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IGOR Srl

Strada Natale Leonardi 32
28062 Cameri (Novara) - Italy
Tel. +39 0321 2001
Fax +39 0321 200256
e-mail: info@igornovara.it
P.IVA / C.F./Reg. Imp. di NO IT 01099710038
Cap. Soc. € 2.000.000 i.v.
Iscritta al n. 148084 del REA di Novara



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ESG POLICY





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1. Introduction

IGOR S.r.l. and its subsidiaries (hereinafter referred to as 'IGOR' or the 'Group'), with a long-standing tradition in the production of Gorgonzola PDO, are deeply committed to upholding social and environmental responsibility across all aspects of their operations. IGOR believes that corporate success and the creation of long-term shared value extend beyond economic performance, encompassing the Group's positive contributions to the environment and society. For this reason, IGOR fosters an organizational system that integrates corporate responsibility principles across all functions and is dedicated to implementing ethical, inclusive practices. These efforts are aimed at developing a responsible business model that upholds environmental stewardship, social well-being, and sound governance principles.

Through this ESG - Environment, Social, Governance Policy (hereinafter referred to as the 'Policy' or 'Document'), the Group aims to formalize its commitment to embedding responsible, transparent, and ethical environmental and social practices into its business strategy and operations. In doing so, it seeks to foster awareness and collaboration among all stakeholders. In this context, the Group is dedicated to minimising its environmental impact, advancing social welfare and upholding the highest ethical standards. Furthermore, IGOR adopts a holistic approach to sustainability, embracing the principles of social responsibility and governance to prioritise valuing people and promoting integrity and transparency across all its operations.

Passion, Tradition, Excellence, Innovation and Social Responsibility - these are the core values that IGOR has upheld for years and that continue to guide its journey toward sustainability. For IGOR, **Passion** means striving for the highest quality standards across the entire supply chain, not only at the product level but also in its interactions with the environment, employees, and society. **Tradition** means preserving cultural heritage and craftsmanship, by passing down a historical recipe through three generations, while seamlessly integrating innovation and respect for ESG issues into traditional practices. **Excellence** is pursued not only in the quality of its products, but also through the adoption of sustainable practices that reduce environmental impact, enhance employee well-being, foster trusting relationships with stakeholders and fulfil customer needs. **Innovation**, regarded as the driving force behind the development of new and alternative solutions, is embedded in every strategic decision and is applied with the goal of delivering safe, high-quality, and environmentally friendly products. Finally, **Social**



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Responsibility is reflected in initiatives dedicated to protecting the environment and enhancing the well-being of employees, local communities, and all stakeholders.

This ESG Policy is not merely a declaration of intent but embodies the Group's comprehensive commitment to fostering socially, environmentally responsible, and fair business practices.



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Recipients and Scope of Application

The scope of application of this ESG Policy includes, without limitation, the entire Igor Group, comprising the company IGOR S.r.l., its subsidiaries, and all associated offices and operating structures.

In particular, the Recipients of this Policy are:

- **Employees:** Everyone working within IGOR, at all levels and without exception, is expected to uphold and apply the commitments and principles outlined in this Document in their daily duties, thereby contributing to the achievement of the Group's ESG objectives.
- **Executives and Managers:** Group executives and managers are responsible for implementing the Policy within their respective areas of responsibility, ensuring that business objectives and practices align with the principles outlined in this Document.

In addition, all stakeholders working with IGOR to achieve the company's goals are integral to this commitment, including:

- **Directors and Auditors:** Directors and members of supervisory bodies are expected to adopt behaviours consistent with the principles of the Policy and guide strategic decisions toward enhanced environmental and social responsibility. IGOR is committed to supporting these key functions and expects them to actively promote transparency and compliance with international regulations and standards.
- **Associates and External Consultants:** Anyone working closely with IGOR, including consultants or temporary partners, is an integral part of the Company's commitment to achieving ESG corporate objectives and creating shared long-term value. Therefore, these individuals are expected to act in accordance with the principles of integrity, social and environmental responsibility in their daily activities.

