exports should see growth of +2.5%.

As for **turnover**, it is expected to follow the same trend as production in terms of quantity, but with better performance. Turnover is expected to exceed 40 billion euros again in 2024, with a projected increase of about +2%. This trend can also be explained by a physiological rebound in response to the -5.5% drop recorded in 2023.

¹BOPP Films Global Market

²*Imballaggio in Cifre 2024*, drafted by Barbara Iascone for the Italian Packaging Institute, reported by ItaliaImballaggio.it, available at [PACKAGING IN ITALIA: growth assumptions for 2024 confirmed, although revised downwards - Italian Packaging Institute](#)

The BOPP market - Biaxially Oriented Polypropylene

The global BOPP film market size was estimated at **\$32.7 billion in 2024** and is expected to grow to \$38.4 billion by 2032, with a compound annual growth rate of 5.5% during the forecast period.

Biaxially oriented polypropylene films (BOPP) are produced by stretching the polypropylene film both transversely and longitudinally. These films are used for various end uses, including **packaging, lamination, and labeling**. BOPP films are especially preferred for food packaging worldwide, thanks to their intrinsic properties of moisture resistance, transparency, and excellent chemical and abrasion resistance, which help drive market growth.

The BOPP film market is constantly growing thanks to the increasing demand for flexible packaging solutions in various end-use sectors. **European demand** currently represents about **15% of global demand** and an annual growth rate of about 2% is expected.

Currently, the BOPP market is divided into four main types of players, which make up the different stages of production and use of this product, as shown in the table below.



PLAYER	DESCRIPTION
PP resin producers	Mainly large petrochemical operators who convert crude oil or natural gas into olefins and aromatics.
BOPP producers	BOPP producers convert polypropylene resin into base and specialty films and tapes for different markets.
Converters and printers	Printing, laminating, and cutting BOPP films for various applications (packaging)
Brand owners (End users)	End users include large consumer goods companies

Manucor, within the **BOPP market**, is a **leading producer in the European market** thanks to the recent acquisition by Plastchim-T, with which it holds 13% of the market at the European level.

Manucor's commitment to sustainable development

The United Nations Sustainable Development Goals (SDG - Sustainable Development Goals)

In 2015, the United Nations approved the 2030 Agenda, of which the **SDGs - Sustainable Development Goals** are an integral part, 17 goals for sustainable development, framed within an action program with objectives to be achieved in the environmental, economic, social, and institutional fields by 2030.

The integration of ESG aspects (environmental – social – governance) into periodic reporting to stakeholders aims to highlight the impacts on the environment and people and how the Company manages these aspects. Among the 17 SDGs (*Sustainable Development Goals*) defined by the United Nations 2030 Agenda, those **considered a priority by Manucor in terms of contribution and commitment** for economic development consistent with environmental and social objectives are listed below.





Manucor contributes to **food safety** through the production of plastic film solutions for packaging, which promote and improve **food preservation** and **waste reduction** along the supply chain.

SDG 2:

End hunger, achieve food security, improve nutrition, and promote sustainable agriculture.



The Company guarantees **certified products**, safe and free from contamination, protecting **consumer health**. All Manucor products comply with European regulations for all types of food.

SDG 3:

Ensure health and well-being for all and at all ages.



Manucor promotes **pay equity** between women and men, ensuring transparent and equal pay policies, in line with the principles of **gender equality** and the enhancement of **merit**, contributing to an **inclusive** and **respectful** work environment.

SDG 5:

Achieve gender equality and empower all women and girls.



Manucor adopts a responsible approach to water resource management, using well water and carefully monitoring consumption to **reduce waste** and **optimize efficiency**. The Company is committed, through water treatment before discharge, to minimizing the release of chemicals and potentially hazardous materials, thus preventing any form of environmental pollution.

SDG 6:

Ensure availability and sustainable management of water and sanitation for all.



Manucor is committed to reducing energy waste and the ongoing **improvement** of its plants and production processes. With this in mind, a project has been launched to install a **photovoltaic plant** to increase self-production from renewable sources and reduce the overall environmental impact.

SDG 7:

Ensure access to affordable, reliable, sustainable, and modern energy systems for all



Manucor promotes **sustainable and inclusive economic growth**, creating **stable and quality jobs**: 100% of employees have permanent contracts and are employed full time. The company values human resources through **continuous training** and a safe working environment.

SDG 8:

Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all.



**SDG 10:**

Reduce inequalities within and among countries.

Manucor promotes **inclusion**, ensuring **equal opportunities** and fair treatment for all staff, without discrimination based on gender, age, origin, or role. Internal policies foster a **fair and inclusive work environment**, supporting diversity and valuing every individual.

**SDG 12:**

Ensure sustainable models of production and consumption.

The Company has implemented targeted actions for the **efficiency of production processes**, with particular attention to the **reduction of waste** and the **optimization of the use of natural resources**, such as water, energy, and raw materials.

**SDG 13:**

Promote actions, at all levels, to combat climate change.

Manucor contributes to **mitigation and adaptation to climate change** through the adoption of certified environmental management systems and investment in technologies to reduce the environmental impact of its processes, including emission containment.

**SDG 16:**

Promote peaceful and inclusive societies for sustainable development.

Manucor guarantees **transparency** in its activities, compliance with regulations, and the adoption of **responsible practices** throughout the entire value chain.

Business model

ESRS STANDARDS

ESRS 2 SBM-1

Manucor aims to adopt a business model aligned with its **sustainability strategies**, focusing its strategy on maximizing synergies with Plastchim-T, both in commercial activities and in the procurement of raw materials.

The goal is to maintain the strengths recognized by the market, such as **customer service**, **high quality**, and the **complete range of products**. The company aims to acquire new market shares in a competitive context, taking advantage of current industry dynamics.

An additional strategic objective of the company is to progressively move towards a more sustainable development model, through targeted investments consistent with the targets defined in the ESG framework.

In line with the objectives set for 2024, Management will continue to ensure maximum commitment to achieving corporate priorities, confirming an approach based on continuity and strategic consistency of the business model.

 Business continuity

Manucor is committed to ensuring continuity in product quality and innovation, as well as an increasingly competitive approach in a constantly evolving sector, integrating its technical and production expertise within the Plastchim-T group.

 Quality

The Company maintains high quality standards for its products through the selection and use of quality raw materials, which is essential to support the selling prices required by the market.

 Customers

Manucor is committed to maintaining strong relationships with Customers, based on an offering of quality products and top-level services. The Company's effort to meet customer needs is reflected in the constant expansion of its product range.

 Social commitment

The Company is committed to enhancing its personnel through training and the involvement of its employees. Manucor pays great attention to the safety, health, and integrity of workers and all collaborators.

 Environmental commitment

Manucor pays great attention to its production activities, to ensure the best yield of raw materials and maximum energy efficiency. The Company is committed to the increasing use of alternative raw materials and new technologies.

 Continuous improvement

Continuous improvement of processes and products through the commitment of the entire Operations Management staff and ongoing dialogue with company management.

 Research and development

Manucor's Research and Development activities are focused on expanding the product range with non-fossil polypropylene-based films from sustainable sources, both circular and bio-circular/renewable.

Manucor's products

Manucor is committed to offering, through its products, **packaging solutions among the best available on the market**, capable of meeting the diverse needs of customers in various application fields. BOPP is mainly used in food packaging, but is also employed in numerous other flexible packaging sectors, such as gift bags, flower packaging, adhesive tapes, labels, and decorative applications, including the lamination of cardboard.

In the case of **food packaging**, the film can be intended for both direct contact with food (primary packaging) and external packaging (overwrapping of a primary wrap). Foods packaged with this product cover a wide range of the food sector, including fruit and vegetables, baked goods, pasta, chocolate, ice cream, and dairy products.

These films have a three-layer and five-layer structure, in which a thick layer of polypropylene is inserted between two other thin layers. Products made of polypropylene (including BOPP) can be recycled into granules that can be used for various commercial and industrial applications. Being recyclable, they help reduce plastic waste, and recycling plants can process BOPP films together with other plastic materials, preventing them from ending up in landfills.

The films, characterized by extreme lightness, reduce the overall weight of packaging materials, which results in a **reduction in plastic consumption, transport costs, and emissions**.

The production of BOPP film requires less energy compared to other plastic materials, offering customers a less impactful option, also thanks to advances in production that have led to greater energy efficiency in the manufacturing process.

Manucor is strongly committed to **research, innovation**, and **quality** of products with the aim of optimizing the quality-price ratio, offering a wide range of films, with thicknesses from 12 to 60 microns, intended for a variety of end-market applications.

PRODUCT		MARKET	DESCRIPTION	END MARKET
	Food packaging	63.91% of sales 42,708 tons	Multilayer film for food and non-food packaging	Multilayer film for food and non-food packaging
	Labels	27.47% of sales 18,358 tons	Self-adhesive films for labels Films for in-mold labels Film for wrap-around labels (WAL)	Rigid containers Food products Household products
	Tapes	8.63% of sales 5,764 tons	Adhesive tapes Various types of tapes	Industrial and consumer use

The films produced can be sold in neutral or metallized versions. In this case, an infinitesimal layer of pure aluminum is deposited on the film, in order to create a high barrier to gas permeability through the film.

In recent years, the Company has undertaken a gradual but steady transition from the production of **Commodities** to **Specialties**, that is, differentiated products with **particular technical characteristics** (Manucor produced 75% Commodities in 2015). Today, the product portfolio is evenly balanced between Specialties and Commodities in terms of revenues, and the investment in a new production line fits into this industrial evolution strategy.



Headquarters and plant

The Manucor production site is located near the railway station of **Sessa Aurunca (CE)**, along the consortium road connecting Cellole and Piedimonte.

The production plant, one of the largest in Europe, covers a total area of about **135,000 m²** of which 49,000 m² are covered. The plant has a **nominal capacity** of **90,000 tons per year**.

The production plant is equipped with technologically advanced lines and equipment, subject to continuous updates and modernization interventions to ensure operational efficiency and production versatility.

The different lines are distinguished by configuration, width, number of layers, and type of products made, allowing the production of high-performance films and specific barriers.

ASSET	YEAR OF INSTALLATION / UPDATE	LAYERS	WIDTH	PRODUCTS (CURRENT)
Prod. Line 2	1990/2016	5	6 m	Transparent Coex and base films for metallization
Prod. Line 3	1993/2020	3	6 m	Base films for metallization and Matt
Prod. Line 4	1998/2014/2020	5	8 m	Base films for metallization, white and cavitated
Prod. Line 5	2002/2012/2025	3	10 m	Coextruded, label, plain, tapes
Laybold Mega1	1999	n.a.	2,1 m	Standard metallized barrier
Power Met	2015	n.a.	2,8 m	High barrier films

The plant is also equipped with **8 slitters (cutting machines)**, of which 3 are primary and 5 secondary, used for the **cutting of reels**, with the aim of obtaining rolls of smaller dimensions than the mother reel, according to customer specifications or subsequent processing. There are also 3 machines for the **regeneration** of polypropylene (PP), which allow the reintroduction into the production cycle of waste generated during processing.



Inside the Manucor plants there is also a trigeneration plant with three natural gas engines for a production capacity of 8.7 MW.

As part of the technological modernization and production optimization plan, Manucor plans to install a new production line, **Line 6**, during the second half of **2025**, with commissioning expected by the end of **2026**.

2026

Installation of new
production line, Line 6



...

The production process

Manucor, as a BOPP producer, transforms **granules of polypropylene** into products using three main types of polymer: **homopolymer, terpolymer, and additives**. Below are listed the various processing stages that make up the Company's production process, starting from the procurement of raw materials, through the production and processing phases, up to the packaging and dispatch of the final product.





Procurement of raw material

The main raw materials used consist of **polypropylene granules (homopolymer and copolymer)**, **additives**, and **aluminum** (for film metallization). In the case of purchasing raw materials, products already included in the **list of approved materials** (polypropylene polymers and additives) may be considered.

The list of approved raw materials is defined and kept up to date by ensuring that for each type of raw material at least two suppliers are identified who can provide approved products as equivalents.

Test materials are purchased under the direct control of the Research and Development function, in accordance with what is included in the list of raw materials undergoing approval.

The Supply Chain division, every month, assesses requirements based on production plans communicated by the Sales Department and historical monthly consumption recorded through the management system.

He assigns supplies to the reference suppliers, in accordance with current contractual agreements, and plans arrivals, defining the number of deliveries and the expected dates. Furthermore, it places orders and communicates them to the supplier, respecting contractual conditions, maintaining relations with the supplier for updates on expected delivery dates.

Preparation of Polypropylene Film

The technological cycle for the production of BOPP film follows the **stretching** process, which is divided into two phases: the **longitudinal direction** (Machine Direction) and the **transversal direction** (Transversal Direction).

The main raw material essentially consists of polypropylene, in the form of granules similar to spheres with a diameter of less than 5 mm, which is supplied in auto-silos, which send it to stationary vertical silos for storage; additives, used in smaller quantities, are purchased in bags or octabins (large-capacity industrial containers).

From the silos, the homopolymers and copolymers are sent to dosing by means of pneumatic transport in a dilute and vacuum phase; the masterbatches are used directly in octabins or prepared in intermediate storage by pouring the bags and, subsequently, sent to dosing with a separate pneumatic transport system, also in a dilute and vacuum phase.

The current production capacity is 90,000 tons per year of BOPP film and 18,000 tons per year of metallized BOPP film. The plant has technologically advanced lines capable of producing films from 6.2 to 10 meters wide in BOPP production and films from 2.08 to 2.85 meters wide in metallized film production.



Extrusion

Extrusion takes place according to the following phases:

- Simultaneous melting at about 250°C and pressurization of the plastic mass in the extruders: this phase of the process is managed by three to five extruders, one for the core (main extruder), larger in size, two lateral ones supporting the central layer, and two for the skins (coextruders), all with a total capacity lower than the first, depending on the plant's potential;
- Continuous filtration of each individual flow;
- Feeding into a die characterized, at the exit, by a flat head to form a sheet: in this die, a thickness control system operates, remotely controlled by a continuous thickness measurement using a low-emissivity radiating system.

The formation of the continuous flat sheet takes place simultaneously on three/five overlapping layers: the central one forms the core, intended to provide the mechanical properties of the film; the outer ones, the skins, are where surface properties are imparted, such as printability and sealability of the final product. In the case of a five-layer sheet, the central layer is flanked by two lateral layers that contribute, together with the outer layers, to imparting the surface properties of the film.

The sheet coming out of the die still retains considerable fluidity but is immediately consolidated by direct contact on an internally cooled cylinder (chill-roll) and simultaneous immersion in a thermostatic water bath: in this step, the material takes on a stable form and is prepared for the stretching and orientation processes. The sheet coming out of the bath, about two millimeters thick, is freed from surface water by countercurrent blowing with air blades.

Longitudinal stretching (MDO)

The first longitudinal stretching process (MDO) is carried out by means of a system of contact preheating rollers, internally heated (by diathermic oil) to about 120°C, followed by a passage at increasing speed through further rollers of smaller diameter: in this phase, longitudinal stretching and an initial thinning of the sheet occur. The operation ends with thermal stabilization.

Transverse stretching (TDO)

This process takes place in an oven (Tenter) where the sheet is guided by a system of clamps mounted on a chain that fix it at the edges and lead it through an environment characterized by currents of superheated air at about 170°C, with a well-defined temperature profile, conveyed above and below the sheet.

This section of the machine is ideally divided into four zones:

- a first preheating zone, in which the geometry of the sheet remains unchanged;
- a second transversal stretching zone, where transversal stretching occurs through the widening of the chain profile;
- a thermal stabilization (annealing) zone, which features a slight convergence of the chain profile;
- a final cooling zone.

Manucor's production units are characterized by hourly capacity levels

ranging from a minimum of 1,500 kg/h (lines with a final sheet width of 6 m) to a maximum of 5,500 kg/h (final width 10 m) depending on the line: the final thickness varies, depending on the type of product, from 12 to 60 microns.

Final winding

The outgoing product is guided to the final winding through a final stage called PRS (Pull Roll Stand) where surface treatments of the sheet (flame treatment, corona treatment) are also performed to enhance the appropriate sealing or printability qualities of the product.

In this phase, the film undergoes a side trimming to remove from the final winding the coarse thickness part (unstretched) coming from the transverse stretching process in the frame, at the point where the film is gripped by the clamp system: these trimmings, appropriately reduced to flakes by an in-line grinding process, are added to the material flow feeding the extrusion (main extruder). In this section, the film thickness control operates, acting on the width of the flat sheet extrusion gap: the system is able to ensure the consistency of the film thickness with minimal tolerances.

Metallization

The metallizer consists of two chambers: the evaporation chamber and the winding chamber. In the evaporation chamber, a vacuum is created by a set of pumps, upon reaching which current is passed through the ends of the evaporative boats.

These are fed by an aluminum wire that melts at a temperature of 1450 °C and evaporates, condensing on the polypropylene film that runs over a process roller cooled to -25 °C.

At the end of the metallization phase, the aluminum feed and the voltage at the ends of the boats are stopped, and the residual vapors condense on the final part of the neutral reel and/or on the walls of the evaporation chamber.

When the pressure of 1 atm is reached in the winding chamber, the operator can open the chamber to unload the metallized reel and load the neutral one. The plant includes a cooling unit, serving the process roller.

Cutting and packaging

The semi-finished product (mother reel) is stored for a few days (seasoning) in an automatic warehouse, from which it is subsequently taken for cutting, optimized into commercial formats in suitable slitting machines.

From the slitting machines, through a fully automated transport system, the derived reels move to the final pallet packaging stage, properly protected against damage during handling and stacking in the warehouse: a final polyethylene wrapping is then applied for dust protection.



The value chain

The Manucor value chain covers all the fundamental stages of the production cycle, from the production of raw materials to the end of the product's life. Each phase is managed with attention to efficiency and quality, in line with the Company's commitment to innovation and reducing environmental impact.

Raw material production

The production of raw material, entrusted to specialized companies, constitutes the start of Manucor's value chain. It originates from the transformation of crude oil or natural gas into olefins and aromatics by major petrochemical operators, from which homopolymers, polypropylene copolymers, and masterbatches used in production processes are obtained.

Procurement

Manucor sources raw materials from qualified suppliers, producers of polymers, masterbatches, and additives. The main raw materials used are homopolymer polypropylene, functional additives, and masterbatches.

Upstream transport

The raw materials are transported to the plant. Once they arrive, they are unloaded and stored in silos or dedicated warehouses, under the control of the logistics and quality department, in accordance with technical specifications.

Production

The mixed raw materials are transformed into BOPP film through an extrusion and biaxial orientation process, which gives the product high mechanical, optical, and barrier properties. The required energy comes from the grid and from a cogeneration plant.

Coil storage and seasoning

The produced film reels are stored for a seasoning period, during which they achieve the dimensional and functional stability required for subsequent processing. The seasoned reels are cut according to customer specifications, and rewound, with final palletization.

Downstream transport

The finished BOPP films, after the cutting and packaging stages, are shipped to customers mainly active in the food packaging sector. Transport is managed to ensure the traceability and integrity of the product up to delivery.



Use and end of life

At the end of its life cycle, the BOPP plastic film produced by Manucor, mainly used for packaging, is discarded by the end consumer and sent for waste management by authorized companies, which handle the collection, sorting, and treatment phases in accordance with current regulations.

The suppliers

The main raw material suppliers for Manucor can be divided into three main categories.

Manucor is committed to ensuring that all raw materials and services impacting the production and quality of the final product comply with regulatory requirements and company standards. All Manucor suppliers are subject to **annual monitoring**, with the aim of updating and integrating the specific evaluation of each supplier over the years. The monitoring is carried out on aspects concerning the quality/price ratio, the quality of supply/service, and the ongoing updating of information acquired during the initial qualification phase (certification, questionnaires, audits, authorizations, etc.).



Homopolymer suppliers

The supply of homopolymers comes from leading companies in the chemical and petrochemical sector, renowned for producing high-performance and high-quality polymers.



Copolymer suppliers

The copolymers used by Manucor come from top international manufacturers, with established experience in producing advanced polymers for the plastics industry.



Masterbatch suppliers

As for masterbatches, Manucor relies on suppliers specialized in the creation of concentrated solutions, capable of ensuring optimal technical performance and high color yield.



The customers

Manucor serves a **diversified clientele**, which includes large producers of consumer goods, converters, and printers. Among the main clients are leading multinational companies in the food and beverage sectors, industrial groups in the field of packaging material production and printing, as well as companies specialized in labels, adhesive tapes, and advanced packaging solutions.

Manucor's direct customers are mainly film converters, who use the product to produce semi-finished goods (printed, trimmed, and, if necessary, laminated), which are then intended for end users for packaging and wrapping.

A smaller portion of Manucor's product sales is intended for end users who use the film as supplied for direct contact with food (e.g. primary wrapping of snacks, crackers, biscuits, etc.).

The **level of customer satisfaction** is constantly monitored through various qualitative and quantitative parameters. Among these are considered the trend of complaints, in case of specific needs for individual clients, the OTD (on time delivery) indicator, the results of checks carried out directly by clients during visits to the plant, as well as periodic evaluations expressed by clients, who regularly issue—on a semi-annual or annual basis—evaluation reports of their suppliers.

The markets served

In 2024, the total sales volume, expressed in tons, recorded an increase compared to the previous year, rising from 62,971 tons to 66,830 tons.

Italy confirms itself as the **main reference market**, with growth from 28,451 to 29,833 tons.

A significant contribution to the overall increase also came from Central Europe, which saw a marked rise in volumes, from 20,152 to 25,525 tons. On the other hand, volumes decreased in Northern Europe, Eastern Europe, and the rest of the world. Despite these contractions, growth in the main markets supported the overall positive trend of the year.

The following table lists the markets in which Manucor operates, along with the respective volumes of exported products.

MAIN MARKETS BY VOLUME (t)	2024	2023
Italy	29.833	28.451
Central Europe	25.525	20.152
Eastern Europe	5.774	6.078
Northern Europe	2.734	3.763
Rest of the world	2.964	4.527
TOTAL	66.830	62.971



Employees

As of December 31, 2024, **the number of Manucor employees is 255**, an increase compared to 2023. All employees are based at the single production plant, located in Italy, in Sessa Aurunca (CE). Staff data have been calculated based on the headcount at the end of the period ("Head Count").

EMPLOYEES	2024			2023		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Total employees at the end of the period / by gender	20	235	255	18	206	224

Research and innovation

The commitment to research, innovation, and improving product quality is ongoing, with the aim of ensuring competitive solutions in terms of performance and value for money. Following the acquisition by Plastchim-T, a process of integration between the two companies is also underway, aimed at further strengthening technical and technological expertise in this area.

The **management of raw materials** falls within the area of expertise of the Research and Development department. The list of approved materials is constantly updated, with the aim of ensuring that for each type at least two suppliers are identified who can offer products considered equivalent. Materials intended for testing and validation are purchased under the direct control of the team, in line with the specifications listed in the raw materials approval list, thus ensuring continuity and reliability in the supply chain.

The Research and Development department of Manucor plays a central role in the company's strategy, with the responsibility of introducing and developing innovative tools, such as **life cycle assessments (LCA)** to evaluate the environmental impact of production.

