

SUSTAINABILITY REPORT **2021**









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It's time to look ahead in the direction of an environmentally conscious chemical production.

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INTRODUCTION

➡ OUR FIRST SUSTAINABILITY REPORT

The strategic decision to share the results achieved by C.O.I.M. S.p.A. (hereinafter COIM) in relation to environmental, social and economic sustainability and safety has prompted us to publish our first Sustainability Report for 2021. This document reports the actions implemented to monitor and reduce the environmental impact of production operations and processes, in addition to the activities carried out to foster and capitalise on the development of people and wellbeing in the area in which we operate. Mindful of the international context, which is still reeling from the pandemic and the complex geopolitical situation involving Europe, we are deploying our best resources to foster responsible, sustainable growth while sending out a positive signal to benefit future generations. When considering the times ahead we keep in mind current requirements just as much as future needs - in fact our planning is driven both by the next steps to be taken, which are already clear and defined, and the considered management and allocation of economic resources required to achieve our objectives.

The information stated in this Sustainability Report relates to C.O.I.M. S.p.A. and NOVOTEX ITALIANA S.p.A. (parent company of the C.O.I.M. Group and company belonging to the group respectively), which work together in synergy.

Our aim is to combine Environmental, Social and Governance (ESG) indicators for the whole Group into one report. This objective is already in progress and will have to be gradual, such that the changes it entails are permanent and sustainable, and form an integral part of company processes.

LETTER TO THE STAKEHOLDERS



COIM S.P.A. HAS BEEN **CELEBRATING ITS 60TH ANNIVERSARY** IN 2022.

It has been a remarkable journey since way back in 1962, with growth and successful results made possible by collaboration between employees and the successive generations at the head of the company.

Today, as was the case then, our focus on customers and product/process innovation is intact, in the firm belief that long-term success is measured with the creation of value for all stakeholders.

COIM wholeheartedly believes in the importance of:

- looking after the economic, physical and psychological wellbeing of our employees, such that they have a suitable work-life balance;
- safeguarding the environment;
- supporting the local community;
- safeguarding long-term business continuity, by ensuring that customers have the best product at the right price, and by choosing suppliers from companies that share the same sustainability principles.

Having reached this major milestone, we are delighted to be sharing **our first** Sustainability Report, which sets out company performance in relation to social, economic and environmental factors, in addition to employee health and safety.

The aim is to have a complete picture of the organisation in terms of sustainability, and to define potential areas for improvement in the medium and long term.

Our path is already mapped out - for years we have been working to develop new products which have less environmental impact, and are safer for employees and consumers. Sustainability is now part of our character and our culture. The company must therefore be encountered in this context, building a better world for everyone which can be entrusted to future generations.

> **Giuseppe Librandi** C.E.O. C.O.I.M. S.p.A.







GOVERNANCE

NOVOTEX



000

SOCIAL

ENVIRONMENT





ML TOTAL ADDED VALUE GENERATED

ML TOTAL ADDED VALUE DISTRIBUTED





This first Sustainability Report 2021 is an essential tool for sharing the sustainability results we have achieved with our stakeholders, and reporting the actions implemented to monitor and reduce impact from production processes, in order to safeguard the environment and promote wellbeing in the area and the community.

This report and the continuous improvement plan that COIM is committed to implementing have been drawn up in line with the international standards of the Global Reporting Initiative (GRI).

According to the GRI standards, the reporting principles for defining **Report content are as** follows:

- internal stakeholder inclusiveness in identifying relevant topics;
- sustainability context in its three main areas (social, environmental and economic);
- materiality analysis relating to mission, vision, founding values and analysis of the context and legitimate expectations of stakeholders;
- completeness of the topics deemed significant.

According to the GRI standards, the reporting principles for defining Report quality are as follows:

- accuracy in assessing performance;
- balance between positive and negative data to give a weighted performance assessment;
- clarity of the information illustrated such that it is comprehensible to all stakeholders;
- comparability to enable the analysis of changes in performance over the years;
- reliability of information provided from comprehensive, logged, analysed and traceable sources:
- **timeliness** of information strictly related to the year reported.

The GRI standards are based on agreements, declarations and recommendations issued by authoritative international organisations such as:

UNITED NATIONS

UN

INTERNATIONAL LABOUR ORGANIZATION

ILO

14

ORGANISATION FOR ECONOMIC COOPERATION AND DEVELOPMENT OECD

We plan to continue on the path of sustainable environmental and social development specified by these organisations, in particular the United Nations 2030 Agenda for Sustainable Development.

1.1 INVOLVEMENT AND **ENGAGEMENT WITH STAKEHOLDERS**

After analysing and defining the internal/external processes and factors which contribute to - and are concerned in some way with - the lifeblood of our company, we identified the stakeholders and the corresponding requirements and expectations.

The main internal stakeholders include the top tier of the organisation, employees and external companies, whereas the main external stakeholders include institutions, suppliers, customers and the general community.

We are aware of the need to carry out a more structured assessment and consider all stakeholders, both direct and indirect.

The diagram below shows the map of the main stakeholders identified for this first Report, along with the corresponding requirements and expectations.

COIM S.p.A.

INSTITUTIONS TOP TIER

• Compliance with contractual and regulatory

requirements • Service reputation

- growth
- · Availability of credit

SUPPLIERS

- · Service continuity
- Punctual payments
- Information on
- materials purchased

CUSTOMERS

Maintaining or

increasing value

Investment results

- Value for money Compliance with
- standards Service continuity
- Timely service
- Meeting expectations

- The next step was to understand how to initiate an exchange and constructive engagement with the persons affecting the achievement of our objectives.

- Appropriate remuneration • Safeguarding rights
- Professional development Safe working

THE COMMUNITY

- Responsible practices • Employment opportunities
- Social activities

EMPLOYEES/ EXTERNAL COMPANIES

- Job continuity
 - environment
- dell'ambiente di lavoro

⇒ STAKEHOLDERS AND DIRECT COMMUNICATION **METHODS:**

TOP TIER

Board of Directors

EMPLOYEES/EXTERNAL COMPANIES

- Information displayed on company notice boards
- Information videos
- Mailing newsletters
- Company software
- Face-to-face meetings with management
- Social media

CUSTOMERS

- Telephone contact
- Social media
- Mailing
- Face-to-face meetings
- Customer satisfaction surveys
- Trade fairs and events

SUPPLIERS

- Mailing
- Telephone Contact
- Social media
- Face-to-face meetings
- Trade fairs and events

INSTITUTIONS

- Face-to-face meetinas
- Press releases

THE COMMUNITY

- Face-to-face meetinas
- Press communications/ media
- Meetings mediated by institutions

AREA



MATERIAL TOPIC

1.2 **RELEVANT TOPICS** AND MATERIALITY MATRIX

A fundamental pillar underpinning the generation of value for all stakeholders, and the community in which we operate, is the incorporation of sustainability goals in our business by evaluating environmental, social and economic topics.

An internal survey to highlight the most relevant topics for our company in line with the reporting criteria set out by the Global Reporting Initiative (GRI) was the first step towards defining the Materiality Matrix.

The assessment was carried out by considering the context formed by customers, suppliers and competitors (Materiality Analysis), and the organisation's main internal stakeholders were involved in its production.

The areas of focus in the Materiality Analysis relate to the most significant environmental, social and economic impacts that most affect the decisions of the most strategic stakeholders. To pursue our objectives, we defined a corresponding number of areas of action, which we are committed to monitoring, reporting and improving over time with efforts that go well beyond the requirements under law.



ENVIRONMENTAL TOPICS

MITIGATION OF **ENVIRONMENTAL** IMPACT ALONG THE ENTIRE CHAIN

Mitigate consumption and reduce environmental impact caused by the

> ENVIRONMENT AND RESOURCES

production process.

Use of resources and waste management.

PEOPLE: PROTECTION AND GROWTH

Protect and develop all workers, looking after their wellbeing and career path.

SOCIAL TOPICS

000

GOVERNANCE

TOPICS

LOCAL COMMUNITIES

Focus on communities through engagement and support.

٠

processes.

TRANSPARENCY AND CUSTOMER CARE

GUARANTEEING

SUSTAINABILITY

RELATIONSHIPS

Suppliers and local

ECONOMIC

EXTERNAL

communities.

- Offer high-quality products by maintaining excellent safety standards.
- Invest in research and innovation to ensure that company processes are advanced and sustainable.
- standards.
- Foster local roots/presence by creating economic value.

1. Our approach to sustainability

- Carefully select bio-based and environmentally-friendly raw materials to promote innovation and seek sustainable solutions.
- Reduce atmospheric emissions, including by tracking our carbon footprint.
- Develop sustainable, recyclable or biodegradable product types to put on the market.
- Be mindful of consumption, including energy consumption, limiting its use to what is essential to the production process.
- Track the use of water resources, especially those used in the production process, to ensure they are used responsibly.
- · Promote and adopt good recycling practices in line with circular economy
- Manage waste responsibly, striving to reduce it where possible.
- Ensure employee health and safety by applying standards and adopting controlled procedures.
- Provide suitable training for personnel, ensuring their professional development.
- Capitalise on and develop the talents of workers.
- Create career paths for the development of workers.
- Safeguard diversity and guarantee inclusion for all staff, preventing discrimination.
- Safeguard employment by creating jobs in local communities.
- Support local communities and those in need through concentrated, defined efforts.
- Create a sense of shared involvement in local organisations through volunteer/shared activities.
- Conduct company processes ethically and guarantee transparent communication.
- Encourage internationalisation processes and entry in new markets.
- Establish a relationship of trust with suppliers, ensure the relationship is maintained and is satisfactory in relation to quality and sustainability

The identification of material aspects followed three steps:

- ➡ benchmarking analysis to identify the topics considered relevant to the market (analysis of customer reports, information on competitors and from industry associations, influential non-profit organisations);
- internal analysis to define the significance of the topics identified, on a scale of 1 to 5;
- mapping and analysis of the areas in which we can contribute to pursuing the sustainability goals specified in the UN 2030 Agenda.

The process that resulted in the definition of the environmental, social and economic topics on the basis of the requirements specified in the GRI Sustainability Reporting Standards is shown below.

When defining the topics we also considered the analysis carried out in 2019. After making adjustments with respect to the current context, the Matrix considered the following steps:

DEFINING RELEVANT TOPICS

The relevant topics for COIM and its stakeholders were defined through engagement with senior management and project managers, and analysing internal/external documentation.

EVALUATING THE RELEVANT TOPICS IDENTIFIED

Topics were evaluated in dedicated sessions in which company departments liaised with management. The details were shared and discussed internally.

DEFINITION OF MATERIALITY

"Materiality" is defined as the identification of topics of relevance for the company which have economic, environmental or social impact on business operations and which may influence decisions by stakeholders, in addition to prioritising them.

In other words, it means understanding corporate responsibility topics relating to the context in which the organisation operates, and to what extent they are significant and could affect strategic company policies.

The Materiality Analysis identifies topics relevant to stakeholders which could steer their opinion and actions, and consequently the company's ability to generate shared value.

Details of the Materiality Analysis are shown below.



Mitigation of Environmental Responsible Use of Natural Resources and Waste

PRIORITY

Through this analysis we were able to:

PROVIDE OURSELVES WITH A GUIDANCE TOOL

SOURCE USEFUL INFORMATION FOR **DEFINING FUTURE COMPANY** STRATEGIES REGARDING **SUSTAINABILITY**

ALIGN OUR NEXT **ANNUAL REPORT** WITH INTERNATIONAL **STANDARDS** AND INITIATE THE INCLUSION OF OTHER COMPANIES IN THE COIM GROUP

ANALYSE THE POTENTIAL ESG RISKS.

In drawing up this

Sustainability Report we set ourselves the objective for the coming years of extending the Materiality Analysis to the entire population of significant stakeholders i.e. employees, customers and key suppliers.

THE 2030 AGENDA: THE SIGNIFICANT GOALS

Sustainability represents value for the environment, people and organisations. Companies that are committed to incorporating sustainability within their business model manage their resources efficiently, thereby generating value for the company. To achieve our objectives we have set out a sustainability plan in relation to the aims, fundamental topics and goals of the UN 2030 Agenda, which we have used as a model and guide in commencing our journey.

Of the 169 targets proposed by the United Nations, we have identified those most relevant to our business operations.

Of the 17 goals, 7 (and specific corresponding targets) have been defined as a priority for reporting our information with regards to the balance between the objectives of the Social, Environment and Governance macro areas.

SUSTAINABLE DEVELOPMENT GOALS

The 2030 Agenda for Sustainable Development is an action plan for people, the planet and prosperity signed on 25 September 2015 by the governments of 193 UN member nations and approved by the UN General Assembly. The Agenda contains 17 Sustainable Development Goals (SDGs) categorised within a wider action plan made up of 169 related targets in a social, environmental, economic and institutional context, to be achieved by 2030. For the first time in the UN's history, the 2030 Agenda is not aimed solely at governments, but also at companies, institutions and all organisations deemed essential for achieving the sustainable development goals. We are all links in the same chain, and our strength is not as a single link, but as part of our chains.

