

FLAMMA ESG POLICIES

Ethics

1. POL-012.00 Flamma Anti-Bribery and Corruption Policy
2. POL-013.00 Flamma Confidential Information and Data Protection Policy
3. POL-014.00 Flamma Conflict of Interest Policy
4. POL-015.00 Flamma Financial Management and Anti-Money Laundering Policy
5. POL-016.00 Continuous Learning and Development Policy



Flamma Anti-Bribery and Corruption Policy POL-012.00

Policy n°	POL-012.00	Effective Date	1/10/2024	Revision n°	1
Supersedes	None	Next Review Date	1/10/2026	Issue n°	1
Contact Officer	Risk and Compliance Committee				

1. Introduction

1.1. Purpose

At Flamma, our commitment to financial integrity and transparency is a fundamental part of our purpose: "We embrace challenges to benefit people's lives, pursuing science with a human touch." This policy embodies our dedication to preventing bribery and corruption in all forms, reflecting our core values of care and accountability.

1.2. Material and Legal Scope

Flamma Group (Flamma) adhere to the United Nations Convention against Corruption, the EU Anti-Money Laundering Directive, and other relevant international and local laws. This policy ensures our compliance and promotes ethical conduct throughout our operations.

1.3. Applicability

This policy applies to all employees, contractors, and stakeholders involved in Flamma's operations worldwide. It encompasses all business activities, including transactions, reporting, and third-party interactions.

1.4. Roles & Responsibilities

- Role of Leadership: The Executive Committee will lead by example, ensuring adherence to this policy.
- The Risk and Compliance committee will oversee its implementation and monitoring.
- Responsibility Assignment: Each department head is responsible for integrating anti-bribery and corruption measures into their operations.
- Employees: Employees must understand and comply with this policy.

2. Material Topics

Integrity and Trust

We aim to maintain the integrity and reputation of Flamma by operating fairly and transparently. These builds trust with employees, customers, suppliers, and the broader community, aligning with our Code of Ethics and sustainability commitments.

Financial Transparency and Compliance

Maintaining accurate and transparent financial records and adhering to financial laws and regulations is crucial. This supports our values of simplicity and accountability, helps us avoid legal penalties, protects our reputation, and ensures our long-term sustainability.

2.1. Objectives

- Prevent Bribery and Corruption: We aim to detect and prevent any form of bribery and corruption.
- Ensure Financial Transparency: We keep accurate and transparent financial records to build trust with stakeholders.

- Comply with Regulations: We follow all relevant financial laws and regulations to maintain integrity.
- Foster Ethical Decision-Making: We promote a culture of ethical decision-making and integrity among all employees and stakeholders.

2.2. Implementation

- Robust Financial Controls: We have comprehensive financial controls to ensure accuracy and prevent fraud.
- Segregation of Duties: Our procurement procedures involve at least three different stakeholders to prevent conflicts of interest.
- Training and Awareness: We provide mandatory training programs to educate employees on anti-bribery and corruption principles. We also hold workshops and seminars to discuss financial integrity and promote awareness.
- Monitoring and Reporting: We track key financial performance metrics, compliance metrics, and will publish an annual report outlining financial performance and compliance. We encourage employees to report any suspected bribery or corruption incidents confidentially using <https://whistleblowing-flamma.hawk-aml.com/Whistleblowing/home>

2.3. Key Performance Indicators

Metric (KPI)	Description	Owner	Purpose
Training Hours per Employee	Tracks the average number of training hours per employee annually, covering all relevant topics.	HR Department	Monitor and promote continuous learning and development in various fields.
Incident Reporting Rate	Measures the frequency of reported issues.	RCC Risk and Compliance Committee	Measure the effectiveness of incident reporting mechanisms.
Ethical Compliance Incidents	Monitors the number of ethical compliance breaches.	RCC Risk and Compliance Committee	Identify potential risks and ensure legal compliance.
Accuracy of Financial Records	Measures the accuracy and completeness of financial records.	CFO	Ensure financial records are accurate and compliant.

3. Policy, Review, Sanctions and Approval

3.1. Policy Review

A periodical review will be conducted by the CFO to ensure the continued relevance and accuracy of this policy. Adjustments will be made as necessary to reflect changes in laws and business practices.

3.2. Sanctions

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

3.3. Supporting Documents

- Flamma Purpose and Values
- Flamma Code of Ethics

3.4. Policy Approval

This policy has been approved by the management of Flamma.

