

## **INTEGRATED POLICY**

From the expertise and talent of Marino Belotti, an engraver of precious metals, the company of the same name was born in the early 1960s, initially for the production of moulds for plastic material buttons and subsequently for the complete cycle of buttons manufacturing, from creative idea, to the moulds, up to production.

That is the way, the company began its affirmation in the national and international fashion sector.

At the beginning of the 1980s the company diversified its production by specializing in the design, development and industrialization of plastic packaging for cosmetics, gaining a relevant position in this field too.

Today Marino Belotti s.r.l. distributes its products on the national and international market.

Its experience and the technologies at its disposal allow, in addition to offering customizable standard products, to respond effectively to the ever-changing needs of its customers and interested parties.

### **OUR MISSION**

***“DRESSING UP THE PRODUCT, THAT MEANS COMMUNICATING FEELINGS, DESIRES AND INTERESTS THROUGH THE PACKAGING”***

The packaging of a cosmetic is much more than a simple container, just as the cosmetic is much more than a simple coloured paste: their combination constitutes a significant symbol to affirm and communicate a personality, a lifestyle, a way of relating to the others.

In this regard:

- in the design department, new shapes are continuously studied and new colours and materials are tested, to create a product connected to market trends, to respect the needs, requests and requirements of the customer and of the interested parties;
- in addition to the wide range of customizable standard containers, customers and interested parties can choose to create a new packaging, unique to their needs. The creation of a new container requires a close collaborative relationship with the customer, to achieve harmony in style, colours, shapes between content and container.
- the R&D department constantly works on the search for new eco-friendly materials and finishes, investing in the continuous improvement process and in the search for new and innovative technological solutions;
- speed of service for delivery times and promptness of responses to customer and interested party's requests complete the offered service.

***“BETWEEN SAYING AND DOING”***

One of Marino Belotti's strengths is the ability to manage the entire production process itself, from the creative idea to the finished product.

In fact, all design choices make use of the great expertise accumulated in the creation of packaging for cosmetics.

In this regard:

- the construction of the moulds is carried out internally, allowing us a prompt reply to the customers, interested parties and the market's requests;
- the production departments have the most up-to-date equipment and systems for the injection moulding of plastic materials, for the products decoration and assembly;
- external surface treatments, finishes and decorations are carried out by specialized and qualified suppliers.

***“JUST QUALITY PRODUCES QUALITY”***

Quality is a mentality

From the designer's initial idea to the finished product, all development and industrialization phases require the highest level of accuracy, to achieve the "total quality" objective that we have set ourselves.

In MARINO BELOTTI S.r.l. we are fully aware that in a global market, prosperity and success depend on these aspects:

- capacity for constant innovation;
- attentive and punctual service to customer and interested party's requests;
- product quality.

Quality as a mentality is intended not only to respect mandatory regulations, but to respect all company aspects, namely:

- creativity intuition;
- accuracy of execution;
- production processes improvement;
- continuous research into new technologies;
- commitments punctuality;
- constant and continuous compliance with good manufacturing practices compliant with the GMP standard;
- adequate maintenance of the equipment and tools used within the company;
- the use of suitable products in and around production facilities;
- continuous operators' training;
- the identification and storage of wastes;

- the implementation and effectiveness of traceability systems;
- cleaning of food facilities, equipment, tools, floors, walls and ceilings;
- total control and protection of the product from possible external contamination.

**“COMPLIANCE WITH THE ETHICAL STANDARD: SA8000”**

Marino Belotti's Management has decided to introduce the SA8000 voluntary standard, based on the Universal Declaration of Human Rights, on ILO documents and other international standards regarding human and labour rights, as well as on national laws, to enhance and protect all relevant personnel within an organization's sphere of control and influence.

