INTEGRATED POLICY FOR QUALITY, HYGIENE AND FOOD SAFETY, ENVIRONMENT, SAFETY AND SOCIAL RESPONSIBILITY | 2026-2028

CONTITAL TURKEY ALÜMİNYUM VE PLASTİK SANAYİ TİCARET A.Ş. manufactures packaging products designed for direct food use. The company was founded in 2019 and is part of the **Laminazione Sottile Group**, an industrial firm operating on international markets in the manufacture of aluminium products and which bases its processes on technological innovation and the high Quality of its products and services, with focus on the safety of its employees and collaborators and respect for the environment and the local community. **Contital Türkiye** is committed to continual improvements of its environmental and social performances and to adopting sustainable practices that conserve resources, prevent pollution, and promote recycling and reuse. Yet, it has also implemented a business management operating system capable of meeting the hygiene and food safety requirements of the relevant regulations and good manufacturing practices (GMP).

Purpose and field of application

This Policy aims to define the principles and standards that **Contital Türkiye**, in line with the Group's Mission and Vision, pursues with commitment in order to obtain a continuous improvement of its Integrated Management System for Quality, Hygiene and Food Safety, Safety, Environment and Social Responsibility, through the constant commitment to the improvement of processes and performance with a view to customer satisfaction while always respecting and safeguarding the environment and the health and safety of workers and all stakeholders.

In particular, **Contital Türkiye** undertakes to pursue the following activities:

For Quality

- develop and maintain a Quality management system built on appropriate controls, continuous improvement, and regulatory compliance;
- improve the degree of customer and consumer satisfaction;
- gain new market shares, also turning to new channels (large-scale distribution, Industries);
- reduce costs;
- improve the production efficiency of the lines and all production departments;
- enhance the effectiveness of production control;
- improve the monitoring of waste;
- use the internal laboratory to deepen the controls on Raw Materials and Finished Products;
- increase the involvement of all resources for the achievement of company goals.

For Hygiene and Food Safety

- develop and maintain a management system certified to the BRCGS Packaging standard;
- comply with all applicable consumer/customer safety laws and regulations;
- increase with adequate training the involvement and awareness of staff in reference to the culture of food safety of products;
- ensure an adequate hygienic level of premises, facilities and staff through:
    - the implementation of cleaning, sanitation and maintenance programmes;
    - pest control management;
    - housekeeping controls, involving in-house resources;
    - microbiological checks on finished products, machines and staff;

- monitor all activities, including maintenance, and equipment that may have an impact on the functional integrity and performance of the finished product;
- take the necessary measures to prevent contamination of the product;
- ensure the production of safe and legally compliant products of the specified quality;
- ensure that the raw materials, packaging and everything used for the manufacture of the products comply with current legislation and that suppliers comply with the applicable GMP;
- define and monitor measurable goals aimed at continuous improvement.

For the Environment

- comply with the mandatory environmental rules, laws and regulations applicable to the company, as well as the rules that the company has voluntarily decided to subscribe to in the same field;
- develop and maintain Environmental Management System built on appropriate controls, continuous improvement, and regulatory compliance;
- ensure the continuous improvement of its environmental performance by implementing action programmes and control tools on the main environmental aspects of the site;
- promote continuous dialogue with internal and external stakeholders to eliminate conflicts or misunderstandings, promoting the involvement, participation and awareness of workers and suppliers on environmental as well as health and safety protection issues;
- adopt measures to prevent and/or eliminate pollution and, if this proves impossible, to minimise the production of pollutant emissions and waste and optimise the management of resources, considering the possible and best available technologies;
- reduce the environmental impact of company activities by implementing sustainable practices, recycling and reduction of waste, optimisation of the consumption of natural resources;
- provide a working environment in which all employees are encouraged to save energy and to minimise waste;
- progressively increase the share of waste sent for recovery (recycling/recovery) until reaching at least 96% of the total waste produced by 2026;
- reduce environmental impact by pursuing reductions in energy consumption and both direct and indirect GHG emissions, by promoting energy efficiency, the use of energy from renewable sources, aluminium recycling, and preferring the purchase of low-impact raw materials;
- implement all actions necessary to achieve the decarbonisation objectives defined by the Group, which call for a 50% reduction in the Carbon Footprint by 2030 compared to 2022 levels;
- improve control systems for atmospheric emissions, dust, odorous emissions, water discharges, noise emissions, and any releases into soil and groundwater;
- optimize the use of natural resources by reducing water consumption and minimizing the discharge of pollutants into aquifers;
- reduce the environmental impact generated by the product and its packaging at the end of its life, by: designing products that can be easily recycled; entering into agreements with customers for the recovery of end-of-life products; minimizing packaging and using sustainable materials;
- undergo continuous audits of the procedures in place in order to verify compliance with the requirements prescribed in the Environmental Management Manual and illustrated in the Operating Procedures and Instructions;
- promote and implement staff training programs at all levels in order to optimize the process of growth of human resources, considered as critical resources for the improvement of company environmental conditions and increase staff awareness in cases of emergency;
- source raw materials locally wherever possible;
- establish effective procedures to prevent environmental accidents and, if they occur, for their proper management in order to minimise damage.