Name	Date	Position	Signature
GianPaolo Negrisoni	22/10/2024	CEO	
GianMarco Negrisoni	22/10/2024	Executive Director, Corporate Development	
Anne-Lise Kopp	22/10/2024	Corporate ESG Director	
Maurizio Capelli	22/10/2024	CFO	



Flamma Confidential Information and Data Protection Policy POL-013.00

Policy n°	POL-013.00	Effective Date	1/10/2024	Revision n°	1
Supersedes	None	Next Review Date	1/10/2026	Issue n°	1
Contact Officer	GianPaolo Negrisoni, Chairman – Acting as DPO				

4. Introduction

4.1. Purpose

At Flamma, we prioritize the protection of confidential information and personal data as part of our purpose: "We embrace challenges to benefit people's lives, pursuing science with a human touch." This policy reflects our core values of care, openness, simplicity, and accountability, ensuring that all sensitive information is managed responsibly and securely.

4.2. Material and Legal Scope

Flamma Group (Flamma) follows all relevant data protection laws in the countries where we operate, including the General Data Protection Regulation (GDPR). This policy covers all forms of data, including electronic, paper-based, and verbal communications.

4.3. Applicability

This policy applies to all employees, contractors, and third parties involved in handling confidential information and personal data at Flamma.

4.4. Roles & Responsibilities

- Employees: Understand and follow this policy and report any data protection concerns.
- Management: Promote data protection and ensure adherence to data protection standards.
- DPO: Oversees the implementation and monitoring of data protection initiatives in collaboration with the IT Director and department heads.

5. Material Topics

Protecting Confidential Information and Ensuring Data Integrity

We are dedicated to safeguarding all confidential and sensitive information from unauthorized access and disclosure, maintaining data integrity, and ensuring compliance with data protection laws. This builds trust with our stakeholders and aligns with our Code of Ethics.

5.1. Objectives

- Protect Confidential Information: Safeguard all confidential and sensitive information from unauthorized access and disclosure.
- Ensure Data Integrity: Maintain the accuracy and completeness of data to support effective decision-making.
- Comply with Data Protection Laws: Adhere to all relevant data protection regulations to ensure legal compliance and build trust with stakeholders.

5.2. Implementation

- Data Protection Measures: Implement comprehensive data protection measures, including encryption, access controls, and secure data storage. Regularly review and update data protection protocols to address emerging threats and vulnerabilities.
- Data Integrity and Accuracy: Establish data integrity protocols to ensure the accuracy and reliability of information. Conduct regular data audits to identify and rectify discrepancies.

- **Compliance with Data Protection Laws:** Ensure compliance with GDPR and other relevant data protection regulations. Implement a data protection management system to monitor compliance and address non-compliance issues promptly.

5.3. Key Performance Indicators

Metric (KPI)	Description	Owner	Purpose
Training Hours per Employee	Tracks the average number of training hours per employee annually, covering all relevant topics.	HR Department	Monitor and promote continuous learning and development in various fields.
Number of Confirmed Information Security Incidents	Tracks the number of security incidents confirmed.	IT Department	Measure effectiveness in responding to security breaches.
Compliance Audit Results	Measures the results of audits assessing adherence to data protection standards and regulations.	DPO	Ensure adherence to data protection regulations and rectify issues.

6. Policy, Review, Sanctions and Approval

6.1. Policy Review

A review will be carried out every 2 years by the DPO to ensure the continued validity and accuracy of this policy. Goals and measures will be revised closely, particularly if significant changes occur in Flamma's operations.

6.2. Sanctions

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

6.3. Supporting Documents

- Flamma Purpose and Values
- Flamma Code of Ethics
- Data Protection Procedures
- Information Security Guidelines

6.4. Policy Approval

This policy has been approved by the management of Flamma.

Name	Date	Position	Signature
GianPaolo Negrisoni	22/10/2024	CEO	
GianMarco Negrisoni	22/10/2024	Executive Director, Corporate Development	
Anne-Lise Kopp	22/10/2024	Corporate ESG Director	
Fabio Merlini	22/10/2024	Corporate IT Director	



Flamma Conflict of Interest Policy POL-014.00

Policy n°	POL-014.00	Effective Date	1/10/2024	Revision n°	1
Supersedes	None	Next Review Date	1/10/2026	Issue n°	1
Contact Officer	RCC Risk and Compliance Committee				

7. Introduction

7.1. Purpose

At Flamma, we are committed to maintaining the highest standards of integrity and transparency in all our operations. Our purpose, "We embrace challenges to benefit people's lives, pursuing science with a human touch," guides us in fostering an environment of trust and accountability. This policy reflects our core values of care and accountability, ensuring that all potential conflicts of interest are managed responsibly

7.2. Material and Legal Scope

Flamma Group (Flamma) adheres to relevant local and international laws and regulations concerning conflicts of interest, including the United Nations Convention against Corruption and the OECD Guidelines for Multinational Enterprises.

7.3. Applicability

This policy applies to all employees, contractors, and third parties engaged with Flamma. It covers all potential conflicts of interest that may arise during business, including personal, financial, and familial interests.