As demonstrated by the confirmation for 2024 of the certificate of conformity to the **ISCC PLUS standard**, the R&D team is also engaged in the development of **new formulations**, the identification of technical alternatives, and the rationalization of materials in use. Ongoing activities include the search for alternative grades of resins and masterbatch, the optimization of the performance of existing materials, and thickness reduction projects (downgauging). All actions taken are tracked and updated in dedicated registers, which serve as operational tools for the management and evolution of the technical solutions adopted.



▮ Stakeholders: interests and expectations

ESRS STANDARDS

ESRS 2 SBM-2

Stakeholders are defined as individuals or groups who have interests or expectations regarding a company, or who may be positively or negatively affected by the company's activities and its relationships along the value chain.

Stakeholder engagement

The **involvement** of stakeholders is a central element of the *due diligence* process carried out by the company and of the assessment of the relevance of sustainability, aimed at understanding the processes to identify and evaluate negative, actual, and potential impacts that guide the sustainability reporting process.

Manucor creates, develops, and maintains relationships with its stakeholders over time, with the aim of strengthening these relationships and, consequently, improving its competitive position and ability to generate and distribute value over time. Engagement and dialogue with stakeholders (stakeholder engagement) is a structural activity aimed at understanding their interests, expectations, and needs and, in this way, fostering a more effective and informed decision-making process that can support appropriate strategic planning and the achievement of business objectives.

Manucor bases its relationships with stakeholders on principles of good

faith, fairness, loyalty, and transparency. Stakeholders have been identified taking into account the sector in which they operate, the business model, the existing relationship system, as well as geographical presence.

For Manucor, stakeholder engagement is an activity carried out systematically, as part of the business model, regardless of sustainability reporting. In the context of this process of listening and maintaining constant relationships with stakeholders, some specific engagement initiatives have been implemented. These initiatives are aimed at gathering and analyzing their expectations, ensuring that they are considered in the company's decision-making processes. The results are reported to the Board of Directors, ensuring that stakeholder requests contribute to strategic direction and the creation of sustainable value.

The system of tools through which the company manages relationships with its stakeholders is presented below. These tools are differentiated according to the various categories of stakeholders. Through the "Analysis of needs and expectations of stakeholders", Manucor is committed to understanding the interests and opinions of key stakeholders as they relate to the company's strategy and business model. In particular, for stakeholders with interests considered significant, the preliminary analysis also identifies the needs and expectations that characterize the relationship, relating them to the contextual factors that emerged as relevant during the context analysis.

Further information regarding the activities and organization of engagement initiatives with stakeholders is described in greater detail in the relevant paragraphs of the thematic ESRS.

STAKEHOLDER	TYPE OF ENGAGEMENT ACTIVITY	TOPICS / EXPECTATIONS EXPRESSED BY STAKEHOLDERS
Ownership	Shareholders' meetings, Board of Directors, financial statements, periodic financial reports, strategic meetings	Expected economic returns, risk management, business continuity, reputation, product quality, relationship with other stakeholders
Employees and other workers	Periodic meetings, internal surveys, reporting channels, training	Business continuity, professional skills development, remuneration conditions
Customers	Customer service, audits, satisfaction questionnaires, technical visits	Quality and safety of supply conditions, new product development, customer service
Suppliers	Definition and sharing of production standards, Business meetings and Audits, Website	Business continuity, purchasing conditions, payment punctuality
Banks and Insurance Companies	Economic-financial reporting, individual meetings, ESG questionnaires	Compliance with contracted economic commitments, development of future business for potential investments
Resident population / Local communities	Initiatives, Social media, Website	Maintaining employment levels

Ratings



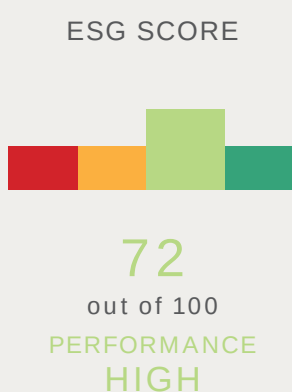
EcoVadis

Responding to the requests of its Clients, Manucor joined the **EcoVadis** platform, a leader in sustainability intelligence for global supply chains. EcoVadis awarded Manucor the **silver medal**, evaluating the company's performance in four macro-areas: environment, labor practices and human rights, ethics, and sustainable procurement.



CRIBIS

Manucor also holds the **CRIBIS** certification, which represents the highest level of company reliability assessment and is granted only and exclusively to companies that consistently maintain high reliability and are virtuous in payments to suppliers.



Open-ES

Manucor S.p.A. participated in the ESG assessment project promoted by UniCredit as part of the **Open-es** initiative, taking part in the questionnaire prepared by Cerved Rating Agency. The reference time frame for the analysis and data collection was the year 2024, and the assessment covered the three fundamental dimensions of sustainability: environmental, social, and governance, resulting in the assignment of an overall

ESG Score, developed based on 31 diversified metrics tailored to the company's specific sector. The methodology adopted by Cerved is based on a scoring model that takes sector materiality into account, allowing for a homogeneous comparison between companies belonging to similar sectors. The results obtained highlighted areas of strength and opportunities for improvement.



Governance

▾ Governance model and corporate bodies

ESRS STANDARDS

ESRS 2 GOV-1

The governance structure adopted by Manucor is based on the traditional organizational model and consists of the following corporate bodies:

- The Shareholders' Meeting
- The Board of Directors
- The Board of Statutory Auditors
- Statutory audit firm

The Shareholders' Meeting

The Shareholders' Meeting is the internal collegial deliberative body of the Company, in which the will of the Company is formed. This is a body with exclusively deliberative functions, whose responsibilities are closely linked to the most significant decisions for the company structure.

Manucor S.p.A. is 100% controlled by **Plastchim-T**, as of April 29, 2024.



The Board of Directors

The Company is managed by a Board of Directors composed of 5 members, appointed by the Shareholders' Meeting on April 29, 2024, and who will remain in office until the Shareholders' Meeting convened to approve the financial statements as of December 31, 2026.

The Board of Directors of Manucor is vested with the broadest powers for the ordinary and extraordinary management of the Company, except for powers expressly reserved by law to the Shareholders' decisions.

BOARD OF DIRECTORS

Tzvetan Lajanski

Chairman of the Board of Directors

Luigi Scagliotti

Chief Executive Officer

Matteo Rossini

Vice Chairman of the Board of Directors

Beyan Aydan Faik

Director

Faik Aydan Faik

Director

BOARD OF DIRECTORS – DIVERSITY (GENDER – AGE GROUPS)

Women No. -	0%	Men No. 5	100%	Total No. 5	100%
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Under 30 years old No. -	0%	Between 30 and 50 years No. 2	40%	Over 50 years No. 3	60%
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The current Articles of Association underline Manucor's commitment to progressively adopting the principle of segregation of duties (*segregation of duties*), in order to implement internal control measures. This approach aims to ensure more transparent and secure management, preventing potential conflicts of interest and improving the effectiveness of business processes.

The Board of Statutory Auditors

BOARD OF STATUTORY AUDITORS

Giovanni Maria Conti	Chairman of the Board of Statutory Auditors
Tiziana Stracquadanio	Statutory Auditor
Pierangela Melli	Statutory Auditor
Guido Sazbon	Alternate Statutory Auditor
Lorenzo Puccini	Alternate Statutory Auditor

According to the Articles of Association of Manucor, the Shareholders' Meeting, in accordance with the law, appoints every three years three standing auditors and two alternates and designates the chairman of the Board of Statutory Auditors, determining the annual remuneration due to each standing auditor.

By the date set for the first call of the meeting, documentation containing comprehensive information on the personal and professional characteristics of the candidates and a declaration by which each candidate accepts the nomination, made under their own responsibility, meeting the required

criteria, must be submitted.

The Board of Statutory Auditors is entrusted with the supervisory functions over compliance with the law and the Articles of Association, respect for the principles of proper management, and in particular the adequacy of the organizational, administrative, and accounting structure adopted by the Company and its actual functioning.

The Board of Statutory Auditors will remain in office until the approval of the financial statements as of 12/31/2026.

Statutory audit

The statutory audit activity is entrusted to Audirevi S.p.A. until the approval of the financial statements as of 12/31/2024.



↳ Sustainability governance

ESRS STANDARDS

ESRS 2 GOV-2

The Board of Directors of Manucor approves the Sustainability Report and the related material topics resulting from the assessment and prioritization phases of impacts, risks and/or opportunities.

The Board of Directors is committed to ensuring the updating of its knowledge and stakeholder engagement for the management of impacts, risks and/or opportunities and the supervision of the sustainability reporting process, and in particular for the identification and management of negative economic, environmental and social impacts, whether potential or actual.

Finally, the Board of Directors defines the **sustainability objectives** to be achieved and identifies the resources and functions involved in achieving them. All functions involved in achieving the objectives are aware of them, through specific communications and meetings.

The sustainability reporting process

Manucor has decided to undertake the reporting process, with the aim of transparently monitoring and communicating the environmental, social, and economic impacts of its operations. This commitment not only reflects responsibility towards the environment and communities, but also responds to the demand for transparency from stakeholders. Reporting thus becomes a fundamental tool to ensure continuous improvement and to consolidate trust in the Company.

The reporting process involved various company roles. Among these, the areas most involved were Environment, Safety, Quality, Administration, Research and Development, and Management. The main activities of the process concerned the collection and analysis of quantitative data and narrative information relating to environmental, social, and economic impacts.

Organizational structure and responsibilities

The management organization of Manucor includes the Operations Department (COO), the Administrative Department (CFO), the IT & Supply Chain Manager, the Commercial Department (Marketing and Sales), and the Production Department (Production Manager). The responsibility for the Sessa Aurunca production site is entrusted to Eng. Luigi Martinese, who serves as Chief Operating Officer (COO) of Manucor.





Chief Executive Officer (CEO): the organization Manucor S.p.A. is coordinated by a Board of Directors, which has appointed Luigi Scagliotti as Chief Executive Officer.

The Chief Executive Officer, representing the Board of Directors, implements the decisions of the Assembly and the Board, executing company strategies and managing delegated powers in accordance with established directives. Proposes initiatives to the Board in the interest of the Company, prepares the annual budget, and manages the organization of services and offices. Defines the functional structures and the criteria for hiring and managing personnel, in accordance with the budget. Proposes the hiring of managers, coordinates hiring, dismissal, and disciplinary actions, and makes decisions regarding personnel. Works operationally with the Management Team, which includes the Operations Department, the Commercial Department, the CFO, the Supply Chain & IT Manager, the Procurement Manager, and the HR Manager.

Human Resources Manager (HR Manager): the Human Resources function is responsible for the proper management and development of personnel and the organization, working with the Chief Executive Officer to support department heads in personnel policies, professional development plans, and incentive systems. Manages labor relations, health surveillance, and the annual human resources budget, aiming to reduce personnel costs and promote corporate welfare strategies. Also handles recruitment, selection, and onboarding of personnel, fostering a culture oriented towards continuous improvement and teamwork. In addition, coordinates mandatory and funded training, and ensures compliance with privacy and GDPR regulations.

Chief Operating Officer (COO): The Operations Director supports the Chief Executive Officer in coordinating the Management System for Quality, Environment, Health, Safety, and Hygiene, and defines, together with the CEO, company policies. Handles the annual system review, procurement management, product realization, resource planning, production monitoring, and cost control. Also manages quality issues and coordinates

the Purchasing, Research & Development, Production, Quality Control, Energy and Cogeneration, and Maintenance and Engineering departments.

Marketing & Sales Manager: defines and implements commercial strategies, coordinates actions to meet customer requests, manages the development of new products, and supervises contract reviews to ensure compliance with requirements.

The Area Sales Manager, reporting to the Sales & Marketing Department, implements commercial strategies, coordinates activities to satisfy customers, and collaborates with Customer Service and Quality Control to ensure the proper management of orders and quality issues.

Chief Financial Officer (CFO): the CFO plans and implements administrative, financial, and management control policies and strategies, in accordance with company management and current regulations. Supervises investments, financial planning, and management of credit lines, presenting industrial plans and budgets. Is responsible for financial communication and governance-related obligations, managing relations with the Board of Directors, the Board of Statutory Auditors, the Audit Firm, and the Supervisory Body.

Procurement: the Procurement function manages the purchasing of raw materials, materials, equipment, and services, ensuring compliance with deadlines and quality requirements. Checks the clarity of purchase requests, defines requirements in contracts, monitors orders, and manages the archive. Collaborates to keep the list of qualified suppliers up to date and coordinates the evaluation of new suppliers and the updating of existing evaluations.

Supply Chain & IT Manager: manages the entire Supply Chain, from sales order management to production planning and shipping, ensuring compliance with company objectives. Oversees IT services, reception, and document registration. The main activities include order management, production and procurement planning, coordination of the Sales and Operations Planning process, stock management, and supervision of logistics services, always in compliance with quality, safety, and budget objectives.

The management of environmental issues

The management of environmental issues at Manucor is entrusted to an integrated organizational model, coordinated by the **Operations Management** and structured across various key functions, each with specific expertise. In particular, regarding environmental management, the Operations Management has appointed an Environmental & Safety Manager (**Environmental & Safety Manager**), tasked with ensuring the implementation and maintenance of the Environmental Management System, as well as reporting on the overall performance of the system for its review and continuous improvement.

To support the actions of the Environmental & Safety Manager, additional key figures are involved in the implementation and maintenance process of the Environmental Management System, such as:

- **Quality and Hygiene Management Manager:** Ensures the integration of Environmental Management Systems with those for Quality, Hygiene, and Safety; collaborates as an internal auditor for environmental audits and management reviews.
- **Research and Development (R&D) Manager:** Introduces and develops life cycle analyses related to production.
- **Production Management:** Ensures the application of correct environmental practices in production processes, reporting to Operations Management.
- **Maintenance Manager:** Ensures the application of environmental practices in internal and external maintenance activities, reporting to Operations Management.
- **Energy Manager:** Manages energy production plants, coordinates maintenance, and optimizes the use of energy resources, in collaboration with COV-ER Power Technology S.r.l.



Relevant Topics

- ▾ The process of identifying and assessing relevant impacts, risks, and opportunities

ESRS STANDARDS

ESRS 2 IRO-1

The information included in the paragraph aims to provide all stakeholders with the necessary information to understand the process through which **impacts, risks**, and **opportunities** were identified and their **relevance** was assessed, and consequently, the information included in the Sustainability Report.

Relevant topics according to the ESRS

The European Sustainability Reporting Standards - ESRS establish that relevant topics (IRO Impact Risk Opportunities) must be identified and assessed from the perspective of impact relevance, financial relevance, or both (in environmental, social, and governance matters).

- **Impact Materiality** – Significant, actual or potential impacts on people and the environment, directly connected to a company's activities, products, and services.
- **Financial Materiality** – sustainability risks and opportunities that can affect the value of the company (in terms of financial effects).

Impacts, risks, and opportunities also include those that arise or may arise within the scope of direct and indirect business relationships in the value chain (activities/sectors, geographic areas, operations, suppliers, customers, other relationships, where there is a probability that relevant IRO may be generated/exist).

Materiality Assessment process and methodology

The process of identifying and assessing relevant impacts, risks, and opportunities includes the following phases:

- Understanding the context
- Identification of actual and potential IRO
- Assessment and determination of relevant IROs

Understanding the context

The reference context refers to what is described in the previous paragraphs regarding general information on strategy, business model and value chain, relationships with stakeholders, underlying business relationships, and sustainability context.

Identification of actual and potential IRO

The process of identifying actual and potential IRO (relevant topics) affecting people and the environment was carried out using a methodology that involved the analysis of external and internal sources, taking into account stakeholder engagement and consultation, integrated with a specific analysis of risks and opportunities, as required by the ESRS.

The analysis took into account the characteristics of activities and the business model, business relationships, geographies, or other factors that entail a higher risk of negative impacts. As already specified, impacts generated directly through the company's own activities or as a result of business relationships were considered, and stakeholder relationships and consultations were taken into account to understand how they might be affected by the impacts. The opinions and assessments of external experts were indirectly considered through the various external sources analyzed.

 Main external sources

World Economic Forum – [Circular Industry Solutions for a Global Plastics Treaty.](#)

OCSE – [Guida dell'OCSE sul dovere di diligenza per la condotta d'impresa responsabile; OECD Guidelines for Multinational Enterprises on Responsible Business Conduct \(2023 update\); Policy Scenarios for Eliminating Plastic Pollution by 2040.](#)

UNHCR - [UN Guiding Principles on Business and Human Rights.](#)

Reference regulatory framework - [Regulation \(EU\) 2025/40 on packaging and packaging waste; Single-Use Plastics \(SUP\) Directive - Directive \(EU\) 2019/90; EU Food Packaging Regulation \(2004\).](#)

Industry research - [European strategy for plastics in the circular economy; ENEA: Analysis of data relating to energy audits and preliminary identification of performance indices in the rubber processing and plastics transformation sectors; European Council: Packaging.](#)

SASB – Industry Standards – [SASB Standards.](#)

IFRS Industry-based guidance – [IFRS General Sustainability-related Disclosures.](#)

Benchmarking relevant topics – policies – risks

→ Internal sources

Company search

Current bylaws

Organization, management, and control model pursuant to Legislative Decree 231/2001

Whistleblowing

Code of Ethics

DVR Risk Assessment Document

Policy for Quality, Environment, Hygiene, and Safety

Certifications (ISO 14001; ISO 9001; ISO 45001; EMAS; BRC Packaging Issue 6)

Assessment and determination of relevant IROs

The assessment of relevant topics (relevant IRO) included, in summary, the following:

ASSESSMENT PHASES	PROCESS AND CONTENT SUMMARY
Qualitative analysis	Identification and in-depth analysis of possible relevant IRO Impacts, Risks, and Opportunities with respect to the issues that emerged during the identification phase of potential relevant topics.
Characteristics of IRO Impacts, Risks, and Opportunities	Characterization of Impacts, Risks and Opportunities under analysis Impact Characteristics • Actual / Potential • Positive / Negative • Short / medium / long term • From own operations / Along the value chain Risk/Opportunity Characteristics • Short / medium / long term • From own operations / Along the value chain
Quantitative analysis	Assessment of impact relevance: relevance according to criteria of severity and likelihood of occurrence. The severity is based on the scale, scope, and the irremediable nature of negative impacts. For this purpose, quantitative and/or qualitative thresholds have been set. Assessment of risks and opportunities: relevance with respect to probability of occurrence and potential magnitude. In this context, and in a manner consistent with the impact assessment, quantitative and/or qualitative thresholds have been set for the evaluation of financial effects related to sustainability issues (economic performance, financial situation, cash flows, and access to financing).

The double materiality analysis process (Materiality Assessment) involved the various company functions.

📌 Relevant topics

ESRS STANDARDS

ESRS 2 SBM-3

The double materiality analysis (**Double Materiality Assessment – Analisi di doppia rilevanza** in the Italian translation of the ESRS), in the context of sustainability reporting, is essential to assess and understand the impact of Manucor's activities on the environment and society and the underlying financial risks and opportunities related to environmental, social, and governance (ESG) issues.

The approach considers both the impacts, classified as actual or potential, positive or negative, that Manucor can generate on people and the environment in the short, medium, or long term (impact relevance), and the influence of environmental, social, and governance (ESG) factors on Manucor's financial performance and resilience (financial relevance). The introduction of the European ESRS standard has facilitated the identification of relevant ESG risks and opportunities, which integrate the results of the impact analysis and reflect greater awareness and attention towards the potential financial impact of these factors and their consistent and integrated assessment.

Analytical information regarding impacts, risks, and opportunities related to individual relevant topics is reported in the corresponding paragraphs, where the topics are addressed (thematic ESRS). The following diagrams provide a summary of such descriptive information.



RELEVANT TOPICS (IRO)	TOPIC DESCRIPTION [IMPACTS RISKS OPPORTUNITIES]	CHARACTERISTICS [IMPACTS RISKS OPPORTUNITIES]
ENVIRONMENTAL TOPICS		
E1 CLIMATE CHANGE		
Energy	Impacts Direct negative impacts related to energy consumption (mainly electricity and natural gas) for the Company's production activities. Risks Recurring and also short-term risks of exposure to market dynamics of energy costs with effects on production costs and economic and financial performance.	Actual Negative Short - Medium - Long term From own operations and along the value chain Short – Medium – Long term From own operations and along the value chain
Climate change mitigation	Impacts GHG / greenhouse gas emissions generated by energy consumption and other direct sources, from production processes and along the value chain (raw material procurement – logistics – waste management – end of product life). Risks Regulatory / legal and technological transition risks: introduction / changes in regulations to address climate change and evolution of production technology to support and accelerate / facilitate energy transition plans. Potential effects on the structure and organization of the supply chain and business continuity risks.	Actual Negative Short - Medium - Long term From own operations and along the value chain Short - Medium - Long term From own operations and along the value chain

RELEVANT TOPICS (IRO)	TOPIC DESCRIPTION [IMPACTS RISKS OPPORTUNITIES]	CHARACTERISTICS [IMPACTS RISKS OPPORTUNITIES]
ENVIRONMENTAL TOPICS		
E1 CLIMATE CHANGE		
	Market and reputational transition risks: market orientation / evolution of demand (both for business and consumer markets) towards sustainable products and business models, which demonstrate commitment and implement actions to contain energy consumption and reduce GHG emissions requirements and adaptation to direct business customer standards. Opportunities Opportunity arising from regulatory/ policy evolution and market mechanisms related to the energy transition (e.g. Energy Release), which allow Manucor to access renewable energy under stable and competitive conditions.	Short - Medium - Long term From own operations and along the value chain Short - Medium - Long term From own operations and along the value chain
Adaptation to climate change	Risks Physical risks (acute and chronic) resulting from climate events: a) in the geographical area of Manucor's production plant and, more significantly, b) supply sources (Value chain), which may have consequences in terms of business continuity on production processes / supply chain interruption, raw material availability.	Medium - Long term From own operations and along the value chain



RELEVANT TOPICS (IRO)	TOPIC DESCRIPTION [IMPACTS RISKS OPPORTUNITIES]	CHARACTERISTICS [IMPACTS RISKS OPPORTUNITIES]
ENVIRONMENTAL TOPICS		
E2 POLLUTION		
Air pollution	Impacts Negative impacts due to the emission of pollutants, such as volatile organic compounds, dust, and combustion fumes into the air during production activities, causing atmospheric pollution. Risks Regulatory / legal, technological, market, and reputational risks: introduction / changes in regulations regarding atmospheric emissions of pollutants with potential consequences on production processes and supply chain (revision of production processes, adoption of new technologies, changes in the supply chain).	Actual Negative Short - Medium - Long term From own operations and along the value chain Short - Medium - Long term From own operations and along the value chain
Water pollution	Impacts Negative impacts due to the emission of pollutants, such as unfiltered solid particles, into receiving water bodies during production activities. Risks Regulatory / legal, technological, market and reputational risks: introduction / changes in regulations relating to water treatment and pollution, with potential consequences on production processes and supply chain (revision of production processes, adoption of new technologies, changes in the supply chain). Operational risk arising from external pollution of water resources, which may compromise the availability of water necessary for industrial processes.	Actual Negative Short - Medium - Long term From own operations Short - Medium - Long term From own operations Short - Medium - Long term From own operations and along the value chain