Compliance with the eight elements required by the international standard, namely:

- **Non-use of child labour and young workers:** prohibition on employing children younger than the legally recognized minimum age to start working. Furthermore, suppliers are presumed to ensure that legally employed workers under the age of 18 do not work at night or overtime and that they are protected from working under conditions dangerous to their health, safety or development, in accordance with Convention No. 138 of the ILO (International Labour Organization) on the minimum age. The supplier should ensure that the young workers' job does not interfere with their school attendance. The time young workers dedicate to work and school should not exceed 10 hours.
- **Compliance with working hours, correct management of work wages and non-use of forced labour:** Marino Belotti Srl undertakes to respect normal working weeks, not exceeding the overtime foreseen by the applied CCNL. Any request for overtime work, always below the legal limits, is voluntary and not forced.
- **Compliance with mandatory requirements regarding health and safety at work.**
- **Freedom of association, right to collective bargaining and respect for the personal freedoms of each individual worker:** Marino Belotti respects any right to freedom to assemble peacefully and to freedom of association at all levels, in particular in trade unions, political parties and for civic issues, thus implying the right of everyone to form and participate in trade unions for the protection of their interests. This also includes collective bargaining, as a process of negotiation between employers and a group of employees, aimed at reaching an agreement governing working conditions.
- **Non-discrimination:** Marino Belotti Srl combats all forms of discrimination and undertakes to use equal treatment for all workers regardless of their particular features, including sex, race, colour, ethnicity or social origin, genetic characteristics, language, religion or belief, political or any other opinion, belonging to an ethnic minority, property, birth, disability, age or sexual orientation.
- Disciplinary practices.
- **Diversity, equality and inclusion:** Marino Belotti Srl develops and promotes inclusive cultures in which diversity is valued, celebrated and in which everyone can fully contribute and reach

their maximum potential. Marino Belotti Srl encourages diversity at all levels of its workforce and management, including boards of directors.

- **Remuneration terms, compliance with wages and benefits:** Marino Belotti Srl respects the basic or minimum wage and the additional rights owed directly or indirectly by the employer to the worker and deriving from the worker's employment. Marino Belotti Srl also undertakes to ensure that suppliers guarantee their workers remuneration in compliance with applicable regulations and prevailing industry practices; this remuneration should be sufficient to meet essential needs and allow a dignified standard of living for workers and their families, as well as include compliance with minimum wages, overtime pay, family care leave and state-funded benefits.

They are essential for right implementation, monitoring and application of the SA8000 system.

- **Rejection of any form of modern slavery:** Modern slavery refers to all work or services required to any person under threat of any sanction and for which that person has not volunteered. Examples include forced overtime, withholding of identification documents and human trafficking i.e. slavery, servitude, forced or compulsory labour and human trafficking. Marino Belotti Srl forcefully opposes these forms of modern slavery and is committed to reducing it at a local and global level through important control over suppliers, mapping them and the entire supply chain.
- **Respect for ethical recruitment:** Marino Belotti Srl is committed to hiring workers on a regular basis, in compliance with international labour standards, in a fair and transparent manner. All workers are provided with a regular contract written in a language they understand well which truthfully and clearly indicates their rights and responsibilities at the beginning of their recruitment.
- **Respect for women's rights:** in Marino Belotti Srl all women have the right to political, economic and social equality. The company is committed to opposing any form of gender inequality and disparity in employment and pay.
- **Respect and protection of minorities and indigenous peoples:** Marino Belotti Srl respects the rights of minorities and indigenous peoples and local communities to dignified living conditions, education, employment, social activities and the right to free, prior and informed consent to developments that affect them and the lands in which they live, with particular attention to the presence of vulnerable groups.
- **Protection and respect of land rights, use of forests and water and forced eviction:** Marino Belotti Srl respects land rights, use of forests and water and undertakes to avoid forced eviction and deprivation of land, forests and waters in the possible acquisition, development or other use of land, forests and waters.
- **Absolute ban on the use of private or public security forces:** Marino Belotti Srl does not employ or use private or public security forces to protect the business project.

In this regard, the Management continuously works to:

- establish a climate of mutual understanding from an organizational point of view;
- maintain optimal relationships between staff and company, encourage a participatory and dialogue model with staff, carry out climate analyses;
- apply equal opportunity criteria to all levels of staff (hiring, training, development, promotion, etc.);
- avoid forms of discrimination and marginalization and promote equal opportunities for the whole staff.
- activate a gradual involvement of suppliers in the undertaken ethical path, in order to consider them as partners, also on issues of social responsibility;
- consider its customers as a fundamental element of its success, guaranteeing a service that reflects the ethical behaviour of the company.

As defined by the Sa 8000 standards and above all for the purposes of greater security of compliance and continuous monitoring of Sa 8000 performances, the company has also established a team (Social Performances Team) which periodically reviews and monitors Sa 8000 performances and ensures that the social responsibility requirements are respected by the interested parties by proposing to the management the relevant actions to be undertaken in order to improve performances.