7.4. Roles & Responsibilities

- Employees: Responsible for disclosing any potential conflicts of interest and adhering to this policy.
- Management: Tasked with promoting a culture of transparency and ethical decision-making.
- RCC Risk and Compliance Committee: Oversees the implementation and monitoring of this policy in collaboration with department heads.

8. Material Topics

Flamma is dedicated to proactively identifying and addressing conflicts of interest to ensure all business decisions are made transparently and ethically.

8.1. Objectives

- Identify and Manage Conflicts of Interest: We proactively identify and address any conflicts of interest that may arise in our operations.
- Maintain Transparency: We ensure all business decisions are made with complete transparency and in the best interest of the company.
- Foster Ethical Decision-Making: We promote a culture of ethical decision-making and integrity among all employees and stakeholders.

8.2. Measures

- Conflict of Interest Declarations: Implement a system for employees to declare any potential conflicts of interest annually. Regularly review and update conflict of interest declarations to ensure accuracy and compliance.
- Training and Awareness: Develop and deliver training programs to educate employees on identifying and managing conflicts of interest. Regularly update training materials and conduct refresher sessions to reinforce understanding and compliance.

- **Monitoring and Reporting:** Establish procedures for monitoring potential conflicts of interest and ensuring they are reported and managed appropriately. Implement a platform for anonymous reporting to ensure employees can report conflicts without fear of retaliation.

8.3. Key Performance Indicators

Metric (KPI)	Description	Owner	Purpose
Training Hours per Employee	Tracks the average number of training hours per employee annually, covering all relevant topics.	HR Department	Monitor and promote continuous learning and development in various fields.
Number of convictions for violation of laws	Track the number of legal violations	RCC Risk and Compliance Committee	Ensure adherence to laws.
Amount of fines for violation of anti-corruption and anti-bribery laws	Track fines related to anti-corruption and anti-bribery violations	RCC Risk and Compliance Committee	Assess financial impact and improve compliance strategies.

9. Policy, Review, Sanctions and Approval

9.1. Policy Review

A review will be carried every 2 years out by the Compliance Officer to ensure the continued validity and accuracy of this policy. Goals and measures will be revised closely, particularly if significant changes occur in Flamma's operations.

9.2. Sanctions

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

9.3. Supporting Documents

- Flamma Purpose and Values
- Flamma Code of Ethics

9.4. Policy Approval

This policy has been approved by the management of Flamma.

Name	Date	Position	Signature
GianPaolo Negrisoni	22/10/2024	CEO	
GianMarco Negrisoni	22/10/2024	Executive Director, Corporate Development	
Anne-Lise Kopp	22/10/2024	Corporate ESG Director	
Maurizio Capelli	22/10/2024	CFO	

Policy n°	POL-015.00	Effective Date	1/10/2024	Revision n°	1
Supersedes	None	Next Review Date	1/10/2025	Issue n°	1
Contact Officer	Maurizio Capelli, CFO				

10. Introduction

10.1. Purpose

At Flamma, we are committed to maintaining the highest standards of financial integrity and transparency. Our purpose, "We embrace challenges to benefit people's lives, pursuing science with a human touch," guides us in fostering an environment of trust and accountability. This policy reflects our core values of care, and accountability, ensuring all financial activities adhere to the highest ethical standards.

10.2. Material and Legal Scope

Flamma group (Flamma) adheres to relevant local and international financial laws and regulations, including the Financial Action Task Force (FATF) recommendations, the EU Anti-Money Laundering Directive, and other applicable laws. This policy encompasses all aspects of financial management, including transactions, reporting, and anti-money laundering (AML) measures.

10.3. Applicability

This policy applies to all employees, contractors, and stakeholders involved with Flamma's financial activities.

10.4. Roles & Responsibilities

- Employees: Understand and follow this policy, reporting any suspicious activities.
- Management: Promote financial integrity and ensure adherence to financial and AML standards.
- CFO: Oversees the implementation and monitoring of financial management and AML initiatives in collaboration with the Compliance Officer and department heads.

11. Material Topics

Flamma is dedicated to maintaining financial transparency, preventing money laundering, and ensuring compliance with financial regulations. We aim to implement robust financial controls and AML measures to protect our organization and stakeholders. This is consistent with our Code of Ethics and sustainability policy.

11.1. Objectives

- Ensure Financial Transparency: We keep accurate and transparent financial records to build trust with stakeholders.
- Prevent Money Laundering: We implement robust measures to detect and prevent money laundering activities.
- Comply with Regulations: We adhere to all relevant financial laws and regulations to maintain integrity.

11.2. Implementation

- Financial Controls: We have comprehensive financial controls to ensure accuracy and prevent fraud. Regular reviews keep our procedures updated to handle emerging risks and regulations.
- Transparency and Reporting: We enhance financial reporting processes for timely and accurate disclosure. Advanced financial management systems improve data accuracy and accessibility.

11.3.

