

FLAMMA ESG POLICIES

Own Workforce

1. POL-009.00 Flamma Human Rights and Labor Rights Policy
2. POL-010.00 Flamma Diversity, Equity, and Inclusion (DEI) Policy
3. POL-011.00 Flamma Health and Safety Policy



Flamma Human Rights and Labor Rights Policy POL-009.00

Policy n°	POL-009.00	Effective Date	1/10/2024	Revision n°	1
Supersedes	None	Next Review Date	1/10/2025	Issue n°	1
Contact Officer	Mariella Gioia, HR Corporate Executive Director				

1. Introduction

1.1. Purpose

At Flamma, our people are our most important asset. We're dedicated to ensuring everyone returns home safe and well to their families every day. Guided by our purpose to benefit people's lives and our value of acting with care, we commit to upholding and promoting human rights and labour rights. This policy demonstrates our dedication to protecting and promoting human rights, preventing forced labour and discrimination, and ensuring dignity and equality in the workplace.

1.2. Material and Legal Scope

Flamma Group (Flamma) adhere to relevant laws and regulations, including key EU directives and other ESG guidelines applicable to our operations. This policy covers all aspects of human rights and labour practices within our organization. It complies with international standards such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, ILO Conventions, the UN Global Compact principles, and the OECD Guidelines for Multinational Enterprises.

1.3. Applicability

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

1.4. Roles & Responsibilities

- Executive Committee: Support initiatives by facilitating access to necessary resources and acting as champions in all subsidiaries
- HR Corporate Executive Director: Leads the implementation of the human rights and labor rights strategy. Handles any questions or complaints
- Procurement: Ensures the respect of these principles with contractors
- Management: Facilitates implementation, ensures access to relevant resources.
- Employees: Expected to understand and adhere to this policy. Report any possible violation or doubts.

2. Material Topics

At Flamma, we are committed to respecting and promoting human rights and labor rights. We continuously work to improve our performance in these areas and integrate our efforts with our DEI and Health and Safety policies to ensure comprehensive protection and promotion of rights in the workplace. The implementation of improvements in human rights and labor standards is further detailed in our DEI and Health and Safety policies

2.1. Objectives

- **Respect for Human Rights:** We commit to upholding the fundamental human rights as defined by international standards, including the Universal Declaration of Human Rights and OECD Guidelines for Multinational Enterprises

- **Fair Labor Practices:** We ensure fair wages, reasonable working hours, and safe working conditions for all employees. Child labour and forced labour are strictly prohibited.
- **Non-Discrimination:** We promote equality and prohibit any form of discrimination based on race, gender, age, religion, sexual orientation, disability, or any other characteristic.

3. Implementation

- Educate employees Through Learning initiatives on human rights and labour standards.
- Monitor compliance and take corrective actions when necessary.
- Provide anonymous reporting mechanisms for violations.

3.1. 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.
Diversity Metrics (Gender, Age, and Minority Representation)	Monitors gender diversity, minority representation, and inclusion metrics within the workforce and leadership.	HR Department	Ensure a diverse and inclusive workplace and leadership, while tracking demographic trends.
Fair Wage Compliance	Ensures all employees earn a living wage according to local standards.	HR Department	Ensure fair wage practices and promote economic equity among employees.
Number and Amount of Fines and Compensation	Track fines and compensations related to discrimination and harassment incidents.	RCC Risk and Compliance Committee	Assess financial impact and measure effectiveness of prevention.
Incident Reports of Discrimination or Harassment	Tracking the number and resolution of reported incidents.	RCC Risk and Compliance Committee	Measures the effectiveness of reporting mechanisms and the organization's responsiveness to discrimination and harassment issues.
Number of Severe Human Rights Issues	Number of severe human rights issues and incidents connected to the workforce.	RCC Risk and Compliance Committee	Identifies serious human rights concerns and ensures they are addressed promptly and effectively.

4. Policy, Review, Sanctions and Approval

4.1. 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.

4.2. Sanctions

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

4.3. Supporting Documents

- Flamma Purpose and Values
- Flamma Code of Ethics
- Flamma Sustainability Policy
- Employee handbook
- Flamma Continuous Learning and Development Policy
- Flamma Diversity, Equity, and Inclusion (DEI) Policy

4.4. 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	



Flamma Diversity, Equity, and Inclusion (DEI) Policy POL-010.00

Policy n°	POL-010.00	Effective Date	1/10/2024	Revision n°	1
Supersedes	None	Next Review Date	1/10/2026	Issue n°	1
Contact Officer	Mariella Gioia, Corporate HR Executive Director				

5. Introduction

5.1. Purpose

At Flamma, our people are our greatest asset. We firmly believe that fostering a diverse, equitable, and inclusive workplace is essential to our mission of benefiting people's lives through science. Embracing DEI reflects our values of care, openness, simplicity, and accountability, and it positions us for sustainable growth and competitiveness in the global market. Our commitment to DEI demonstrates our belief that when everyone gets in the game, we all win.