RELEVANT TOPICS (IRO)	TOPIC DESCRIPTION [IMPACTS RISKS OPPORTUNITIES]	CHARACTERISTICS [IMPACTS RISKS OPPORTUNITIES]
ENVIRONMENTAL TOPICS		
E2 POLLUTION		
Substances of concern Substances of very high concern	Impacts Release into the environment of substances, such as hazardous and flammable liquids, with negative effects on human health and ecosystems, even in the absence of intentional use / accidental presence of SVHC (<i>Substances Very High Concern</i>) in products, with consequences for product safety. Risks Regulatory / legal, market and reputational risks: non-compliance of own products in case of exceeding regulatory limits or more stringent requirements from customers and authorities.	Potential Negative Short - Medium - Long term From own operations and along the value chain Short - Medium - Long term From own operations
E3 WATER AND MARINE RESOURCES		
Water - Water consumption - Water withdrawals	Impacts Negative impacts resulting from the withdrawal and consumption of water resources used for film coating processes and in cooling circuits. Risks Market, reputational and business continuity risks: the unavailability of water in areas subject to water stress can compromise production capacity and the regularity of industrial processes, with potential impacts on the ability to meet demand and maintain the standards expected by customers. Such situations can generate repercussions on commercial positioning and on the continuity of relationships with key stakeholders.	Actual Negative Short - Medium - Long term From own operations Short - Medium - Long term From own operations and along the value chain



RELEVANT TOPICS (IRO)	TOPIC DESCRIPTION [IMPACTS RISKS OPPORTUNITIES]	CHARACTERISTICS [IMPACTS RISKS OPPORTUNITIES]
ENVIRONMENTAL TOPICS		
E5 RESOURCE USE AND CIRCULAR ECONOMY		
Resource inflows, including resource use	Impacts Negative impacts related to the use of raw materials from fossil sources (mainly polypropylene) used in production processes for the production of BOPP.	Actual Negative Short - Medium - Long term From own operations and along the value chain
	Risks Regulatory and legal transition risks: the evolution of regulations on plastic packaging may entail restrictions on the use of raw materials of fossil origin, which may require adjustments in production processes and availability of raw materials.	Short – Medium – Long term From own operations and along the value chain
	Market and technological transition risks: depletion of fossil reserves, the source of virgin polypropylene, creates pressure on prices and procurement costs, with negative effects on production costs, margins, and competitiveness. Market and reputational transition risks: the growing attention of consumers towards low environmental impact products can influence the perception of traditional products, with potential repercussions in terms of customer preference and commercial positioning.	Short – Medium – Long term From own operations and along the value chain
	Opportunities Business and market opportunities: the growing demand for bio, bio-circular, and circular raw materials offers Manucor the opportunity to strengthen its competitive positioning, enhance its product portfolio and grow in segments oriented towards the circular economy thanks to certifications such as ISCC PLUS.	Short - Medium - Long term From own operations and along the value chain

RELEVANT TOPICS (IRO)	TOPIC DESCRIPTION [IMPACTS RISKS OPPORTUNITIES]	CHARACTERISTICS [IMPACTS RISKS OPPORTUNITIES]
ENVIRONMENTAL TOPICS		
E5 RESOURCE USE AND CIRCULAR ECONOMY		
Outflows of resources connected to products and services	Impacts Negative impacts related to the placing on the market of plastic films, often single-use, with negative consequences on the environment if not properly recycled.	Actual Negative Short – Medium – Long term From own operations
	Risks Regulatory, legal and technological transition risks: the evolution of regulations on plastic packaging may introduce restrictions that affect the possibility of marketing certain products, requiring technical adjustments in the materials used or in production plants, generating increases in operating costs and significant investments to ensure compliance.	Short – Medium – Long term From own operations and along the value chain
	Market and reputational transition risks: failure to align with new consumer preferences on packaging may compromise the perception of the Company and its products, with effects on competitive positioning, customer loyalty and market demand.	Short – Medium – Long term From own operations
	Opportunities Business and market opportunities: the increasing regulatory pressure and market demand for sustainable and circular packaging solutions favors companies able to offer bio-based, monomaterial and recyclable products.	Short – Medium – Long term From own operations and along the value chain



RELEVANT TOPICS (IRO)	TOPIC DESCRIPTION [IMPACTS RISKS OPPORTUNITIES]	CHARACTERISTICS [IMPACTS RISKS OPPORTUNITIES]
ENVIRONMENTAL TOPICS		
Waste	Impacts Impacts resulting from the generation of waste from the internal production process. Risks Risks related to increased costs due to the treatment and disposal of waste. Opportunities Reduction of costs related to waste disposal and increase in revenues due to sales of Secondary Raw Material, thanks to the increased percentage of waste destined for recovery.	Actual Negative Medium – Long term From own operations and along the value chain Medium – Long term From own operations and along the value chain
SOCIAL TOPICS		
S1 OWN WORKFORCE		
Working conditions - Secure employment - Adequate wages - Social dialogue - Freedom of association, existence of works councils and rights to information, consultation and participation of workers - Collective bargaining, including the percentage of workers covered by collective agreements	Impacts Creation of a work environment that offers stable employment, adequate wages and respect for rights, such as social dialogue and collective bargaining, with attention to work-life balance and dialogue with internal representatives. Risks Regulatory/legal, market and reputational risks: failure to protect working conditions may expose to the risk of sanctions, litigation and reputational risks, as well as a high turnover rate, with repercussions on the loss of strategic skills. Opportunities Market and reputational opportunities: promotion of company policies that guarantee secure employment, adequate wages and social dialogue strengthens the ability to attract and retain	Actual Positive Medium – Long term From own operations Medium – Long term From own operations Short – Medium – Long term From own operations and along the Value chain

RELEVANT TOPICS (IRO)	TOPIC DESCRIPTION [IMPACTS RISKS OPPORTUNITIES]	CHARACTERISTICS [IMPACTS RISKS OPPORTUNITIES]
SOCIAL TOPICS		
S1 OWN WORKFORCE		
	adequate professional figures, improves corporate reputation and contributes to greater productivity, enhancing business competitiveness.	
Health and safety	Impacts Negative impacts due to the possibility of accidents or other incidents occurring in the workplace.	Negative Potential Short – Medium – Long term From own operations
	Risks Regulatory / legal and reputational risks arising from the failure to adopt effective prevention and monitoring measures, with increased likelihood of accidents, occupational diseases and work-related stress, compromising productivity and business continuity and leading to possible litigation.	Short – Medium – Long term From own operations
Equality of treatment and opportunity for all - Gender equality and equal pay for work of equal value - Training and skills development - Diversity	Impacts Positive impacts on people's conditions resulting from a work environment that ensures respect for workers and equal opportunity, absence of discrimination, and continuous training.	Effective Positive Long term From own operations
	Risks Regulatory/legal, reputational and market risks arising from episodes of discrimination or failure to comply with regulations on equal opportunities, inclusion and adequate training paths, in the absence of appropriate measures and procedures to guarantee people's rights and skills development.	Short – Medium – Long term From own operations
	Opportunities Market and reputational opportunities, deriving from offering conditions and a work environment that ensure adequate training processes and career paths, a workplace free from discrimination and with equal opportunities.	Short – Medium – Long term From own operations



RELEVANT TOPICS (IRO)	TOPIC DESCRIPTION [IMPACTS RISKS OPPORTUNITIES]	CHARACTERISTICS [IMPACTS RISKS OPPORTUNITIES]
S2 WORKERS IN THE VALUE CHAIN		
Working conditions - Secure employment - Adequate wages - Social dialogue - Health and safety	Impacts Impacts related to working conditions in the production chain that may be characterized by potential negative impacts on human rights and other people's rights (secure employment – inadequate wages – social dialogue – health and safety). Risks Legal risks (sanctions, litigation, administrative proceedings), market and reputational risks caused by the absence or inadequacy of due diligence and monitoring activities related to the supply chain, primarily aimed at verifying adequate and compliant working conditions for the workforce. Market risks also concern business continuity and possible consequences on the structure, composition and availability of the Supply Chain	Negative Potential Short – Medium - Long term Along the value chain - upstream and downstream Short – Medium – Long term Along the value chain – upstream
S4 CONSUMERS AND END USERS		
Personal safety of consumers and/or end users - Health and safety - Personal safety	Impacts Impacts related to non-compliance with food safety standards for products offered by the Company, in line with compliance standards to protect the health and safety of end users. Risks Regulatory / legal and market risks: product defects, particularly in food packaging, can cause recalls, economic losses and legal disputes, impacting business continuity and regulatory compliance. Reputational, legal and technological risks: the presence of contaminants in products can compromise corporate reputation and lead to sanctions or production adjustments to ensure safety and compliance.	Negative Potential Short – Medium Long term From own operations and along the value chain Short – Medium – Long term From own operations and along the value chain Short – Medium – Long term From own operations and along the value chain

RELEVANT TOPICS (IRO)	TOPIC DESCRIPTION [IMPACTS RISKS OPPORTUNITIES]	CHARACTERISTICS [IMPACTS RISKS OPPORTUNITIES]
GOVERNANCE TOPICS		
G1 BUSINESS CONDUCT		
Active and passive corruption - Prevention and detection including training - Incidents	Impacts Negative impacts: possible events of active and passive corruption in relations with stakeholders, resulting in distortions in the conditions of free competition and business conduct. Risks Regulatory / legal, reputational, and market risks following episodes of corruption and/or extortion.	Negative Potential Short – Medium – Long term From own operations and along the value chain Medium – Long term From own operations and along the value chain
Management of relationships with suppliers, including payment practices	Impacts Negative impacts resulting from improper management of the supply chain / failure to select and qualify suppliers in compliance with environmental and social standards and criteria, with consequences for the environment and people in the supply chain. Risks Regulatory / legal, market and reputational risks arising from the presence of suppliers characterized by potentially negative environmental and social impacts. Risks may also involve business continuity issues (interruptions in the supply chain), increases in raw material costs, reputational damage and potential legal, contractual and administrative sanctions.	Negative Potential Short – Medium – Long term From own operations and along the value chain Short – Medium – Long term From own operations and along the value chain

RELEVANT TOPICS (IRO)	TOPIC DESCRIPTION [IMPACTS RISKS OPPORTUNITIES]	CHARACTERISTICS [IMPACTS RISKS OPPORTUNITIES]
GOVERNANCE TOPICS		
G1 BUSINESS CONDUCT		
Corporate culture	Impacts The promotion and consolidation of corporate culture, based on ethical business conduct, generates positive impacts for internal and external stakeholders, strengthening the sense of belonging among the workforce, and the sense of responsibility in relationships with workers, suppliers, customers and other stakeholders. Risks Market and reputational risks related to the inadequate dissemination and promotion of corporate culture, as well as the failure to apply the founding principles and values of business conduct.	Negative Potential Short – Medium – Long term From own operations Medium – Long term From own operations

The effects of relevant impacts, risks and opportunities on the business model, strategy and decision-making process are explored in detail within the reporting of the various topics (ESRS) assessed as relevant. It should be noted that there are no current financial effects related to the risks and opportunities identified as relevant that have not been reflected within the Manucor Report.

➤ Relevant topics and ESRS reporting

ESRS STANDARDS

ESRS 2 IRO-2

Within the ESRS Content Index chapter, an Index is presented, to which reference is made, summarizing the information provided in the document (Disclosure Obligations) based on the results of the materiality analysis.

The information relevant to Manucor that will be presented in the following chapters has been defined with respect to the impacts, risks and opportunities identified through the Double Materiality process. No omissions are reported with respect to the topics described.

➤ Policies adopted for the management of relevant sustainability topics

ESRS STANDARDS

ESRS 2 MDR-P, ESRS 2 MDR-A, ESRS 2 MDR-M, ESRS 2 MDR-T

Manucor pursues the goal of consolidating and developing, in harmony with the Group's policies, of which it has been a part since 2024, its own market share through the promotion of a policy based on the satisfaction of its customers and all other stakeholders, and that fulfills the commitment to **create value**.

The Company is committed to ensuring responsible business conduct through the adoption of policies and procedures.

Below is a summary of the main policies and management systems currently adopted by Manucor, which will be further detailed within the document.



POLICIES / MANAGEMENT SYSTEMS	THEMATIC ESRS
Code of Ethics	S1 Own workforce S4 Consumers and end users G1 Business conduct
Whistleblowing Procedure	S1 Own workforce G1 Business conduct
Organizational, management and control model pursuant to D.Legislative Decree 231/2001 (Model 231)	S1 Own workforce G1 Business conduct
Policy for Quality, Hygiene, Environment, Safety	E1 Climate change E2 Pollution E3 Water and marine resources E5 Resource use and circular economy S1 Own workforce S4 Consumers and end users
ISO 14001:2015	E1 Climate change E2 Pollution E3 Water and marine resources E5 Resource use and circular economy

POLICIES / MANAGEMENT SYSTEMS	THEMATIC ESRS
ISO 9001:2015	S4 Consumers and end users
ISO 45001:2018	S1 Own workforce
EMAS Regulation	E1 Climate change E2 Pollution E3 Water and marine resources E5 Resource use and circular economy
ISCC Plus	E5 Resource use and circular economy
BRC Issue 6 - Packaging	E5 Resource use and circular economy S4 Consumers and end users

Code of Ethics

Manucor adopts a Code of Ethics as an integral part of its Organizational Model pursuant to D.Legislative Decree 231/2001, recognizing the importance of a **shared value system** in business management. The Code defines principles and behaviors expected from Directors, employees, collaborators, and other stakeholders, promoting legality, transparency, fairness, and responsibility in every business activity.

The objective of Manucor's Code of Ethics is to strengthen the oversight of ethical and reputational risks, enhance human capital, and protect the integrity of the Company over time. The importance of economic, social, and environmental sustainability, respect for fundamental rights, prevention of corruption, workplace safety, environmental protection, and respect for competition is also reiterated.

The Company recognizes that business management must address emerging risks, both internal and external, arising from economic developments.

Manucor's approach is based on the use of resources, organization, procedures, control systems, and strategic decisions that allow for the prevention and management of such risks, ensuring the continuity, growth, and prosperity of the company.

In this context, areas of risk that are insufficiently monitored are identified, as well as those where controls are redundant, obsolete, or inadequate, highlighting weaknesses that require priority remediation actions. The Code is binding for all personnel and subject to periodic review by the Supervisory Body.

General principles



Legality and transparency

Ethics in relationships and impartiality

Social and environmental responsibility

Integrity and economic fairness

Protection of company interests and information

→ **Legality and transparency**

Manucor **operates in full compliance with national** and international laws, promoting **transparency** as an essential condition in business management. The company's activities are oriented towards the accuracy of information, **traceability** of decisions, and **prevention** of unlawful behavior.

→ **Ethics in relationships and impartiality**

Relationships with employees, customers, suppliers, institutions, and stakeholders are based on **fairness, respect, and absence of discrimination**. The company rejects favoritism, undue pressure, and abuse of power, ensuring equal treatment and working conditions that respect personal dignity.

→ **Social and environmental responsibility**

Manucor is committed to ensuring the **health and safety of workers**, protecting the environment, and contributing to the well-being of the community. The company complies with environmental regulations and promotes a culture of prevention and shared responsibility.

→ **Integrity and economic fairness**

Financial resources and company assets are managed with diligence, **responsibility, and transparency**. Corporate behavior avoids any form of corruption, contractual abuse, or undue advantage, ensuring respect for **free competition** and the **quality** of services and products.

→ **Protection of company interests and information**

All parties involved in Manucor's activities must **avoid conflicts of interest** and treat all sensitive information with **confidentiality**. The company protects its information assets and promotes a culture oriented towards professional integrity and responsibility towards stakeholders.



Whistleblowing

In accordance with the current regulatory framework (D.Legislative Decree 231/2001, L. 179/2017, EU Directive 2019/1937 and D.Legislative Decree 24/2023), Manucor has implemented a structured whistleblowing procedure that allows the reporting of unlawful conduct or behaviors contrary to corporate integrity. The system is aimed at a wide range of individuals, including employees, suppliers, contractors, customers, and members of local communities, and allows the reporting of acts, omissions, or violations that may harm the public interest or the organization's ethics.

The aim of the procedure is to strengthen the culture of transparency and legality, promoting a work environment based on **ethical principles** and on **compliance with regulations**. Reports can be made through internal or external channels, in written and oral form, and, in the cases provided for, also through public disclosure. The management of reports guarantees the confidentiality of the whistleblower's identity and protection from any retaliation.

The possibility of reporting is extended to all persons operating within the corporate context. Depending on the type of communication channel used in accordance with the provisions indicated below, the Whistleblower may resort to:

- **Internal report:** written/oral communication of information on violations;
- **External report:** written/oral communication of information on violations through the use of the online channel;
- **Public disclosure:** making information on violations public through the press or electronic means or in any case through means of dissemination capable of reaching a large number of people.

Model 231

The adoption of an Organization, Management and Control Model in accordance with the Decree, together with the simultaneous presence of the Code of Ethics, in addition to representing a reason for exemption from the Company's liability with reference to the commission of certain types of crimes, is an act of social responsibility, from which benefits arise for all stakeholders, such as employees, creditors, and all other parties whose interests are linked to the fate of the Company.

The introduction of an additional control system, together with the establishment and dissemination of ethical principles, by improving the standards of conduct adopted by the Company, increases the trust and reputation of the Company towards third parties and, at the same time, fulfills a regulatory function. These tools, in fact, help to regulate the behaviors and decisions of those who, on a daily basis, are called upon to operate in the name or on behalf of the Company.

Manucor has therefore intended to initiate a series of activities aimed at creating and adopting its own organizational model in compliance with the requirements set out by the Decree and consistent both with the principles already rooted in its governance culture and with the guidelines contained in the Confindustria Guidelines. Manucor has initiated a process aimed at adopting and implementing the Model itself, taking into account regulatory developments, the company reality, and Manucor's organizational structure.

The Model and its General Part and Special Parts are addressed to Manucor's directors and employees, as well as to external collaborators and those who work with the Company. In particular, the aim of the Special Parts is that all Recipients adopt rules of conduct in accordance with what is prescribed by each of them, in order to prevent the occurrence of the offenses provided for in the Decree.



Policy for Quality, Hygiene, Environment, Safety

Manucor's Policy for Quality, Hygiene, Environment, and Safety defines the Company's strategic commitment to satisfying customers and stakeholders, ensuring compliance with regulations and international standards.

The Policy is based on principles of **continuous improvement, process efficiency, environmental protection, pollution prevention, worker safety and health**.

The Policy for Quality, Hygiene, Environment, and Safety is integrated with the issuance of annual improvement plans, which define the objectives to be achieved, the responsibilities and resources assigned, and the methods adopted for monitoring and verifying results.

This policy is implemented through certified management systems, compliant with the standards **UNI EN ISO 9001, ISO 14001, ISO 45001, Regulation EMAS, BRC Issue 6 - Packaging**. Manucor has identified the Quality-Hygiene area and the Environment-Safety area as representatives of this policy, assigning them the responsibility of ensuring the full operation of what is provided for in the manual, verifying its implementation, effectiveness, level of integration, and reporting on the overall performance of the system.

Management Systems and Certifications

Manucor is committed to constantly developing and improving an integrated management system that meets the standards of the main international regulations, including **UNI EN ISO 9001, UNI EN ISO 14001, EMAS Regulation** no. 1221/2009, **UNI EN ISO 45001**, and the **Global**

Standard BRC for the production of packaging and packaging materials.

This approach, focused on quality, environmental protection, and occupational safety, allows the Company to meet the needs of the market and the end consumer, while maintaining high levels of efficiency.

NAME OF THE CERTIFICATION	DESCRIPTION
 ISO 14001:2015 Environmental Management System	Management system suitable for keeping the environmental impacts of its activities under control, and systematically seeks their improvement in a consistent, effective, and above all sustainable way.
 ISO 45001:2018 Occupational Health and Safety Management System	The certification is based on the management of occupational health and safety and requires organizations to pursue continuous improvement, thus providing all stakeholders with the guarantee of compliance with the specified safety policies.
 ISO 9001:2015 Quality Management System	Quality management system, applied to processes and company organization, with the aim of improving effectiveness in product realization and service delivery, as well as achieving and increasing customer satisfaction.

NAME OF THE CERTIFICATION	DESCRIPTION
 EMAS Environmental Management System	The voluntary EMAS environmental management system establishes compliance with the requirements of Regulation (EC) No. 1221/2009 as amended by REGULATION (EU) 2017/1505 and REGULATION (EU) 2018/2026 OF THE COMMISSION of the European Parliament and of the Council of 25 November 2009, on the voluntary participation of organizations in a Community eco-management and audit scheme (EMAS).
 ISCC Plus Management System for Environmental Sustainability and Traceability	ISCC (International Sustainability and Carbon Certification) PLUS is an independent sustainability certification recognized internationally, which guarantees complete traceability and ensures that the entire supply chain is free from deforestation and respects the environment and social rights; the certification can be obtained according to the mass balance approach, facilitating the production of certified polypropylene, the main raw material used by Manucor S.p.A.
 BRC Issue 6 - Packaging Quality Management System for Packaging	The global BRCGS standard for packaging materials helps packaging organizations provide products that support the delivery of safe food and comply with hygiene standards. By using a hazard- and risk-based approach related to the lack of hygiene at the site itself, controls of printed packaging, product inspection, and foreign body control, certified organizations and their customers can be confident in the outcome of the quality management system. The BRC Packaging Standard is the first packaging standard in the world to be recognized by the Global Food Safety Initiative (GFSI).

📄 Relevant topics - Objectives and actions

ESRS STANDARDS ESRS 2 MDR-T, ESRS E1 E1-4, ESRS E3 E3-3, ESRS E4 E4-4,
ESRS E5 E5-3, ESRS S1 S1-5, ESRS S3 S3-4, ESRS S4 S4-5

The industrial perspective provided by the new ownership within the Plastchim-T group has made it possible to plan Manucor's development path for the coming years through the preparation of an **Industrial Plan**, which includes an investment program that will lead to an increase in the Company's production capacity with lower production costs, thereby strengthening the group's leadership in the European market.

The new development investments are aimed at making the Company's business model more sustainable, especially from an environmental point of view.

Manucor has set **specific objectives** in terms of sustainability, integrating them directly with the objectives and actions of the industrial plan. These objectives are also consistent and integrated with the annual improvement plan prepared for environmental certification according to ISO 14001 and the EMAS Regulation, ensuring substantial alignment between development strategies, environmental initiatives, and continuous improvement processes.

The approach adopted aims to combine technological and production evolution with greater attention to environmental efficiency and the responsible use of resources. Sustainability is treated as an integral part of the strategic and operational choices that will accompany the implementation of the industrial plan in the coming years, strengthening the Company's solidity and competitiveness in the medium to long term.



RELEVANT TOPIC	OBJECTIVES	ACTIONS	SDG
E1 - CLIMATE CHANGE			
Energy	Reduce energy consumption from fossil sources	Purchase energy with a Guarantee of Origin Certificate.	7.2 By 2030, substantially increase the share of renewable energy in the global energy mix.
Mitigation of climate change			
Adaptation to climate change	Reduce greenhouse gas emissions	Installation of a new photovoltaic system.	7.3 By 2030, double the global rate of improvement in energy efficiency.
		Mapping of the perimeter of GHG Scope 3 emissions and relevant categories.	13.2 Integrate climate change measures into national policies, strategies, and planning.
E2 - POLLUTION			
Air and water pollution	Prevent air and water pollution	Development and improvement of the environmental emergency response plan.	6.3 Improve water quality by reducing pollution, eliminating uncontrolled discharge practices, and minimizing the release of chemicals and hazardous materials.
		Seek plant solutions that apply the best available technologies.	13.1 Strengthen resilience and adaptive capacity to climate-related risks and natural disasters.