Every year during the Review, the Management undertakes to define new measurable and quantifiable objectives for Social Responsibility, with a view to continuously improving its performance. From this perspective, it is believed that emphasis is placed on the importance of the active involvement of staff, suppliers and other stakeholders in the formulation of proposals and ideas for improvement and in the implementation of the System through communication, training and awareness-raising activities on Social Responsibility issues. Marino Belotti guarantees the documentation, implementation and conservation of the information and results of its Social Responsibility Management System, guaranteeing its accessibility and availability to all interested parties who wish to view it.

Contact details to send SA8000 reports are displayed here below:



MARINO BELOTTI  
Via Kennedy, 23  
Chiuduno (Bg)  
Report form through anonymous  
mailbox



TUV NORD  
Via Filippo Turati, 70  
20023 Cerro Maggiore (MI)  
Tel. 0331 541488  
Fax: 0331478854  
Mail: info@tuev-nord.it

SAAS – Social Accountability  
Accreditation Service  
15 West 44th Street 6th fl.  
NY 10036 New York  
Tel. (212) 684-1414  
Fax: (212) 684-1515  
Mail: saas@saasaccreditation.org

**“RESPECT FOR HEALTH AND SAFETY IN THE WORKPLACE AND ENVIRONMENTAL  
PROTECTION:  
CREATION OF A SYSTEM COMPLIANT WITH UNI EN ISO 14001:2015 AND UNI EN ISO  
45001:2023 STANDARDS”**

Marino Belotti has always been careful to create a safe and healthy working environment, to oppose work-related injuries and illnesses and to operate in compliance with respect for the environment and applicable legal requirements.

The Management believes that the establishment of the Integrated Management System is the path that leads to the implementation of the company Policy and the achievement of the objectives specified here below:

- strengthening top management in demonstrating leadership and commitment in relation to the management system and ensuring the consultation and participation of workers in the development, planning, implementation and continuous improvement of the integrated management system;
- compliance with current laws and regulations;
- carrying out a correct assessment and management of environmental risks and risks related to health and safety at work;
- optimization of energy resources (reduction of electricity and improvement of separate waste collection) through internal training and awareness programmes;
- development, guidance and promotion by the Management of a culture in the organization that supports the achievement of the expected results of the integrated management system; also for the environment;
- consultation and participation of workers and workers' representatives;
- assignment of suitable resources for maintaining the integrated management system;
- empowerment of departments to maintain constant process management efficiency;
- internal communication of information pertinent to the integrated management system among the different levels and different functions of the organization, including changes to the management system. With reference to communications the organization will take into account aspects of diversity (language, culture and gender) and ensure that the views of external stakeholders are considered when establishing its communications processes;
- optimization of the supplier base, through the evaluation of their performance and the selection of products, materials and equipment with lower environmental impact and reduced risk for workers;
- choice of used products and raw materials, preferring safer products for the risks of workers exposure and environmental protection, while always selecting high quality products;
- reduction of paper use in the production process by replacing it with a **dedicated App e**

- implement economically sustainable efforts in organizational, operational and technological terms to protect the environment and prevent pollution through correct management of treated and generated wastes (identification, storage, initiation of disposal/recovery);
- daily commitment to reducing the production of greenhouse gases, promoting activities aimed at optimizing and improving energy efficiency at every stage of the company, trying to comply with all the requirements of national laws;
- raise awareness among all staff about the correct use of water, avoiding waste and reducing consumption with the aim of persevering with it for the next future generations;
- contribute to improving air quality and reducing the level of air pollution in the atmosphere, raising awareness among all staff and the supply chain;
- improve the responsible management of any chemical substances used in the production process, taking into account their life cycle, including their manipulation;
- improve the sustainable management of resources, optimizing the use of raw materials, encouraging their recovery and recycling activities and trying to use natural resources in a way and at a pace that maintains the resilience of ecosystems: in order to accomplish this Marino Belotti Srl undertakes to rethink the entire implementation process, starting from the planning, design and implementation phase of the activities in order to best optimize the use of resources and raw materials. Marino Belotti Srl is also committed to extending this thinking to the entire supply chain;
- respect noise emissions and not exceed the limits imposed by the acoustic zoning ratio of the area in which the company is located and raise awareness of all stakeholders on the same practice;
- reduce to "zero" the accident risks associated with the company's activity for workers and for all people who can access the company (visitors, customers, contracting companies, etc.) in a process aimed at continuous improvement, in accordance with what provided for by Legislative Decree 81/2008 and subsequent amendments;
- provide its employees with suitable PPE and carry out controls on the use of the same by all personnel, supported in this process by those in charge: in this context the company also undertakes to adopt appropriate protection measures (e.g. technical, organizational or personal nature), monitoring and ensuring their observance and constant development;
- implement possible technical measures to create a working environment that avoids the onset of occupational diseases, in collaboration with the Competent Doctor, RLS and SPP;
- carry out adequate maintenance activities on all company machineries, systems and equipment in accordance with the provisions of Legislative Decree 81/2008 and subsequent amendments;
- use CE machinery and equipment exclusively and the provisions given by the machinery directive;
- continuously improve, through careful design of work environments, the ergonomics of workplaces, thus promoting the adaptation of the workplace to the physical and psychological