5.2. Material and Legal Scope

Flamma Group (Flamma) adhere to relevant laws and regulations, including key EU directives and other ESG guidelines applicable to our operations. Our policy ensures adherence to the principles of the Universal Declaration of Human Rights, ILO conventions, and relevant local legislation to promote equal opportunities and fight discrimination.

5.3. Applicability

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

5.4. Roles & Responsibilities

- Executive Committee: Support initiatives by facilitating access to necessary resources and acting as champions in all subsidiaries. It is frontline in promoting an inclusive culture and ensure DEI principles to be infused in Flamma's business
- Corporate Executive HR Director: Leads the implementation of the DEI strategy. Handles any questions or complaints.
- Management Facilitates implementation of DEI principles in business processes and projects, support team members' education and awareness.
- Employees: Apply DEI guidelines in their work and participate in learning initiatives.

6. Material Topics

At Flamma, we are committed to creating a workplace where diversity, equity, and inclusion are at the forefront. Our efforts include attracting diverse talent, ensuring fair treatment and equal opportunities, and fostering an inclusive environment where everyone feels valued. We continually strive to improve our DEI performance and integrate these values into our daily operations and strategic goal.

6.1. Objectives

- Promote Diversity: Ensure representation of diverse backgrounds.
- Ensure Equity: Create a fair workplace with equal opportunities.
- Foster Inclusion: Cultivate an inclusive environment where everyone feels valued.

6.2. Measures

- Implement recruitment strategies to attract diverse talent.
- Conduct DEI Learning initiatives for all employees.
- Educate employees on DEI topics and enhance DEI culture through relevant initiatives

6.3. 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.
Diversity Metrics (Gender, Age, and Minority Representation)	Monitors gender diversity, minority representation, and inclusion metrics within the workforce and leadership.	HR Department	Ensure a diverse and inclusive workplace and leadership, while tracking demographic trends.
Pay Equity Analysis	Analyzes the ratio of compensation between different groups (e.g., gender, ethnicity) to ensure equity.	HR Department	Ensure fair and equitable pay across all employee demographics.
Number of executive committee members from diverse groups	Promote diversity in leadership roles	HR Department	Ensure diverse leadership

7. Policy, Review, Sanctions and Approval

7.1. 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.

7.2. Sanctions

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

7.3. Supporting Documents

- Flamma Purpose and Values
- Flamma Code of Ethics
- Flamma Sustainability Policy
- Flamma Human Rights and Labor Rights Policy
- Flamma Continuous Learning and Development Policy

7.4. 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	



Flamma Health and Safety Policy POL-011.00

Policy n°	POL-011.00	Effective Date	1/10/2024	Revision n°	1
Supersedes	None	Next Review Date	1/10/2025	Issue n°	1
Contact Officer	Alessia Galbiati, HSE Corporate Executive Director				

8. Introduction

8.1. Purpose

At Flamma, our people are our most important asset. We are dedicated to ensuring that everyone returns home safe and well to their families every day. Our purpose is to "embrace challenges to benefit people's lives, pursuing science with a human touch." This Health and Safety Policy reflects our values of care, openness, simplicity, and accountability. We are committed to creating a safe and healthy workplace because we believe that safety is fundamental to our success and well-being.

8.2. Material and Legal Scope

Flamma group (Flamma) adhere to relevant laws and regulations, including key EU directives, and other guidelines applicable to our operations. Our policy ensures compliance with international standards such as:

- ILO guidelines
- OSHA standards
- The European Union's Seveso III Directive on major-accident hazards
- EU Framework Directive on Safety and Health at Work (Directive 89/391/EEC).

8.3. Applicability

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

8.4. Roles & Responsibilities

- HSE Director: Leads the implementation of our health and safety strategy. Handles any questions or complaint
- Employees: Expected to understand and adhere to this policy.
- Management: Facilitates implementation, ensures all employees have access to relevant resources, and updates the policy as needed.

9. Material Topics

At Flamma, we are committed to maintaining the highest standards of health and safety across our operations. We continuously strive to improve our safety performance through proactive measures and continuous improvement initiatives. Our goal is to create a workplace where safety is ingrained in our culture, and every employee feels responsible for their own safety and the safety of others

9.1. Objectives

- Safe Working Environment: Maintain a safe and healthy workplace.
- Zero Incidents: Aim for zero workplace incidents through comprehensive safety measures.
- Emergency Preparedness: Ensure readiness to respond to health and safety emergencies..

9.2. Measures

- Conduct regular safety training and awareness programs.
- Perform risk assessments and implement measures to mitigate hazards.
- Conduct health and safety audits to ensure compliance and continuous improvement

9.3. 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.
Work-Related Accidents	Tracks the number of workplace injuries and accidents.	HSE Department	Monitor and improve workplace safety to reduce accidents.
Health and Safety Audits	Conducts regular audits to ensure compliance with safety standards.	HSE Department	Ensure continuous improvement in workplace safety.
Emergency Response Drill Frequency	Tracks the number of emergency drills conducted annually.	HSE Department	Ensure readiness for emergencies through regular drills.

10. Policy, Review, Sanctions and Approval

10.1. 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.

10.2. Sanctions

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

10.3. Supporting Documents

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

10.4. Policy Approval

This policy has been approved by the management of Flamma.

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