RELEVANT TOPIC	OBJECTIVES	ACTIONS	SDG
E3 - WATER AND MARINE RESOURCES			
Water	Reduce water consumption	Implement a water consumption monitoring system for each activity. Introduce a system for measuring water discharges. Construction of a new well to support the production upgrade.	6.4 Increase water efficiency in all sectors and ensure sustainable withdrawals.
E5 - CIRCULAR ECONOMY			
Inflows and outflows of resources related to products and services	Increase the procurement of raw materials from sustainable supply chains or internal recovery	Increase the use of ISCC Plus certified raw materials. Further improve the waste recovery process to increase internal reuse / external valorization through sales. Increase the use of material from sustainable supply chains for packaging. Improvement of the overall yield of virgin plant material (Virgin Plant Material Yield - VPMY).	12.2 By 2030, achieve sustainable management and efficient use of natural resources 12.3 Halve per capita global food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses.



RELEVANT TOPIC	OBJECTIVES	ACTIONS	SDG
E5 - CIRCULAR ECONOMY			
Waste	Reduce waste destined for disposal	Seek partnerships with other companies for the recycling or reuse of waste (e.g. returnable pallets). Seek methods to increase the final recyclability of packaging.	12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling, and reuse.
S1 OWN WORKFORCE			
Secure employment Adequate wages Social dialogue	Enhance human capital and reduce turnover	Adopt a corporate welfare plan for employees. Maintain and adopt an adequate specific training plan (e.g. D&I, sustainability, etc.) to increase internal skills. Definition of career development and performance development plans and adoption of an internal procedure for performance review (Job Evaluation). Promote the "Values Based Culture PROJECT" as a project for connection and cultural inclusion among the Group's countries.	8.3 Promote development-oriented policies that support productive activities, the creation of decent jobs, entrepreneurship, creativity, and innovation.

RELEVANT TOPIC	OBJECTIVES	ACTIONS	SDG
S1 OWN WORKFORCE			
Health and safety	Maintain a work environment attentive to the health and safety of employees	Promote the participation and active consultation of workers by identifying priority aspects and planning targeted actions for effective involvement in health and safety processes. Completion of asbestos remediation operations on the plant's roofing.	8.8 Protect labor rights and promote a safe and healthy working environment for all workers. 3.9 Substantially reduce the number of deaths and illnesses from hazardous chemicals and from air, water, and soil pollution and contamination.
Gender equality and equal pay Diversity	Implementation of a certified management system for Gender Equality	Initiate procedures to obtain UNI PdR 125:2022 certification. Raising employee awareness on diversity, equity, and inclusion through initiatives / dedicated training day.	5.5 Ensure women's full and effective participation and equal opportunities for leadership at all levels. 10.2 Empower and promote the social, economic, and political inclusion of all, regardless of age, sex, disability, race, ethnicity, origin, religion, economic status, or other factors.

RELEVANT TOPIC	OBJECTIVES	ACTIONS	SDG
S2 WORKERS IN THE VALUE CHAIN			
Secure employment Adequate wages Social dialogue	Protect workers along the value chain	Adoption of a Supplier Code of Conduct, establishing clear ethical principles and standards to be followed throughout the entire supply chain, including clauses regarding respect for human rights. Integrate social criteria into the supplier evaluation system, such as respect for human rights and working conditions.	8.3 Promote development-oriented policies that support productive activities, the creation of decent jobs, entrepreneurship, creativity, and innovation. 8.8 Protect labor rights and promote a safe and healthy working environment for all workers.
S4 CONSUMERS AND END USERS			
Health and safety of end consumers	Increase customer satisfaction Maintain high quality and safety of marketed products	Increase awareness among production and quality control staff through specific information / training. Collect direct feedback from customers to understand the causes of complaints (product defects) and increase the number of inspections / audits Reduction of product non-conformities.	12.8 Increase awareness for informed and sustainable choices.

RELEVANT TOPIC	OBJECTIVES	ACTIONS	SDG
G1 CORPORATE CONDUCT			
Active and passive corruption	Increase internal knowledge and awareness on the topic of active and passive corruption	Develop a training plan on the topic of corruption for responsible personnel.	16.5 Substantially reduce corruption and bribery in all their forms.
Management of relationships with suppliers, including payment practices	Adopt supplier selection and monitoring criteria based on ESG requirements	Adoption of a Supplier Code of Conduct, establishing behavioral standards regarding social, environmental, and governance aspects as an integral part of contractual obligations.	8.3 Promote development-oriented policies that support productive activities, the creation of decent jobs, entrepreneurship, creativity, and innovation.
Corporate culture	Spread corporate culture and focus on sustainability issues	Provide training at all levels on sustainability topics.	8.3 Promote development-oriented policies that support productive activities, the creation of decent jobs, entrepreneurship, creativity, and innovation.

Although a precise timeline has not yet been defined for all planned initiatives, Manucor has already started, at the beginning of 2025, some preparatory activities aimed at achieving the strategic objectives related to

sustainability, in line with the industrial plan and the business development guidelines.

Ongoing actions include the expansion of the range of ISCC PLUS certified films, analysis of supply chains to increase the use of bio-circular and circular resins, as well as the technical-economic evaluation of plant solutions, such as the new photovoltaic plant, with lower environmental impact.

The definition of precise timeframes will be addressed in future reports, as soon as conditions allow for accurate planning of the relevant timeframes.

02

Environmental disclosure





Climate change

TOPIC	SUBTOPIC	SDG
E1 Climate change	Adaptation to climate change	 
	Mitigation of climate change	
	Energy	

Relevant impacts, risks and opportunities and their interaction with the strategy and business model

ESRS STANDARDS

ESRS 2 SBM-3, ESRS 2 IRO-1

IMPACTS

Energy

Direct negative impacts related to energy consumption (mainly electricity and natural gas) for the Company's production activities.

Mitigation of climate change

GHG / greenhouse gas emissions generated by energy consumption and other direct sources, from production processes and along the value chain (raw material procurement – logistics – waste management – end of product life).

RISKS/OPPORTUNITIES

Energy

Risks

Recurring and also short-term risks of exposure to market dynamics of energy costs with effects on production costs and economic and financial performance.

Mitigation of climate change

Risks

Regulatory / legal and technological transition risks: introduction / changes in regulations to address climate change and evolution of production technology to support and accelerate / facilitate energy transition plans. Potential effects on the structure and organization of the supply chain and business continuity risks.

Market and reputational transition risks: market orientation / evolution of demand (both for business and consumer markets) towards sustainable products and business models, which demonstrate commitment and implement actions to contain energy consumption and reduce GHG emissions, requirements and adaptation to direct business customer standards.

Opportunities

Opportunity arising from regulatory/policy evolution and market mechanisms linked to the energy transition (e.g. Energy Release), which allow Manucor to access renewable energy under stable and competitive conditions.

RISKS/OPPORTUNITIES

Adaptation to climate change

Risks

Physical risks (acute and chronic) resulting from climate events: a) in the geographical area of Manucor's production plant and, more significantly, b) supply sources (Value chain), which may have consequences in terms of business continuity on production processes / supply chain interruption, raw material availability.

Manucor has assessed its impacts, risks, and opportunities related to climate change, taking into consideration not only its own activities but also activities along the value chain, both upstream and downstream. For further information on the process of identifying relevant impacts, risks, and opportunities, please refer to the chapter *Relevant topics*.

▮ Policies related to climate change mitigation and adaptation

ESRS STANDARDS

ESRS E1 E1-2, ESRS 2 MDR-P

Environmental Policy

Manucor is committed to the **management and rationalization of its energy consumption** as an integral part of its Environmental Policy. In particular, with reference to the environmental management system, an Environmental Declaration is issued and kept up to date, establishing environmental goals and programs.

As part of its Policy, Manucor is committed to **monitoring** and **constantly reducing** its **energy consumption** and **atmospheric emissions** resulting from its production activities. The goal is to optimize the use of electricity and fuels by evaluating consumption through specific performance indicators and promoting energy efficiency.

The Company adopts technological and management solutions to reduce greenhouse gases and the impacts resulting from the transportation of goods.

Manucor confirms its concrete commitment to environmental protection and the prevention of climate change, integrating these principles within its management system, in compliance with the standard **UNI EN ISO 14001:2015** and **EMAS Regulation No. 1221/2009**.

▾ Actions on climate change

ESRS STANDARDS

ESRS E1 E1-3, ESRS 2 MDR-A

Energy efficiency interventions

As part of the **modernization project for Line 5**, the current extruder has been replaced with a new, more modern and efficient machine, which will be accompanied by the installation of a photovoltaic system. Thanks to a simpler and more compact configuration, the new extruder will allow a **significant reduction in electricity consumption**, estimated at over 6,500 MWh per year.

As part of the technological modernization and production optimization plan, Manucor plans to install a new, more energy-efficient production line, called **Line 6**, starting in 2025, with commissioning expected by the end of 2026.

Production of energy from renewable sources - photovoltaic plant

Manucor has designed a **new photovoltaic system** within its production site, with the aim of increasing energy efficiency and reducing the consumption of non-renewable sources. The plant will produce 4,470 MWh per year, mainly intended for self-consumption, and will be installed above Line 5, which is undergoing a modernization intervention aimed at improving its efficiency and integration with new energy systems. The project has been developed to integrate with existing equipment, without modifying the production process or increasing its capacity, in order to ensure operational continuity and full compliance with current regulations.

Manucor has also planned the **installation of an additional photovoltaic system** to support Line 6, with the aim of contributing to the **progressive decarbonization** of the plant's energy consumption.

Cogeneration plant

Given the energy requirements (simultaneous demand for electricity and heat), Manucor procures energy from the operator of a **trigeneration plant** located within the site itself (**CO-VER Power Technology S.r.l.**). In fact, the plant houses a cogeneration facility owned by CO-VER Power Technology, with a total power of 8.76 MW electric.

In 2012, Manucor installed a substation that allows the self-production plant to operate in parallel with the grid, **avoiding frequent anomalies** on the 20 kV lines and enabling the units to operate close to the nominal load (3 MW), with a significant **improvement in electrical efficiency**.

The plant is complemented by a **recovery system** capable of utilizing the heat made available by the engines. The recovered heat is used for the **heating of diathermic oil** required within the production lines, for the production of hot water for winter heating, and finally for the production of hot water to supply absorption chillers.

Energy management

Overall, Manucor's energy needs exceed the 10,000 toe limit set by Legislative Decree 10/91, and therefore Manucor has appointed a person responsible for the conservation and rational use of energy (*Energy Manager*).

The Energy Manager reports to the Operations Management and is responsible for the **management of the plants** connected with energy production, including relations with the supplier COV-ER Power Technology S.r.l., operator and owner of the cogeneration plant, as well as all issues related to the **rational use of energy resources**.

The Energy Manager is also responsible for **planning** and **coordinating** interventions, requested from specialized external companies, for the ordinary and extraordinary maintenance of energy production plants, in order to maintain their efficiency.

Adherence to SBTi

The monitoring and reporting of emissions represents a constant commitment for Manucor, from the perspective of responsible management of environmental impacts, in line with the objectives defined by the Company's Environmental Policy.

During 2024, Manucor formalized its adherence to the **Science Based Targets initiative (SBTi)**, committing to define emission reduction targets, in line with what is required by the scientific community to limit global warming. This commitment has been recognized through the publication of the Company's name on the official SBTi website and on those of the initiative's partners, including *We Mean Business*.

With this adherence, Manucor commits to developing short-term climate targets (*near-term targets*) that must be validated within 24 months through the official SBTi platform booking system. The targets will be developed in accordance with the most up-to-date criteria of the initiative (*SBTi Criteria 5.0*, in force since July 15, 2022), with the support of the tools and guidelines provided by SBTi itself.

The initiative also provides for a due diligence activity by SBTi, both before and after the confirmation of the commitment, in order to ensure the integrity and consistency of the paths undertaken by participating companies.

▮ Energy consumption and energy mix

ESRS STANDARDS

ESRS E1 E1-5, ESRS 2 MDR-M

Manucor's energy needs are closely linked to the Company's operational and production requirements, both in terms of electricity and thermal energy, necessary for the operation of production plants, civil utilities, and production support systems, as well as for heating and film treatment along the processing lines.

Electricity is used to power production plants (film lines, metallization lines, cutting and packaging lines, regranulation lines), civil utilities (offices, lighting), and production support plants.

Thermal energy is mainly used for heating diathermic oil, used in film lines, as well as for the production of hot water and air intended for winter heating. It is also used for the cooling water required for production processes, for hot air in the ovens of film lines, and for flame generation, through gas combustion, used in film treatment.

The production of thermal energy is supplemented for winter heating needs by thermal plants (powered by methane gas) and for production needs by burners (powered by methane gas) located at the points of use (ovens, flame treatment rollers).

With regard to Manucor's energy consumption for the two-year period 2023-2024, fossil sources currently account for 100% of the energy consumed. In 2024, there is an increase in the consumption of **natural gas for cogeneration** (+9.75%), rising from 141,208.70 MWh in 2023 to 154,976.27 MWh in 2024. The increase is mainly associated with the intensification of production activities, particularly in the use of natural gas for the production of electricity and heat.

The consumption of **purchased electricity** has decreased, going from 17,928.13 MWh in 2023 to 16,489.18 MWh in 2024. On the contrary, the consumption of petroleum fuels, such as diesel and gasoline for vehicles, is increasing. This trend is linked to an increase in production activities, which has led to greater use of vehicles and equipment powered by fossil fuels, thus contributing to the increase in fuel consumption.

During the two-year period 2023-2024, Manucor did not purchase electricity produced from renewable sources through contracts with Guarantee of Origin.

Manucor's **energy consumption** for the two-year period 2023-2024 is reported in MWh, as required by ESRS standards. All Manucor's activities are considered to belong to **high climate impact sectors**.

ENERGY CONSUMED (MWh)	2024	2023
Total energy consumption related to own operations	204.829,61	189.105,97
Energy consumption from fossil sources (MWh)	204.829,61	189.105,97
Consumption of coal fuel and coal products (MWh)	-	-
Consumption of crude oil and petroleum products (MWh)	203,04	193,13
Diesel for vehicles	193,60	190,11
Gasoline for vehicles	9,44	3,01
LPG for production	-	-
Consumption of natural gas fuel (MWh)	188.137,52	170.984,84
Natural gas for cogeneration	154.976,27	141.208,70
Industrial natural gas	33.161,25	29.776,14
Consumption of fuel from other fossil sources (MWh)	-	-
Consumption of electricity from fossil sources (MWh) purchased or acquired	16.489,18	17.928,13
Self-produced energy from non-renewable sources and consumed	-	-
Self-produced energy from non-renewable sources	0,14	0,12
Less: energy fed into the grid	0,14	0,12
Share of consumption from fossil sources in total energy consumption (%)	100%	100%
Consumption of energy from renewable sources (MWh)	-	-
Share of consumption from renewable sources in total energy consumption (%)	0%	0%

Energy intensity

Manucor's energy intensity index is defined, as required by the ESRS, as the ratio between total energy consumption and net revenues. Between 2023 and 2024, energy intensity increased slightly, recording a 3% worsening.

ENERGY INTENSITY INDEX (REVENUES)	2024	2023
Energy consumption (MWh)	204.829,61	189.105,97
Net revenues (Euro)	142.505.395	135.460.392
Intensity index (MWh / thousands of euro)	1,44	1,40
Difference %	3,0%	-

For the calculation of the energy intensity index, the data on **tons of raw material used** by the Company was also taken as a reference, considered more significant due to the nature of Manucor's production activities. The intensity thus calculated, not influenced by inflationary trends in recent years, shows relative stability, with a slight worsening of 1.2% between 2023 and 2024.

ENERGY INTENSITY INDEX (PRODUCTION)	2024	2023
Energy consumption (MWh)	204.829,61	189.105,97
Tons of raw material used	75.717,13	70.732,02
Intensity index (Energy consumption MWh / tons of raw material used)	2,71	2,67
Difference %	1,2%	-

GHG emissions

ESRS STANDARDS

ESRS E1 E1-6, ESRS 2 MDR-M

In the context of its industrial activities, Manucor recognizes the relevance of atmospheric emissions as a priority environmental aspect. In particular, the most significant emissions are represented by greenhouse gases (GHG - Greenhouse Gases), in line with the nature of its business and production processes.

Emissions are expressed in tonnes of carbon dioxide equivalent (t CO₂e) and include both **direct emissions (Scope 1)**, mainly attributable to the use of diesel for vehicles and natural gas used in production processes, and **indirect emissions (Scope 2)**, generated by the consumption of electricity purchased from the grid.

The calculation of indirect emissions from electricity consumption (GHG - Scope 2) was carried out both according to the “**Location-based**” approach and the “**Market Based**” approach:

The **location-based** method provides for accounting for emissions resulting from electricity consumption, applying national average emission factors for electricity production.

The **market-based** method, which requires determining GHG emissions - Scope 2 resulting from the purchase of electricity by considering the specific emission factors communicated by suppliers. For purchases of electricity from renewable sources, an emission factor of zero t CO₂ is assigned. In cases where specific contractual agreements have not been defined, the approach in question requires the use of national “residual mix” emission factors, where technically applicable.

Overall, the **total emissions** (Scope 1 + Scope 2) **increased by 7.9%**, mainly due to the greater use of gas for the cogeneration plant, resulting from the increase in Manucor's production activity during 2024.

TOTAL EMISSIONS – GHG SCOPE 1 + GHG SCOPE 2 (t CO ₂ e)	2024	2023
Total GHG emissions Scope 1 (direct)	38.195,81	34.719,43
Total GHG Scope 2 emissions (indirect) – Location-based	4.339,81	4.718,53
Total GHG Scope 1 / Scope 2 Location-based emissions	42.535,62	39.437,95

Direct emissions - GHG Scope 1

In 2024, **direct emissions (Scope 1)** recorded an **increase** (+10%), mainly due to the increase in production activity. This operational intensification led to greater use of both diesel for company vehicles and natural gas for cogeneration, with a consequent impact on overall emission levels.

DIRECT EMISSIONS - GHG SCOPE 1 (t CO ₂ e)	2024	2023
Fuels from crude oil and petroleum products	51,38	49,01
Diesel for vehicles	49,19	48,31
Gasoline for vehicles	2,19	0,70
Fuels from natural gas	38.144,43	34.670,41
Natural gas for cogeneration	31.421,07	28.632,74
Industrial natural gas	6.723,36	6.037,68
F-gas (refrigerant gases released into the atmosphere)	-	-
Total - Scope 1 emissions (t CO ₂ e)	38.195,81	34.719,43

Sources: Diesel for vehicles – DEFRA - Greenhouse gas reporting: conversion factors 2024 - GOV.UK (www.gov.uk)

LPG - DEFRA - Greenhouse gas reporting: conversion factors 2024 - GOV.UK (www.gov.uk)

Natural Gas – DEFRA - Greenhouse gas reporting: conversion factors 2024 - GOV.UK (www.gov.uk)

As part of its environmental commitment, Manucor closely monitors sources of direct greenhouse gas emissions, including plants that use fluorinated gases. Currently, there are 23 refrigeration units, including two absorption chillers, which use the thermal energy produced by the cogeneration plant.

Within these units, refrigerants subject to regulations on fluorinated greenhouse gases are used, whose use is governed by specific control and management obligations.

All units have been regularly inspected and maintained by specialized external companies and **no gas leaks have been reported during the two-year period.**

Indirect emissions - GHG Scope 2

The calculation of **indirect emissions** from electricity consumption (**GHG - Scope 2**) was carried out using both the *location-based* and *market-based* approaches. It should be noted that the most representative value for Manucor is currently the *location-based* one, due to the company's current electricity purchasing profile, which is produced entirely from non-renewable sources.

The data calculated using the *location-based* method shows that emissions have decreased (-8%), both due to more efficient use of electricity and greater use of the cogeneration plant for on-site electricity production.

INDIRECT EMISSIONS - GHG SCOPE 2 (t CO ₂ e)	2024	2023
Purchased electricity - Location-based method	4.339,81	4.718,53
Purchased electricity - Market-based method	8.253,92	8.974,20

Source: Electricity Location Based: ISPRA - Emission factors for the production and consumption of electricity in Italy (publication date 05/2024) Sheet 19 - Estimate of greenhouse gas emission factors from the electricity sector for gross electricity production net of pumping.

Electricity Market Based: European Residual Mix | AIB (aib-net.org) [data 2023] Table 2: Residual Mixes ton/CO₂/kWh

Emissions intensity

Similarly to the energy intensity index, the emissions intensity index is calculated with reference to net revenues and the tons of raw material used. For the calculation of Scope 2 emissions intensity indices, the values resulting from the *location-based* calculation methodology were used, as it is more representative of the current profile of electricity purchasing and self-production.

The emissions intensity, calculated with reference to net revenues and tons of raw material used, shows a **substantial stability in the two-year period 2023-2024**.

In 2024, the emissions intensity index in relation to net revenues is 0.30 t CO₂ per thousand euros, a slight increase compared to 2023 (+2.5%).

Conversely, the emission intensity relative to the tons of raw material used shows an almost stable situation (+0.8%).

EMISSIONS INTENSITY INDEX	2024	2023
Total GHG Scope 1, 2 emissions (t CO ₂ e)	42.535,62	39.437,95
Net revenues (Euro)	142.505.395	135.460.392
Intensity index (t CO ₂ e / thousand euros)	0,30	0,29
Difference %	2,5%	-

EMISSIONS INTENSITY INDEX	2024	2023
Total GHG Scope 1, 2 emissions (t CO ₂ e)	42.535,62	39.437,95
Tons of raw material used	75.717,13	70.732,02
Intensity index (t CO ₂ e / tons of raw material used)	0,561	0,557
Difference %	0,8%	-



Pollution

TOPIC	SUBTOPIC	SDG
E2 Pollution	Air pollution	
	Water pollution	
	Substances of concern	
	Substances of very high concern	

⌵ The process of identifying and assessing relevant impacts, risks, and opportunities

ESRS STANDARDS

ESRS E2 IR0-1

IMPACTS	
Air pollution	Negative impacts due to the emission of pollutants, such as volatile organic compounds, dust, and combustion fumes into the air during production activities, which cause air pollution.
Water pollution	Negative impacts due to the emission of pollutants, such as unfiltered solid particles, into receiving water bodies during production activities.
Substances of concern	Release into the environment of substances such as hazardous and flammable liquids, with negative effects on human health and ecosystems, even in the absence of intentional use / accidental presence of SVHC (<i>Substances Very High Concern</i>) in products, with consequences for product safety.
Substances of very high concern	

RISKS/OPPORTUNITIES

Risks

Air pollution

Regulatory / legal, technological, market, and reputational risks: introduction / changes in regulations regarding atmospheric emissions of pollutants with potential consequences on production processes and supply chain (revision of production processes, adoption of new technologies, changes in the supply chain).

Risks

Water pollution

Regulatory / legal, technological, market, and reputational risks: introduction / changes in regulations relating to water treatment and pollution, with potential consequences on production processes and the supply chain (revision of production processes, adoption of new technologies, changes in the supply chain).

Operational risk arising from external pollution of water resources, which may compromise the availability of water necessary for industrial processes.