WE SHARE THESE GOALS AND ARE **COMMITTED TO ACTIVELY CONTRIBUTING TO ACHIEVING THEM**

A focus on social and environmental issues has always been part of COIM's DNA. The pandemic in 2020 and 2021 put the pursuit of the SDGs heavily to the test. However, as can be understood from this Sustainability Report, our commitment has been unfailing.

Outlined below are the internationally-accepted definitions of the goals we deem to be significant for us and our journey towards sustainability.



production patterns.

1. Our approach to sustainability



DECENT WORK AND ECONOMIC GROWTH

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.



SUSTAINABLE CITIES AND COMMUNITIES

Make cities and human settlements inclusive, safe, resilient and sustainable.



LIFE ON LAND

Protect, restore and promote sustainable use of terrestrial ecosystems.





We are an Italian company which has been developing and producing **speciality chemicals since 1962.**

60 years on from starting the business, **we are now an international organisation** that has a leadership role in the production of:

POLYESTERS

- POLYOLS
- POLYURETHANES (COATINGS, ADHESIVES, SEALANTS AND ELASTOMERS)
- SPECIAL RESINS TO MAKE COMPOSITE MATERIALS AND COATINGS

A global approach with local presence puts our company in the position to meet the numerous application requirements specified by our customers on five continents.

Our daily operations, an ability to establish relationships based on transparency and integrity, and to meet the expectations of our stakeholders, have enabled us to boast a reputation which has gone from strength to strength over the years. Added to this value system, which has always set us apart, is a longstanding sense of responsibility towards future generations, which requires us to operate sustainably and tackle the challenges of our times head on.



1962 Birth of the manufacturing site of Offanengo. Production of organic peroxides

1964

Production of monomeric plasticizers. COIM achieves 50% of the Italian peroxide market.

2.1 1962-2022: THE STAGES **OF CONTINUOUS** GROWTH

Our journey started through a meeting between Mario Buzzella and Cesare Zocchi who, with a shared passion for chemistry, decided to embark on an ambitious project together - an Italian chemical company that could meet the expectations of a market and an economy undergoing significant growth. The result was COIM and, in the space of a few months, the production facility in Offanengo in the province of Cremona opened in October 1962.

industry.

The first products developed were organic peroxides for the production of composite materials (KETANOX).

This rapid success was just the first step in

continuous growth, thanks also to the strategic vision that led both entrepreneurs to enter uncharted waters in the market. The production of monomeric plasticisers used in the cellulose field commenced in 1964 (PLAXTER), and in just a few years COIM had conquered 50% of the Italian peroxide market. A period of major expansion in those years was linked to the production of saturated polyesters destined for the production of soles for sports footwear.

COIM was producing saturated polyesters (DIEXTER) and polyurethanes for footwear (UREXTER) and, through these new products, tripled and then quadrupled its turnover in a few years.

> Halfway through the 1970s COIM was expanding and constantly researching new products to conquer more market segments. Benefitting from the boom for products carrying the Made in Italy label in the 1970s, the company set up a more extensive sales network, which enabled expansion not only in Europe but also in South America, the United States and Asia.

In 1979 a strong relationship was forged with NOVOTEX, a company owned by the Magni family, thanks to which the production of faux leather commenced (LARITHANE). In the same period, the company bought back the 50% share sold to Akzo, putting full ownership in the hands of the Buzzella and Zocchi families.

In the meantime, there was an increase in the production of polymer plasticisers and polyurethane pellets for moulding and extrusion (LARIPUR), used for ski boots, cables,







26

In 1966, Nouri & Van der Lande (now Akzo) acquired a 50% share in COIM. The proceeds from the sale enabled investment at the Offanengo facility for the production of unsaturated polyesters (EXTER S) and alkyd resins (GLICEXTER) used in the paint

1966 Nouri & Van der Lande (now Akzo) acquires 50% of the COIM shares.

1975

COIM expands not only in Europe, but also in South America, United States and Asia.

1979

COIM starts a collaboration with NOVOTEX. The whole property of COIM returns to Buzzella and Zocchi families.



1990

28

New production: binders and sizes for glass fiber; aromatic polyesters; polyurethanes for building insulation panels; water-based polyurethane dispersions.

pipes seals, faux leather, adhesives etc.

The first half of the 1990s was witness to new products, in 1992 with binders and sizing for fibre glass (FILCO), and in 1994 with aromatic polyesters and polyurethanes for making insulation panels (ISOEXTER) used mainly in the building industry. The production of water-based polyurethane dispersions also commenced (HYDROLAR).

COIM's first step in this new direction was the takeover of the Brazil-based company Polimind, which became COIM Brasil Ltda, and the on-site production of polyurethanes for footwear. This was followed by the decision in 2003 to establish COIM Asia Pacific Pte Ltd in Singapore, specialising in the production of polyurethanes and saturated polyesters.

In 2004, a production facility was bought in West Deptford, New Jersey, from the American company Huntsman. A few years later, COIM bought a production facility in Paulsboro, NJ from AirProducts, along with the polyurethane pre-polymer business. As a result, the subsidiary COIM USA Inc. was established.

In addition to investment outside of Europe, market penetration continued with the takeover of the German company Novacote for the production of laminating adhesives in the pharmaceutical and food packaging industry (NOVACOTE).

In 2007, the production of polyurethanes for casting (IMUTHANE) commenced, with various applications, ranging from mining operations through to printing rollers.

The major development of the footwear industry in 2012 led to the establishment of the Indian site in New Delhi (COIM India Pvt. Ltd.), which guickly set the market standard for footwear customers.

After the takeovers outside of Europe, COIM extended its presence within the European area by establishing COIM East Europe in 2013 (Moscow) and COIM Turkey in 2014 (Istanbul).

In 2014, the Zocchi and Buzzella families decided to entrust the management of COIM to a CEO, remaining on the Board of Directors.

In 2017, with the takeover of the company Darwink in San Martino in Strada (LO), COIM went into liquid printing inks with the creation of the brand COIMINKS.

In the same year, COIM China was established, with the aim of adding trading activities (importing and distribution) to the existing commercial network to support the Chinese market.

The Spanish company Neoflex SL was taken over only recently (end of April 2021).

"This strategic takeover will enable our Group to strengthen its presence in the polyurethane adhesives market", explained Giuseppe Librandi, Chairman and CEO of COIM. "Integration downstream of our polyesters will let us decisively enter a speciality market with high added value that is continually expanding. There are numerous synergies with COIM - Neoflex provides solutions with low environmental impact that involve the use of raw materials already produced by COIM. By becoming part of a Group with our type of setup, Neoflex customers can be supported not only at a national and European level, but in all parts of the world where they operate", continued Librandi.

Finally, COIM took over Synres on 1 January 2022, a company established in 1947 and specialising in the production of acrylic and alkyd resins, situated near Rotterdam in the Netherlands.

2003 Foundation of COIM Asia Pacific Pte Ltd in Singapore.

2004

Foundation of the subsidiary COIM USA Inc. Acquisition of NOVACOTE company.

2007 Polyurethane for casting.

2012-2014

Indian site in New Delhi (COIM India Pvt. Ltd.). Foundation of COIM East Europe. Foundation of COIM East Turkey.

2017

Acquisition of Darwink company: COIM enters in the liquid printing inks market. Birth of COIM China.

2021

Acquisition of controlling share in the Spanish company Neoflex SL.

2022 Acquisition of Synres company.

2.2 CORPORATE STRUCTURE AND GOVERNANCE

The COIM Group's corporate structure reflects its international dimension.





COIM ORGANISATION CHART



NOVOTEX **ORGANISATION CHART**



OWNERSHIP STRUCTURE

COIM and NOVOTEX are limited companies. COIM has its headquarters in the municipality of Buccinasco (Milan), whereas NOVOTEX has its headquarters in the municipality of Gaggiano (Milan). There are other operational premises at Offanengo (Cremona), the Group's main production site, and in San Martino in Strada (Lodi).

Management of the two companies is entrusted to a Board of Directors (hereinafter BoD), n independent auditing firm appointed in the ordinary shareholders' meeting oversees the Board of Statutory Auditors and statutory audits, in addition to accounts management.

BOARD OF DIRECTORS AND BOARD OF STATUTORY AUDITORS

The BoD is responsible for corporate governance, supported by company management for running business operations. The main supervisory bodies, in accordance with legislative decree 231/2001, are the Board of Statutory Auditors and the Supervisory Board.

FORMATION OF THE BOD COIM S.P.A.

Giuseppe Librandi Francesco Buzzella Beatrice Buzzella Beatrice Zocchi Cesare Riccardo Zocchi

FORMATION OF THE BOD NOVOTEX ITALIANA S.P.A.

Giuseppe Librandi Luca Maria Pesenti Paolo Magni Marco Magni



FORMATION OF BOD MEMBERS BY GENDER AND AGE GROUP - COIM

at 31 December 2021

Professional	<30 yea	ırs of age	30-50 ye	ars of age	>50 yea	rs of age	Tot.
category	Men	Women	Men	Women	Men	Women	101.
Chair	0	0	1	0	0	0	1
Member	0	0	1	2	1	0	4
Member	0	0	0	0	0	0	0
Member	0	0	0	0	0	0	0
Member	0	0	0	0	0	0	0
TOTAL	0	0	2	2	1	0	5

FORMATION OF BOD MEMBERS BY GENDER AND AGE GROUP - NOVOTEX at 31 December 2021

Professional	<30 yea	rs of age	30-50 ye	ars of age	>50 yea	rs of age	Tet
category	Men	Women	Men	Women	Men	Women	Tot.
Chair	0	0	1	0	0	0	1
Member	0	0	2	0	0	0	2
Member	0	0	0	0	1	0	1
Member	0	0	0	0	0	0	0
Member	0	0	0	0	0	0	0
TOTAL	0	0	3	0	1	0	4

BoD – gender 2021 COIM









2.3 **OUR BUSINESS MODEL**

At COIM we firmly believe that an efficient corporate governance structure contributes to increasing company competitiveness and the sustainability of its development. The principles of Corporate Governance define the organisation of departments and responsibilities, develop a suitable control system, and ensure the implementation of mindful decisions, the effectiveness of monitoring and the management of business risks. As a result, we can ensure increased generation of revenue and value for all stakeholders.

The main elements of the Corporate Governance system are the Board of Directors, the Board of Statutory Auditors and the Shareholders' Meeting.

2.3.1 PRECAUTIONARY PRINCIPLE FOR SUSTAINABILITY

In the present-day challenges faced by every business, success on the market, or put another way, customer satisfaction, is determined by the focus that companies reserve for people's expectations in the context in which they operate, and their ability in creating value for the area and local community.

Of course, this approach fosters considerable integration as part of sustainability between systems that manage quality, the environment, health and safety, but it also requires companies to use these management systems as tools of prevention in line with risk-based thinking, whereby the organisation makes decisions and takes action as the result of assessing the positive and negative consequences of their choices.

Indeed, it is essential to eliminate or minimise negative or unwanted effects on business operations. The organisation must, therefore, consider the context in which it operates and the expectations of stakeholders, define the environmental, social, cultural, legal and economic factors linked to conditions that are internal or external to the organisation that affect the context in which it plans to pursue its objectives, and assess the risks and opportunities on which to set up the management system.





CODE OF ETHICS AND ORGANISATION, MANAGEMENT AND CONTROL MODEL **PURSUANT TO LEGISLATION 231**

We are always mindful of applying and respecting principles of loyalty and integrity, which are key to business success and characterise activities at COIM and throughout the entire Group. A Code of Ethics became necessary for further clarity and transparency, providing a set of principles and guidelines to underpin COIM and Group operations, and direct the conduct of employees and anyone in contact with the organisation.

Our express intention is for the Code of Ethics to be an essential part of the Organisation, Management and Control Model (Corporate Compliance). This is also the reason why, to produce it, we considered the guidelines drawn up by the Confederation of Italian Industry (Confindustria) on creating Organisation, Management and Control Models to be applied to prevent crime and determine corporate liability as per legislative decree no. 231 of 08 June 2001.

When drawing up the Code of Ethics we also considered the ten principles adopted by the UN Global Impact initiative, which were based on the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention Against Corruption.

The ethical principles which the company observes are detailed below:

COMPLIANCE WITH LEGISLATION

SAFEGUARDING HUMAN RIGHTS

FAIRNESS AND IMPARTIALITY

PROFESSIONALISM AND RELIABILITY

LOYALTY AND GOOD FAITH

VALUING PEOPLE AND HUMAN RESOURCES

TRANSPARENCY AND INTEGRITY

CONFIDENTIALITY

PREVENTING CONFLICTS OF INTEREST

HEALTH & SAFETY IN THE WORKPLACE

SAFEGUARDING THE ENVIRONMENT

PREVENTION OF MONEY LAUNDERING AND SELF-LAUNDERING

SAFEGUARDING THE COMPETITION

PRODUCT QUALITY AND SAFETY

RESPONSIBLE PRODUCT MANAGEMENT

TACKLING CORRUPTION

SAFEGUARDING INTELLECTUAL PROPERTY

ANTI-CORRUPTION

Conduct based on principles of lawfulness, loyalty, honesty, integrity and transparency is an important driver of economic and social development. Our monitoring system is designed to prevent the risk of corruption, and implements the best internationally-recognised practices. Every single person working with us on any basis, and at all levels, must understand and apply our Code of Ethics, and report any omissions or infringements. Demonstrating a strong sense of lawfulness and compliance with legislation, in the 2020-2021 two-year period no cases of unfair competition, anti-trust or monopolistic practices were recorded.

