



SUSTAINABILITY POLICY: INTRODUCTION AND OBJECTIVES

Ponti S.p.A. has always been committed to bringing food products to tables around the world that combine Italian tradition with the pursuit of innovative flavours, meeting the highest standards of quality.

Acting sustainably from an economic, social and environmental perspective has been a value underpinning the history of the Ponti Group from the outset. Sustainability is a process through which strategies, production methods and organisational models evolve to create value in the present while looking to the future.

In 2021, Ponti S.p.A. strengthened this commitment by becoming a Benefit Corporation; in 2023, it obtained B Corp certification and, in 2024, Gender Equality Certification, consolidating a path that integrates corporate responsibility, quality of work, care for people, environmental protection and the creation of shared value.

As a Benefit Corporation, the Company intends to pursue one or more common-benefit purposes and to operate in a responsible, sustainable and transparent manner towards people, communities, territories and the environment, cultural and social assets and activities, institutions and associations, and other stakeholders. (Articles of Association, Art. 3).

Ponti considers sustainability a structural responsibility of the business towards society, the territories in which it operates and future generations. It concerns the environment, people, work, the quality of development and the continuity of the industrial system, while also representing a long-term factor of competitiveness, reputation and credibility.

The **Sustainability Policy** translates the Group's conviction that the creation of sustainable and lasting value over time must be pursued:

- in compliance with the ethical principles of legality and fairness, integrity and honesty, impartiality and transparency;
- with a view to continuous improvement, operational efficiency and cost-effectiveness;
- in support of business and employment continuity;
- with attention to the impacts generated on people, communities, territories, the environment and other stakeholders.

The Policy provides the framework within which the **Sustainability Strategy** and **Sustainability Plan**:

- the **Strategy** is structured around 4 pillars:
 1. Care for and quality of the product
 2. Listening to and caring for people
 3. Protection of the Territory and its resources
 4. Sustainability throughout the product life cycle;

- the **Sustainability Plan**: during 2026, the new plan for the three-year period 2027-2029 will be prepared. It consists of the actions planned for each Pillar, detailed by area, activity description, performance indicators, responsible function and implementation timeline.

INTEGRITY AND LEGALITY - THE FOUNDATIONS

Ponti S.p.A. operates in compliance with the ethical principles of legality and fairness, integrity and honesty, impartiality and transparency in all relations with stakeholders. These principles, already set out in the Code of Ethics, guide relations with shareholders, employees, external collaborators, customers, suppliers, consumers, local communities and financial institutions.

Ponti requires all people working for the Company and all those acting in its name or on its behalf to act with transparency, clarity, consistency between what is stated and what is done, loyalty and respect. The Group promotes full compliance with applicable legislation, internal regulations and the highest ethical standards, rejecting any form of active or passive corruption, extortion, fraud and any other unlawful conduct.

Legality is considered an integral part of sustainability: corruption, unlawful conduct, lack of transparency in business relations and behaviour contrary to the Code of Ethics have negative economic, social and environmental impacts, both for the Group and for the society in which it operates.

In line with the Code of Ethics, the Organization, Management and Control Model pursuant to Italian Legislative Decree 231/2001 and the Codes of Conduct applicable to relations with third parties, Ponti requires all parties who establish direct or indirect relationships with the Group to:

1. contracts and work assignments must be performed as agreed by the parties, without Ponti ever using positions of dominance to obtain services that are not due or that are disadvantageous to the other party;
2. no sums of money, benefits, gifts, favours or other advantages, including indirect ones, may be promised with the aim of obtaining commercial advantages in an unfair, improper or non-transparent manner;
3. no sums of money or other benefits may be requested for the Company, its personnel or third parties;
4. every relationship must be managed on the basis of objective, documentable criteria consistent with Company procedures, avoiding conflicts of interest, improper dependencies or conduct that could compromise independence of judgement;
5. no lobbying activities may be carried out, either directly or indirectly, with the aim of influencing public regulatory decisions or legislative acts;
6. any violations, suspected violations or requests to violate Company principles must be reported through the designated internal channels, in compliance with confidentiality requirements and the prohibition of retaliation.