Substances of concern

Risks

Extremely concerning substances

Regulatory / legal, market and reputational risks: non-compliance of own products in case of exceeding regulatory limits or more stringent requirements from customers and authorities.

Manucor has assessed its impacts, risks, and opportunities related to Pollution, taking into account not only its own activities but also those along the value chain, both upstream and downstream. For further information on the process of identifying relevant impacts, risks, and opportunities, please refer to the chapter *Relevant topics*.

▮ Policies related to pollution

ESRS STANDARDS

ESRS E2 E2-1, ESRS 2 MDR-P

Manucor, in line with its own **Policy for Quality, Hygiene, Environment and Safety**, adopts measures aimed at the **prevention and reduction of pollution**, through the **containment of emissions** within limits lower than those established by the applicable regulations.

The Company is committed to reducing and preventing pollution resulting from its production activities, adopting measures aimed at monitoring and progressively minimizing environmental impacts. In particular, pay attention to:

- to the containment of **atmospheric emissions**, through the control of concentration levels and mass flows of polluting substances, including volatile organic compounds and greenhouse gases, in all main phases of the production process, including film production, metallization, hydropyrolysis, cogeneration plants and thermal generators;
- to the management of **water**, constantly checking water consumption and the quality of discharges, in order to prevent the release of pollutants into surface and underground waters;
- to the prevention of **soil** contamination, with targeted controls in circuits and plants that use hazardous or flammable fluids;

Through these commitments, the Company adopts a responsible and proactive approach in managing potential environmental impacts, with particular attention to the **prevention and reduction of the various forms of pollution**. In line with current regulations and its own Environmental Policy, the Company monitors and implements specific measures to contain air, water and soil pollution, as well as to reduce the use and release of substances of concern within its production processes.

└ Air and water pollution

ESRS STANDARDS

ESRS E2 E2-4, ESRS 2 MDR-M

Air pollution

Manucor's atmospheric emissions are subject to periodic monitoring, in accordance with the requirements established by the competent authorities when issuing the relevant permits. The permits relating to emissions are unified and defined within the **Single Environmental Authorization (AUA)**.

The Authorization currently covers **92 stacks**, of which one relates to cogeneration plant A and two relate to cogeneration plant B, both usable in case of emergency.

The substances that can potentially be released from the emissions of Manucor's activities derive from the processes of extrusion, metallization and electronic treatment.



ACTIVITY	POLLUTANT SUBSTANCES	PRESCRIBED LIMITS	
		CONCENTRATION	MASS FLOW
Extrusion, Metallization and Electronic Treatment	Total Dust (particulate of organic compounds in the form of gas)	50 mg/Nm ³	0.500 kg/h
	Formaldehyde, Acetaldehyde, 2-propenal (organic compounds in the form of gas, vapors or dust)	20 mg/Nm ³	0.100 kg/h
	Ozone	/	/
Methane gas combustion (Combustion plants with nominal thermal power less than 50 MW)	Nitrogen oxides (NO _x)	250 mg/Nm ³	/
Methane gas combustion (stationary combustion engines internal)	Nitrogen oxides (NO _x)	400 mg/Nm ³	/
	Nitrogen oxides (NO _x) Legislative Decree 152:2006 (Annex 1 to Part V - Part 3 - § 3 - Stationary engines constituting medium new combustion plants powered by gaseous fuels (natural gas). Values refer to an oxygen content in the gaseous effluent of 15%.)	95 mg/Nm ³	/
	Carbon monoxide (CO)	300 mg/Nm ³	/

Manucor is committed to operating in compliance with current environmental regulations regarding atmospheric emissions, in particular in accordance with the provisions of **Legislative Decree 152/2006** (Consolidated Environmental Act). The channeled emissions are kept within limits that are **at least one order of magnitude lower than the limit values** of emissions indicated by the regulations.

To ensure this result, the Company uses dedicated **abatement systems** and **monitoring**, which allow continuous and precise control of atmospheric emissions.

Manucor's activity does not fall among those subject to the Integrated Environmental Authorization (AIA) regime, nor is it subject to Regulation (EU) No. 2018/842 concerning the sharing of efforts in reducing greenhouse gas emissions in sectors not included in the ETS (Emission Trading System). Consequently, the Company is not currently included within the scope of the **European Pollutant Release and Transfer Register (E-PRTR)**, which applies exclusively to industrial activities with emission thresholds higher than those generated by Manucor. For these reasons, the quantities of emissions generated during the two-year period are not indicated, as they are below the thresholds to be reported.

Abatement systems

The pollutant content in the fumes resulting from the metallization operation is reduced by the presence of a **dry filter**. The emission consists exclusively of air, extracted to create the vacuum necessary for the aluminum evaporation process. As a precaution, there is a filter that retains any oil particles present in the air extracted from the metallization chamber in case of malfunction of the vacuum pumps. Such a condition would, in any case,

be immediately detected because the process would be interrupted due to the failure to achieve a vacuum. In any case, the possible concentration of volatile organic compounds (oil vapors) at the stack is estimated at a maximum of about 10 mg/Nmc.

The film coating process also involves emissions of volatile organic compounds (VOCs) and dust. The emission of pollutants in the film coating process, however, depends on the type of product and, more precisely, on the amount of additives (generally more volatile substances) used in the respective formulation.

Water pollution

Wastewater discharges into surface waters are subject to periodic monitoring, in accordance with the requirements established by the competent authorities when issuing the Single Environmental Authorization (AUA).

During the year, **semi-annual analyses of wastewater** were carried out in order to determine the average concentrations of pollutants and estimate the water volumes discharged through the manholes into surface waters.

The management of civil wastewater discharges is carried out with a **phytodepuration plant** characterized by a discontinuous discharge and, in any case, strongly limited due to the transpiration action of the tree species that constitute it. The natural phytodepuration plant, in addition to ensuring an adequate level of purification even under conditions of high variability of the incoming hydraulic and organic load, is characterized by excellent landscape and environmental integration.

There are also **4 underground tanks**, two of which are empty 10-cubic-meter tanks intended for emergency containment of diathermic oil, and two more (one 3 and one 5 cubic meters), empty, intended for emergency containment of any oil spills from transformers. Since all oil transformers have been replaced with resin transformers, these latter tanks are no longer in use and therefore no further checks on their condition are planned.

▮ Substances of concern and substances of very high concern

ESRS STANDARDS

ESRS E2 E2-5, ESRS 2 MDR-M

Regulation No. (EC) 1907/2006 **REACH** (*Registration, Evaluation, Authorisation and Restriction of Chemicals*) entered into force on June 1, 2007 and concerns the production and use of chemical substances and their potential impacts on human health and the environment. Annex XVII of the REACH Regulation contains a list (Candidate List) of substances subject to restrictions, called "Substances of Very High Concern" (SVHC).

Annex XIV of the REACH Regulation, as amended by Regulation (EU) 2017/999 of June 13, 2017, contains a list (Authorization List) of SVHCs that may not be used, placed on the market, or imported into the EU unless the Company obtains a specific authorization.

According to the REACH Regulation, throughout the entire product life cycle, **Manucor is considered a downstream user**, and not a manufacturer, and therefore Manucor is exempt from such registration. As a downstream user, Manucor has contacted raw material suppliers to ensure the registration (or pre-registration) of the substances contained in the raw materials used.



All suppliers have confirmed that all substances used have been pre-registered or registered.

In Manucor products, the substances present in the "*Candidate List of Substances of Very High Concern (SVHC)*" updated as of 21/01/2025, **are neither intentionally used as raw materials nor added as components in raw materials**, in concentrations above 0.1%, as determined by supplier certifications, mass balance, and specific analytical tests.

With regard to the substances in Annex XVII of Regulation No. (EC) 1907/2006, which are restricted and for which authorization is required, Manucor **does not intentionally add or use as raw materials, nor employ raw materials containing substances in concentrations above the thresholds set by the annex.**

Chemical risk analysis

Although these substances are not used in the products, some of the substances monitored within the chemical risk register meet the criteria that define a substance of concern or of very high concern. In consideration of the active monitoring of these substances, Manucor has carried out a chemical risk assessment in the workplace environments of the plant. This chemical risk assessment involved identifying the sources of risk, determining the potential exposure risks, and estimating the extent of exposure risks.

The information on the chemical agents considered and for which

the chemical risk was assessed were obtained from the safety data sheets of the products used in the various operational phases.

Following the assessment, compliance with the criteria for the existence of **low risk** conditions was verified, that is, for each chemical agent assessed and for the synergistic effect of all monitored pollutants, it was concluded that the risk is to be considered low for safety and negligible for workers' health.

HAZARDOUS SUBSTANCES ANALYZED

Inhalable PNO_C

Respirable PNO_C

Aluminum dust

Ethylene glycol

Formamide

Formaldehyde

Ethanol

Acetaldehyde

Acrolein

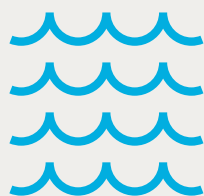
VOC (n-hexane)

Nitrogen dioxide

Titanium dioxide

Mineral oil

Ozone



Water and marine resources

TOPIC	SUBTOPIC	SUB-SUBTHEME	SDG
E3 Water and marine resources	Water	Water consumption Water withdrawals	

▾ The process of identifying and assessing relevant impacts, risks, and opportunities

ESRS STANDARDS

ESRS E3 IR0-1

IMPACTS

Water

Impacts Negative impacts resulting from the withdrawal and consumption of water resources used for film coating processes and in cooling circuits.

RISKS/OPPORTUNITIES

Water

Risks Market, reputational, and business continuity risks: the unavailability of water in areas subject to water stress can compromise production capacity and the regularity of industrial processes, with potential impacts on the ability to meet demand and maintain the standards expected by customers. Such situations can generate repercussions on commercial positioning and on the continuity of relationships with key stakeholders.

Manucor has assessed its impacts, risks, and opportunities related to Water, taking into consideration not only its own activities but also those along the value chain, both upstream and downstream. For further information on the process of identifying relevant impacts, risks, and opportunities, please refer to the chapter *Relevant topics*.

▾ Policies related to water and marine resources

ESRS STANDARDS

ESRS E3 E3-1, ESRS 2 MDR-P

Manucor, in line with its Policy for Quality, Hygiene, Environment, and Safety, pays particular attention to the sustainable management of natural resources, with the aim of **progressively reducing water consumption** in relation to production volumes.

The materiality analysis of environmental aspects carried out by Manucor led to the identification of environmental objectives included in the environmental policy, among which is the **reduction in the use of natural resources and, in particular, water**, through the periodic assessment of water withdrawals/consumption (expressed in m³ per ton of product) in the various production circuits, including cooling circuits, and the monitoring of discharges into surface waters, in order to optimize process efficiency and prevent any form of waste or contamination.

This commitment is part of a broader strategy aimed at minimizing environmental impact, improving process efficiency, and promoting responsible use of water resources, in compliance with current regulations and the environmental protection principles adopted by the Company.

▮ Actions and resources related to water

ESRS STANDARDS

ESRS E3 E3-2, ESRS 2 MDR-A

Manucor is committed to the **responsible management** of water discharges generated by its production activities, with the aim of **minimizing the associated environmental impact**. Even in the absence of a continuous monitoring system, the Company carries out a detailed classification of the different types of discharge, in order to ensure adequate control of the sources and disposal methods.

Among the improvement actions implemented for more efficient use of water resources are the **management of rainwater** and the **treatment of civil wastewater**. Rainwater, collected as a result of the washing of road surfaces and roof areas, is conveyed to the appropriate drainage systems, in accordance with applicable regulatory requirements.

Civil wastewater, on the other hand, coming from internal services such as changing rooms, offices, production departments, and warehouses, is directed to the on-site phytodepuration plant, ensuring adequate treatment.

↘ Water consumption

ESRS STANDARDS

ESRS E3 E3-4, ESRS 2 MDR-M

Water withdrawals

Manucor operates in compliance with the permits issued by the Province of Caserta for the withdrawal and use of groundwater for industrial purposes, with decrees and concessions regulating the exploitation of **two wells** located in the Municipality of Sessa Aurunca, obtained between 1993 and 2009.

The water, supplied from two private wells, undergoes UV disinfection treatment in the case of water for civil use and softening with ion exchange resins and their regeneration in the case of process water.

Civil uses are limited to sanitary services (toilets, sinks, and showers).

The **process uses** are instead the following:

- process water used in the polypropylene film production cycle (as a cooling fluid);
- cooling towers;
- wetting of polypropylene film;
- cooling of process rollers in the metallization plant;
- polypropylene regranulation;



- resin filter washing;
- firefighting services.

The water withdrawn during 2024 amounts to 543,120 m³, a slight decrease compared to 2023 (-3.44%).

Manucor has reduced water withdrawals also taking into account the location of its plant, which is situated in an area classified as having high water stress. This choice is consistent with the company's policy of responsible water resource management and confirms the Company's commitment to minimizing the environmental impact of its activities.

WATER WITHDRAWALS (m ³)	2024	2023
Total water withdrawals	543.120	562.501
of which in areas of medium-high water risk and high water stress	543.120	562.501

Water stress - Water stress refers to the ability or inability to meet water demand, both human and that of ecosystems as a whole, i.e., the ratio between total water withdrawal and the renewable supply available from surface and groundwater sources. As a tool for assessing water-stressed areas, reference was made to the Aqueduct Water Risk Atlas [Aqueduct | World Resources Institute \(wri.org\)](https://www.wri.org/aqueduct) by the *World Resources Institute*.

Water discharges

The industrial processes that generate water discharges include the operation of **cooling towers**, the **wetting rollers** of the polypropylene film, the **overflow** of the polypropylene regranulation machines, the **discharge of oily condensates** from the compressor group, and the discharge resulting from the **washing of filters** in the hydrolysis plant.

During the two-year period, Manucor's discharges remained almost unchanged, with a slight reduction in 2024 (-5.86%). These data are not directly monitored by the Company, but are estimated based on production activities and identified sources.

WATER DISCHARGES (m ³)	2024	2023
Total water discharges	211.816	225.000

The data relating to discharges have been estimated, as there is no detection system in place.



Water consumption

The consumption of water resources within the site is calculated as the difference between the volumes of water withdrawn and those actually discharged. This difference is attributable to specific production and management processes. In particular, a significant portion of the water is **lost through evaporation** via the stacks of the evaporative towers, constituting a significant absorption. Other components of consumption include oily water, generated by certain processes and classified as waste, as well as the water input required by the phytoevapotranspiration plant. Finally, water consumption is also contributed to by the washing operations of the oven channels, which involve direct use of the resource.

The recorded consumption is almost exclusively attributable to process use, with civil consumption estimated, on average, at 10,000 m³/year.

As required by the ESRS Standards, data relating to water consumption are reported in cubic meters.

WATER	2024	2023
Water withdrawals (m ³)	543.120	562.501
Water discharge (m ³)	211.816	225.000
Water consumption (withdrawals - discharges)	331.304	337.501
Of which in areas of medium-high water risk and high water stress	331.304	337.501

Water intensity

The water intensity index shows an improvement in Manucor's water consumption efficiency between 2023 and 2024. Water intensity, calculated both in relation to net revenues and to the tons of raw material used, has improved in both cases.

The water intensity calculated on the tons of raw material used **showed an improvement of 8.3%** in 2024, highlighting the effectiveness of the initiatives adopted to optimize consumption and improve resource management.

WATER INTENSITY INDEX	2024	2023
Total water consumption (m³)	331.304	337.501
Net revenues (Euro)	142.505.395	135.460.392
Intensity index (Water consumption (m³) / thousands of euros)	2,32	2,49
Difference %	-6,7%	-
WATER INTENSITY INDEX	2024	2023
Total water consumption (m³)	331.304	337.501
Tons of raw material used	75.717,13	70.732,02
Intensity index (Water consumption (m³) / tons of raw material used)	4,38	4,77
Difference %	-8,3%	-



Resource use and circular economy

TOPIC	SUBTOPIC	SDG
E5 Resource use and circular economy	Resource inflows, including resource use	
	Resource outflows related to products and services	
	Waste	

➤ The process of identifying and assessing relevant impacts, risks, and opportunities

ESRS STANDARDS

ESRS E5 IR0-1

IMPACTS

Resource inflows, including resource use

Negative impacts related to the use of raw materials from fossil sources (mainly polypropylene) employed in production processes for the manufacture of BOPP.

Resource outflows related to products and services

Negative impacts related to the introduction to the market of often single-use plastic films, with negative consequences for the environment if not properly recycled.

Waste

Impacts resulting from the generation of waste from the internal production process.

RISKS/OPPORTUNITIES

Resource inflows, including resource use

Risks Regulatory and legal transition risks: the evolution of regulations on plastic packaging may entail restrictions on the use of raw materials of fossil origin, which may require adjustments in production processes and availability of raw materials.

Market and technological transition risks: the depletion of fossil reserves, the source of virgin polypropylene, creates pressure on prices and procurement costs, with negative effects on production costs, margins, and competitiveness.

Market and reputational transition risks: the growing attention of consumers towards low environmental impact products can influence the perception of traditional products, with potential repercussions in terms of customer preference and commercial positioning.

Opportunities Business and market opportunities: the growing demand for bio, bio-circular, and circular raw materials offers Manucor the opportunity to strengthen its competitive positioning, enhance its product portfolio and grow in segments oriented towards the circular economy thanks to certifications such as ISCC PLUS.

Resource outflows related to products and services

Risks Regulatory, legal and technological transition risks: the evolution of regulations on plastic packaging may introduce restrictions that affect the possibility of marketing certain products, requiring technical adjustments in the materials used or in production plants, generating increases in operating costs and significant investments to ensure compliance.

Market and reputational transition risks: failure to align with new consumer preferences on packaging may compromise the perception of the Company and its products, with effects on competitive positioning, customer loyalty and market demand.

Opportunities Business and market opportunities: the increasing regulatory pressure and market demand for sustainable and circular packaging solutions favors companies able to offer bio-based, monomaterial and recyclable products.

Waste

Risks Risks related to increased costs due to the treatment and disposal of waste.

Opportunities Reduction of costs related to waste disposal and increase in revenues due to sales of Secondary Raw Material, thanks to the increased percentage of waste destined for recovery.



Manucor has assessed its impacts, risks, and opportunities related to resource use and the circular economy, taking into account not only its own activities but also those along the value chain, both upstream and downstream. For further information on the process of identifying relevant impacts, risks, and opportunities, please refer to the chapter *Relevant topics*.

▮ Policies related to resource use and the circular economy

ESRS STANDARDS

ESRS E5 E5-1, ESRS 2 MDR-P

Manucor has developed a strategic approach to manage the impacts, risks, and opportunities related to the circular economy. To this end, the Company has adopted specific corporate policies and operational tools, including the **Environmental Policy** which sets out the guidelines for responsible resource management and an environmental management system certified **UNI EN ISO 14001:2015**.

The decision to adopt the international ISO 14001 standard has enabled Manucor to implement a structured environmental management system, aimed at **preventing, reducing, and controlling** the negative impacts resulting from business operations. This integrated approach allows for constant monitoring of environmental performance and ensures compliance with current regulations.

Manucor's commitment **towards** environmental sustainability includes the adoption of practices aimed at **reducing waste production**, with particular attention to the **decrease of waste destined for disposal**, instead promoting **recovery**, also through third parties.

Activities are monitored through specific performance indicators, including the amount of non-hazardous waste sent for disposal per ton of product in the film lines, as well as hazardous waste generated during maintenance operations and in the hydrolysis plant, always in relation to production volumes.

In 2024, Management confirmed its commitment to ensuring access to **high-quality raw materials**, a crucial element to support the sales prices required by the market. This objective will be supported by the continuation of the audit process, already started in 2023, aimed at the main suppliers of raw materials and packaging materials.

In line with customer needs and the growing **focus on the environmental impact** of plastic packaging, Manucor is committed to including in its range **certified film products** according to the **ISCC standard**, with the aim of actively contributing to the **transition towards a circular economy**. The Operations Management and Quality Assurance, with the support of a team dedicated to managing the ISCC system, have been tasked with implementing and developing this production line.

▮ Actions related to resource use and the economy

ESRS STANDARDS

ESRS E5 E5-2, ESRS 2 MDR-A

Raw material procurement

In the context of Manucor's corporate policies, the management of incoming raw materials is a fundamental aspect to **ensure production efficiency, final product quality, and compliance with current regulations**. The CEO manages relationships with suppliers through contracts that establish prices, annual quantities, and monthly requirements. Every month, the *Raw Material Flow Manager* assesses requirements based on production plans and historical consumption, assigns supplies, schedules arrivals, and issues orders, in compliance with contractual agreements.

During the raw material purchasing process, products already included in the list of approved raw materials, such as polypropylene polymers and additives, are considered. This list is kept up to date, with the aim of ensuring that for each type of raw material there are at least two suppliers able to offer equivalent products.

A specific team, composed of Research and Development, Purchasing Office, Production Managers, and Quality Control, is responsible for consolidating and extending the approval of equivalent products to avoid dependence on a single supplier. Test materials are purchased under the direct control of Research and Development, following the provisions of the list of raw materials undergoing approval.

Certified raw materials

Manucor has identified among its main objectives the integration of environmental criteria in product development activities, steering its choices towards solutions with lower use of virgin resources, such as bio, bio-circular, or circular resins. Based on this objective, the Company has started the production of polypropylene film using **certified sustainable raw material (ISCC)**. A high potential for the certified product has been identified on the market, but also difficulties in sourcing ISCC raw materials, particularly Circular Renew ones.

The **ISCC PLUS system** (International Sustainability and Carbon Certification) is a voluntary scheme recognized internationally, which verifies the **sustainability** and **traceability of raw materials**, intermediate and final products in various industrial supply chains. Manucor applies the standard as a “Processing Unit”, managing a chain of custody that can be **bio-based, bio-circular** or **circular**, for the production of certified sustainable polypropylene film, through the mass balance method. Production with ISCC resin is **compatible with the entire range of** Manucor products, with no appreciable impact on conversion factors. The ISCC PLUS Management Manual defines roles, responsibilities, and procedures, including the traceability and recording system. The system is managed by an interdisciplinary team led by the Operation Manager & ISCC PLUS Manager, with skills and responsibilities distributed among Production, Quality, Logistics, Purchasing, Research and Development, Cost Control, and Sales.

Specific responsibilities include the definition of formulations and approval of raw materials, management of production in compliance with specifications, execution of mass balances, traceability and document custody, and data management through the management system. All records relevant to ISCC certification are archived for at least five years, and compliance with the system is verified through annual internal audits and Management review.



Packaging reduction - Vertical packaging

The environmental impact of the materials used for packaging the finished product is a significant aspect. Among the materials used are cardboard tubes, wooden pallets, chipboard flanges, circular cartons, and cones. For each of these types, an analysis of consumption was carried out in relation to production and processed volumes, in order to determine their specific consumption.

In collaboration with the main converters, the Company has developed and implemented a vertical packaging solution, eliminating the use of wood and contributing to a significant reduction in logistics costs. The reels are no longer placed on wooden pallets with straps and stretch film, but are packed in a vertical position, protected at the ends by thin discs and wrapped with protective films.

The introduction of vertical packaging has made it possible to **reduce the packaging weight** of film reels from about 40 kg to 1 kg. The elimination of pallets and wooden flanges has reduced weight and bulk, improving logistics efficiency: the number of trucks needed for transport has decreased by 25%, resulting in lower fuel consumption, fewer emissions into the atmosphere, reduced packaging material, and consequently, less waste production.