NUMBER OF INFRINGEMENTS



RESPECTING PRIVACY

Our Code of Ethics also refers to the processing of personal data in compliance with the EU GDPR in force since 25/5/2018, pursuant to article 13 of legislative decree 196/2003. All data subjects receive the relevant information.

The Group handles data belonging to three types of stakeholders:

- customers (commercial and administrative information);
- suppliers (commercial and administrative information);
- personnel (personal, sensitive information).

As stipulated in the GDPR, we use procedures to obtain consent on processing and handling data. Furthermore, our IT systems have been reinforced to prevent any data losses. Should this transpire, it would be promptly flagged and remedied.

In the 2020-2021 two-year period no cases were recorded of non-compliance with privacy. Sensitive data security was also (and will be) assessed during the audit for full AEO status, whereby the customs authority issues certification to economic operators deemed to be reliable, making it possible to benefit from simplified customs procedures. We obtained certification in 2021 following an audit carried out by this authority.

A WINNING SYNERGY ON THE MARKET

We were established as an Italian company and have been operating on the market since 1962 with the development and implementation of speciality chemicals, and speciality polyurethanes in particular. The subsidiary NOVOTEX mainly handles the commercial development of various products made by the parent company.



➡ MARKET PRESENCE

The COIM Group now has 7 production facilities and 20 operational headquarters on four continents, combining a global approach with a local presence.



COIM mainly operates in the following sectors.

As the diagram shows, the dominant industry is Food and Pharma Packaging, followed by Footwear and Fashion.



The diagram below shows the geographical distribution of our customers, with the EMEA (Asia, Middle East, Africa) market, which has reached a level of 51% (Italian market 16%).



The presence of NOVOTEX on the national and international markets is shown below. Europe prevails at 54%.



2.5 SHARED ECONOMIC VALUE

The challenges presented to us require companies to change their business model considerably, also in relation to creating wealth and managing economic resources. Indeed, nowadays our role is no longer just about maximising profit, it has to pursue maximum benefit for our stakeholders, starting with the host community. Never before has the principle of shared value been more important, with companies playing a fundamental role in changing society. We are not shying away from this challenge, and this is demonstrated by how the economic value we generate is distributed to our stakeholders. Our role in creating economic value is important, and therefore the time has also come for us to maximise profit in a win-win rationale i.e. advantageous for us and our stakeholders.

ECONOMIC VALUE GENERATED AND DISTRIBUTED

We have made the principle of shared value our own, creating wealth all around us. This is known as 'added value', in other words the remaining value generated after subtracting the economic resources required to purchase raw materials, goods and services.

This wealth rewards stakeholders who have established economic relationships with us, and who have contributed to the success of our company through work, investments, loans, public services and social benefit initiatives.

The figures shown below refer to annual turnover, added value deducted and distributed, and investments allocated in the two-year 2020-2021 period separately between COIM and NOVOTEX.

COIM

→ ADDED VALUE GENERATED (EUR '000 or € '000)	2020	2021
Net revenue from sales - invoiced Revenue and other proceeds Change in finished product inventories	393.854 5.658 -1.699	520.148 9.805 14.460
TOTAL ADDED VALUE GENERATED	397.813	544.413

→ ADDED VALUE DISTRIBUTED (EUR '000 or € '000)	2020	2021
Supplier remuneration	286.092	450.852
Employee remuneration	37.036	37.801
BoD/Executive remuneration	2.162	2.155
Remuneration sponsorships and electoral campaign donations	127	135
Change in raw material inventories	-47	-13.847
Financial income and expenses (including exchange differences realised)	1.029	-1.275
Taxes and duties	11.625	6.644
TOTAL ADDED VALUE DISTRIBUTED	338.024	482.464
DELTA CREATED - DISTRIBUTED	59.789	61.949

→ ADDED VALUE DEDUCTED (EUR '000 or € '000)	2020	2021
Amortisation, depreciation and write-down of fixed assets	25.370	37.981
* * Provisions for risks and charges (including bad debts and impairments)	2.714	2.760
Exchange differences not realised	534	-83
Net profit (profit or loss for the year net of taxes)	31.170	21.290
TOTAL ADDED VALUE DEDUCTED	59.789	61.948

NOVOTEX

ADDED VALUE GENERATED (EUR '000 or € '000)

Net revenue from sales - invoiced Revenue and other proceeds

TOTAL ADDED VALUE GENERATED

⇒ ADDED VALUE **DISTRIBUTED** (EUR '000 or € '000)

Supplier remuneration

Employee remuneration

Taxes and duties

TOTAL ADDED VALUE DISTRIBUTED

⇒ ADDED VALUE **DEDUCTED** (EUR '000 or € '000)

Amortisation/Depreciation

* * Provision for risks

FINANCIAL INCOME AND EXPENSES

2020	2021
37.412 981	46.002 2.011
38.393	48.012
2020	2021
30.650 3.102 1.091	39.462 3.454 1.269
34.842	44.185
2020	2021
374 828	356 182
538	742

COIM

EUR '000 or € '000	2020	2021
Net profit (profit or loss for the year net of income taxes)	31.170	21.290
Cash flow from business operations	75.636	-3.363
TOTAL ASSETS	700.478	741.045
Long-term debt	77.358	74.985
EBITDA	70.493	65.742
Capitalised investments in R&D	-	8.086

NOVOTEX

EUR '000 or € '000	2020	2021
Net profit (profit or loss for the year net of income taxes) Cash flow from business operations	2.886 2.692	4.032 3.845
TOTAL ASSETS	26.085	31.571

544.413 ML TOTAL ADDED VALUE GENERATED 482.464 ML DISTRIBUTED 61,948 ML TOTAL ADDED VALUE DEDUCED 741.045 TOTAL ASSETS

2021 COIM

2021 NOVOTEX 448.012 ML TOTAL ADDED VALUE GENERATED ML TOTAL ADDED VALUE DISTRIBUTED ML TOTAL ADDED VALUE DEDUCED

31.571 TOTAL ASSETS

2. Responsible growth





INITIAL INVESTMENT PROGRAMME AIMED AT INCORPORATING SUSTAINABILITY INTO ALL AREAS **OF THE BUSINESS.**

Investments are assessed on a case-by-case basis on the basis of need and in line with company policy, while standing firm on our responsible growth objective.



2021 INVESTMENT IN R&D: 8.086.000€ 1.6% OF TURNOVER



ALLIANCES FOR SUSTAINABLE DEVELOPMENT

We have a strong local presence, and this is also expressed in our commitment to engagement, which is essential for promoting our sustainable business model and sharing the values of social and environmental responsibility.

This means that for years we have been communicating and working regularly with organisations in the community, and are members of major Italian and international trade and business organisations, including:



INSTITUTIONAL POSITIONS

Francesco Buzzella is the President of Confindustria Lombardia for the 2021-2025 four-year term, having been unanimously elected by the association's presiding council. During council member consultations carried out by the appointed commission (with three past presidents of Confindustria Lombardia), he was identified as the sole candidate.

Born in 1968 in Crema and an economics graduate from Bocconi University, Buzzella is the CEO of COIM and Chairman of Green Oleo, chemical companies with a combined turnover of more than a billion euro and with 1250 employees, operating in the chemical industry, in particular polyurethanes and green chemicals from renewable sources. President of Associazione Industriali della Provincia di Cremona from 2017 to June 2021, Buzzella has been a member of the Federchimica board since 2014, and a member of the presiding Federchimica council since 2017.





Our main objective is to pursue compatible development based on fundamental values relating to health, safety, quality and the environment.

A commitment to continually improve customer satisfaction, safeguard the environment and people's health, inside and outside of the production sites, is systematically monitored so that new targets can be achieved in accordance with legislation in every country where we operate.

THE IMPORTANCE OF RAW MATERIALS

The raw materials we mainly use are:

- **isocyanates** (monomers used for polyurethane products);
- glycols (monomers used mainly for polyester products, and polyurethane resins);
- dicarboxylic acids and anhydrides (monomers used in polyester products);
- **polyols and polyesters** (largely developed internally for use as raw materials for polyurethane products);
- solvents.

We have initiated a research process for solutions that move towards increasing sustainability. The main alternatives to synthetic raw materials are:

raw materials from renewable sources (bio-based);

raw materials from recycling.

Information on quantities of raw material used in 2021 with respect to the previous year is shown below.

MATERIALS USED **BY UNIT OF MEASUREMENT (GRI** 301-1) Recovered materials are excluded from the figure for recycled materials.

2020

1.597.683 **KG** PACKAGING

193.135.463 KG RAW MATERIALS

11.964.369 KG RENEWABLE

769.926 **KG** RECYCLED

180.401.141 KG NON-RENEWABLE

2021 1.671.359

KG PACKAGING

203.875.075 **KG** RAW MATERIALS

11.464.564 **KG** RENEWABLE

1.289.497 KG RECYCLED

191.121.014 KG NON-RENEWABLE

Raw materials used 2021

RENEWABLE AND RECYCLED RAW MATERIALS

The slight reduction in the percentage of raw bio-based materials (the percentage refers to annual consumption) is mainly due to the global shortage that transpired. In the last twenty years our company has definitely increased its amount of raw materials from renewable sources. In the last two years their consumption has exceeded 10 thousand tonnes.

Our R&D departments are committed to sourcing sustainable and bio-based solutions, in order to develop alternatives to existing synthetic products. Being able to boast that our production is sustainable, while maintaining product quality, is of major importance to our development. This is why, where possible, we are researching raw materials with performance levels similar to existing materials but which are bio-based, to offer the market both options (synthetic and bio/biotic/biobased), compare the performance of the two products, and promote the bio-based product as much as possible on the market and to our customers.

While reuse is an immediate action, and means reusing an item that is not yet waste for the same purpose it was created, recycling is a fully-fledged transformation, because it means "recovering and reusing waste materials".

At COIM we believe that the Remade in Italy® certification is of fundamental



importance, as it endorses the fact that recycled materials are used to make products. In 2021, we worked hard to ensure that we obtained Remade in Italy® certification for our product ISOEXTER 40072.





We also obtained OK Compost certification for the Group's adhesives, coatings and ink modifiers for flexible packaging materials. The development of these product types is the result of major investment in research and development, with the aim of providing biodegradable, flexible solutions for food packaging. Such solutions have a low environmental impact. To obtain the OK Compost endorsement, packaging had to pass the biodegradation tests set out by European standards. Even though packaging does not really come under raw materials, it is still a constituent part of the development of sustainable products.

➡ LIFE CYCLE ASSESSMENT (LCA)

Life Cycle Assessment (LCA) is an analytical method that systematically evaluates the environmental footprint of a product or service along its entire life cycle. It covers all phases from sourcing the raw materials through to the production, distribution, use and final disposal of the product, thereby obtaining the environmental impact values associated with its life cycle.

RECYCLING

USAGE

In April 2021, we purchased special software with a perpetual licence and total access to all available databases, enabling access to a large number of chemical substances and processes, including those relating to raw materials that we use. The software also makes it possible to integrate the database with data on the basis of knowledge possessed or received from suppliers. Integrating environmental data on raw materials involved in creating products and data from the synthesis process (relating to the plant used) means the value of a set of environmental impact categories can be calculated for each specific product. The software also enables us to assess the impact of individual elements examined, identify the origin of the most significant impact and evaluate mitigation and improvement actions in accordance with the specifications of ISO14040-ISO14044 standards.

Thanks to the addition of three new resources in the team, we now have personnel who are essential to carrying out the analysis and the LCA.

RESULT: OVER 11.000 TONNES

OF BIO-BASED RAW MATERIALS CONSUMED



3.1.1 THE SUPPLY CHAIN

The tables below refer solely to COIM, as they are not relevant to NOVOTEX.

PROPORTION OF SPENDING ON LOCAL SUPPLIERS - (GRI 204-1) Raw materials



As shown in the table, almost all purchases of raw materials are made in Europe, and in Italy especially.

Supply of raw materials 2021



PROPORTION OF SPENDING ON LOCAL SUPPLIERS (GRI 204-1)





With regards to the purchase of indirect and technical materials and contracts, we mainly procure in Italy, with European suppliers accounting for 6% of supplies (and an insignificant number of suppliers outside of Europe), reflecting the previous year's trend.





The supplier qualification process requires prior checks and verification carried out by our legal department. This is a structured process which involves:



SELECTION, PRELIMINARY AUTHORISATION AND APPROVAL OF SUPPLIERS

Suppliers are preliminarily authorised as potential suppliers on the basis of an evaluation of different aspects, including the following:

- REGISTRATION AND COMPLIANCE WITH ETHICAL AND SUSTAINABILITY REQUIREMENTS
- TECHNICAL/PROFESSIONAL CAPABILITY
- ORGANISATIONAL STRUCTURE
- RANGE OF PRODUCTS AND SERVICES PROVIDED
- ABILITY TO GUARANTEE COMPLIANCE OF PRODUCTS OR SERVICES WITH OUR REQUIREMENTS
- BUSINESS AND FINANCIAL RELIABILITY
- BEFORE AND AFTER-SALES SUPPORT CAPABILITY
- COMPETITIVENESS OF BUDGET PROPOSALS
- DELIVERY TIMESCALES AND AVAILABILITY OF PRODUCTS/SERVICES

Once these evaluations have been carried out, the relevant department (Purchasing or Technical Purchasing) proceeds with the next steps required for the supplier to be added to the list of qualified suppliers. The involvement of relevant technical resources and departments may be useful in this phase (HSE, Site Manager, Contractor Manager, Electronic Instruments Manager, Engineering). On completion of this phase, the supplier is assigned Potential status.