Violation of this Policy, the Code of Ethics or Company procedures may result in disciplinary or contractual consequences proportionate to the seriousness of the conduct and consistent with the applicable sanctioning system.

REFERENCE STANDARDS AND PRINCIPLES

The Policy reinforces what is already established in Ponti's Code of Ethics and is inspired by the main standards, principles and references issued by relevant national and international organisations, including:

- the United Nations International Bill of Human Rights, comprising the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;
- the United Nations Guiding Principles on Business and Human Rights, as a reference for respecting human rights, preventing potential adverse impacts and managing appropriate remedies;
- the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the applicable related conventions, with particular reference to freedom of association, the right to collective bargaining, the elimination of forced labour, the effective abolition of child labour, non-discrimination and the protection of a healthy and safe working environment;
- ILO Conventions No. 138 on the minimum age for admission to employment and No. 182 on the worst forms of child labour, as well as the ETI Base Code, as references for the Company's zero-tolerance policy towards child labour;
- ILO Convention No. 190 and ILO Recommendation No. 206 on the elimination of violence and harassment in the world of work, as references for preventing abuse, harassment and conduct that harms personal dignity, with particular attention to the protection of women and gender equality;
- the Sustainable Development Goals (SDGs) of the United Nations and the UN 2030 Agenda;
- the guiding principles for promoting gender equality, the Women's Empowerment Principles (WEPs);
- UNI/PdR 125:2022, the guideline on the management system for gender equality;

THE SUSTAINABILITY STRATEGY: PONTI'S COMMITMENTS

A. PRODUCT QUALITY AND CARE

Ponti has always been committed to offering products developed on the basis of two non-negotiable criteria: quality and safety. With this in mind, we develop recipes and source ingredients by combining Italian tradition with the pursuit of innovative flavours, in order to offer quality products and promote healthy, balanced eating habits and lifestyles.

Food quality and safety are monitored throughout the entire process, from raw materials to production processes, from packaging to distribution, from the point of sale to final consumption, through internal procedures, management systems, controls and certifications issued by independent external bodies.

With a view to continuously improving processes, services and products, the Group is constantly committed to reformulating its market offering. We aim to anticipate and support consumers' growing awareness of social and environmental issues, promoting the integration of sustainability criteria into everyday choices.

B. LISTENING TO AND CARING FOR PEOPLE

At Ponti, we have always considered people to be the true driving force of the business and the necessary condition for ensuring the Company's success and continuity. For this reason, we build professional relationships based on fairness, transparency, equity, loyalty and respect for personal dignity.

Ponti is committed to ensuring regular and formalised employment relationships, freedom of association, the right to collective bargaining, equal opportunities, occupational health and safety, pay equity, professional development and work-life balance. The Company rejects all forms of discrimination, forced labour, compulsory labour, irregular employment, exploitation, bullying and child labour, whether direct or indirect.

Ponti's Child Labour Policy establishes a zero-tolerance principle towards child labour in its own operations and supply chain. During recruitment, documentary verification of age is carried out and, should a case of child labour arise, the Company provides for immediate cessation of the work, protection of the child and support for returning to education, following a responsible remediation approach.

Ponti also adopts a zero-tolerance approach to abuse, harassment, gender-based harassment, discrimination and any conduct that may harm the dignity, freedom or integrity of the individual. Preventing abuse and harassment is an integral part of the gender equality management system and is based on training, including anonymous reporting channels, confidentiality protection, a prohibition of retaliation and responsible management of any reported incidents.

In particular, we believe that these conditions are pursued by ensuring a healthy, safe and welcoming environment, valuing each person's professional contribution, providing spaces and tools for engagement and participation, and supporting and encouraging professional growth through training and continuous learning paths.

C. PROTECTION OF THE TERRITORY AND ITS RESOURCES

Ponti is aware that the production and distribution of goods have an impact on the environment and therefore invests resources to continuously improve its environmental performance, with the aim of minimising the impacts generated by business activities.