These parties are collectively referred to as the '**Recipients**'. IGOR believes that every individual plays a vital role in promoting responsible practices and is committed to ensuring that this responsibility is both shared and widely disseminated.



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Under no circumstances can the pursuit of corporate interests justify actions that contravene the principles outlined in this Policy. For IGOR, long-term success and growth must be founded on unwavering respect for people, the environment, and society, and must be pursued in alignment with the highest standards of ethics and business integrity.

Objective of the Policy, Internal Policies, Standards and International References

The primary objective of this Policy is to establish the commitments and principles that IGOR upholds to ensure full compliance with ESG criteria across all its activities, wherever the Group operates, both now and in the future. IGOR is firmly committed to integrating these criteria into its corporate decision-making processes, operational strategies and daily activities. This commitment aims at creating shared value and contribute to a better future for all the people and communities with whom IGOR interacts, as well as reducing its environmental impact and ensuring business conduct in line with current regulations.

Within the framework of corporate references, this Policy forms part of the existing documentary apparatus related to ESG principles, including the **Code of Ethics**, the **Environmental Policy**, the **Workforce Policy**, the **Human Rights Policy** and the **Responsible Sourcing Policy**.

In a broader context, IGOR aligns with several established and recognised international standards, which form the basis of its commitment to developing the Group's ESG approach. In particular:

- **The United Nations Sustainable Development Goals (SDGs)**, with particular reference to goals such as SDG 3 (Health and Well-being), SDG 4 (Quality Education), SDG 5 (Gender Equality), SDG 6 (Clean water and Sanitation), SDG 7 (Clean and affordable energy), SDG 8 (Decent Work and Economic Growth), SDG 9 (Industry, Innovation and Infrastructure), SDG 10 (Reducing Inequality), SDG 11 (Sustainable



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Cities and Communities), SDG 12 (Responsible Consumption and Production), SDG 13 (Climate Action), and SDG 15 (Life on Land), SDG 17 (Partnership for the Goals);¹

- **The 10 Principles-UN Global Compact**, which provide a practical framework to guide companies in adopting responsible practices to manage their impact on the environment and society; These principles encompass areas such as human rights, labour, environment and anti-corruption;²
- **The UN Guidelines for Business and Human Rights**, which provide a framework for companies to fulfil their responsibility to respect human rights;³
- **The ISO 50001 Guidelines**, which provide a framework for an energy management system aimed at improving energy efficiency, optimising consumption and reducing environmental impact;⁴
- **Legislative Decree No. 81 of 9 April 2008** regulates health and safety in the workplace, establishing obligations for the protection of workers and the assessment of company risks⁵;
- **Legislative Decree 231/2001** establishes the administrative liability of employers and companies for offences committed by their employees or managers;⁶
- **Legislative Decree 101/2018**, which protects the privacy of natural persons as concerns the processing of personal data while also ensuring the free movement of such data.⁷

¹ UN Italy. The new 2030 Agenda for Sustainable Development

² The Ten Principles | UN Global Compact

³ Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework | OHCHR

⁴ ISO - ISO 50001 - Energy management

⁵ Official Gazette

⁶ Legislative Decree No. 231 of 8 June Official Gazette

⁷ Legislative Decree 10 August 2018, No. 101 Official Gazette



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2. Main ESG topics

As outlined in the other ESG documents, the Group adopts a proactive approach to identifying, preventing and mitigating ESG impacts resulting from its operations, aiming to minimise related risks for the Group. These impacts are also specifically addressed in existing company policies, such as the Code of Ethics, the Environmental Policy, and the Labour Force and Human Rights Policy. IGOR is committed to addressing and preventing the following impacts, concentrating its efforts in the following main areas:

ENVIRONMENT

- **Negative impacts on climate change**, stemming from the use of fossil fuels and other resources that contribute to greenhouse gas emissions and exacerbate global warming.
- **Negative impacts on pollution**, caused by the generation of waste and other hazardous pollutants that require proper management to prevent environmental harm.
- **Negative impacts on water resources**, linked to the intensive use of water, requiring responsible management to prevent waste and contamination.
- **Negative impacts on biodiversity and ecosystems** due to agricultural practices and land use that could affect ecosystems and natural habitats.
- **Negative impacts on the circular economy** from waste generation and the use of non-recyclable or non-biodegradable materials, which hinder recycling and reuse efforts.
- **Negative impacts on animal welfare**, caused by any sub-optimal husbandry practices that could compromise animal health and welfare.