Following legal checks carried out in accordance with procedure 08-CFO03 Prior Checks and Verification of Customers and Suppliers, the Purchasing/Technical Purchasing Manager decides DECIDES IF THE SUPPLIER IS TO BE ASSIGNED

QUALIFIED STATUS,

added to the company ERP, and set up to be able to receive purchase orders. Suppliers deemed unsuitable will be assigned Not Qualified status.

If suppliers fail to meet our ethical and sustainability requirements, they will automatically be classed as Not Qualified.

We also aim to introduce

REGULAR SUPPLIER EVALUATION ON THE BASIS OF ESG PRINCIPLES.



^{3.2} PRODUCT SAFETY

Product safety is essential to our business. The search for raw materials with toxicological profiles with less impact and which can guarantee higher safety levels for employees and end consumers is ongoing. Dedicated teams are in charge of assessing health and safety requirements (HSE) and legal compliance (Regulatory, Quality & Compliance).

Before purchasing a raw material we give suppliers a questionnaire to assess the materials comprehensively and gather all information to make an adequate internal evaluation. This is an essential step in the approval process, especially in the case of new raw materials or new suppliers.

We are also members of various industry organisations (EuPIA, FEICA, Federchimica to name but a few), which help us stay up-todate with legal developments and predict potential impact on product compliance.

At the end of this process we are able to issue customers and users with certification that lets them make the necessary evaluations regarding the safety and compliance of products and processes. Our ongoing commitment is to guarantee a rapid, substantiated response.

3.2.1 TRANSPARENCY IN TRACEABILITY

Traceability is an essential requirement of good manufacturing practices (GMP) and, as producers of intermediates for food packaging, at COIM we place considerable focus on this subject.

We have a specific traceability procedure for all raw materials entering the premises, in addition to semi-finished products, intermediates, finished manufactured products or retail products that our departments put on the market. The aim of this procedure is to guarantee the traceability of raw materials and intermediates along the entire production chain.

On registering an incoming raw material, Plant Logistics personnel must note:



The raw material is then stored in the warehouse. Raw materials which are loose are stored in special tanks and numbered. Departments are therefore able to retrieve the raw material and use it in production while always maintaining the traceability of intermediates, finished products and the relevant analyses.

We perform regular traceability tests in various company departments to check their efficiency. Recall generally takes two hours and may involve:

TRACING A RAW MATERIAL

if an issue is flagged (e.g. contamination) following our checks on an incoming raw material, we can promptly trace the products that contain that specific raw material and quickly advise customers who have received the products (recall).

FINDING RAW MATERIALS

if issues with specific finished products are flagged, we can trace all batches of raw materials used in those products.

RELATIONSHIPS WITH CUSTOMERS

Our strength is our continuous engagement with customers. We strive for their full satisfaction through ongoing communication, careful assessment of their requirements, and the development of tailor-made products.

Our aim is always to establish longstanding relationships of trust with customers. We can boast a large commercial operation with product managers, commercial managers, representatives and customer service personnel split by product line and geographical area. Customer loyalty is also established through the work of the technical support team, the R&D team, HSE and Regulatory, Quality & Compliance departments, which ensure constant support in relation to legislation, regulations and regulatory developments.

➡ CUSTOMER-FOCUSED APPROACH

Our Customer Service aims to turn a purchase into a positive experience. This requires substantial organisation and management engagement to ensure precision, timeliness, reliability, flexibility and transparency, not to mention a special aptitude which we engender with training for our personnel.

We are happy for customers to carry out checks and inspections of our facilities, in the very spirit of full transparency.

➡ COMMUNICATION

Sixty years in business and continuous growth have allowed us to become reliable and establish a good reputation, fostering strong internal and external relationships with customers, suppliers and public institutions in particular. Brand reputation has been essential to our growth and development strategies in various markets.

Communication contributes to brand awareness, and a priority channel is the company's LinkedIn page showing interaction with customers that is constantly increasing.



^{3.4} INNOVATION AND RESEARCH FOR PRODUCT SUSTAINABILITY

The continuous search for innovation is another essential pillar for the company. Every product line is under a dedicated R&D team, with a total of about 50 employees. The main activities are as follows:

DEVELOPMENT OF PRODUCTS FOR NEW APPLICATIONS.

• In the basis of reviewed and changing market requirements, the aim of this activity is to develop new application solutions to meet continually-evolving uses and technologies.

CUSTOMISATION OF EXISTING PRODUCTS.

• Research is aimed at improving/optimising existing products on the basis of customer and market requirements, by customising our solutions as required.

DEVELOPMENT OF SUSTAINABLE ALTERNATIVES.

• This is an area where we are consolidating our focus, to make bio-based products (as alternatives to synthetics) which are biodegradable and developed with recycled raw materials that meet the increasing demand for sustainability.

MAINTAINING PRODUCT COMPLIANCE.

• Considering the highly dynamic nature of current legislation, it is essential for the research team to be ready to adapt products to new rules and regulations to ensure their compliance.





CERTIFICATION AND RATINGS

System certification is the pinnacle of the company process to integrate advanced s. Management and product systems are certified by independent and third-party organisations to ensure transparency and propriety. Processes and products are continually monitored and optimised in terms of quality, safeguarding the environment and employee safety. This represents value for us, our customers and the host community.

We have been endorsed through the following certification:





OK COMPOST relating to several of the Group's products (Adhesives, coatings and ink modifiers for flexible packaging materials)



CERTIFIED MANAGEMENT SYSTEMS





UNI EN ISO 9001:2015 UNI EN ISO 14001:2015 UNI ISO 45001:2018

Added to these is the product certification already mentioned, and the Ecovadis rating obtained in the course of the year.

62



ECOVADIS RATING referring to overall figures for 2021





Goal 13 of the UN 2030 Agenda states the following: "Take urgent action to combat climate change and its impacts", and it is extremely important for all businesses, large or small, to contribute to this shared objective.

We are committed every day to limiting our impact on the environment. We continually monitor and manage our operations and the production chain to prevent harm and improve our environmental performance.

On Management instigation, we have implemented a governance system that involves continually monitoring environmental, production, administrative and social factors that are significant for the stakeholders. The application of the system aims to:

- comply with current legislation regarding processes, safety, the environment and products;
- monitor significant environmental aspects, such as water and energy consumption, wastewater management and reduced greenhouse gas emissions;
- set up production control systems to reduce product waste and implement its controlled management;
- prioritise, where possible, new processes, incoming materials, plants, machinery and equipment designed to improve company performance and contain environmental impact in compliance with health and safety in the workplace requirements;
- design new products, focusing on environmental impacts generated by the entire product life cycle, maintaining and developing processes compliant with international standards.

For the purpose of transparency, the following sections will discuss these topics in more detail for the benefit of our stakeholders.

REGULATORY COMPLIANCE

It was due to the major importance of environmental issues, and the consequences that climate change is having on production, that we decided to consider Goal 13 as one of the 7 priority objectives for COIM. Climate imbalances have significant, direct repercussions on the production, productivity and quality of every company. We therefore strive every day to do everything in our power to achieve this objective in accordance with legislation.

Our Integrated Environmental Authorisation (Cremona provincial decree no. 151 of 30/03/2020) covers the main environmental authorisation elements.

Specific environmental authorisations are shown below:



LEGISLATION DETAILS: Decree no. 967 of 01/12/2006 (authorisation no. 44139 of 20/06/1989)

NOTES: Drawing underground water for industrial use from 5 private wells. Duration of authorisation: 30 years.



NOTES: Permit to draw from the Babbiona channel for recirculation in the rainwater reservoir.



LEGISLATION DETAILS: DEC/RAS/2179/2004

NOTES: Authorisation to release greenhouse gases from combustion plants with combustion heat output of over 20 MW.



4.2 **RESPONSIBLE USE** OF NATURAL RESOURCES

We plan to share the details of how we manage natural resources (water and energy) needed for production requirements with our stakeholders.

4.2.1 **USE OF WATER IN PRODUCTION PROCESSES**

At COIM we draw water from proprietary wells (authorised by the provincial government) for two main purposes:

COOLING TOWERS

the predominant use. COIM's two towers make it possible to reuse water in industrial processes, reducing amounts drawn and discharged.



CONSIDERING AN ANNUAL AMOUNT previous years.

PRODUCTION PROCESSES

in this case too water is recovered and used to

SUPPLY COOLING TOWERS

PRODUCE **DEMINERALISED WATER**

Discharges are managed as follows:

- SEWAGE SYSTEM: the water passes through settling tanks and ends up in the council sewer and onto the Crema water treatment plant.
- SURFACE WATER BODY: the only discharges are well water used to cool plants, rainwater from roofing and subsequent rain flush.

Water that is discharged (in either the sewage system or surface water body) is analysed regularly.

INDICATORS ARE LOGGED MONTHLY BY A DEDICATED TEAM.

We have set ourselves the aim of

FURTHER IMPROVING THE PUMPS **TO INCREASE THE AMOUNT OF WATER RECOVERED**,

and to make the reuse process even more efficient

GRI 303-3

WATER WITHDRAWAL BY SOURCE (ML) - COIM



WATER WITHDRAWAL BY SOURCE (ML) - NOVOTEX

Withdrawal point	2020	2021
Source	Fresh water	Fresh water
Surface water (river)		
Groundwater (private well)		
Third-party water (water supply)	1,9 ML	2,6 ML
TOTAL	1,9 ML	2,6 ML

GRI 303-4

WATER DISCHARGE BY SOURCE (ML) - COIM



Reintegration (m ³)	105.000	24.700
Bleeding (m ³)	41.000	11.940
Evaporated water (m³)	64.000	12.760
Heat (kcal/year)	34.560.000	6.890.400
ML savings (10 °C Delta)	3.456,000	689,040


➡ RECOVERED GLYCOLS

The production process for some products involves an esterification reaction, which has water as a by-product. This water, which has a high organic load and contains the glycols dispersed during the process, is collected and has two possible destinations - it can be transferred to the burner or can be distilled.

The distillation process has several phases, and aims to obtain water with a low COD, recovering glycols in particular to reuse them in various production processes. This technique is in line with circular economy principles, as it is based on recovering and reusing glycols, which constitute the main raw material used at our production facilities.

PROCESS WATER CONCENTRATOR (PWC)

Glycol esterification tails are used in water treatment plants to enrich the purification tanks filled with bacteria, in order to facilitate their proliferation by acting as nutrients.

The PWC enables the amount incinerated (externally) to be reduced by 600 to 12,000 tonnes/ year, which is an important amount in terms of sustainability, also considering the reduction in external transport used to move the waste to the incinerator.

Following the increase in efficiency, the PWC values for 2021 are as follows:

- **WATER TREATED:** 11,425,910 litres (11,425.910 tonnes);
- RECOVERED GLYCOLS: 313 tonnes (reused internally);
- GLYCOL ESTERIFICATION TAILS: 398 tonnes (destined for the enrichment of external tanks).

PWC PLANT CAPACITY

BEFORE 2020	APPROX. 1000 kg/h
FROM MID-2021	APPROX. 2000 kg/h

The plant improvement process commenced in the first few months of 2020, and progressed gradually until halfway through 2021 when capacity had almost doubled. The next aim is to obtain an even higher percentage of recovered glycols to achieve 2400 kg/h.



4.2.2 ENERGY CONSUMPTION

Energy is produced partly from electrical sources and partly from thermal sources with the consumption of methane gas.

The electricity purchased comes from the national grid. Its consumption is carefully monitored as every production department records its own measurements. The aim is to implement an automatic, digital reporting process to be able to have timely, accurate and detailed information available on electricity consumption.

The highest level of consumption is due to steam generation. Research is in progress which aims to make steam management more efficient to reduce this consumption.

Natural gas consumption is mainly due to:

TWO THERMAL PLANTS

TWO COMBINED HEAT & POWER PLANTS

The boilers burn methane, which is mostly used in production processes and steam generation

These use natural gas to produce electricity and steam, and to heat water

WATER (discharged into sewage system or reused in its unaltered state) RECOVERED GLYCOLS (reused internally)

ESTERIFICATION TAILS

(external tank enrichment)

BETWEEN 2020 AND 2021

WE DID A DETAILED MAPPING OF THERMAL CONSUMPTION,

thanks to the installation of meters that enable us to monitor energy losses in departments in the southern area of the facility.

This means we can categorise departments on the basis of energy consumption and identify wastage more easily. The figures are logged monthly by a dedicated team.



Improvement actions currently being implemented include the installation of analogue meters in the northern area of the facility. Once this step has been completed, we can fully analyse thermal consumption, and intervene to contain it as required.