The Group continuously reviews processes, facilities and technologies to increase the sustainability of its activities. The main objectives are to reduce waste and risks associated with climate change, use energy efficiently, increase the use of renewable energy wherever possible, improve the energy efficiency of facilities, reduce water consumption and ensure proper waste management.

Protecting the territory and its resources also means safeguarding and supporting the communities in which Ponti is rooted, creating employment opportunities and contributing to their economic, social and cultural development. Accordingly, the Group is committed to supporting initiatives and activities that enhance the well-being of local areas, including through financial and food surplus donations, sponsorships, fundraising campaigns, campaigns supporting local traditions, projects to safeguard artistic heritage and initiatives to regenerate disused areas.

Ponti is committed to donating 2% of its annual profit to the initiatives referred to above, also through the two dedicated funds it has established with the Fondazione della Comunità del Novarese.

D. SUSTAINABILITY THROUGHOUT THE PRODUCT LIFE CYCLE

We are committed to combating climate change also by measuring and managing the impacts of our products throughout their entire life cycle. We seek strategies aimed at reducing environmental impacts throughout the production process, from the purchase of raw materials to delivery and the end of the product's life.

Our commitment translates into promoting supply chains that are environmentally responsible and respectful of workers' human and social rights. The Supplier Code of Conduct requires business partners to comply with Ponti standards, including ethical, social and environmental principles, respect for human rights, the prohibition of discrimination, abuse and harassment, and the elimination of child labour, forced labour, slavery, human trafficking and all forms of exploitation.

We seek relationships with suppliers so that they become long-term strategic partners with whom to build paths of collaboration and compliance with the fundamental ethical standards of Ponti. In the supplier qualification, evaluation and monitoring processes, Ponti promotes acceptance of the Code of Ethics and the Supplier Code of Conduct, as well as the collection of information useful for assessing partners' consistency with Company requirements.

We encourage the promotion of local speciality products and the selection of local suppliers who, thanks to an increasingly short supply chain, ensure that resources are reinvested in the local area. Supporting local production is intended to foster the development of suppliers and the local economy, promoting the creation of shared value.

IMPLEMENTATION AND MONITORING

The Sustainability Policy was formally approved by the Board of Directors of Ponti S.p.A. on 18 November 2021 and remains in force, being periodically updated in line with developments in the sustainability strategy, corporate governance, the internal document management system and the results of annual reporting.

The Policy applies to all Group companies, current and prospective employees, collaborators, suppliers and Group business partners. Ponti undertakes to communicate it to all personnel and make it available to interested stakeholders through its website and internal communication tools.

Failure to comply with this Policy is assessed on a case-by-case basis. Depending on the seriousness of the violation and the party involved, Ponti S.p.A. may adopt corrective, disciplinary or contractual measures, in accordance with the Code of Ethics, the Company sanctioning system and applicable internal procedures.

Ponti is committed to reporting annually on its social, environmental and economic performance, highlighting progress made towards achieving sustainability objectives through corporate reporting documents, including in particular the Impact Report, alongside publication of the Annual Financial Statements.

GOVERNANCE

Sustainability is an integral part of Ponti S.p.A.'s governance and is overseen through a model that separates ordinary business management from the coordination of sustainability and gender equality matters.

The Board of Directors approves the Sustainability Policy, provides direction for the overall strategy and periodically assesses progress against plans and objectives relevant to the creation of sustainable value.

The Board Member with delegated responsibility for Sustainability and Gender Equality promotes and oversees the sustainability and gender equality strategy and plans, supporting the Board of Directors in assessments and decisions relating to these areas.

The Chief Sustainability Officer operationally coordinates the actions that make up the Sustainability Plan, the collection of performance data, monitoring of the plan's progress and reporting activities.

The Management Committee contributes to the proposal of the Sustainability Strategy and the related Operational Plan, promoting the integration of sustainability objectives into the relevant business areas.