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SOCIAL

- **Negative impacts on the health and safety of employees and workers within the value chain**, arising from unsafe or inadequate working conditions and the absence of preventive measures against stress and jeopardise the physical and psychological well-being of workers.
- **Negative impacts resulting from inadequate working conditions**, such as insufficient wages, excessive and irregular working hours, and lack of work-life balance.
- **Negative impacts arising from the violation of the principles of inclusion and equality**, such as discrimination thereby hindering the individual and collective growth of employees within an organisation.
- **Negative impacts on workers' rights**, stemming from the failure to protect freedom of association, collective bargaining and freedom of expression, as well as the absence of protection against abuse and harassment in the workplace, thereby undermining the freedom and well-being of employees.
- **Negative impacts related to the risk of forced and child labour within the value chain**, arising from insufficient controls and monitoring in the supply chain, which could lead to human rights violations and undermine the integrity of the entire production chain.
- **Negative impacts on the protection of economic, social, cultural, civil and political rights of local communities**, which could result from the failure to protect these rights, leading to significant consequences for the development of surrounding communities.
- **Negative impacts resulting from privacy breaches and the improper handling of sensitive data**, whether related to employees, value chain workers or customers, which could jeopardise data security and erode stakeholder trust.
- **Negative impacts on the health and safety of consumers and end-users**, stemming from the failure to implement adequate safety measures, thereby posing risks to their physical well-being.



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- **Negative impacts resulting from the dissemination of inadequate or misleading information to consumers and end-users**, which could impair their ability to make informed decisions.

GOVERNANCE

- **Negative impacts arising from the violation of ethical principles and fair business practices**, as well as from the occurrence of predicate offences outlined in the company's Organisation, Management and Control Model (hereinafter also 'OMC 231'), which could erode stakeholder trust and harm the company's reputation.
- **Negative impacts associated with a lack of transparency in decision-making processes** and the definition of corporate objectives, potentially leading to inefficiencies and diminished trust from the parties involved.
- **Negative impacts arising from the failure to protect whistleblowers through effective whistleblowing systems**, which could compromise the ability to detect and prevent misconduct or unethical practices within the organisation.
- **Occurrence of corruption incidents** or increased risk of corruption incidents or conflicts of interest within the Group.
- **Negative impacts resulting from non-compliant or unethical payment practices in managing relations with suppliers**, which could undermine compliance with regulations and corporate principles, thereby damaging the Group's reputation.
- **Negative ESG impacts along the value chain**, resulting from inadequate controls on suppliers and partners, which could lead to the adoption of practices that violate international regulations and IGOR principles.



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3. General Principles

IGOR is committed to ensuring that its daily activities are driven by a core set of fundamental principles. These principles demonstrate the Group's commitment to fostering responsible behaviour, including respecting the environment, protecting human rights, supporting local communities, creating a safe and inclusive working environment, and promoting fair business practices. The Group firmly believes that adhering to these principles is essential to contributing to a better and prosperous future for all.

Below is a list of the principles that the Group strives to integrate into its operations:

- **Climate Change Mitigation and Adaptation:** IGOR is committed to implementing measures to reduce its greenhouse gas emissions, improve energy efficiency and integrate renewable energy sources into its operations, aiming not only to adapt, but also to mitigate its impact on climate change wherever possible.
- **Pollution Prevention and Reduction** IGOR aims to prevent and reduce pollution by adopting innovative technologies and promoting production practices that minimise environmental impact, beyond greenhouse gas emissions. Through a proactive approach, the company is committed to identifying and minimising the sources of pollution generated throughout the production cycle.
- **Responsible Water Resource Management:** IGOR considers water a precious resource and is committed to promoting its conscious and sustainable use. The Group implements strategies to prevent waste, striving to maximise the efficiency of production processes and reuse water resources wherever possible, with the aim of protecting water ecosystems and preserving this vital resource.
- **Protection of Biodiversity and Ecosystems:** IGOR is dedicated to reducing impacts that threaten biodiversity and local ecosystems. The company actively addresses key drivers of biodiversity loss, such as land use changes and pollution, by supporting initiatives focused on preserving and protecting local flora and fauna.