Key Performance Indicators

Metric (KPI)	Description	Owner	Purpose
Number of Suspicious Activity Reports (SARs) Filed	Monitors the number of SARs filed.	RCC Risk and Compliance Committee	Measure the effectiveness of anti-money laundering measures.
Number of findings from internal and external financial and AML audits	Track findings from financial and AML audits.	CFO	Identify areas for improvement and ensure financial compliance.

12. Policy, Review, Sanctions and Approval

12.1.

Policy Review

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

12.2.

Sanctions

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

12.3.

Supporting Documents

- Flamma Purpose and Values
- Flamma Code of Ethics

12.4.

Policy Approval

This policy has been approved by the management of Flamma.

Name	Date	Position	Signature
GianPaolo Negrisoni	22/10/2024	CEO	
GianMarco Negrisoni	22/10/2024	Executive Director, Corporate Development	
Anne-Lise Kopp	22/10/2024	Corporate ESG Director	
Maurizio Capelli	22/10/2024	CFO	

Continuous Learning and Development Policy POL-016.00

Policy n°	POL-016.00	Effective Date	1/10/2024	Revision n°	1
Supersedes	None	Next Review Date	1/10/2026	Issue n°	1
Contact Officer	Mariella Gioia, Corporate Executive HR Director				

13. Introduction

13.1. Purpose

At Flamma, we believe in embracing challenges to benefit people's lives, pursuing science with a human touch. A crucial part of achieving this is through continuous learning and awareness, including in business conduct. Our values of care, openness, simplicity, and accountability drive us to foster a culture of learning and development.

13.2. Material and Legal Scope

Flamma Group (Flamma) adhere to relevant EU laws and international standards related to employee training and development, ensuring our practices align with industry best practices for continuous professional development.

13.3. Applicability

This policy applies to all Flamma's employees, and it covers all aspects of learning at each step of employees' journey and experience at Flamma, starting from onboarding to continuous professional development. We are committed to empowering learning culture building an ecosystem with the community we are impacting with our business by collaborating with schools, universities and organizations.

13.4. Roles & Responsibilities

- Executive Committee: Support initiatives by facilitating access to necessary resources and acting as champions in all subsidiaries
- Executive Corporate HR Director: Oversees the implementation and management of learning and development plans and initiatives.
- Management: Ensures employees have access to relevant initiatives and education to develop their skills and competencies. Champion development in their teams.
- Employees: Actively participate in learning and development initiatives

14. Material Topics

We are committed to promoting continuous learning and development among our workforces. Flamma is dedicated to creating an environment that foster high performance, innovative thinking and professional development, and where everyone can thrive and succeed.

14.1. Objectives

- Enhance Employees skills and competencies: we ensure all employees have access to ongoing learning and development opportunities, ensuring they are well-equipped to perform their current roles effectively and to take on future challenges.
- Foster a culture of Continuous learning and innovation: we encourage mindset of continuous learning and curiosity among employees to lead to higher levels of engagement, innovation, and job satisfaction. This culture supports both individual growth and the overall adaptability and resilience of the organization.

14.2. Implementation

- Onboarding Initiative: Comprehensive introduction to Flamma’s purpose, values, policies, and procedures for all new employees.
- Continuous Professional Development: Regular learning and development initiatives to enhance skills, knowledge, and competencies.

14.3. Key Performance Indicators

Metric (KPI)	Description	Owner	Purpose
Employee Training Completion Rate	Tracks the percentage of employees completing mandatory training programs across all topics (e.g., ethics, DEI, sustainability, data protection).	HR Department	Ensure that all employees complete required training for compliance and development.
Training Hours per Employee	Tracks the average number of training hours per employee annually, covering all relevant topics.	HR Department	Monitor and promote continuous learning and development in various fields.
Participants' Satisfaction Rate	Measures feedback on training sessions to assess usefulness and satisfaction.	HR Department	Ensure training is effective and meets employee needs.
Number of Training Events	Tracks the total number of training sessions delivered annually across the company.	HR Department	Monitor the variety and frequency of training opportunities provided to employees.

15. Policy, Review, Sanctions and Approval

15.1. Policy Review

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

15.2. Sanctions

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

15.3. Supporting Documents

- Flamma Purpose and Values
- Flamma Code of Ethics
- Flamma Sustainability Policy
- Flamma Human Rights and Labor Rights Policy
- Flamma Diversity, Equity, and Inclusion (DEI) Policy

15.4. Policy Approval

This policy has been approved by the management of Flamma.

Name	Date	Position	Signature
GianPaolo Negrisoni	22/10/2024	CEO	
GianMarco Negrisoni	22/10/2024	Executive Director, Corporate Development	
Anne-Lise Kopp	22/10/2024	Corporate ESG Director	
Mariella Gioia	22/10/2024	Executive Corporate HR Director	