Product recyclability

All Manucor products are made of **polypropylene (PP)** and are therefore classified as **monomaterial**. The end consumer who purchases the product packaged with packaging made by Manucor can dispose of the packaging directly in the plastic recycling stream as PP5.

Manucor supports the development and awareness of **PGHT** and **SGHS** products, introduced since 2021. PGHT is a plain film characterized by high heat resistance, high flatness and rigidity, designed to provide sustainable and 100% recyclable solutions as polypropylene (PP).

A laminate between these two products is ideal for packaging powders for soluble drinks, single-dose capsules, biscuits, and small packages for pet food. PGHT can also be used as part of a laminate with other PP or polyethylene (PE) films, creating a “ready for recycling” structure that can be directed to the polyolefin recycling stream.

These solutions allow the replacement of laminates made of different materials (e.g. aluminum, PET with BOPP film) in order to **simplify the recycling process**.

▮ Incoming resource flows

ESRS STANDARDS

ESRS E5 E5-4, ESRS 2 MDR-M

In 2024, Manucor used a total of **75,774.09 tonnes of raw materials** to support its production activities. The main categories of materials used include **polypropylene granules** – mainly **homopolymers**, with a residual share of copolymers – **regenerated granules, additives** used in the film production process, and **aluminum** used for film metallization.

In the comparison of raw material consumption between 2024 and 2023, shown in the table below, there is an increase of +8.57% in the use of polymers, confirming the centrality of these materials in Manucor's production volumes. There is also an increase of +5.39% in the consumption of additives, mainly due to the higher percentage incidence of productions classified as specialties. Overall, the total volumes of raw materials used in tonnes recorded a growth of +6.7% during 2024.

TECHNICAL MATERIALS (t)	2024	2023
Raw materials		
Polymers	71.628,18	66.852,50
Additives	4.088,95	3.879,53
Aluminum	56,97	56,39
Total	75.774,09	70.788,41

Homopolymers, copolymers, and regenerated granules are presented within the polymers category. The data are aggregated to protect sensitive information related to production processes.

In 2024, there was an increase in the quantities of materials used in the production process but not included in the finished product, in line with the increase in production volumes. Since these materials do not become part of the final product and are not subject to the same measurement methods as those provided for the industrial process, the reported data refer to annual purchases.

TECHNICAL MATERIALS (t)	2024	2023
Materials required for the production process not part of the finished product		
Sea salt	442,60	319,00
Oil and lubricants	25,71	23,59
Extruder filters	9,11	7,00
Tape	1,81	1,38
Softener resin	1,45	-
Masking tape	1,11	0,39
Absorbent cotton	0,80	6,25
Ethyl alcohol	0,76	0,99
Silicone spray	0,23	0,53
Erema blades	0,08	2,00
Menzerna paste	0,05	0,03
Total	483,70	361,16



In 2024, the overall use of packaging materials saw an increase of 0.99% compared to 2023. The use of cardboard shows an increase of +9.61%, while the use of plastic for packaging (PP-PE-HDPE) shows a decrease of 11.98%. The consumption of wood and chipboard remains substantially stable compared to the previous year.

TECHNICAL MATERIALS (t)	2024	2023
Packaging materials		
Wood / Chipboard	5.816,90	5.817,01
Cardboard	1.166,31	1.064,04
Plastic (PP-PE-HDPE)	222,27	252,55
Total	7.205,46	7.133,60

Materials from a sustainable supply chain

Starting from 2023, Manucor began producing polypropylene film using **raw material certified as sustainable (ISCC)**, derived from bio-based sources, supplemented by small quantities of additives and other raw materials.

In 2024, certified bio-based materials represent 0.3% of the total materials purchased, divided between **ISCC Homopolymer** (99%) and **Circulen Renew Terpolymer**, both entirely sourced from **ISCC Plus certified** sustainable supply chains.

Manucor is technically able to increase the use of sustainable raw materials, however, the actual quantity used is adjusted **according to market demand and the economic sustainability for the end customer**. Certified bio-based materials in fact entail a higher cost, and their introduction is currently subject to the customer's willingness to bear the investment.

As shown in the table, the procurement of biological materials from sustainable supply chains has seen significant development over the past year.

BIOLOGICAL MATERIALS FROM A SUSTAINABLE SUPPLY CHAIN		2024		2023	
	CERTIFICATION	QUANTITY (t)	% FROM SUSTAINABLE SUPPLY CHAIN	QUANTITY (t)	% FROM SUSTAINABLE SUPPLY CHAIN
Raw materials / natural resources					
ISCC Homopolymer	ISCC Plus	235,20	100%	1,38	100%
Circulen Renew Terpolymer	ISCC Plus	2,75	100%	-	-



Recycled and reused raw materials - Packaging

Through collaboration with customers and specialized companies, Manucor has adopted a **collection and reuse service for packaging materials** in wood (pallets and flanges). The table below shows the quantities of packaging material reused in the two-year period 2023-2024.

MATERIALS (t)	2024		2023	
	RECYCLED OR REUSED MATERIALS	% RECYCLED OR REUSED MATERIALS	RECYCLED OR REUSED MATERIALS	% RECYCLED OR REUSED MATERIALS
Packaging				
Wood / Chipboard	259,48	4,46%	261,68	4,5%
Cardboard	-	-	-	-
Plastic (PP-PE-HDPE)	-	-	-	-
Total	259,48	3,60%	261,68	3,67%

↳ Outgoing resource flows

ESRS STANDARDS

ESRS E5 E5-5, ESRS 2 MDR-M

The products

Manucor produces numerous types of products every day, divided according to a specific classification: **food packaging, tapes and labels**. For further details, please refer to the section *Manucor's Products*.

As shown in the table below, Manucor guarantees a **product durability of 6 months** from the production date. This period represents the interval within which the film maintains the **agreed technical specifications** with the customer. After this period, any issues encountered in the processing of the film (e.g., during printing) **are not attributable to Manucor**, as they fall outside the technical warranty period.

As for the durability related to the quality and food safety of the material, this cannot be determined unambiguously by Manucor, as it strictly depends on the specific use made by the converter and, subsequently, the end-user.

In particular, the duration in terms of hygienic-sanitary compliance and suitability for food contact is influenced by:

- the type of finished packaging made by the converter;
- the conditions of processing and storage of the film;
- the characteristics of the packaged food;
- the conditions of final use.

PRODUCT PLACED ON THE MARKET	EXPECTED DURABILITY	AVERAGE INDUSTRY DURABILITY	RECYCLABLE CONTENT IN PRODUCTS (%)
Food Packaging	6 months	6 months	100%
Tapes	6 months	6 months	100%
Labels	6 months	6 months	100%

Waste generated

Waste management is a central aspect of Manucor's commitment to environmental sustainability and the efficiency of production processes. The activities of collection, storage, and disposal of waste are governed by specific contracts in place, which ensure full compliance with current environmental regulations.

These services are organized to ensure the proper movement of waste from production departments to dedicated storage areas, up to final delivery to authorized operators, while also promoting traceability and reducing environmental impact.

Each year the Company submits the Single Environmental Declaration Model (MUD), a report that entities and companies must submit annually, indicating the quantity and type of waste they have produced and/or managed during the previous year.

In 2024, the Company produced a total of 2,181 tons of waste, of which only 7% was hazardous waste, mainly oily water, flammable foams, and engine oils.

The classification and traceability of waste are based on technical documentation issued at the time of collection, in accordance with environmental regulations.

Between 2023 and 2024, the total waste production remained almost unchanged, recording a slight increase in hazardous and non-hazardous waste produced.

In the case of non-hazardous waste, alongside a slight overall increase in waste generated, the percentage of waste sent for recovery has increased.

The overall increase in waste production is related to greater production activity. In industrial contexts, an expansion in production leads to a proportional increase in the amount of waste generated, both hazardous and non-hazardous, linked to the materials used in the processes and the volume of operational cycles.

Below is a table summarizing the waste generated in the two-year period 2023-2024, divided between hazardous and non-hazardous waste, expressed in tons.



WASTE GENERATED BY CATEGORY (t)	2024			2023		
	RECOVERY	DISPOSAL	TOTAL	RECOVERY	DISPOSAL	TOTAL
Hazardous waste						
Oily waters	-	64,56	64,56	-	20,83	20,83
Flammable skimmings	26,42	-	26,42	24,39	-	24,39
Other oils from engines, transmissions and gears	20,75	-	20,75	14,35	-	14,35
Empty drums	18,54		18,54	15,96		15,96
Oily emulsions	-	14,98	14,98	-	62,48	62,48
Tar deposits from flue gas treatment	-	5,26	5,26	-	4,42	4,42
Absorbents and filtering materials contaminated by hazardous substances	4,61	-	4,61	4,31	-	4,31
Lead batteries	1,64	-	1,64	2,74	-	2,74
Fluorescent tubes and other waste containing mercury	0,10	-	0,10	0,18	-	0,18
Out-of-use equipment containing hazardous components	0,08		0,08	0,57	-	0,57
Metal packaging containing hazardous substances	0,06	-	0,06	0,05	-	0,05

WASTE GENERATED BY CATEGORY (t)	2024			2023		
	RECOVERY	DISPOSAL	TOTAL	RECOVERY	DISPOSAL	TOTAL
Hazardous waste						
Used toner cartridges	0,03	-	0,03	-	-	-
Medical waste	0,02	-	0,02	0,01	-	0,01
Bituminous sheath	-	-	-	-	0,80	0,80
Waste from tank cleaning containing other hazardous substances	-	-	-	-	1,10	1,10
Glass, plastic and wood containing hazardous substances	-	-	-	-	0,50	0,50
Total hazardous waste	72,25	84,8	157,05	62,56	90,13	152,69



WASTE GENERATED BY CATEGORY (t)	2024			2023		
	RECOVERY	DISPOSAL	TOTAL	RECOVERY	DISPOSAL	TOTAL
Non-hazardous waste						
Plastic particles	1.270,68	-	1.270,68	1.194,56	-	1.194,56
Wooden packaging	346,72	-	346,72	319,96	-	319,96
Paper and cardboard	276,15	-	276,15	285,23	-	285,23
Iron and steel	82,90	-	82,90	54,66	-	54,66
Plastic packaging	29,28	-	29,28	15,20	-	15,20
Sludge from industrial wastewater treatment	-	8,18	8,18	-	21,32	21,32
Multi-material packaging	6,52	-	6,52	8,03	-	8,03
Plastic	1,45	-	1,45	-	-	-
Absorbents, filtering materials, rags and protective clothing	0,93	-	0,93	1,16	-	1,16
Out-of-use electrical equipment	0,92	-	0,92	0,54	-	0,54
Unspecified components	0,43	-	0,43	0,37	-	0,37
Cables	0,26	-	0,26	0,20	-	0,20
Insulating materials	-	-	-	-	2,08	2,08
Total non-hazardous waste	2.016,23	8,18	2.024,41	1.879,91	23,40	1.903,31
Total waste generated	2.088,48	92,98	2.181,46	1.942,47	113,53	2.056
	95,74%	4,26%	100%	94,48%	5,52%	100%

Waste for recovery

In 2024, 95.7% of the waste produced is destined for recovery. In particular, all waste is sent for other recovery operations. The production of non-hazardous waste destined for recovery is mostly made up of “plastic particles” (EWC 120105), and the trend of this figure is affected by the increase in the incidence of specialties production, which leads to a greater number of interruptions and production changes and, consequently, a decrease in production yields.

HAZARDOUS WASTE (t)	2024	2023
Other recovery operations	72,25	62,56
Total Hazardous Waste	72,25	62,56
NON-HAZARDOUS WASTE (t)	2024	2023
Other recovery operations	2.016,23	1.879,91
Total Non-hazardous Waste	2.016,23	1.879,91
Total Waste for Recovery	2.088,48	1.942,47

Waste for Disposal

During the two-year reporting period, the percentage of waste produced destined for disposal decreased by 18%. In 2024, only 4% of the waste produced was destined for disposal.

HAZARDOUS WASTE (t)	2024	2023
Landfill	84,80	90,13
Total Hazardous Waste	84,80	90,13

NON-HAZARDOUS WASTE (t)	2024	2023
Landfill	8,18	23,40
Total Non-hazardous Waste	8,18	23,40
Total Waste for Disposal	92,98	113,53

03

Social disclosure





Own workforce

TOPIC	SUBTOPIC	SUB-SUBTHEME	SDG
S1 Own Workforce	Working conditions	Secure employment Adequate wages Social dialogue Freedom of association, existence of works councils and rights to information, consultation and participation of workers	3 SALUTE E BENESSERE
		Collective bargaining, including the percentage of workers covered by collective agreements	5 PARITÀ DI GENERE
			8 LAVORO DIGNITOSO E CRESCITA ECONOMICA
	Health and safety	Gender equality and equal pay for work of equal value	10 RIDURRE LE DISUGUAGLIANZE
	Equal treatment and opportunities for all	Training and skills development Diversity	

Interests and opinions of stakeholders

ESRS STANDARDS

ESRS SBM-2

Manucor considers its stakeholders as a group of internal and external actors, each bringing distinctive interests and perspectives. Among these, the workforce plays a fundamental role, as a key element for achieving company objectives and guiding strategic decisions. For a more detailed overview of the engagement activities carried out with the own workforce, please refer to the section *Stakeholders: interests and expectations*.

Relevant impacts, risks and opportunities regarding own workforce

ESRS STANDARDS

ESRS 2 SBM-3

IMPACTS

Working conditions

Creation of a work environment that offers stable employment, adequate wages and respect for rights such as social dialogue and collective bargaining, with attention to work-life balance and dialogue with internal representatives.

Health and safety

Negative impacts due to the possibility of accidents or other incidents occurring in the workplace.

Equality of treatment and opportunity for all

Positive impacts on people's conditions resulting from a work environment that ensures respect for workers and equal opportunities, absence of discrimination, and continuous training.

RISKS/OPPORTUNITIES

Working conditions

Risks Regulatory/legal, market and reputational risks: failure to protect working conditions may expose to the risk of sanctions, litigation and reputational risks, as well as a high turnover rate, with repercussions on the loss of strategic skills.

Opportunities Market and reputation opportunities: promoting company policies that ensure secure employment, adequate wages and social dialogue strengthens the ability to attract and retain suitable professionals, improves corporate reputation and contributes to greater productivity, enhancing business competitiveness.

Health and safety

Risks Regulatory / legal and reputational risks arising from the failure to adopt effective prevention and monitoring measures, with increased likelihood of accidents, occupational diseases and work-related stress, compromising productivity and business continuity and leading to possible litigation.

Equality of treatment and opportunity for all

Risks Regulatory/legal, reputational and market risks arising from episodes of discrimination or failure to comply with regulations on equal opportunities, inclusion and adequate training paths, in the absence of appropriate measures and procedures to guarantee people's rights and skills development.

Opportunities Market and reputational opportunities, deriving from offering conditions and a work environment that ensure adequate training processes and career paths, a workplace free from discrimination and with equal opportunities.

For further information on the process of identifying material impacts, risks and opportunities, please refer to the chapter *Relevant topics*.

▾ Policies relating to own workforce

ESRS STANDARDS

ESRS S1 S1-1, ESRS 2 MDR-P

Organization, Management and Control Model

The adoption of an *Organization, Management and Control Model*, together with the simultaneous presence of the Code of Ethics, in addition to representing a reason for exemption from the Company's liability with reference to the commission of certain types of offenses, is an act of social responsibility, from which benefits arise for all stakeholders: employees, creditors and all other parties whose interests are linked to the fate of the Company.

Code of Ethics

Human resources are the main success factor, within a framework of **loyalty and mutual trust** between employer and employees. All personnel are hired with a regular employment contract and the employment relationship is carried out in compliance with the sector's collective contractual regulations and social security, tax and insurance regulations.

The management of relations with personnel is carried out with **fairness, correctness** and in **respect for the dignity and autonomy of collaborators**. Manucor promotes a **safety culture**, raising workers' awareness of risks and encouraging responsible behavior.

Harmful conduct is not tolerated, nor is any pressure that induces violation of the law or the Code of Ethics.

Hiring and retention policies

Manucor regulates staff hiring through the procedure *Criteria and methods for staff selection*, governing the authorizations and behaviors to be followed in contacts with new hires, until they have passed the probationary period and the hiring becomes definitive.

The staff selection process applied by Manucor is carried out in compliance with ethical and regulatory provisions. The search and identification of human resources is first and foremost carried out in accordance with the principles of the Code of Ethics.

The people to be hired must fill a position already provided for in the budget approved at the beginning of each financial year by the Board of Directors or in its subsequent updates. For the purpose of preparing the budget and the related hiring plan, each department communicates its needs, in terms of human resources, by no later than November 30.

For each selection process, the Human Resources division involves the department manager of the sought position and the main company figures who will come into contact with the chosen resource.

Training policy

Manucor recognizes **the importance of investing in training** and in the **development of its human resources** as an integral part of its sustainability strategy and continuous improvement. The management of staff skills, combined with an adequate training program, is fundamental for maintaining high quality standards and for compliance with safety and environmental regulations. The training procedures are structured to ensure that every employee possesses the necessary knowledge to perform their role safely and efficiently, contributing to the success of the Company and the well-being of the work environment.

The Company has adopted a procedure to assess staff skills based on roles and responsibilities, in compliance with mandatory training requirements. The procedure includes guidelines for identifying training needs, defining and implementing training programs, and evaluating their effectiveness, with methods for recording and documenting training sessions. Training focuses on technical education and raising staff awareness of the objectives of Manucor's Management System. The procedure applies to the management of human resources and the implementation of the Management System for Quality, Environment, Hygiene, Safety and Health in the Workplace.

Safety policy

Manucor adopts an integrated Management System compliant with the **UNI ISO 45001** standard, with the aim of preventing accidents and occupational diseases, ensuring safe and healthy working conditions.

The Company is committed to eliminating hazards, reducing risks, and continuously improving performance in health and safety matters.

Through the Quality, Hygiene, Environment and Safety Policy, **active participation of workers** is promoted in the development and implementation of the system, encouraging safe behaviors and involvement in initiatives to reduce accidents and occupational diseases.

Manucor raises awareness among **customers, suppliers and visitors** on health and safety aspects, spreading a **shared culture of prevention**. The company management takes an active role in promoting and verifying the effectiveness of the system, supported by specific responsible figures.

Processes to remedy negative impacts and channels that allow own workers to raise concerns

ESRS STANDARDS

ESRS S1 S1-3

For its employees, Manucor has established a **Whistleblowing procedure** and an **internal reporting channel**, compliant with ANAC Guidelines and Legislative Decree. March 10, 2023, no. 24, implementing EU Directive 2019/1937.

The whistleblowing procedure **allows employees to report** unlawful conduct or behaviors contrary to corporate integrity. The system is aimed at a wide range of subjects, including employees, suppliers, contractors, customers, and members of local communities, and allows reporting of

acts, omissions or violations that may harm the public interest or the ethics of the organization.

The aim of the procedure is to strengthen the culture of transparency and legality, promoting a work environment based on **ethical principles** and on **compliance with regulations**. Reports can be made through internal or external channels, in written and oral form, and, in the cases provided for, also through public disclosure. The management of reports guarantees the confidentiality of the whistleblower's identity and protection from any retaliation.

The system also helps to promptly detect irregular behaviors, encouraging the adoption of corrective actions and preventive measures aimed at avoiding the recurrence of violations. The implementation of the whistleblowing channel is part of Manucor's broader commitment to ensuring compliance with regulations and the integrity of its business activities.

- **Actions on significant impacts for the own workforce and approaches for managing significant risks and pursuing significant opportunities in relation to the own workforce, as well as the effectiveness of such actions**

ESRS STANDARDS

ESRS S1 S1-4, ESRS 2 MDR-A

Management Training

During the reporting period, Manucor successfully completed the training plan entitled “Control, management and strategic innovation for the relaunch of Manucor”. The Plan was approved by the **Board of Directors of Fondirigenti** and obtained a score of **95/100 points**, ranking first in the final standings, following the positive evaluation by the external evaluation committee.

Specifically, the training plan falls within area 3 “Market and external context changes” and addresses the need to face the changing current scenario, which affects market dynamics and the interconnections between consumer demand and geopolitical and economic factors.

The main objective of the plan was to provide the necessary tools to interpret the context and identify new critical variables, thus improving **planning, management**, and **control of corporate objectives**. The plan also aimed to develop a decision-making model that allows the analysis

of uncertainties to be translated into effective strategic choices, taking into account economic and financial constraints and the ability to adapt business processes to the decisions made.

The training plan was developed by identifying specific objectives.

Develop skills to analyze the context, coordinate business functions, and use design thinking to identify sustainable competitive advantages.

Map processes, define KPIs to monitor and improve performance, and implement an effective reporting system.

Analyze cash flows, develop a Business Plan, and assess the relationship between costs and value creation.

Specifically, analysis and evaluation techniques, process mapping, analysis and **performance measurement** through KPIs consistent with the current economic and financial situation, have enabled management to define flexible yet precise strategies and to best direct their resources, within a “collective” change process that allows individuals, as well as the entire

organization, to grow and proactively face the challenges of competition, strengthening trust, motivation, and sense of belonging.

The implementation of the training plan has led to significant results for Manucor, improving the managerial and competitive growth of the Company.

At the conclusion of the training plan, the Company has a series of organizational and management tools designed to face current and future challenges.

Inclusion Projects



Following the acquisition by the Plastchim-T Group, Manucor launched the *Values Based Culture* project, a strategic initiative aimed at promoting an inclusive and shared corporate culture. The project is based on

the “ONE COMPANY” philosophy, with the aim of defining a common culture for the future of the Plastchim-T Group.

This path involves the creation and sharing of a set of corporate values, the development of a unified vision oriented towards 2030, and the integration of strategies that consistently guide all Group activities. The new *culture framework* is gradually being integrated into key business processes, with a plan aimed at supporting cultural and organizational change in a structured and sustainable way.

Welfare and Work Environment

Manucor, through the application of the Company Collective Agreement, is committed to maintaining a proper system of industrial relations aimed at fostering company development, valuing workers' commitment, and expanding opportunities for discussion through dialogue and information, in order to evaluate topics of common interest constructively.

The Company Collective Agreement applies to all employees hired under an employment contract by the Company, excluding managers and temporary staff.

In 2024, an agreement was signed for the introduction of a **professionalism incentive**, with the aim of valuing and rewarding the development of employees' skills. This initiative is part of the broader corporate welfare program, which aims to encourage professional growth and strengthen employee engagement.

During the year, Manucor consolidated the adoption of **smart working** as part of its welfare strategy, improving the work-life balance of employees. A detailed information notice on health and safety in agile work was also

provided, with training sessions useful for raising employee awareness on risks and good practices for a safe and ergonomic work environment, even remotely.

The Company also provides **meal vouchers** for all employees, which serve as a substitute allowance for the canteen and therefore are not considered an integral part of corporate welfare. The Company also provides a **health insurance** with Unisalute, compliant with the National Collective Labor Agreement (CCNL), and the provision of company cars for mixed use for managers and sales staff.

Performance Bonus

Manucor has established a **Performance Bonus** for the three-year period 2023-2025 in order to value workers' commitment and increase productivity and efficiency. The Bonus consists of the share due based on production efficiency, quality, and reduction of absenteeism. Its payment is based on the quarterly results of the indicators used. It is possible, on a voluntary basis, to convert the entire accrued Performance Bonus, or a percentage of it, into additional contributions to the Gomma Plastica Fund.