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- **Promoting the Circular Economy and Optimising Resource Use:** IGOR is committed to adopting a responsible approach to resource management, focusing on promoting the reuse and recycling of materials and reducing the waste generated by production processes whenever possible. The Group strives to optimise the use of natural resources by integrating circular economy principles, thereby contributing to a more sustainable development model.
- **Animal welfare throughout the supply chain:** IGOR regards respect for and protection of animal welfare as a fundamental principle. The company adheres to strict standards to ensure ethical conditions across its operations and works closely with suppliers and partners who uphold the same principles of responsibility and respect for animals.
- **Decent working conditions for employees and workers within the value chain:** the Group is committed to ensuring adequate wages, reasonable working hours and safe working environments while promoting the physical and mental well-being of its employees. Furthermore, it is committed to fostering business relations with suppliers and partners that adhere to the same principles.
- **Non-discrimination, equal treatment and opportunities for all:** IGOR considers diversity a value and is dedicated to promoting a working environment based on fairness and transparency. The company is dedicated to providing equal access, growth and development opportunities for all employees, irrespective of gender, ethnicity, religion, disability or sexual orientation. Furthermore, the Group is committed to collaborating exclusively with suppliers and partners who adhere to the same principles of inclusiveness and respect for diversity.
- **Active participation and social dialogue:** IGOR values open and constructive dialogue, recognising as fundamental the right to collective bargaining, not only for resolving potential conflicts, but also for enhancing working conditions. The Group promotes transparent and participative communication among all stakeholders, fostering a fair and collaborative working environment.



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- **Condemnation of forced and child labour and any form of violence:** the Group is committed to ensuring full respect for human rights and human dignity by unequivocally condemning forced and child labour. Furthermore, IGOR expects all parties involved in the Group's value chain to share a commitment to respecting and protecting fundamental human rights.
- **Health and safety at work:** IGOR adopts appropriate measures to protect the health and safety of its employees, ensuring full compliance with current worker protection regulations. By fostering relationships both upstream and downstream, IGOR ensures that ethical and safe practices are maintained throughout the entire supply chain, from the sourcing of materials to the delivery of final products.
- **Training and skills development:** IGOR is committed to fostering the personal and professional growth of its employees through training and skills development programmes. The Group considers investment in human capital a key element for its success and for the creation of shared value.
- **Condemnation of violence and harassment in the workplace:** The Group strongly condemns any form of violence or harassment in the workplace, adopting a zero-tolerance approach. IGOR is dedicated to ensuring that these principles are upheld not only within the organization but also by all participants in the value chain.
- **Protection of privacy:** IGOR regards the protection of personal and sensitive data of its employees and stakeholders as a top priority. The company is committed to safeguarding information security and ensuring compliance with applicable privacy regulations, implementing appropriate measures to prevent data breaches or misuse.
- **Supporting the social, economic and cultural rights of communities:** IGOR strives to actively contribute to the well-being of the communities in which it operates, respecting their fundamental rights, promoting ethical business practices and preserving their cultural heritage.