The table below provides a broader picture, considering the exceptional circumstances of 2020 when consumption was affected by the Covid-19 pandemic. Analysis of the data indicates a greater emphasis on heating from electricity rather than natural gas, plus an increase in the number of electric forklifts. Furthermore, the new no. 85 automated warehouse - where goods are moved using electricity only - has been in operation since 2021.

GRI 302-1

ENERGY CONSUMPTION WITHIN THE ORGANISATION - COIM

Energy consumption

Energy sources

Natural Gas

Natural Gas

TOTAL ELECTRICITY CONSUMPTION

Consumption of electricity purchased

Consumption from renewable sources (photovoltaic panels)

TOTAL ENERGY CONSUMPTION

Diesel for internal equipment

Fuel for vehicles (57 company vehicles)

TOTAL FUEL

ENERGY CONSUMPTION WITHIN THE ORGANISATION - NOVOTEX

Energy consumption

Energy sources

Natural Gas

Natural Gas

Electricity consumption

of which from renewable sources (panels)

of which non-renewable (national grid)

TOTAL ENERGY CONSUMPTION

Diesel

* Total energy produced by the plant is 140,815 kWh for 2020 and 116,170 kWh for 2021. Surplus energy is fed back into the grid.

2020	2021
18.362.898 Smc/year 179.012.853 KWh	19.261.117 Smc/year 189.699.176 KWh
37.152.317 KWh	39.349.644 KWh
16.011.336 KWh -	13.678.032 KWh 56.533 KWh
195.024.189 KWh	203.377.208 KWh
51.561 Litres 86.685 Litres	52.800 Litres 103.042 Litres
138.246 Litres	155.842 Litres

2020	2021
18.777 Smc/year	27.571 Smc/year
200.726 KWh	294.733 KWh
217.338 KWh	282.205 KWh
75.692 KWh*	80.010 KWh*
141.646 KWh	202.195 KWh
418.064 KWh	576.938 KWh
19.959 Litres	21.226 Litres



CLEAN ENERGY

COIM

The Buccinasco building is home to the commercial premises so has no production activity, and currently has active photovoltaic panels with an installed peak power of 69 kWh. As shown in the table, during 2021 the company was therefore able to use 56,533 kWh of clean, self-produced energy.

Every kWh produced by the photovoltaic systems prevents the release of 0.65 kg of carbon dioxide into the atmosphere, therefore in 2021 we saved 36,746 kg of CO2.

Our future objectives include activating the photovoltaic panels already installed in Offanengo. Energy produced from renewable sources will be fed into the site supply. The plant's installed peak power is 160 kWh with activation planned for October 2022.

NOVOTEX

NOVOTEX has always been sensitive to sustainability issues and safeguarding the environment, committing major investments in research to develop new environmentallyfriendly systems and technologies. An innovative photovoltaic panel arrangement was installed on the roof of the Gaggiano premises, in keeping with this philosophy. The first panels were installed on 20/05/2008 and others have been active since 02/08/2012, resulting in overall production capacity of 400 kW/h, which is equivalent to 50% of the company's energy requirements. Surplus electricity is fed back into the grid.

COIM: IN 2021 -36.746 Kg OF CO₂ OF 400 KW/H, EQUIVALENT **TO 50% OF THE** REQUIREMENTS

NOVOTEX: IN OVERALL PRODUCTION CAPACITY **COMPANY'S ENERGY**



4.3 OUR CARBON FOOTPRINT



COIM

With regard to atmospheric emissions, our aim is to initiate a gradual process of engagement with our suppliers, starting with the most strategic, to enable us to calculate Scope 3 values accurately.

We realise that this will be a process that requires time and concerted effort by all stakeholders, however we are motivated to continue this.

The method for monitoring SCOPE 1 emissions is based on calculations produced in compliance with Regulation (EU) 601/2012. The amount of greenhouse gases concerns all combustion emissions (fuel consumption) coming from all business-related sources.

The CO2 released is quantified on the basis of specifications in article 24 of Regulation (EU) 601/2012:

CO2 EMISSIONS = ACTIVITY DATA (TJ) x EMISSION FACTOR (TCO2/TJ) **x OXIDATION FACTOR**

The types of COMBUSTIBLES **USED IN THE PLANT** FOR ENERGY/ **ENVIRONMENTAL** (reducing emissions)/other purposes are as follows:

NATURAL GAS (METHANE)

Energy purposes: -

FUEL OIL (NAPHTHA)

Energy purposes: for energy; alternative to natural gas but only in exceptional circumstances (emergencies), as the natural gas supply contract is the type which cannot be interrupted.

DIESEL FOR EMERGENCY EQUIPMENT (FEM GENERATORS AND FIREFIGHTING PUMPS)

Energy purposes: -

VOCS BURNED TO REDUCE ATMOSPHERIC EMISSIONS

Energy purposes: -

UREA OXIDISED IN THE REACTION WITH GASES DISCHARGED FROM THE COGENERATION PLANTS TO REDUCE NITROGEN OXIDES

Energy purposes: -

The Scope 1 value has increased because the self-produced energy originating from natural gas increased, therefore the value of Scope 2 relating to energy purchased and used decreased.

DIRECT AND INDIRECT GREENHOUSE GAS EMISSIONS CAUSED BY THE **ORGANISATION'S ACTIVITIES COIM**

Type of consumption	2020	
Scope 1	34.663 tonnes CO ₂ eq	38.
Scope 2 - Location Based	5.905 tonnes CO ₂ eq	3.17
TOTAL Scope 1 + Scope 2	40.568 t CO ₂ eq	41

* The Scope 2 value includes CO2-eq. savings relating to the Buccinasco photovoltaic plant, amounting to 36,746 kg of CO2-eq.

NOVOTEX

DIRECT AND INDIRECT GREENHOUSE GAS EMISSIONS CAUSED BY THE **ORGANISATION'S ACTIVITIES COIM**

Type of consumption	2020	
Scope 1 Scope 2 - Location Based	91 tonnes CO ₂ eq 320* tonnes CO ₂ eq	1 47
TOTAL Scope 1 + Scope 2	411 t CO ₂ eq	5

*The Scope 2 value includes CO2-eq. savings in relation to the photovoltaic plant, amounting to 49,200 kg of CO2-eq. for the year 2020, and 52,007 kg of CO2-eq. for the year 2021.

With respect to the absence of a production facility, NOVOTEX's carbon footprint is definitely less significant.

THE FIGURE FOR CO, SAVINGS IS SIGNIFICANT DUE TO THE PRESENCE OF THE PHOTOVOLTAIC PLANT DESCRIBED PREVIOUSLY.

This demonstrates NOVOTEX's commitment to the environment and tackling climate change.

2021

- .520 tonnes CO eq
- 71* tonnes CO_geq

.691 t CO eq

2021

112 tonnes CO_geq 75* tonnes CO_eq

587 t CO eq

Local voluntary initiatives to offset emissions:



In 2021, we **planted** more than

of varying type around the company perimeter (land belonging to COIM), further demonstrating our focus on the environment and the area in which we operate.

These plants represent the main resource for cutting emissions (CO2-eq).

FOCUS ON WASTE MANAGEMENT

Waste management has undergone a significant shift since January 2021, at the instigation of the management team.

The Technical Purchasing department handles the selection/sourcing of waste disposal firms directly without intermediary consultation and so reducing costs, after verifying the authorisations and documentation held by the disposal firm and the haulier.

We have therefore implemented a coding system for all types of waste with corresponding characterisation data sheets.

The Health, Safety & Environment department provides crucial support in characterising waste (assigning codes such as CER, ADR etc.).

Continuing the focus on reuse, in 2021 we painted emptied drums that had contained raw materials, in order to reuse rather than dispose of them.

Outlined below are the figures for waste produced in 2021 compared to the previous year.

GRI 306-2 WASTE PRODUCED OVER THE YEAR - COIM

Type of waste	2020
Hazardous waste Non-hazardous waste	7.920 tonnes 3.629 tonnes
TOTAL	11.548 t
% waste produced [t/t produced] % waste recovered [t/t produced] % waste produced WITHOUT PFMP not reusable [t/t produced]	4,4% 1,2% 5,479%

WASTE PRODUCED OVER THE YEAR - NOVOTEX

TOTAL	3490 kg
Hazardous waste Non-hazardous waste	3236 kg 254 kg
Type of waste	2020

WE PAINTED EMPTIED DRUMS THAT HAD CONTAINED RAW MATERIALS, IN ORDER TO REUSE

RATHER THAN DISPOSE OF THEM.









The people who work for the COIM Group have always been viewed as a precious resource. This is why

ENGAGING WITH THEM AND FOCUSING ON THEIR WELLBEING HAS BEEN AN ESSENTIAL PART OF COMPANY POLICY.

We are committed not only to ensuring respect for human rights in all work environments along the entire chain, but also to putting people at the centre of our operations. Indeed the growth of the business has coincided with that of our workers, and their wellbeing enables us to pursue development and improvement objectives.

Team work and the development of talent have been essential to this vision, which is reflected in the personnel recruitment process carried out by our HR department in line with the following procedure:



RECRUITMENT OF NEW RESOURCES

The personnel recruitment process is completely transparent with no fast-track routes. This process is carried out in line with the principles of our Code of Ethics and the Organisation, Management and Control Model as per legislation 231.

We place significant focus on the people we choose to join our team. The aim is always to source personnel with the most suitable profiles and to develop their skills, in consideration of the increasingly evolving requirements of the market and production.

Depending on the defined job profile, the initial screening phase is based on various sources, such as:

- speculative applications;
- CVs received via the company website;
- ➡ applicant CVs submitted by COIM personnel;
- ➡ assessing potential candidates known through work experience opportunities, such as dual workeducation schemes;
- dedicated digital platforms, such as LinkedIn;
- recruitment agencies;
- ⇒ specialist head hunters in the case of key roles.

The initial search and selection procedures result in drawing up a shortlist of applicants followed by interviews.

When new resources are recruited, a map of their skills and knowledge is drawn up, which is then processed via specific software and made available to the relevant managers.

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5.1 HUMAN RESOURCES

The strong and stable relationships that are established with people working at the company are based on a bond of mutual trust, which gets stronger day by day. We are of the belief that relationships with our workers must aim to nurture their development, with an approach that focuses on team work, sharing and communication - three aspects that have always featured in our personnel policy.

2021



COIM + NOVOTEX WORKERS

TOTAL NUMBER OF INTERNAL AND EXTERNAL EMPLOYEES SPLIT BY GENDER

COIM +		2020		2021			
NOVOTEX workforce	Men	Women	Total	Men	Women	Total	
Internal COIM employees	414	47	461	433	45	478	
Internal NOVOTEX employees	17	16	33	19	17	36	
External COIM employees (agency staff)	46	3	49	36	2	38	
TOTAL WORKFORCE	477	66	543	488	64	552	

TOTAL NUMBER OF INTERNAL AND EXTERNAL COIM EMPLOYEES SPLIT BY GENDER

COIM workforce		2020		2021			
	Men	Women	Total	Men	Women	Total	
Internal employees	414	47	461	433	45	478	
External employees (agency staff)	46	3	49	36	2	38	
TOTAL COIM EMPLOYEES	460	50	510	469	47	516	

TOTAL NUMBER OF INTERNAL AND EXTERNAL NOVOTEX EMPLOYEES SPLIT BY GENDER

NOVOTEX workforce		2020		2021			
	Men	Women	Total	Men	Women	Total	
Internal employees	17	16	33	19	17	36	
External employees (agency staff)	0	0	0	0	0	0	
TOTAL NOVOTEX EMPLOYEES	17	16	33	19	17	36	

Given the importance of establishing long-lasting, trusted relationships, we prioritise permanent contracts, which account for 90% of the contracts held by internal personnel. Of the total workforce, external personnel in the form of agency staff account for 7%.



The National Collective Employment Agreement (in Italian CCNL) in force at COIM relates to the chemical industry, whereas that of NOVOTEX relates to commerce. The Group's commitment to developing and engaging with local communities is also reflected in the decision to put senior management personnel in place who are of the same nationality as the location in which the facility is situated.