Health and safety at work

Hazard identification, risk assessment

In the context of Manucor's corporate policies, the management of health and safety in the workplace is of fundamental importance. To ensure a safe environment in compliance with current regulations, the Company has adopted a **structured system for hazard and risk analysis**.

In order to keep prevention measures and the adoption of protective devices active, the Company has identified hazards, assessed risks, and determined the related controls for all activities on an ongoing basis, through the **Risk Assessment Document (DVR)**. During the risk assessment phase for health and safety in the workplace, workers' representatives are consulted and an annual meeting is organized with the employer, the occupational physician, the Head of the Prevention and Protection Service (RSPP), and the Workers' Safety Representatives (RLS), who are elected and properly trained.

Manucor is also committed to keeping an annual activity plan constantly updated, taking into account all aspects required by the UNI ISO 45001 standard. This planning was evaluated with the participation of all the Workers' Safety Representatives (RLS).

In addition to relations with the RLS, information initiatives have been undertaken, on the occasion of the implementation of the annual internal audit plan, for the managers of the various activities and, in some cases, also for operational staff. Manucor guarantees working conditions that respect individual dignity and safe and healthy working environments, in full compliance with current regulations on the prevention of workplace accidents and the protection of workers.

Occupational health services

The **health surveillance** is carried out by the **competent physician** in cases provided for by current regulations and also at the request of the worker, if such request is deemed relevant to occupational risks. Health surveillance activities include the pre-employment medical examination, periodic medical examinations, those carried out at the worker's request, examinations on the occasion of a change of job, and those required at the end of the employment relationship.

The Company adopts all measures indicated by the occupational physician. If the medical indications result in a declaration of unfitness for the specific job, the worker is, where possible, assigned to an activity compatible with their state of health. If the new job is lower than the previous one, the worker retains the previously acquired salary. If, on the other hand, the new duties are equivalent or higher, the provisions of the Civil Code and Legislative Decree 165/2001 apply.

Training in health and safety

Manucor's Management is committed to identifying the main needs and expectations of personnel, with particular reference to aspects concerning the work environment, health and safety in the workplace, awareness of the role played in the company, and involvement in growth processes.

The Company organizes and provides training and education programs on occupational health and safety, in compliance with current regulations, offering an additional and optional training plan in addition to the mandatory one required by law.

Manucor is committed to complying with the regulatory requirements relating to mandatory training provided for by D. Legislative Decree 81/08 for all company roles.

Information

Manucor also adopts appropriate measures and means to inform all workers about the competent physician, the safety manager, and the names of those in charge of first aid, evacuation, and fire prevention services. Finally, information on risks also includes the results of the assessment and the planned prevention and protection measures.



Employee characteristics

ESRS STANDARDS ESRS S1 S1-6, ESRS 2 MDR-M

Employees

As of December 31, 2024, the Company's employees are **255**, an increase compared to 2023, all located in Italy at the Company's headquarters.

Data relating to the workforce are calculated with reference to employees at the end of each period (HC/ Head Count).

EMPLOYEES	2024			2023		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Total employees at the end of the period / by gender	20	235	255	18	206	224

The commitment to fostering stable and lasting relationships is demonstrated by the high proportion of employees with a **permanent employment contract**, which in 2024 reached 100% of the total.

TOTAL NUMBER OF EMPLOYEES BY CONTRACT TYPE / BY GENDER	2024			2023		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Permanent	20	235	255	17	206	223
Fixed-term	-	-	-	1	-	1
Total	20	235	255	18	206	224

Although it is possible to sign a part-time contract, currently 100% of Manucor employees are employed with a **full-time** contract.

TOTAL NUMBER OF EMPLOYEES BY CONTRACT TYPE / BY GENDER	2024			2023		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Full-time	20	235	255	18	206	224
Part-time	-	-	-	-	-	-
Total	20	235	255	18	206	224

Turnover

During 2024, the Company's employment recorded a **net increase of 13.8%** (overall turnover), starting from a total of 224 employees in 2023 and reaching 255 people for the year 2024.

During 2024, there was a significant increase in hiring, with a total of **38 new hires** (15% of the total Manucor workforce), compared to 6 in the previous year. The total number of terminations, on the other hand, remained stable compared to 2023.

The increase in hiring is due to the **insourcing of the film packaging activity**, which was previously outsourced. The employees, previously hired by a contractor, were hired directly by Manucor.

Specifically, the data relating to incoming and outgoing employees for the two-year period 2023-2024 are detailed below, in absolute and percentage terms.

TURNOVER		2024			2023		
HIRINGS	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL	
Up to 29 years	3	2	5	-	2	2	
From 30 to 50 years	-	16	16	2	2	4	
Over 50 years	1	16	17	-	-	-	
Total	4	34	38	2	4	6	

TERMINATIONS	2024			2023		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Up to 29 years	1	-	1	-	-	-
From 30 to 50 years	1	5	6	-	2	2
Over 50 years	-	-	-	-	4	4
Total	2	5	7	-	6	6
REASON FOR TERMINATION	2024			2023		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Voluntary exits	1	4	5	-	2	2
Retirement	1	-	1	-	3	3
Dismissal	-	1	1	-	1	1
Total	2	5	7	-	6	6
TURNOVER	2024			2023		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Positive turnover - hires	22,2%	16,5%	17,0%	12,5%	1,9%	2,7%
Negative turnover - terminations	11,1%	2,4%	3,1%	0,0%	2,9%	2,7%
Total turnover	11,1%	14,1%	13,8%	12,5%	-1,0%	0,0%



Seniority

Within Manucor, the average length of service highlights a **significant staff stability**, with an **overall average of 18 years**. Out of a total of 255 employees, 53 people (20.8%) have seniority of over 30 years, 133 (52.2%) have seniority between 10 and 29 years, while 69 (27.1%) have worked at Manucor for less than 10 years.

These data demonstrate a strong **sense of belonging** and **professional continuity**, which represent a strategic value for the Company.

SENIORITY	TOTAL
Over 30 years	53
From 29 to 10 years	133
Less than 10 years	69
Total	255

➤ Characteristics of non-employee workers in the company's own workforce

ESRS STANDARDS

ESRS S1 S1-7; ESRS 2 MDR-M

As of December 31, 2024, the number of non-employee workers is 12, continuously used by the Company for the performance of certain support activities. As shown in the table below, during the reporting biennium Manucor has kept the number of non-employee workers stable, mostly represented by **agency workers** (58.3%) and **freelancers with VAT number** (25%).

OTHER WORKERS	2024			2023		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Agency workers	1	6	7	3	5	8
Interns	-	1	1	-	-	-
Coordinated collaboration contracts	-	1	1	-	1	1
VAT number	1	2	3	1	3	4
Total at end of period / by gender	2	10	12	4	9	13

Collective bargaining and social dialogue

ESRS STANDARDS

ESRS S1 S1-8; ESRS 2 MDR-M

In the geographical area where Manucor operates, there are no situations in which the right to freedom of association and collective bargaining is hindered (thanks to national legislation). All workers are therefore free to form, join, and organize in trade unions of their choice and to bargain collectively with the Company.

Manucor applies, in managing contractual relationships with all its workers, the management guidelines defined by the applicable National Collective Labor Agreement (CCNL) and all the requirements established by the applicable binding legislation regarding contractual relationships with employees/collaborators. The applied National Collective Labor Agreement (CCNL) is **Rubber and Plastics - Industry**.

The total percentage of employees covered by collective bargaining agreements in 2024 is 100%.

▾ Diversity metrics

ESRS STANDARDS

ESRS S1 S1-9, ESRS 2 MDR-M

The most represented professional category in Manucor is that of **workers**, who make up over 74% of the workforce employed by the Company. This figure reflects the **industrial and productive nature** of the company's activity, where line operations, quality control, plant maintenance, and logistics management play a central role.

50% of the Company's employees are in the 30 to 50 age group, while 46% of employees are over 50 years old. Employees under the age of 30 represent 4% of the total.

The gender information regarding the composition of employees refers to male/female genders. The data presented have been processed based on the available personal data. As of today, no communications have been received from employees stating that they do not identify with these genders or who have expressed the desire not to disclose the gender with which they identify, regardless of personal data and biological sex.

With reference to the reporting periods, it should be noted that there have been no cases of discrimination in the management of human resources relations, nor have there been any events regarding violations of human rights. Manucor is also committed to ensuring equal opportunities within the work environment and in the professional development paths of its employees.

EMPLOYEE DIVERSITY						
EMPLOYEES BY CATEGORY / BY GENDER	2024			2023		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Managers	1	3	4	1	3	4
Middle managers	3	8	11	3	7	10
Clerical staff	16	35	51	14	37	51
Workers	-	189	189	-	159	159
Total	20	235	255	18	206	224

EMPLOYEE DIVERSITY						
EMPLOYEES BY CATEGORY / BY GENDER %	2024			2023		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Managers	0,4%	1,2%	1,6%	0,4%	1,3%	1,8%
Middle managers	1,2%	3,1%	4,3%	1,3%	3,1%	4,5%
Clerical staff	6,3%	13,7%	20%	6,3%	16,5%	22,8%
Workers	0,0%	74,1%	74,1%	0,0%	71,0%	71,0%
Total	7,8%	92,2%	100,0%	8,0%	92,0%	100,0%

EMPLOYEE DIVERSITY	2024			2023		
EMPLOYEES BY AGE GROUP / BY GENDER	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Up to 29 years	4	6	10	2	6	8
From 30 to 50 years	10	118	128	10	102	112
Over 50 years	6	111	117	6	98	104
Total	20	235	255	18	206	224
EMPLOYEE DIVERSITY	2024			2023		
EMPLOYEES BY AGE GROUP / BY GENDER %	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Up to 29 years	1,6%	2,4%	3,9%	0,9%	2,7%	3,6%
From 30 to 50 years	3,9%	46,3%	50,2%	4,2%	45,5%	50,0%
Over 50 years	2,4%	43,5%	45,9%	2,7%	43,8%	46,4%
Total	7,8%	92,2%	100,0%	8,0%	92,0%	100,0%

EMPLOYEE DIVERSITY								
EMPLOYEES BY CATEGORY / AGE GROUP	2024				2023			
	UP TO 29 YEARS	FROM 30 TO 50 YEARS	OVER 50 YEARS	TOTAL	UP TO 29 YEARS	FROM 30 TO 50 YEARS	OVER 50 YEARS	TOTAL
Managers	-	-	4	4	-	-	4	4
Middle managers	-	3	8	11	-	3	7	10
Clerical staff	5	22	24	51	2	21	28	51
Workers	5	103	81	189	6	88	65	159
Total	10	128	117	255	8	112	104	224

EMPLOYEE DIVERSITY								
EMPLOYEES BY CATEGORY / AGE GROUP	2024				2023			
	UP TO 29 YEARS	FROM 30 TO 50 YEARS	OVER 50 YEARS	TOTAL	UP TO 29 YEARS	FROM 30 TO 50 YEARS	OVER 50 YEARS	TOTAL
Managers	0,0%	0,0%	1,6%	1,6%	0,0%	0,0	1,8%	1,8%
Middle managers	0,0%	1,2%	3,1%	4,3%	0,0%	1,3%	3,1%	4,5%
Clerical staff	2,0%	8,6%	9,4%	20,0%	0,9%	9,4%	12,5%	22,8%
Workers	2,0%	40,4%	31,8%	74,1%	2,7%	39,3%	29,0%	71,0%
Total	3,9%	50,2%	45,9%	100,0%	3,6%	50,0%	46,4%	100,0%

▾ Training and skills development

ESRS STANDARDS

ESRS S1 S1-13, ESRS 2 MDR-M

In 2024, a total of **2,185** hours of training were provided, equal to **8.6 hours of training per capita** during the year, covering **general and specific training** depending on the job role.

In addition to the mandatory training hours dedicated to workplace safety, specific training sessions were provided on various topics, including IT-Cybersecurity Training, Privacy, Strategic Planning, ISCC PLUS training Circular Economy and Bioeconomy, and Whistleblowing.

As part of training activities, starting from 2024, Manucor has made available the opportunity to participate in an **online English course** open to a large number of employees.

With a BRC-GS perspective and in order to constantly raise awareness among employees, Manucor carries out a training/information program for various employees, giving priority to employees in the packaging department who are part of Manucor's organizational chart.

Below are the **training hours** of the Company, broken down by employment category and gender.

TOTAL TRAINING HOURS	2024			2023		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Managers	62	177	239	41	18	59
Middle managers	253	380	633	168	37	205
Clerical staff	283	671	954	294	332	626
Workers	-	359	359	-	487	487
Total	598	1.588	2.185	503	874	1.377
AVERAGE TRAINING HOURS	2024			2023		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Managers	61,7	59,0	59,7	41,0	6,0	14,8
Middle managers	84,3	47,6	57,6	56,0	5,3	20,5
Clerical staff	17,7	19,2	18,7	21,0	9,0	12,3
Workers	-	1,9	1,9	-	3,1	3,1
Total	29,9	6,8	8,6	27,9	4,2	6,1

The balance between professional and private life

ESRS STANDARDS

ESRS S1 S1-15, ESRS 2 MDR-M

As per national regulations and the relevant National Collective Labor Agreement (CCNL), pursuant to art.32 of D.Legislative Decree no.151/2001, the Company guarantees parental leave to each parent, for every child, within the first twelve years of the child's life, for a maximum period not exceeding 10 months.

All Manucor employees are entitled to take family leave in accordance with current regulations. The table below shows the data of employees who have taken family leave. In 2024, 12 employees took such leave, compared to 11 in 2023, of whom 2 were women and 10 were men.

FAMILY LEAVE (HC)	2024			2023		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
No. of employees entitled to family leave	20	235	255	16	208	224
No. of employees who have taken family leave	2	10	12	1	10	11
Percentage of employees who have taken family leave out of those entitled	10%	4,3%	4,7%	6,3%	4,8%	4,9%

▾ Remuneration

ESRS STANDARDS

ESRS S1 S1-10, ESRS S1 S1-16

Manucor is committed to ensuring **pay equity** and to promoting an inclusive work environment, guaranteeing non-discriminatory pay between male and female employees. The Company complies with all the minimum wage levels established by the applicable National Collective Labor Agreements (CCNL).

The gender pay gap is determined by comparing the **average gross hourly wage** of men and women, expressed as a percentage of the average male wage, including all employees present at the end of the year.

The **gross wage** is calculated by summing the total wages paid, including base salary and additional components such as bonuses, benefits, overtime, and other supplementary compensation.

In 2024, the gender pay gap was -1%, resulting in a slightly higher wage for women. This result is partially influenced by the composition of the workforce, in which women are mainly employed in administrative or technical roles, while men make up 100% of the blue-collar staff, the numerically predominant category in the Company.

Analyzing the data by job level, in 2024 there was a 14% gap in favor of men among executives, up from 10% the previous year. Among middle managers, the gross hourly wage shows a gap of 16%, a slight improvement compared to the 18% recorded in 2023, while among employees the gap remains at 17%, unchanged from the previous year.

Since the workforce in this category is composed exclusively of men, the calculation of the gender pay gap is not applicable.

GENDER PAY GAP	2024	2023
Gender pay gap	-1%	-10%

PAY GAP /BY PROFESSIONAL CATEGORY	2024	2023
Managers	14%	10%
Middle managers	16%	18%
Clerical staff	17%	17%
Workers	-	-



People with disabilities

ESRS STANDARDS

ESRS S1-12; ESRS 2 MDR-M

The Company recognizes the importance of promoting inclusion and diversity within its working environment. To this end, particular attention is paid to the inclusion and support of **protected categories** and **people with disabilities**, ensuring **equal opportunities** and **adequate working conditions**. This commitment translates into specific initiatives to promote the integration of these groups into the workforce, in line with current regulations and the company's values of social responsibility.

As of December 31, 2024, there are 16 employees with disabilities, in line with the data for 2023 and with the Company's commitment to ensuring equal opportunities and promoting inclusion.

PEOPLE WITH DISABILITIES	2024			2023		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Employees with disabilities	-	16	16	-	15	15
% Employees with disabilities / Total employees	0,0%	6,8%	6,3%	0,0%	7,3%	6,7%

Health and safety

ESRS STANDARDS

ESRS S1 S1-14, ESRS 2 MDR-M

Injuries

During the two-year period 2023-2024, no fatal or serious accidents occurred. As shown in the table below, the injury frequency rate, calculated in relation to hours worked during 2024, is significantly lower than in 2023.

In 2024, the recorded injuries were two incidents related to manual handling of loads within Manucor's production site. All injuries occurring during the period were classified as "Other incidents," as they were not serious.

WORKPLACE INJURIES - EMPLOYEES	UNIT	2024	2023
Workplace accidents	No.		
Fatal	-	-	-
Serious accidents	-	-	-
Other accidents	-	2	10
of which commuting	-	-	-
Total recorded accidents	-	2	10
Total hours worked	h	393.650	394.008
Accident indices			
Accident Frequency Index (No. of accidents/hours worked x 1,000,000)		5,08	28,65
Fatal		-	-
Serious accidents		-	-
Other accidents		-	-
Accident Severity Index (days of accident absence / hours worked x 1,000)		0,39	0,26

With regard to **non-employee workers**, no accidents occurred during the 2023-2024 two-year period. It should be noted that currently there is no system in use for recording hours worked for this type of workers.

▮ Serious accidents, reports and impacts regarding human rights

ESRS STANDARDS

ESRS S1 S1-17

It should be noted that, during the reporting period and in previous periods, there were no episodes of discrimination based on race, color, sex, religion, political opinion, national descent or social origin, as defined by the ILO (International Labour Organization), nor any other relevant forms of discrimination involving internal and/or external stakeholders.

During the reporting period, no disputes or cases of violations of relevant laws and/or regulations relating to social and economic provisions have arisen. No significant sanction of this nature was received during the 2022-2024 period and no relevant proceedings have been reported in this regard.



Supply chain management

TOPIC	SUBTOPIC	SUB-SUBTHEME	SDG
S2 Workers in the value chain	Working conditions	Secure employment	
		Adequate wages	
		Social dialogue	
		Health and safety	
61 Business conduct	Management of relationships with suppliers, including payment practices		

└ Interests and opinions of workers in the value chain and their involvement

ESRS STANDARDS

ESRS 2 SBM-2, ESRS S2 S2-2

Manucor recognizes the strategic importance of its stakeholders, both internal and external, and values relationships along the entire value chain. In this context, workers represent a fundamental component for the realization of the company's vision and for ensuring the sustainability and continuity of the business.

The Company is aware that **the active involvement of those operating in the supply chain** is a key element in promoting responsible behaviors aligned with its values. Although a formalized approach to the direct involvement of value chain workers on generated impacts has not yet been adopted, Manucor, through its **Code of Ethics**, is committed to **guiding the behavior of its suppliers** and stakeholders and to spreading the culture of **social responsibility** as a shared ethical reference.

Relevant impacts, risks and opportunities regarding the supply chain

ESRS STANDARDS

ESRS 2 SBM-3

IMPACTS

Working conditions

Impacts related to working conditions in the production chain that may be characterized by potential negative impacts on human rights and other people's rights (secure employment – inadequate wages – social dialogue – health and safety).

Management of relationships with suppliers, including payment practices

Negative impacts resulting from improper management of the supply chain / failure to select and qualify suppliers in compliance with environmental and social standards and criteria, with consequences for the environment and people in the supply chain.

RISKS / OPPORTUNITIES

Working conditions

Risks Legal risks (sanctions, litigation, administrative proceedings), market and reputational risks caused by the absence or inadequacy of due diligence and monitoring activities related to the supply chain, primarily aimed at verifying adequate and compliant working conditions for the workforce. Market risks also concern business continuity and possible consequences on the structure, composition and availability of the Supply Chain.

Management of relationships with suppliers, including payment practices

Risks Regulatory / legal, market and reputational risks arising from the presence of suppliers characterized by potentially negative environmental and social impacts. Risks may also involve business continuity issues (interruptions in the supply chain), increases in raw material costs, reputational damage and potential legal, contractual and administrative sanctions.

For further information on the process of identifying impacts, risks, and material opportunities, please refer to the chapter Relevant Topics.

▮ Policies related to supply chain management

ESRS STANDARDS

ESRS S2 S2-1, ESRS 2 MDR-P

Policy for Quality, Hygiene, Environment and Safety

As part of its Policy, Manucor adopts strict criteria for supply chain management, integrating environmental aspects with ethical and conduct requirements. The Company is committed to promoting the selection of suppliers who share its principles of environmental responsibility, introducing **environmental criteria** in the evaluation of the suppliers themselves. In particular, the percentage of raw material suppliers with an active environmental management system is monitored, in relation to the total number of suppliers used, as well as the environmental impact associated with transport services, in terms of resource consumption and atmospheric emissions.

At the same time, Manucor is committed to protecting the health and safety of its supply chain. The **rules of conduct to be applied to external personnel** – called upon to operate directly or on behalf of third-party companies within the plant – are defined and kept up to date by the Safety and Environment Manager and the Purchasing Manager. These rules take into account hygiene, health, occupational safety and environmental impacts related to the activities carried out. These principles are an integral part of the Company's Code of Ethics, which establishes the expected standards of behavior along the entire supply chain, in compliance with legality, professional integrity and social and environmental responsibility.

Code of Ethics

In managing the supply chain, Manucor is committed to ensuring relationships based on **fairness, transparency and respect for legality**, as established by its Code of Ethics. The processes of selection and management of suppliers must take place in compliance with the principles of **equal treatment, fair competition and impartiality**, avoiding favoritism or discrimination. Manucor requires that its suppliers also adhere to ethical behaviors and respect the dignity of workers, promoting fair contractual conditions and respect for fundamental rights throughout the entire supply chain.

Processes to remedy negative impacts and channels that allow workers in the value chain to express concerns

ESRS STANDARDS

ESRS S2 S2-3

The procedure and the related **Whistleblowing** reporting channel, established in accordance with ANAC Guidelines and Legislative Decree March 10, 2023, no. 24, implementing EU Directive 2019/1937, is **also applicable to external parties** operating in the company's value chain.

All parties who have relationships with Manucor — including suppliers, subcontractors, consultants, business partners and external collaborators —

are required to report any violations, even attempted ones, of the provisions contained in the Code of Ethics and in the Organization, Management and Control Model adopted by the Company.

▮ Management of relationships with suppliers

ESRS STANDARDS

ESRS G1-2

Manucor has adopted a specific Procedure regarding the **control of the procurement of raw materials and services**.

Through this procedure, the criteria and responsibilities related to the qualification and evaluation of suppliers, the definition of purchasing data, and the issuance and approval of purchase orders are defined. The activities in question concern the purchase of products for the production process, such as raw materials and auxiliary materials, plants and machinery necessary for production and quality control, services closely linked to the production process, and other products and services that impact the management system for quality, environment, hygiene, health, and safety in the workplace.

Supplier qualification

The qualification of suppliers is an essential element of Manucor's procurement system and is defined in close relation to the type of supply. The initial assessment is entrusted to specific company functions, each competent for its own area.