For Employees' Health and Safety

- develop and maintain a Safety Management System built on appropriate controls, continuous improvement, and regulatory compliance;
- ensure safe and healthy workplaces in order to prevent occupational diseases and injuries;
- ensure the engagement of workers and their active participation in the activities to improve the safety and health of workers and all stakeholders;
- eliminate, where possible, hazards and prevent/reduce risks to occupational health and safety;
- reduce exposure to risk in the workplace through the application of the Safety Management System, the involvement of all resources and the continuous search for better technologies;
- further improve the fire safety system and machine protection systems in order to minimise risks to workers;
- strictly comply with all current legislation in the field of occupational health and safety and the requirements of all stakeholders;
- promote continuous dialogue with internal and external stakeholders to eliminate conflicts or misunderstandings, promoting the involvement, participation and awareness of workers and suppliers on health and safety protection issues;
- structure equipment and resources in order to prevent and possibly deal promptly, effectively and diligently with emergencies or accidents that may occur;
- use plants and equipment and employ human resources and operating procedures, sufficient and adequate for the protection of workers and the community in which they operate;
- select suppliers who operate in compliance with the principles of safety in the workplace and adopt a policy aimed at continuous improvement;
- improve the safety culture, the involvement and the assumption of responsibility of resources with systematic training and information and through monthly meetings;
- carry out the appropriate reviews and evaluations of its operations to always and constantly quantify the progress found in the safety sector;
- record zero injuries in each year of validity of this Policy, from 2026 to 2028.

For Social Responsibility

- develop and maintain an active Social Responsibility Management System built on appropriate controls, continuous improvement, and regulatory compliance;
- ensure the exclusion of the use or support of child or under-age labour in general and of forced or compulsory labour in any form;
- ensure compliance with the right to freedom of association and collective bargaining;
- ensure compliance with the workers' statute and the provisions of the National Collective Bargaining Agreement, wherever applicable;
- ensure compliance with individual dignity and freedom by preventing all forms of discrimination;
- ensure there is no implementation or support for discrimination with respect to hiring, remuneration, access to training, promotion, dismissal or retirement, on the basis of race, class, national or territorial origin, religion, disability, gender, sexual orientation, union membership or political affiliation;
- ensure the management of working hours, wages, as well as disciplinary procedures, consistent with current legislation, employment contracts, trade union agreements and industry standards, ensuring a decent minimum living wage for its workers;
- ensure compliance with the Constitution of the Republic of Türkiye, current laws and future amendments and additions, as well as international conventions and documentation;
- promote strategies, goals, targets, improvement plans to ensure commitment to ongoing improvement, empowerment, awareness, training and involvement of all staff;
- ensure constructive dialogue with internal and external stakeholders, always maintaining an attitude open to dialogue.

- record zero incidents of human rights violations (child labour, forced labour, or human trafficking, violations of freedom of association, discrimination, and harassment) in each year of this Policy's validity, from 2026 to 2028;
- record zero incidents of corruption, fraud, conflicts of interest, or money laundering in each year of this Policy's validity, from 2026 to 2028;
- record zero incidents of data breaches or privacy violations involving data subjects, such as employees, contractors, customers, and suppliers, in each year of this Policy's validity, from 2026 to 2028.

A communication system has been activated for the management of reports, complaints, suggestions relating to Social Responsibility, working conditions, safety, the environment, and in general conduct in breach of applicable laws and regulations, consisting of the following channels:

- direct reporting (HR, HSE/RSPP, RLS) or via email sa8000@laminazionesottile.com
- telephone and email number of the company's Supervisory Body
- leaving the complaints/suggestions in the physical box located in the plant.

Reports can also be made anonymously and, in any case, the company ensures that there is no discrimination against employees who have reported non-compliance.

Regardless of the chosen communication channel, all reports received are handled in accordance with internal procedures (designed to ensure compliance with the principles of confidentiality, impartiality, and non-retaliation) and in compliance with personal data protection legislation.

Contital Türkiye hereby undertakes to implement all the measures and resources necessary to pursue these general principles and, where needed, implement the corrective actions, in line with the orientation to continuous improvement of company performance.

Contital Türkiye, in sourcing any minerals required for its production process, adheres to the "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" issued by the Organization for Economic Co-operation and Development (OECD), specifically by communicating the use and origin of minerals through the Conflict Minerals Reporting Template (CMRT) and the Extended Mineral Reporting Template (EMRT) developed by the Responsible Minerals Initiative (RMI).

Review Mechanism

This Policy is valid from the date of its issue (indicated on the document). Any update repeals and supersedes, from the date of its issue, all previously issued versions.

The Policy is subject to periodic review and is re-issued by the Issuing Entity whenever necessary (in particular when the applicable national and international standards and regulations, to which reference is made as best practice, undergo changes).

In addition, the Quality and HSE Function(s), as the Issuing Entity of this Policy, in coordination with the Compliance Function, undertakes to maintain the general principles contained therein efficient over time, periodically reviewing them to adapt them to the context in which the Organization operates.

Governance, Allocation of Responsibilities and Disclosure

The Governance Bodies of the LS Group, supported by the Steering Committee and the Group Sustainability Committee, and with the involvement of the various Functions involved (including but not limited to the Quality and HSE and Sustainability Functions) play a strategic role in the full implementation of this Policy, ensuring the involvement of all workers and collaborators so that they express behaviours consistent with the values contained therein.

In order to ensure continuous improvement of its performance, in relation to the processes covered by this Policy, the LS Group undertakes to identify the most significant key performance indicators (KPIs), to set achievable quantitative improvement goals and to periodically monitor and report on the results achieved in the Annual Sustainability Report.

This policy is made available:

- to all employees through posting in offices and departments;
- to the public and all interested parties through publication on the company website

Tekirdağ, 18/05/2026

General Manager
Andrea Leo