TOTAL NUMBER OF INTERNAL EMPLOYEES SPLIT BY GENDER AND CONTRACT TYPE

Contract type	2020			2021			
	Men	Women	Total	Men	Women	Total	Total
COIM permanent NOVOTEX permanent	414 17	47 16	461 33	431 18	45 17	476 35	511
COIM temporary NOVOTEX temporary	0 0	0 0	0 0	2 1	0 0	2 1	3
TOTAL (AS IN A)	431	63	494	452	62	514	

TOTAL NUMBER OF INTERNAL EMPLOYEES SPLIT BY GENDER AND CONTRACT TYPE - COIM

Contract type		2020		2021		
	Men	Women	Total	Men	Women	Total
Permanent Temporary	414 0	47 0	461 0	431 2	45 0	476 2
TOTAL (AS IN A)	414	47	461	433	45	478

TOTAL NUMBER OF INTERNAL EMPLOYEES SPLIT BY GENDER AND CONTRACT TYPE - NOVOTEX

C + ++		2020		2021			
Contract type	Men	Women	Total	Men	Women	Total	
Permanent Temporary	17 0	16 0	33 0	18 1	17 0	35 1	
TOTAL (AS IN A)	17	16	33	19	17	36	

		2020		2021				
Full-time / Part-time	Men	Women	Total	Men	Women	Total	Total	
COIM Full-time NOVOTEX Full-time	43117	44 15	458 32	433 19	43 16	476 35	511	
COIM Part-time NOVOTEX Part-time	0 0	3 1	3 1	0 0	2 1	2 1	3	
TOTAL (AS IN A)	431	63	494	452	62	5	14	

TOTAL NUMBER OF EMPLOYEES AND EXTERNAL WORKERSPERSONNEL SPLIT BY GENDER - COIM

		2020		2021			
Full-time / Part-time	Men	Women	Total	Men	Women	Total	
Full-time Part-time	414 0	44 3	458 3	433 0	43 2	476 2	
TOTAL (AS IN A)	414	47	461	433	45	478	

TOTAL NUMBER OF EMPLOYEES AND EXTERNAL WORKERSPERSONNEL SPLIT BY GENDER - NOVOTEX

		2020		2021			
Full-time / Part-time	Men	Women	Total	Men	Women	Total	
Full-time	17	15	32	19	16	35	
Part-time	0	1	1	0	1	1	
TOTAL (AS IN A)	17	16	33	19	17	36	





The diagram shows that almost all contracts are full-time. The reason for this is not only because the relationship established between management and personnel is based on loyalty, but also because the tasks and hours of work required to meet business requirements are difficult to manage on a part-time basis. However, we are assessing the option of extending part-time contracts where the needs of personnel are incompatible with business requirements.



part-time contracts



GRI 401-1A - TOTAL NEW HIRES IN THE YEAR BY AGE - 2021

КРІ	under 30		betwe	between 30 and 50			over 50			TOTAL		
	Men	Women	Tot.	Men	Women	Tot.	Men	Women	Tot.	Tot.	Tot.	Tot.
New hires COIM	15	0	15	19	2	21	3	0	3	37	2	39
New hires NOVOTEX	0	0	0	1	0	1	1	0	1	2	0	2
TOTAL	15	0	15	20	2	22	4	0	4	39	2	41

GRI 401-1B - TOTAL LEAVERS IN THE YEAR BY AGE - 2021 - COIM

KPI	under 30			between 30 and 50			over 50			TOTAL		
	Men	Women	Tot.	Men	Women	Tot.	Men	Women	Tot.	Tot.	Tot.	Tot.
Resignations	1	0	1	4	2	6	1	0	1	6	2	8
Dismissals	0	0	0	0	0	0	3	1	4	3	1	4
Retirement	0	0	0	0	0	0	13	1	14	13	1	14
Death	0	0	0	0	0	0	1	0	1	1	0	1
TOTAL	1	0	1	4	2	6	18	2	20	23	4	27

GRI 401-1B - TOTAL LEAVERS IN THE YEAR BY AGE- 2021 - NOVOTEX

under 30			between 30 and 50			over 50			TOTAL		
en	Women	Tot.	Men	Women	Tot.	Men	Women	Tot.	Tot.	Tot.	Tot.
)	0	0	1	0	1	0	0	0	1	0	1
)	0	0	0	0	0	0	0	0	0	0	0
)	0	0	0	0	0	2	0	2	2	0	2
)	0	0	0	0	0	0	0	0	0	0	0
	0	0	1	0	1	2	0	2	3	0	3
	en)))) 0) 0) 0) 0	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 1 0 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 1 0 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 2 0 0 0 0 0 0 0	0 0 0 1 0 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 1 0 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 2 0 2 0 0 0 0 0 0 0 0 0	0 0 0 1 0 1 0 0 1 0 0 0 0 0 0 0 0 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 2 0 2 2 0 0 0 0 0 0 0 0 0	0 0 1 0 1 0 0 1 0 0 0 0 0 0 0 0 0 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0

NO REPORTS OF DISCRIMINATION WERE **SUBMITTED DURING 2021.**

Nevertheless, to prevent potential situations of prejudice or distress arising, we have introduced procedures and control tools to safeguard and respect all employees as early as the recruitment phase, and all personnel appraisals are carried out on the basis of defined, fully transparent protocols.

TOTAL NUMBER OF NEW HIRES SPLIT BY GENDER AND AGE - COIM

Employees		20	20		2021					
(age)	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total		
Men	1	4	5	10	15	19	3	37		
Women	0	0	1	1	0	2	0	2		

TOTAL NUMBER OF LEAVERS SPLIT BY GENDER AND AGE - COIM

Employees		20	20		2021				
(age)	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total	
Men	2	4	17	23	1	4	18	23	
Women	0	1	0	1	0	2	2	4	

NUMBER OF NEW HIRES SPLIT BY GENDER AND AGE - NOVOTEX

Employees		20	20		2021					
(age)	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total		
Men	0%	3%	3%	6%	0%	14%	0%	14%		
Women	0%	0%	0%	0%	0%	5%	0%	5%		

NUMBER OF LEAVERS SPLIT BY GENDER AND AGE - NOVOTEX

Dipendenti		20	20		2021					
(anni)	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total		
Men	0%	3%	6%	9 %	0%	3%	6%	9 %		
Women	0%	0%	0%	0%	0%	3%	3%	6 %		



PROMOTING DIVERSITY

People are essential for achieving company objectives, and we are committed to preventing all types of discrimination and ensuring equal opportunities for professional development.

Our Group promotes and safeguards respect for people's moral, cultural, physical and professional integrity, and is committed to continually improving all personnel professionally and involving them at all levels, fostering values based on merit, loyalty and team work.

GRI 405-1

TOTAL NUMBER OF EMPLOYEES SPLIT BY PROFESSIONAL CATEGORY, AGE AND GENDER - COIM 2020

Professional	< 30 yea	< 30 years of age		ars of age	> 50 yea	rs of age	T + 1
category	Men	Women	Men	Women	Men	Women	Total
Senior managers	0	0	6	2	19	2	29
Middle managers	0	0	25	3	24	1	53
Non-manual workers	7	2	69	20	14	16	128
Manual workers	31	0	114	0	105	1	251
TOTAL	38	2	214	25	162	20	461

TOTAL NUMBER OF EMPLOYEES SPLIT BY PROFESSIONAL CATEGORY, AGE AND GENDER - COIM 2021

Professional	< 30 yea	ırs of age	30 - 50 ye	ars of age	> 50 yea	rs of age	T . 1
category	Men	Women	Men	Women	Men	Women	Total
Senior managers	0	0	6	1	19	3	29
Middle managers	0	0	29	3	23	1	56
Non-manual workers	9	1	65	19	15	17	126
Manual workers	37	0	124	0	106	0	267
TOTAL	46	1	224	23	163	21	478
IOIAL	40		224	23	105	21	47 0

2021 Personnel by professional category -COIM

At COIM manual workers account for 56% of personnel, followed by non-manual workers at 26%. Middle managers account for 12% and senior managers 6%.

56%

2021 Personnel by age - COIM

With regard to age group, at COIM employees between the age of 30 and 50 account for 52% of the workforce, followed by 38% who are over 50. The remaining 10% are younger, and this age group has increased over the last two years.

52%

30 - 50 YEARS OF AGE



TOTAL NUMBER OF EMPLOYEES SPLIT BY PROFESSIONAL CATEGORY, AGE AND GENDER - NOVOTEX 2020

Professional	< 30 yec	ırs of age	30 - 50 ye	ars of age	> 50 yea	rs of age	T . 1
category	Men	Women	Men	Women	Men	Women	Total
Senior managers	0	0	3	0	3	1	7
Middle managers	0	0	2	2	3	1	8
Non-manual workers	0	1	6	8	0	3	18
Manual workers	0	0	0	0		0	0
TOTAL	0	1	11	10	6	5	33

2021 Personnel by professional category -NOVOTEX

The situation is different at NOVOTEX, as the workforce does not include manual workers because there is no production facility. Nonmanual workers account for 58% of the workforce, followed by middle managers at 28%. Senior managers account for 14% of the workforce.

58% NON-MANUAL WORKERS

TOTAL NUMBER OF EMPLOYEES SPLIT BY PROFESSIONAL CATEGORY, AGE AND GENDER - NOVOTEX 2021

Professional	onal < 30 years		30 - 50 ye	ars of age	> 50 years of age		Texal	
category	Men	Women	Men	Women	Men	Women	Total	
Senior managers	0	0	3	0	2	0	5	
Middle managers	0	0	3	4	2	1	10	
Non-manual workers	0	1	9	8	0	3	21	
Manual workers	0	0	0	0	0	0	0	
TOTAL	0	1	15	12	4	4	36	

2021 Personnel by age - NOVOTEX

As shown in the diagram, at NOVOTEX most employees (75%) are 30-50 years old.

75%

30 - 50 YEARS OF AGE

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EMPLOYEES BELONGING TO PROTECTED CATEGORIES - COIM



The Cremona facility has 9 employees with disabilities, 16 classed under the partial exemption mechanism, and 1 categorised as per Convention article 11 of the Italian legislation on protected categories.

Convention article 14 of the Italian legislation on protected categories applies at the production facility in the province of Lodi, with a type B social cooperative for outsourcing cleaning work to cover 1 position.

At the production facility in the province of Milan, 2 people are classed under the partial exemption mechanism and 2 are categorised as per Convention article 11 of the Italian legislation on protected categories.

ETHICS AND FREEDOM OF ASSOCIATION

Recognising people's diversity as a value and asset is reflected in four focus areas:



Work takes up a large part of our lives, and this is why we strive to make it benefit the personal and professional development of all personnel.

We support the principle of free association of employees, and their right to collective bargaining. We recognise the importance of union organisations, and are committed to respecting their activities and engaging with them as required.

At COIM, relationships with unions and trade union representatives are ongoing, and involve general informal meetings on company progress and any specific topics. The personnel management team handles and coordinates relationships with unions. In 2021, there were 42 trade union members.

In 2021, 11 union representatives were elected, all male, 8 of them at the Offanengo facility and 3 in San Martino.

AND THIS IS WHY WE STRIVE TO MAKE **IT BENEFIT THE PERSONAL AND** PROFESSIONAL DEVELOPMENT

of all personnel.

WORK TAKES UP A LARGE PART OF OUR LIVES,

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PROMOTING COMPANY WELLBEING

Outlined below are other initiatives we have put in place to improve people's wellbeing.

NURSERY

We contributed to the construction of a nursery in the district of Offanengo and entered into an agreement that enables our employees to use it at a subsidised rate.

COMPANY BENEFITS PLAN

If employees choose to join the company benefits plan (allocating a percentage of the voluntary participation premium), COIM will add another 10%.

TAX SUPPORT AND LEGAL ADVICE SERVICES

Every year, we offer our employees free professional support to complete their tax return and tax deduction documents. We have also signed an agreement for tax support services for employees and their partners. Furthermore, the company offers employees a legal advice service provided by Studio Tagliaferri e Associati. This service is free of charge unless deeds and/or documents need to be drawn up (letters, injunctions, appeals, summons, statements, communication with the judicial or public safety authorities etc.). If one of these documents is required, employees and their partners can benefit from reduced fees.

TRAINING

In addition to these benefits we are also committed to training. Growing as a business means enabling people and their skills to grow, by fostering a constructive team spirit starting with a focused induction process for new hires joining our team.

5.2.1 **PROFESSIONAL DEVELOPMENT**

Our personnel recruitment policies apply criteria of merit and the advancement of ability, skills and potential of each individual through continuous learning, the delivery of training and mentoring for new hires.

To adapt the professional skills of employees to technological progress and the latest market requirements, we provide training and refresher courses for all employees concerned.

Personnel training information is entered into the relevant software by the HR or HSE teams as appropriate, to ensure each employee's CV is up-to-date.

All training documentation is kept by HR or HSE as appropriate, for at least 10 years following the course completion date.