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- **Protecting the Civil and Political Rights of Communities Across the Supply Chain**
IGOR upholds freedom of expression and political participation and is committed to operating in full compliance with both local and international regulations. The Group fosters an environment where all individuals can exercise their civil and political rights without fear of discrimination or repression.
- **Integrity and transparency:** IGOR fosters a corporate culture based on integrity, transparency and fairness. The Group is dedicated to conducting all its operations in a transparent and responsible manner, ensuring that information provided is accurate, complete, and timely. This commitment is also reflected in the responsible dissemination of information given to end consumers concerning the quality and safety of their products.
- **Prevention of corruption:** IGOR is firmly committed to fighting corruption in all its forms, adopting strict policies and procedures to prevent acts of corruption, fraud or other illegal or unethical practices. The Group advocates for ethical and fair conduct in all its operations, both within the organization and in its relationships with partners and suppliers.
- **Whistleblower protection:** The Group has developed and implemented a whistleblowing procedure to ensure that any ethical or legal violations are reported in a secure and confidential manner. IGOR is dedicated to protecting individuals who report misconduct or wrongdoing, providing an environment in which whistleblowers are safeguarded from retaliation or discrimination.
- **Proper management of payment practices in relations with suppliers:** IGOR is committed to ensuring fair and transparent management of payment practices towards its suppliers, in accordance with contractual agreements and current regulations. IGOR promotes transparency in financial transactions, avoiding practices that could compromise the integrity of business relations.

The principles outlined in this document, which the Group is committed to respecting and promoting, are complemented and supported by detailed objectives within IGOR's individual strategic guidelines, aimed at ensuring the full and effective implementation of this policy.



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4. Policy Implementation and Monitoring

To ensure that this ESG Policy is properly respected, implemented, and sustained over time, IGOR has established a structured process designed to guarantee the continuous protection of the environment, respect for human rights and labour rights, and the promotion of fair and equitable business practices. This process is guided by the ethical principles of fairness and transparency, aiming to ensure their observance by both internal and external stakeholders.

The key aspects of the ESG Policy implementation process are defined below:

Responsibilities of Internal Recipients

Adherence to the principles defined in the ESG Policy is an integral part of the contractual obligations of all employees and other internal stakeholders. Any violation of the principles contained in the Policy will lead to the enforcement of measures stipulated by applicable legislation and company policies. The heads of each department are responsible for monitoring the implementation of the Policy by all members of their team, fostering a work environment where environmental protection, respect for social rights, and adherence to governance standards are daily priorities and fully integrated into the company's operations.

Reporting Tools

IGOR has set up a whistleblowing procedure accessible to all recipients, both internal and external, enabling them to **safely and anonymously report** any violations of the Policy. This includes environmental offences, breaches of human and workers' rights, and non-compliance with the principles of ethics and fairness that underpin corporate governance, as outlined in IGOR's OMC 231. This tool is a vital component of the implementation process of the Policy, fostering a corporate culture rooted in transparency, accountability and proactivity.



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5. Policy Dissemination

The **Sustainability Manager** is tasked with promoting the ESG Policy within the Group, ensuring that all employees and contractors fully comprehend its principles and implications. The Policy is accessible to all employees in printed format, ensuring visibility, ease of reference and fostering widespread awareness of environmental, social and governance issues. Furthermore, to ensure a comprehensive understanding of the principles outlined in the Policy, an ongoing training program will be implemented, in addition to its dissemination and communication, as defined in the individual Group ESG policies.

This Document was approved by the IGOR Board of Directors on *15 November 2024* and is regularly updated to ensure alignment with evolving regulations and legal developments. Any revisions or amendments are subject to the approval of the Board to ensure that the content remains current and aligned with industry best practices.

Finally, the Policy is publicly available at [Gorgonzola DOP Dolce e Piccante | IGOR Gorgonzola Novara](#), ensuring maximum transparency and accessibility to all stakeholders. Furthermore, to gather stakeholders' opinions and suggestions regarding the Policy and to promote continuous improvement, all Addressees are encouraged to share their feedback and proposals for updates by contacting the following email address: giulialeonardi@igornovara.it. Comments and observations received will be carefully evaluated during the periodic review of the Policy, ensuring that the document remains aligned with regulatory changes and continues to reflect IGOR's commitments to environmental protection, the well-being of employees, local communities, and all stakeholders, as well as the adoption of effective and transparent governance standards.

Signature


IGOR s.r.l.
Strada Natale Leonardi 32
28062 CAMERI (NO)
Tel. 0321 2001 - Fax 0321 200256
Partita IVA 01099710038
15 / 11 / 2024