characteristics of the individual, thus allowing the reduction of the risk of accidents and problems postural and thus increasing comfort and productivity;

- correctly carry out, based on what is defined by current regulations, evacuation and emergency management tests in accordance with the company emergency plan;
- correctly carry out the tests for managing the spill, based on what is defined in the spill instruction;
- ensure the protection of work and health and the prevention of fires in the workplace in compliance with national legal regulations and in accordance with the requirements of the company's compliance management system;
- involve and raise awareness of all company subjects, at all levels, in the management of issues relating to health and safety at work;
- ensure the understanding, application and maintenance at all levels of the company organization of the correct operating procedures, of health and safety at work instructions, of the safety regulations in force and of the Management provisions;
- ensure that workers, at all levels, receive adequate information, training and training and have the necessary competence to carry out the tasks entrusted to them as safely as possible;
- ensure the implementation of a process for consultation and participation of workers' and workers' representatives;
- carry out periodic reviews of the integrated policy and its effectiveness.



## OUR VALUES

The main features and values that distinguish MARINO BELOTTI S.r.l. are the following:

- keep the premises location in Italy to guarantee the “Made in Italy” brand and enhancement of local suppliers;
- strengthening on the territory and of the ethical social context;
- product protection;
- setting up a control system dedicated to continuous improvement;
- achieving customer and stakeholder’s satisfaction;
- continuous investments in R&D, internal staff’s training and knowledge;
- constant participation in sector world trade fairs;
- continuous trends and market values analysis;
- people’s respect and growth with valorisation of each worker;
- satisfaction from employees and interested parties;
- operating staff involvement so as to be able to work with better quality both from the point of view of the result offered to the customer and the quality of the work for the employee himself;
- making all staff responsible for the quality of their work and the need to pursue continuous improvement of the Integrated Quality, Health and Safety at Work and Environmental Management System by fulfilling the explicit and implicit requirements of the Customer and the interested party;
- accountability of the Function Managers to ensure the application of the Quality, Health and Safety Policy and the maintenance of the Integrated Management System in full efficiency;
- development of joint participation of workers and management regarding the implementation of the SA8000 system;
- increase in credibility and improvement of the company image on the reference market, giving consumers and users guarantees of the ethics of its operating cycle;
- improvement of the relationship with social institutions and organisations;

- control of the supplier chain ethics and social correctness through "social" checks;
- improvement of relationships with internal staff, raising life and working conditions quality;
- improvement of the company atmosphere: workers feel protected by the company in which they work and more involved in achieving goals;
- internal and external communication improvement, through reports made publicly available;
- work organisation to improve the processes efficiency and the management of activities by the workers involved;
- sustainable exploitation of water resources;
- optimization of energy resources;
- guarantee correct compiling and archiving of environmental and safety records which constitute objective proof of the service quality;
- priority research into product safety and reliability;
- ability to respond to customers' orders in the shortest time possible;
- planning of staff training for all functions and at all levels, making them aware of the risks associated with their duties and activities;
- definition of objectives/targets for company functions that allow the adequacy and continuous improvement of the Integrated Management System to be verified;
- avoid any form of corruption at any level and strongly oppose any form of power abuse that could lead to financial and non-financial advantages;
- respect and protect personal data and the person's right to make his/her own decisions about who can process his/her data and for what purpose. But it also undertakes to protect and safeguard such data from unauthorized access and data corruption throughout its life cycle. The collection, storage, processing or other use of personal data is subject to the consent of the interested party or is carried out pursuant to contractual agreements or legal provisions;
- respect the concept of financial responsibility: Marino Belotti takes responsibility for accurately recording, maintaining and reporting business documentation including, without limitation, financial accounting, quality reports, time summaries, expense reports and submissions to customers or regulatory authorities where necessary. Books and records are kept in accordance with applicable law and generally accepted accounting standards;
- compliance with the prohibition on information disclosure: Marino Belotti assumes responsibility for communicating financial and non-financial information in accordance with applicable regulations and prevailing industry practices and, where applicable, communicating information relating to the workforce, practices relating to health and safety, environmental practices, business activities, financial situation and performance;
- promote fair competition, anti-trust and avoid conflict of interest: Marino Belotti respects the trade and fair competition rules including, without limitation, avoiding commercial practices that