HOURS OF TRAINING PER YEAR BY PROFESSIONAL CATEGORY AND GENDER - COIM

Prof.		2020		2021			
category	Men	Men Women Total		Men	Total		
Senior managers	254,5	79,5	334	208	79	287	
Middle managers	465,5	96,5	562	1031	157	1188	
Non-manual workers	972	496	1468	1772	444	2216	
Manual workers	1954,5	0	1954,5	3553	0	3553	
TOTAL	3646,5	672	4318,5	6.564	680	7.243	

AVERAGE HOURS OF TRAINING PER YEAR BY EMPLOYEE - COIM

Prof.		2020		2021			
category	Men	Women	Total	Men	Women	Total	
Senior managers	10	20	30	8	20	28	
Middle managers	9	24	33	20	39	59	
Non-manual workers	11	13	24	20	12	32	
Manual workers	8	0	8	13	0	13	
TOTAL	38	57	95	61	71	132	

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HOURS OF TRAINING PER YEAR BY PROFESSIONAL CATEGORY AND GENDER - NOVOTEX

Prof.		2020			2021			
category	Men	Women	Women Total		Men Women			
Senior managers	0	0	0	0	0	0		
Middle managers	41	41,5	82,5	171	96	267		
Non-manual workers	146,5	30	176,5	316,5	0	316,5		
Manual workers	0	0	0	0	0	0		
TOTAL	187,5	71,5	259	487,5	96	583,5		

AVERAGE HOURS OF TRAINING PER YEAR BY EMPLOYEE - NOVOTEX

Prof.		2020		2021			
category	Men	Women	Total	Men	Women	Total	
Senior managers	0	0	-	0	0	-	
Middle managers	8,2	13,8		34,2	19,2		
Non-manual workers	24,4	2,7		35,2	0		
Manual workers	-	-	-	-	-	-	
TOTAL	32,6	16,5	-	69,4	19,2	-	

As can be observed in the table, the number of hours of training was lower in 2020 due to the restrictions resulting from the Covid-19 pandemic. Training is planned according to the following requirements:

STANDARD INFORMATION AND TRAINING FOR NEW HIRES

- ➡ JOB-SPECIFIC TRAINING FOR NEW HIRES
- TRAINING IN RESPONSE TO SIGNIFICANT CHANGES (E.G. RESPONSIBILITIES OR DEPARTMENT)
- ➡ TRAINING IN THE CASES STIPULATED BY LEGISLATION
- ➡ SPECIALISATION AND PROFESSIONAL DEVELOPMENT



Training is categorised as follows:

1.	
	NOT LEGA BROKE
	developn (linguistic, use
COMPULSORY (HSE)	developı (leadershi
	webinars, (e.g.
	job-sr

Through annual membership of professional development schemes, such as Fondimpresa and Fondirigenti, **we are able to access qualification and training courses for our employees.** Indeed, we regularly accrue a 'training account' to be used in autonomous training plans or for attending free courses funded in this way on subjects such as technological innovation, business development, safety and the environment in conjunction with trade associations (such as Cremona's industrial association) or training providers.

5. The people-centred approach

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2. ALLY COMPULSORY, EN DOWN INTO:

oment of hard skills use of specific software)

pment of soft skills hip, communication)

s/refresher courses g. on legislation)

specific training

COIM 2020

5.3
HEALTH AND SAFETY
IN THE WORKPLACE

Safeguarding the health and safety of employees is our number one priority. As a result we implement strategies to prevent accidents and occupational diseases by allocating all of the human and financial resources required.

We firmly believe that striving for continuous improvement in all fields, and in relation to OSH in particular, is essential for the success of the Organisation and we intend to pursue this. Therefore, in accordance with the Health & Safety in the Workplace policy, we have established practices with a

HEALTH & SAFETY IN THE WORKPLACE MANAGEMENT SYSTEM THAT COMPLIES WITH **STANDARD ISO 45001:2018**

Using such a management system makes it possible to

DEFINE, MONITOR AND IMPROVE ALL PROCESSES FOR SAFEGUARDING THE HEALTH AND SAFETY OF EMPLOYEES,

distributing the benefits obtained in and outside of the Organisation.

		ecrempioye
KPI	Men	Women
Total no. of deaths due to work- related incidents	0	0
Total no. of serious work-related incidents (excluding deaths) with absence > 40 days	1	0
Total no. of recordable work-related incidents	7	0
Hours worked (standard hours + overtime)	707.327,0	72.405,0
Level of severity [2]	-	-
Index of occupational diseases [3]	-	-
Rate of frequency (Rate of recordable work-related incidents) [1]	-	

		соім	2021				
	Dir	ect employ	ees	Indi			
KPI	Men	Women	Total	Men	Women	Total	TOTAL
Total no. of deaths due to work- related incidents	0	0	0	0	0	0	0
Total no. of serious work-related incidents (excluding deaths) with absence > 40 days	1	0	1	0	0	0	1
Total no. of recordable work-related incidents	4	0	4	0	0	0	4
Hours worked (standard hours + overtime)	730.946,0	72.099,0	803.045,0	-	-	79.807,9	882.852,9
Level of severity [2]	-	-	-	-	-	-	0,17
Index of occupational diseases [3]	-	-	-	-	-	-	0,00
Rate of frequency (Rate of recordable work-related incidents) [1]	-	-	-	-	-	-	4,53

*Rate reported on millions of hours worked

*The accident rate was calculated as the relationship between the total number of accidents and the total hours worked, using a multiplication factor of 1,000,000

*SI: severity index (number of days of accidents/hours worked * 1000) * PD: no. of confirmed professional diseases per million of hours worked

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NOVOTEX 2020										
KPI	Dir	rect employe	ees	Ind						
	Men	Women	Total	Men	Women	Total	TOTAL			
Total no. of deaths due to work- related incidents	0	0	0	0	0	0	0			
Total no. of serious work-related incidents (excluding deaths)	0	0	0	0	0	0	0			
Total no. of recordable work-related incidents	0	0	0	0	0	0	0			
Hours worked (standard hours + overtime)	27.497,0	20.597,0	48.094,0	0,00	0,00	0,00	48.094,0			

NOVOTEX 2021							
	Direct employees		Indirect employees				
KPI	Men	Women	Total	Men	Women	Total	TOTAL
Total no. of deaths due to work- related incidents	0	0	0	0	0	0	0
Total no. of serious work-related incidents (excluding deaths)	0	0	0	0	0	0	ο
Total no. of recordable work-related incidents	0	0	0	0	0	0	ο
Hours worked (standard hours + overtime)	31.444,0	26.890,0	58.334,0	0,00	0,00	0,00	58.334,0

*Rate reported on millions of hours worked

Prevention is the most effective tool for safeguarding health and eliminating accidents. For this reason we are committed to continually providing employees with safety information and training.

As soon as new hires are recruited, they receive intensive training on the risks and hazards (e.g. chemical risks) inherent in production processes.

➡ OCCUPATIONAL MEDICINE

Every production facility has company doctors on site, as stipulated in legislation. This safety measure is accompanied by a health protocol that identifies the task of each employee and establishes the compulsory checks that each person must undergo and how often.

In addition to accident prevention, the main aim of the plan is to define a procedure for responding to any emergencies, which defines roles, responsibilities and tasks of each department, in order to tackle issues in the most appropriate manner.

	THE LAST TW ALLOCATED TO PERSONNEL R FAC
THE COMPANY DOCTOR IS ON SITE	
AT THE OFFANENGO FACILITY	EMPLOYEES
TWICE A WEEK	MEDICAL SUPE
	BY THE COM
	ADDITIONA
	WHICH WILL
	COMPANY

➡ ONGOING MANAGEMENT OF THE PANDEMIC

During 2021 we kept the Covid-19 containment actions put in place, restricting movement on site and access to communal areas as much as possible. In addition to social distancing, we extended the use of PPE such as masks and gloves for employees and visitors, as well as sanitising work stations daily and allowing people to work from home.

At the company every preventative action was of fundamental importance for safeguarding our employees and the surrounding community.

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VO HOURS ON SITE IS O APPOINTMENTS FOR REQUIRING A FACE-TO-ACE SESSION

CAN INTEGRATE THE ERVISION ESTABLISHED APANY DOCTOR WITH AL INVESTIGATIONS, L BE COVERED BY THE Y (E.G. BLOOD TESTS).

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Having ascertained the persistence of the pandemic and the need to be fully protected as quickly as possible,
IN DECEMBER 2021 WE ORGANISED
A VACINATION
A VACINATION
CAMPAGINATION
CAMPAG

This campaign was organised in the vaccination hub in Cremona, and was directed at anyone due to have their third dose of the vaccine.



EXTERNAL COMMUNITY-FOCUSED INITIATIVES

The main production facility, and the first to be established, is in Offanengo, a small district with about 6,000 inhabitants in the province of Cremona. **Since its early years we have represented a point of reference and a source of work for families in the area.** Most of the employees in Offanengo live in the same or nearby districts. This is why we have always focused on initiatives of social benefit in the area, and every year we allocate financial resources in the form of donations or sponsorships to support events by organisations, non-profit associations and authorised charities.

Donations and sponsorships may be for social, cultural, artistic or sporting events and initiatives. These initiatives, such as the Grest summer schools or sports tournaments (football, tennis, volleyball), often involve our employees' children, who get the chance to play sport and have fun in their own area.

Requests for sponsorship are assessed and approved by our BoD, which checks the ethical integrity of the projects and prioritises those with a social-humanitarian aspect.

For example, we place special emphasis on local associations that support children with disabilities using hydrotherapy, or volunteers who support families in handling the day-to-day life of autistic children or children affected by other cognitive issues.

Similar consideration is also given to amateur sports **organisations that promote sport** as a way of bringing children together, with football, tennis and volleyball tournaments. Many of the sporting events are named after our company, as in the COIM S.p.A.

Tournament organised by a non-profit sports organisation in Offanengo, which brings together young people in the area for sport and educational purposes. Another event worthy of mention is the **local football championship**, whose matches are played on Offanengo's council sports pitch, named in memory of Mario Buzzella.

POINT OF REFERENCE AND A SOURCE OF WORK FOR FAMILIES

DONATIONS AND SPONSORSHIPS

SPECIAL EMPHASIS ON LOCAL ASSOCIATIONS THAT SUPPORT CHILDREN WITH DISABILITIES

NON-PROFIT SPORTS ORGANISATION SPONSORSHIP



RELATIONSHIPS WITH EDUCATIONAL ESTABLISHMENTS

R&D WITH SCHOOLS AND UNIVERSITIES

We support young people by collaborating with schools and universities through our R&D department.

MIDDLE SCHOOLS

Except for when activities were suspended due to the pandemic, second-year students can work on laboratory activities alongside our personnel (e.g. pH and titration experiments normally carried out in company laboratories).

The laboratory is in Offanengo and is named after Cesare Zocchi, founder of COIM along with Mario Buzzella. Planned visits of the production facility are organised for thirdyear students.

HIGH SCHOOLS

Currently the main collaboration is with the Galileo Galilei High School in Crema and involves dual work-education schemes and work experience opportunities that last several weeks. During this time students are able to become familiar with the working environment and learn directly in the company. Company policy requires the students to be over 18 with no subject fails. The facility can also be visited for post-diploma careers guidance purposes on request.

Our collaboration with high schools is also structured to support specific post-diploma courses on cosmetics, energy efficiency etc. In such cases, some of our employees are happy to act as lecturers, and we take 1-2 students onto our work experience scheme.

We also work closely with employment agencies, which organise career guidance pathways for young people.



➡ UNIVERSITIES

We collaborate with numerous Italian and foreign universities and research organisations, including Milan Polytechnic, Turin Polytechnic, Venice University, Parma University, the National Research Council's Area di Ricerca Napoli 3 in Pozzuoli, and the Dresden polymer research institute.

We also collaborate with students with requests regarding three-year or specialist theses for their courses. With regard to work experience offers, we use the public announcements on the placement platforms of many universities (Cattolica, Milan University, the Polytechnic, Bocconi, etc.).

In collaboration with the Orientagiovani association of Crema, we attend university career sessions which enable young people to engage directly with our personnel and give us their CV.

Finally, we provide support through various study grants, split into two macro categories:

- COIM COMPANY GRANT IN LINE WITH COMPANY AGREEMENTS (DECIDED) AND FUNDED BY COIM):
- GENERAL GRANT FOR EMPLOYEES' CHILDREN (HIGH SCHOOLS)
- STEM SKILLS GRANT FOR FEMALES (EMPLOYEES' DAUGHTERS)
- APPLICATIONS FOR GRANTS MADE AVAILABLE BY TRADE ASSOCIATIONS, WHICH CAN BE SUBMITTED BY OUR EMPLOYEES' CHILDREN



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Università Ca'Foscari Venezia







Sustainability is a challenge that can be transformed into excellence thanks to the research and development of innovative solutions, and an ongoing focus on everyone involved in the life of the company.

At COIM, we therefore view it as a generator of opportunities, not to mention a value for people as well as the environment.

A SET OF ACTIONS TO BE IMPLEMENTED IN THE NEXT TWO YEARS IN RELATION TO THE GOALS OF THE UN 2030 AGENDA,

and the results will be illustrated in the next Sustainability Report.

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To achieve our objectives we have defined



FUTURE GOALS

➡ ENVIRONMENTAL



LIFE CYCLE ASSESSMENT (LCA)

Extension of courses for developing software skills (the courses were already delivered in 2022 to 11 laboratory technicians and 2 staff members from the regulatory department) to prepare internal resources for carrying out the LCA for

different product lines, with increased awareness of the impact on the environment and people's health generated by individual products; further implementation of the data collection process relating to various raw materials (initiated in 2020) by involving the supply chain.

LCA Context 2022: during 2022 we shared various LCAs on customer request (mainly carbon footprint) or carried out some LCAs (concerning a few verified situations) to compare synthetic and alternative bio-based products to assess the extent of the reduction in environmental impact. Our LCAs are certified and, in some cases, details on raw materials are sourced from literature (databases) or based on estimates, as specified in the report we send communicating the results.

This is mainly due to the fact that some suppliers have not yet incorporated this type of assessment into their system, which means that we are unable to source the data we need. Our efforts to raise the awareness of these suppliers so that they use these assessment tools is ongoing, but we cannot currently guarantee timescales or LCAs that are in line with international standards for customers.



GHG

We will be asking our suppliers for data on their emissions to calculate the Scope 3 value, which considers emissions linked to the entire supply chain. The Scope 3 calculation is complex and time-consuming, especially for large companies. As a

result, we will be initiating a gradual process that assists in achieving this objective. The ultimate aim is to report a Cradle-to-Gate figure (the same system of limits used for the LCA), including at site level.