The responsibility for the qualification of raw material suppliers falls to the **Research and Development (R&D)** area, while Logistics handles product transportation and external warehouses. Services related to waste management are managed by the Safety and Environment Manager, while **Quality Control** evaluates suppliers for subcontracting activities and auxiliary materials. The competent Management is responsible for the qualification of service suppliers, while the evaluation of external contractors is jointly managed by the Safety and Environment Manager and the Maintenance Manager.

The results of the qualification activities are recorded in a specific database called *"Supplier Evaluation"*, coordinated by Quality Assurance. This tool is shared on the network with all those responsible for evaluations and with the Purchasing Office, in order to ensure traceability, updating, and transparent access to information.

➔ Type of evaluation

- Previous experiences or references
- Questionnaire
- Trial order
- Evaluation visit
- Historical supplier
- Registration in the Environmental Managers Register
- Regional Plant Determinations

**General requirements**

- ISO 9001 system certifications
- System certifications (BRCGS or similar)
- ISO 14001 system certifications
- ISO 45001 system certifications
- ISCC PLUS certification
- Quality of supply / service
- Quality / Price ratio
- Adequacy of Means / Available resources

**Specific requirements**

- Compliance with current regulations regarding Food Contact
- UNI 11381 certification
- 17025 accreditation or LAT center
- Specific technical acceptance for subcontracting activities
- Authorization from the competent Ministry for each CER code
- Registration in the Environmental Managers Register
- Technical-professional suitability
- Compliance with product safety / hygiene practices/regulations
- Chamber of Commerce registration
- Contractor's DVR
- DURC
- Miscellaneous

The qualification process for raw material suppliers includes an assessment of their ability to operate in compliance with the requirements defined by an applicable GFSI Standard (*Global Food Safety Initiative*). In this context, Quality Assurance carries out a preliminary risk analysis with the aim of verifying the overall reliability of the supplier. If the analysis does not reveal particular critical issues, a **questionnaire** is administered to collect specific information regarding product safety, traceability, good manufacturing practices, and HARA analysis (*Hazard Analysis and Risk Assessment*).

If deemed necessary, the results of the questionnaire may be supplemented by an audit conducted at the supplier's site. Regardless of the data collection method, the evaluation always includes a test on product traceability. As an alternative to the process described above, the supplier can also be qualified by possessing a certificate of conformity to the Global Standard BRC, specifically for packaging materials.

Supplier evaluation

All qualified suppliers are subject to annual monitoring by Manucor. This activity involves updating the evaluation, recorded in a summary table, and focuses on key aspects such as the quality/price ratio, the quality of the supply or service, and the maintenance of up-to-date documentation acquired during the initial qualification phase, including certifications, questionnaires, audits, and authorizations.

In the event that a **disqualification** is formalized, the supplier may only be reconsidered after a new complete evaluation. If, during monitoring, shortcomings or critical issues arise, Manucor requires the implementation

of corrective actions, also defining the methods by which the effectiveness of the measures adopted will be verified.

In compliance with the principles of social responsibility, transparency, and sustainability of its supply chain, Manucor launched in 2023, on the initiative of the Operations Management (Chief Operating Officer), a structured audit process for suppliers of raw materials and packaging materials. These activities aimed at the **strengthening of the control system** and the **continuous improvement of the quality of the materials received**.

The monitoring of suppliers continues systematically and any non-conformities are promptly recorded through technical inspection observations, carried out internally by the relevant departments.

In 2024, the **audit program** was extended and consolidated, including the main suppliers already involved in the previous year. At the same time, new evaluation processes have been launched for suppliers in the maintenance and packaging sectors, with the aim of ensuring increasingly high supply standards and optimizing management costs.

With a view to assessing the **vulnerability of the supply chain**, the Purchasing Office – in close collaboration with Quality Control and the Research and Development (R&D) Department – maintains constant dialogue with the qualified contacts of the main suppliers.

This approach makes it possible to promptly collect any reports, even potential ones, relating to changes or substitutions in production. Such information is subject to periodic updates, at least annually.

Procurement requests are then sent to suppliers already included in the list of Qualified Suppliers. In the case of contractors, the qualification documentation includes the acquisition of all required documents, depending on the type of contract, with a specific procedure.



Consumers and end users

TOPIC	SUBTOPIC	SUB-SUBTHEME	SDG
S4 Consumers and end users	Personal safety of consumers and/or end users	Health and safety Personal safety	

Relevant impacts, risks and opportunities regarding consumers and end users

ESRS STANDARDS

ESRS 2 SBM-3

IMPACTS

Personal safety of consumers and/or end users

Impacts related to non-compliance with food safety standards for the products offered by the Company, in line with compliance standards to protect the health and safety of end users.

RISKS / OPPORTUNITIES

Personal safety of consumers and/or end users

Risks Regulatory / legal and market risks: defects in products, particularly in food packaging, can cause recalls, economic losses, and legal disputes, impacting business continuity and regulatory compliance.

Reputational, legal and technological risks: the presence of contaminants in products can compromise corporate reputation and lead to sanctions or production adjustments to ensure safety and compliance.

For further information on the process of identifying relevant impacts, risks, and opportunities, please refer to the chapter *Relevant topics*.

Policies related to consumers and end users

ESRS STANDARDS

ESRS S4 S4-1, ESRS 2 MDR-P

Manucor is committed to adopting policies aimed at ensuring the compliance of its products and providing its stakeholders with accurate, truthful, and correct information. Internal staff are constantly made aware of the importance of complying with the requirements indicated by the customer and applicable regulations, operating effectively and efficiently.

Quality Policy

In the context of Manucor's corporate policies, quality is a fundamental aspect, which is constantly monitored and managed with care. The Company is committed to ensuring that the products supplied are **compliant with applicable regulations** and **meet safety** and **suitability requirements** for their intended use, in particular direct contact with food.

During the various stages of product manufacturing, quality checks are carried out according to specific control and testing plans. Detected defects are recorded in a specific database, which highlights critical issues in terms of potential impact on consumer health or that could compromise the functional integrity and performance of the finished product.

The **ISO 9001 quality management system** and **BRC Issue 6 - Packaging** set out policies, objectives, activities, roles, and responsibilities on the subject. In this way, the principle of continuous improvement aimed at consolidating quality at all levels is ensured, also thanks to periodic reviews of the management system itself, to monitor product quality and adopt any corrective or improvement actions.

↘ The involvement of consumers and end users, processes to remedy negative impacts, and channels that allow consumers and end users to express concerns

ESRS STANDARDS

ESRS 2 SBM-2, ESRS S4 S4-2, ESRS S4 S4-3

Manucor drafts the Declaration of Conformity, which reflects Manucor's approach to transparency and responsibility in managing the regulatory compliance of its products. The document defines the scope of validity, the limits of responsibility, and the conditions under which the declaration applies, in line with the Company's commitment to ensuring the quality and compliance of the materials supplied.

All information contained in the **Declaration of Conformity** refers to the product as supplied directly by Manucor. If the product is subsequently converted (through metallization, printing, die-cutting, lamination, or using inks, adhesives, varnishes, and other substrates), it is the customer's responsibility to ensure compliance with regulations and suitability for food contact of the converted product. Since such activities are outside Manucor's control, the Company does not provide guarantees nor does it assume responsibility regarding compliance with regulations for food contact of the converted product.

Manucor undertakes to update this Declaration every year from the date of issue and to replace it in the event of significant changes in the production of the material that may invalidate it, or in the event of changes or updates to the reference regulations for each country.

Customer satisfaction

The Sales Department of Manucor is committed to evaluating and monitoring both the Company's performance and the level of satisfaction expressed by its customers in relation to product quality and safety aspects. The corrective actions identified usually arise following inspections carried out by external bodies and/or as a result of non-conformities reported by the Customer, which support the Company's own improvement process.

The management of process and product non-conformities and the related corrective/preventive actions are managed with the aid of IT databases. Non-conformities, initially managed in line with ISO 9001 and BRC-GS standards, have been extended to the field of Occupational Health and Safety and Environment. In the management system adopted by Manucor, customer complaints are classified into three main categories.



Quality complaints:

related to non-conformities in the product supplied



Logistical/planning complaints:

related to issues in delivery, timing, or planning



Administrative complaints:

attributable to documentary, invoicing, or commercial management aspects

In the management system, a systematic distinction of complaints has been implemented based on the year of shipment and invoicing, with the

aim of **ensuring more accurate traceability** and improving the analysis of the impact of additional costs on the overall value of non-conformities.

The annual analysis allows Manucor to monitor the evolution of complaints in quantitative, qualitative, and economic terms, with the aim of implementing corrective actions, preventing the recurrence of non-conformities, and improving customer satisfaction.

↳ Consumers and end users: actions

ESRS STANDARDS

ESRS S4 S4-4, ESRS 2 MDR-A

Packaging and product protection

All Manucor products are packaged with particular attention to **protection from contamination and external agents**. Each pallet is wrapped with stretch film and covered on top with a polyethylene sheet. The small reels, intended for final use, are individually bagged immediately after cutting, avoiding any direct contact with packaging materials thanks to the use of insulating cardboard discs or sheets.

For **vertically packaged reels**, mainly intended for the label sector, a solution with reduced use of wood materials has been adopted, with the addition of specific protections against dust and mechanical deformations

(closed discs and bubble wrap). The integrity of the packaging is ensured by the operator during the packaging phase.

Quality control

Manucor constantly carries out analysis on any defects or incidents related to products placed on the market. The results of tests and theoretical calculations show **compliance with European regulations for all types of food**, guaranteeing their suitability for long-term storage at room temperature or lower and under hot packaging or heating conditions up to 100°C for a specified maximum time, as required by Regulation (EU) 10/2011.

The criteria adopted for **product and process control** are defined in a structured and documented manner, in order to ensure compliance with the required quality standards and adherence to regulatory and safety requirements. These criteria include technical processing specifications, acceptability parameters, in-line and off-line control plans, as well as methods for recording and tracing results. The system allows constant monitoring of production performance and timely identification of any non-conformities.

→ Document verification upon entry

→ Physical inspection of materials

- Traceability and coding of materials
- Self-checks in production
- Sample control and production approval
- Management of non-conformities
- Controls on process parameters
- Centralized data recording
- Issuing quality documentation for customers

In accordance with the requirements of the BRC standard, Manucor has implemented structured procedures to ensure control and quality throughout the entire product life cycle. These procedures cover product development, control of production processes, calibration and monitoring of instruments, as well as inspection and testing of products. Specific criteria are also defined for the management of non-conforming products, control of incoming materials, storage and preservation activities, up to the shipment of the finished product. All processes are supported by traceable documentation and a risk-based approach.

In general, the analysis carried out by the Company on product safety helps to detect all defects that may have a direct impact on the functional integrity

of the product. The data collected by Manucor refer to all **complaints** made by the converter and not by the end-user; therefore, these are complaints that have not had a direct impact on the final consumer.

The incidence of defects that may impact the functional integrity or performance of the finished product is subject to annual monitoring through an analysis of complaints by type of defect, in order to highlight any critical issues and undertake any corrective and/or preventive actions.

Functional integrity and product performance

The quality and functionality of the films produced are guaranteed through continuous monitoring of fundamental characteristics, ensuring their suitability both technically and in terms of hygiene and safety.

The **thickness** of the film is a key element to allow proper handling of the material. The control takes place directly during the film production phase using automated systems.

The **integrity of the film** is essential to avoid breakage during processing stages. The control is intrinsic, and no specific recordings are required. Also in this case, the level of risk is considered acceptable.

In the case of **coextruded films**, **sealability** is an essential requirement to ensure the protection of the contents, especially in food packaging. The presence of copolymers or terpolymers in the sealing layer is ensured by controlling the extruder flows. This is complemented by manual seal tests and weld resistance tests, with any anomalies recorded in the production

sheets and laboratory control documents. Also in this area, the level of risk is assessed as acceptable.

For **metallized films**, the barrier function against gases and water vapor is ensured by the **thickness of the aluminum layer**, which is controlled by a continuous inspection system (*DeCoSystem*), monitoring any defects and maintaining traceability through the "Defect History". The data are continuously recorded in graphs and in the specific documentation of the reels.

Finally, attention is paid to possible **irregular adhesion of the metal** in metallized films. To prevent the detachment of aluminum microparticles during handling, films with an outer copolymer-based layer are used, which improves metal adhesion. Seal control is an integral part of the production process.

Internal and external audits

During the two-year period, Manucor regularly continued internal verification activities (**first-party audits**), carried out in accordance with the planned annual program. In particular, greater emphasis was placed on audits relating to the suitability of the production site and infrastructure with respect to the requirements of the **Global Standard BRC**. All observations and non-conformities detected during these activities were formally managed through specific non-conformity reports, according to the procedures provided by the management system.

At the same time, under the direction of Management, the audit cycle aimed at the main suppliers of raw materials and packaging materials continued,

with the aim of ensuring continuity of compliance along the supply chain and strengthening the oversight of quality and regulatory requirements.

With regard to **second-party audits**, that is, audits conducted by customers towards Manucor, there is a gradual resumption of activities during 2024. At this stage, interactions have mainly taken place remotely through Teams meetings aimed at technical alignments and operational updates.

Regarding **third-party audits**, in 2024 Manucor maintained all existing certifications, confirming the compliance of its management system with the adopted standards. In particular, certification according to the **ISCC PLUS Standard** is progressing positively, with specific reference to the procurement of *bio-circular resin* and the related production of *bio-circular film*, made with different percentages of this component, in line with commitments on environmental sustainability and resource traceability.



Governance disclosure





Business conduct

TOPIC	SUBTOPIC	SUB-SUBTHEME	SDG
G1 Business conduct	Corporate culture		
	Active and passive corruption	Prevention and detection including training Incidents	 

Relevant impacts, risks and opportunities in governance matters

ESRS STANDARDS

ESRS 2 IR0-1

IMPACTS

Corporate culture

The promotion and consolidation of corporate culture, based on ethical business conduct, generates positive impacts for both internal and external stakeholders, strengthening the sense of belonging among the workforce and the sense of responsibility in relationships with employees, suppliers, customers, and other stakeholders.

Active and passive corruption

Negative impacts: possible events of active and passive corruption in relationships with stakeholders, resulting in distortions in conditions of fair competition and business conduct.

RISKS / OPPORTUNITIES

Corporate culture

Market and reputational risks related to the inadequate dissemination and promotion of corporate culture, as well as the failure to apply the founding principles and values of business conduct.

Active and passive corruption

Regulatory/legal, reputational, and market risks following episodes of corruption and/or extortion.

For further information on the process of identifying relevant impacts, risks, and opportunities, please refer to the chapter *Relevant topics*.

Policies on corporate culture and business conduct

ESRS STANDARDS

ESRS G1 G1-1, ESRS 2 MDR-P

Policies on corporate culture and business conduct focus on fundamental principles that guide every aspect of Manucor's activities, promoting ethical and responsible behavior.

Code of Ethics

Manucor bases its corporate culture on solid and shared ethical principles, oriented towards **transparency, legality, and respect for human dignity**, considering them essential elements for sustainable and responsible development. The Code of Ethics, an integral part of the Organizational Model pursuant to Legislative Decree Legislative Decree 231/2001, represents the binding behavioral reference for directors, managers, employees, and collaborators. Manucor promotes a working environment based on **fairness, protection of health and safety, confidentiality, and respect for equal opportunities**, opposing all forms of discrimination, favoritism, or abuse of power.

The Company is committed to maintaining **fair and transparent relationships** with customers, suppliers, public institutions, and stakeholders, adopting criteria of impartiality, fair competition, and environmental responsibility. Every business conduct aims to prevent conflicts of interest, ensure the integrity of financial resources, and guarantee diligent use of company assets. Manucor values the quality of its products and services through processes focused on innovation and customer satisfaction, and adopts strict standards of control and accounting verification, including the social report certified by independent auditors.

▮ Prevention and detection of active and passive corruption

ESRS STANDARDS

ESRS G1 G1-3

Organization, Management and Control Model

Manucor has adopted an "Organization and Management Model" (Model 231) pursuant to Legislative Decree Legislative Decree 231/2001 as a mandatory conduct of the Company in order to prevent, as far as possible, the commission of the offenses provided for by the Decree.

The adoption of an Organization, Management and Control Model in accordance with the Decree, together with the simultaneous presence of the Code of Ethics, in addition to representing a reason for exemption from the Company's liability with reference to the commission of certain types of offenses, is an act of social responsibility, from which benefits arise for all stakeholders: employees, creditors, and all other parties whose interests are linked to the fate of the Company.

The introduction of an additional control system, together with the establishment and dissemination of ethical principles, by improving the standards of conduct adopted by the Company, increases the trust and reputation of the Company with third parties, but above all, fulfills a regulatory function. These tools, in fact, help to regulate the behaviors and decisions of those who, on a daily basis, are called to operate in the name or on behalf of the Company.

The Model aims to establish a structured and organic system of procedures and control activities, designed to prevent, as far as possible, the commission

of conduct that may constitute the offenses contemplated by the Decree.

Through the identification of sensitive activities and their consequent proceduralization, the aim is, on the one hand, to create full awareness among all those who operate in the name and on behalf of Manucor that they may incur an offense subject to sanction; on the other hand, thanks to constant monitoring of activities, to enable the Company to intervene promptly to prevent or counter the commission of such offenses.

Training on active and passive anti-corruption

Manucor's management staff plays a central role in promoting ethical culture and organizational responsibility. They are responsible for training and updating their collaborators, with particular attention to spreading the principles contained in the Code of Ethics and consolidating practices based on transparency, legality, and fairness. Managers are required to promote organizational clarity, encourage staff accountability, and ensure knowledge of the standards required in relations with Public Administration.

The Company is committed to ensuring that all employees participate in mandatory anti-corruption training courses. To strengthen the crime prevention system, **management has also taken an active part in specific training** on the Organizational Model 231, in accordance with articles 6 and 7 of Legislative Decree 231/2001. The training activities and methodologies adopted are subject to annual review, in order to ensure their effectiveness and continuous updating.

▾ Cases of active or passive corruption

ESRS STANDARDS

ESRS 2 MDR-M, ESRS G1 G1-4

In the reporting period, as in previous ones, there were no episodes of corruption or extortion involving the Company's Directors or employees. In particular, there have been no convictions nor have any sanctions been imposed for violations of anti-corruption and anti-money laundering regulations. Furthermore, no confirmed episodes of corruption have been detected, nor have there been any disciplinary measures or dismissals related to these issues.

Similarly, there are no reported cases in which contracts with business partners have been terminated or not renewed due to such violations. Finally, there are no ongoing or concluded public legal proceedings against Manucor or its employees for issues related to corruption. These results confirm the effectiveness of the prevention measures adopted by the Company and its ongoing commitment to promoting a culture of integrity, transparency, and regulatory compliance.



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S1-9	Diversity metrics	DR 64, DR 66	Social disclosure / Own workforce / Diversity metrics
S1-10	Adequate wages	DR 67, DR 69	Social disclosure / Own workforce / Remuneration
S1-12	People with disabilities	DR 77, DR 79, DR 80, AR 76	General disclosure / Own workforce / People with disabilities
S1-13	Training and skills development metrics	DR 81, DR 83, AR 78	Social disclosure / Own workforce / Training and skills development
S1-14	Health and safety metrics	DR 86, DR 88, DR 89, AR 89, AR 91	Social disclosure / Own workforce / Health and safety
S1-15	Work-life balance	DR 91, DR 93, DR 94	Social disclosure / Own workforce / Work-life balance
S1-16	Remuneration metrics (pay gap and total remuneration)	DR 95, DR 97, DR 98, AR 98, AR 99, AR 100, AR 101	Social disclosure / Own workforce / Remuneration
S1-17	Serious accidents, reports and impacts regarding human rights	DR 100, DR 103, DR 104	Social disclosure / Own workforce / Incidents, complaints and serious impacts regarding human rights



ESRS STANDARD	DISCLOSURE	ESRS INDICATOR	CHAPTER REFERENCES
ESRS S2 - WORKERS IN THE VALUE CHAIN			
S2.SBM-2	Interests and opinions of stakeholders	DR 9, AR 4	Social disclosure / Supply chain management / Interests and opinions of workers in the value chain and their involvement
S2.SBM-3	Relevant impacts, risks and opportunities and their interaction with the strategy and business model	DR 10, DR 11	Social disclosure / Supply chain management / Relevant impacts, risks and opportunities concerning the supply chain
S2-1	Policies related to workers in the value chain	DR 14, DR 16	Social disclosure / Supply chain management / Policies related to supply chain management
S2-2	Processes for involving workers in the value chain regarding impacts	DR 20	Social disclosure / Supply chain management / Interests and opinions of workers in the value chain and their involvement
S2-3	Processes to remedy negative impacts and channels that allow workers in the value chain to express concerns	DR 25, DR 27	Social disclosure / Supply chain management / Processes to remedy negative impacts and channels that allow workers in the value chain to express concerns

ESRS S4 - CONSUMERS AND END USERS

S4.SBM-2	Interests and opinions of stakeholders	DR 8, AR 3	Social disclosure / Consumers and end users / The involvement of consumers and end users, processes to remedy negative impacts, and channels that allow consumers and end users to express concerns
S4.SBM-3	Relevant impacts, risks and opportunities and their interaction with the strategy and business model	DR 9, DR 10, DR 11	Social disclosure / Consumers and end users / Relevant impacts, risks and opportunities regarding consumers and end users
S4-1	Policies related to consumers and end users	DR 13, DR 15	Social disclosure / Consumers and end users / Policies related to consumers and end users
S4-2	Processes for involving consumers and end users regarding impacts	DR 18	Social disclosure / Consumers and end users / The involvement of consumers and end users, processes to remedy negative impacts, and channels that allow consumers and end users to express concerns
S4-3	Processes to remedy negative impacts and channels that allow consumers and end users to express concerns	DR 23, DR 25, DR 26	Social disclosure / Consumers and end users / The involvement of consumers and end users, processes to remedy negative impacts, and channels that allow consumers and end users to express concerns

ESRS STANDARD	DISCLOSURE	ESRS INDICATOR	CHAPTER REFERENCES
S4-4	Actions on relevant impacts on consumers and end users, approaches to manage relevant risks and achieve relevant opportunities in relation to consumers and end users, and effectiveness of such actions	DR 28, DR 30, DR 31, DR 32, DR 34, AR 35	Social disclosure / Consumers and end users / Consumers and end users: actions
S4-5	Objectives related to the management of relevant negative impacts, the enhancement of positive impacts, and the management of relevant risks and opportunities	DR 38, DR 40	General disclosure / Relevant topics / Relevant topics - Objectives and actions

ESRS STANDARD	DISCLOSURE	ESRS INDICATOR	CHAPTER REFERENCES
GOVERNANCE INFORMATION			
ESRS G1 - BUSINESS CONDUCT			
61.IR0-1	Description of the processes to identify and assess relevant impacts, risks and opportunities	DR 6	Governance disclosure / Business conduct / Relevant impacts, risks and opportunities regarding governance
61-1	Policies regarding corporate culture and business conduct	DR 7, DR 9, DR 10	Governance disclosure / Business conduct / Policies regarding corporate culture and business conduct
61-2	Management of relationships with suppliers	DR 12, DR 15	Social disclosure / Supply chain management / Management of relationships with suppliers
61-3	Prevention and detection of active and passive corruption	DR 16, DR 18, DR 20	Governance disclosure / Business conduct / Prevention and detection of active and passive corruption
61-4	Cases of active or passive corruption	DR 22, DR 24, DR 25	Governance disclosure / Business conduct / Cases of active or passive corruption



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