illegally forbid competition; incorrect exchange of competitive information; and pricing, bid manipulation, or unfair market allocation;

- respect for intellectual property by Marino Belotti of inventions; literary and artistic works; projects; and symbols, names and images, patents, copyrights and trademarks used in trade;
- export activities and economic sanctions controls: Marino Belotti respects limitations on exports or re-exports of goods, software, services and technology, as well as limitations applicable to trade involving certain countries, regions, companies or entities and individuals;
- protection for anyone who has reported (anonymously or otherwise) a suspicion of wrongdoing that involves a significant risk or who has cooperated with a duly authorized audit or investigation into a report of wrongdoing to avoid retaliation.

Marino Belotti Srl is also firmly convinced that its commitment to preventing corruption can influence its contractual relationships, thus guaranteeing a progressive diffusion of ethical principles and values to an increasingly wider sphere of stakeholders.

In this context, Marino Belotti Srl formally undertakes the commitment to:

- ban all forms of corruption by adopting a zero-tolerance approach towards it;
- observe national laws, other laws and requirements in force regarding anti-corruption and Legislative Decree 231/2001;
- supervise the application of the internal Code of Ethics regarding the regulation of business conduct;
- make this Policy public and accessible to all company levels by posting it on the notice board, publishing it on the website and providing appropriate training;
- encourage reporting of suspicions in good faith, or based on reasonable and confidential belief, without fear of retaliation.

Adapt this Policy to regulatory developments in the sector and to the needs deriving from the requirements defined in the Anti-Corruption management system with a view to continuous improvement.

To give concreteness and be able to measure the level of implementation of the commitments set out in this Policy, Marino Belotti Srl establishes objectives and goals linked to Legislative Decree 231/2001.

All employees and collaborators, according to their skills and responsibilities, are called upon to support this Policy, to adopt the guiding principles listed below and to actively participate in the growth of the Management System with observations and proposals for improvement.

The Management undertakes to respect the requirements of the above mentioned rules and standards and to disseminate the principles within the company through the communication of this Integrated Policy.

In this context, the Management supports the belief that the organization model defined by the UNI EN ISO 9001:2015, UNI EN ISO 14001:2015, UNI EN ISO 45001:2018, SA8000 and 231/2001 standards is the correct model to follow for carrying out a careful analysis of the way of operating, the definition of the monitoring methods of all phases of company activities and the description of organizational practices.

The Management also supports the concept that the organization model continuously improves with the constant training of operators with a view to respecting good operating practices, in accordance with the provisions of the GMP guidelines.

Finally, the Management, with a view to the centrality of the worker and internal and external interested parties, recognises the importance of the concept of protecting the product and the consumer who uses it: we know that the consumer is the user of the product as a tool, user of information that it proposes, interpreter of the product as a cultural and social object.

In this regard, the organization moves by exploiting the concept of total product protection: the final product is 100% controlled so as to be able to safeguard and protect, throughout its life cycle, those who will use the product itself.

As stated above, the Management undertakes to take an active role in the promotion and guidance of all activities having an influence on quality, understood as Customer Satisfaction, through the spread at all levels of the concepts set out here, the monitoring of processes and of the risk assessment, the monitoring of the obtained results.

**It is therefore necessary to ensure the quality of what we create through continuous improvement to aspire and achieve the primary objective of product and service quality.**

**CEO**

*Maria Teresa Belotti*