WASTE

The main improvement action concerns the capacity of the plant for the Process Water Concentrator (PWC) (see section 4.2.1.). In February 2022, we commenced work to upgrade the plant, to improve the yield of recovered glycols and further

reduce the amount of esterification water for disposal









WATER

increased. We are proactively seeking solutions to help us further reduce this consumption as, even though we have made considerable savings in terms of water withdrawn and discharged (thanks to the recovery system), the amount of This is a priority objective for us. We are working directly with SA), which has a much lower level of consumption than the tion setup is similar to our own. We expect this consultation to

water we consume is still very high. This is a priority objective for us. We are working directly with the American subsidiary (COIM USA), which has a much lower level of consumption than the Italian site, even though the production setup is similar to our own. We expect this consultation to result in major improvements in terms of limiting consumption.

ENERGY



Identification of high consumption areas and determination of reduction targets; installation of meters in the northern section (the southern section already has them) for detailed consumption monitoring.

Activation of photovoltaic panels (already installed) at the Offanengo site.

➡ SOCIAL: PERSONNEL



Personnel training, delivering courses on ethical/environmental/human rights and other topics. We have already provided training on our Code of Ethics and the idea is to bring it to the fore again, even more so due to the Covid pandemic, which meant that some activities were postponed.



Improve communication between the company and its employees, including through the creation of a special app for company communications.

We earmark financial resources for environmental, social and governance aspects in line with set objectives. The most significant investments are assessed on a case-by-case basis and analysed according to company requirements, in full compliance with company policy and responsible growth targets.

There is a long road ahead and processes undergo continuous improvement, but we are of the firm belief that we will achieve our intention to balance current needs with those of future generations.







➡ REPORTING CRITERIA, STANDARDS AND OBJECTIVES

This Sustainability Report represents the first tool for providing stakeholders with the results of our journey towards sustainability on an annual basis.

Details on the content within the scope of the 2021 Sustainability Report are shown in the section Reporting Scope & Period Analysed.

This report has been drawn up in line with the Sustainability Reporting Standards published in 2016 by the Global Reporting Initiative - GRI (as per the Core option). Note that all reported GRI indicators refer to the version published in 2016, except for indicator 403, which refers to the 2018 version, and indicator 306, which refers to the 2020 version.

GRI indicators were chosen by considering the importance of the various material topics for the company. The scope of the reporting content was chosen on the basis of the results of an initial Materiality Analysis, which enabled us to define relevant material aspects for COIM, the subsidiary NOVOTEX, and their stakeholders, and which is contained within the Materiality Matrix.

The references to GRI Standards are shown in the final table of indicators.

➡ REPORTING SCOPE & PERIOD ANALYSED

The information in this document refers to 31.12.2021 and concerns the previous year, 2020.

Estimates were used as little as possible to ensure the reliability of the information. Any estimates made have been suitably highlighted and are based on the best available methods.

For further information and suggestions relating to the COIM Sustainability Report send an e-mail to regulatory@coimgroup.com.

This document is also available on the website at <u>https://www.coimgroup.com.</u>

SUSTAINABILIT REPORTING STANDARDS PUBLISHED IN 2016 BY THE GLOBAL REPORTING INITIATIVE.

his report has been drawn up in line with the



The table below shows the list of indicators reported in this Sustainability Report. **Reference to the relevant section is shown for each GRI indicator.** If the value or information is not contained in the text a description of the indicator is provided.

GRI STANDARD	DISCLOSURES	PAGE NUMBER/NOTES	OMISSION
GRI 102 - GEN Organisatioi	NERAL DISCLOSURES (2016) NAL PROFILE		
102-1	NAME OF THE ORGANISATION	COIM S.p.A. NOVOTEX ITALIANA S.p.A.	
102-2	ACTIVITIES, BRANDS, PRODUCTS AND SERVICES	Pages 24-25	
102-3	LOCATION OF HEADQUARTERS	Pages 30-31	
102-4	LOCATION OF OPERATIONS	Pages 30-31	
102-5	OWNERSHIP AND LEGAL FORM	Page 35	
102-6	MARKETS SERVED	Pages 40-42	
102-7	SCALE OF THE ORGANISATION	Page 11, Page 31	
102-8	INFORMATION ON EMPLOYEES AND OTHER WORKERS	Page 11, Pages 86-91	
102-9	SUPPLY CHAIN	Pages 56-59	
102-10	SIGNIFICANT CHANGES TO THE ORGANISATION AND ITS SUPPLY CHAIN	There were no significant changes	

GRI STANDARD	DISCLOSURES	PAGE NUMBER/NOTES	OMISSION
102-11	PRECAUTIONARY PRINCIPLE	Pages 37-38	
102-12	EXTERNAL INITIATIVES	Pages 109-111	
102-13	MEMBERSHIP OF ASSOCIATIONS	Page 49	
102-14	STATEMENT FROM A SENIOR DECISION-MAKER	Letter to Stakeholders Page 10	
102-16	VALUES, PRINCIPLES, STANDARDS AND NORMS OF BEHAVIOUR	Page 38	
102-18	GOVERNANCE STRUCTURE	Pages 33-35	
102-40	LIST OF STAKEHOLDER GROUPS	Page 15	
102-41	COLLECTIVE BARGAINING AGREEMENTS	Page 88	
102-42	IDENTIFYING AND SELECTING STAKEHOLDERS	Page 15	
102-43	APPROACH TO STAKEHOLDER ENGAGEMENT	Page 15	
102-44	KEY TOPICS AND CONCERNS RAISED	Pages 16-19	

GRI STANDA	RD DISCLOSURES	PAGE NUMBER/NOTES	OMISSION
REPORTING	PRACTICES		
102-45	ENTITIES INCLUDED IN THE CONSOLIDATED FINANCIAL STATEMENT	COIM S.p.A. NOVOTEX ITALIANA S.p.A.	
102-46	DEFINING REPORT CONTENT AND TOPIC BOUNDARIES	Page 9	
102-47	LIST OF MATERIAL TOPICS	Page 17	
102-48	RESTATEMENTS OF INFORMATION	N/A	
102-49	CHANGES IN REPORTING	N/A	
102-50	REPORTING PERIOD	2021	
102-51	DATE OF MOST RECENT REPORT	N/A	
102-52	102-52 REPORTING CYCLE	Annual	
102-53	CONTACT POINT FOR QUESTIONS REGARDING THE REPORT	Explanatory Notes	
102-54	CLAIMS OF REPORTING IN ACCORDANCE WITH THE GRI STANDARDS	Explanatory Notes	
102-55	GRI CONTENT INDEX	Content index	

GRI STANDAI	
GRI 200 - I	CIFIC STANDARDS ECONOMIC SERIES (2016) CUREMENT PRACTICES
	NAGEMENT APPROACH (2016) CUREMENT PRACTICES (2016)
204-1	PROPORTION OF SPENDING ON LOCAL SUPPLIERS
TOPIC: ANTI	-CORRUPTION
	NAGEMENT APPROACH (2016) I-CORRUPTION (2016)
205-3	CONFIRMED INCIDENTS OF CORRUPTION AND ACTIONS TAKEN
TOPIC: ANTI	-COMPETITIVE BEHAVIOUR
	AGEMENT APPROACH (2016) I-COMPETITIVE BEHAVIOUR (2016) LEGAL ACTIONS FOR ANTI-
206-1	COMPETITIVE BEHAVIOUR, ANTI-TRUST AND MONOPOLY PRACTICES
	RONMENTAL SERIES (2016)
GRI-103: MAN GRI-103: MAN GRI 301: MAT	AGEMENT APPROACH (2016)
301-1	MATERIALS USED BY WEIGHT OR VOLUME
TOPIC: ENER	RGY
GRI-103: MAN GRI 302: ENEI	NAGEMENT APPROACH (2016) RGY (2016)
	ENERGY CONSUMPTION WITHIN THE

ORGANISATION

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Pages 56-57

No confirmed cases of corruption recorded in 2021

No legal actions for anti-competitive behaviour, anti-trust or monopoly practices were recorded in 2021

Pages 52-51

Pages 73-77

GRI STANDARD	DISCLOSURES	PAGE NUMBER/NOTES	OMISSION
TOPIC: WATER			
	GEMENT APPROACH (2016) GEMENT APPROACH (2018)		
303-1	INTERACTIONS WITH WATER AS A SHARED RESOURCE	Pages 68-69	
303-2	MANAGEMENT OF WATER DISCHARGE-RELATED IMPACTS	Page 68	
GRI 303: WATER (2018)		
303-3	WATER WITHDRAWAL	Page 70	
303-4	WATER DISCHARGE	Page 71	
TOPIC: EMISSIONS GRI-103: MANAGEMENT APPROACH (2016) GRI 305: EMISSIONS (2016)			
305-1	DIRECT GHG EMISSIONS (SCOPE 1)	Pages 78-79	
305-2	ENERGY INDIRECT (SCOPE 2) GHG EMISSIONS	Pages 78-79	
TOPIC: WASTE			
GRI-103: MANAG GRI 306: WASTE (EMENT APPROACH (2016) 2020)		
306-3	WASTE GENERATED	Page 81	

RONMENTAL COMPLIANCE (2016)
NON-COMPLIANCE WITH ENVIRONMENTAL LEGISLATION AND STANDARDS
AL SERIES (2016) OYMENT
IAGEMENT APPROACH (2016) OYMENT (2016)
NEW EMPLOYEE HIRES AND EMPLOYEE TURNOVER
TH & SAFETY IN THE WORKPLACE
UPATIONAL HEALTH & SAFETY (2018)
OCCUPATIONAL HEALTH & SAFETY (2018)
OCCUPATIONAL HEALTH AND SAFETY
OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM HAZARD IDENTIFICATION, RISK ASSESSMENT AND INCIDENT

PAGE NUMBER/NOTES

OMISSION

No fines or non-monetary penalties were recorded in 2021 for failing to comply with environmental legislation or regulations	
Page 92	
Page 104	
Page 104	
Page 107	
Page 103, Page 107	
Pages 105-106	

GRI STANDA	RD DISCLOSURES	PAGE NUMBER/NOTES	OMISSION
TOPIC: TRAI	NING		
	NAGEMENT APPROACH (2016) INING (2016)		
404-1	AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE	Pages 101-102	
TOPIC: DIVE	ERSITY AND EQUAL OPPORTUNITY		
	NAGEMENT APPROACH (2016) ERSITY AND EQUAL OPPORTUNITY (2016)		
405-1	DIVERSITY OF GOVERNANCE BODIES AND EMPLOYEES	Pages 87-91, Pages 93-98	
TOPIC: NON	N-DISCRIMINATION		
GRI-103: MAI	N-DISCRIMINATION NAGEMENT APPROACH (2016) N-DISCRIMINATION (2016)		
GRI-103: MAI	NAGEMENT APPROACH (2016)	No reports of discrimination were recorded during 2021	
GRI-103: MAI GRI 406: NOI 406-1	NAGEMENT APPROACH (2016) N-DISCRIMINATION (2016)	recorded during 2021	
GRI-103: MAI GRI 406: NOI 406-1 TOPIC: ASSE GRI-103: MAI	NAGEMENT APPROACH (2016) N-DISCRIMINATION (2016) INCIDENTS OF DISCRIMINATION AND CORRECTIVE ACTIONS TAKEN	recorded during 2021	
GRI-103: MAI GRI 406: NOI 406-1 TOPIC: ASSE GRI-103: MAI	NAGEMENT APPROACH (2016) N-DISCRIMINATION (2016) INCIDENTS OF DISCRIMINATION AND CORRECTIVE ACTIONS TAKEN ESSMENT OF RESPECT FOR HUMAN RIC NAGEMENT APPROACH (2016)	recorded during 2021	
GRI-103: MAN GRI 406: NON 406-1 TOPIC: ASSE GRI-103: MAN GRI 412: HUM 412-2	NAGEMENT APPROACH (2016) N-DISCRIMINATION (2016) INCIDENTS OF DISCRIMINATION AND CORRECTIVE ACTIONS TAKEN ESSMENT OF RESPECT FOR HUMAN RIC NAGEMENT APPROACH (2016) MAN RIGHTS ASSESSMENT (2016) EMPLOYEE TRAINING ON HUMAN	recorded during 2021 GHTS No specific training on human rights topics	
GRI-103: MAI GRI 406: NOI 406-1 TOPIC: ASSE GRI-103: MAI GRI 412: HUM 412-2 TOPIC: CUS GRI-103: MAI	NAGEMENT APPROACH (2016) N-DISCRIMINATION (2016) INCIDENTS OF DISCRIMINATION AND CORRECTIVE ACTIONS TAKEN ESSMENT OF RESPECT FOR HUMAN RIGHTS ASSESSMENT (2016) MAN RIGHTS ASSESSMENT (2016) EMPLOYEE TRAINING ON HUMAN RIGHTS POLICIES OR PROCEDURES	recorded during 2021 GHTS No specific training on human rights topics	

TOPIC: CUS	TOMER PRIVACY	
GRI-103: MANAGEMENT METHODS (2016) GRI 418: CUSTOMER PRIVACY (2016)		
418-1	SUBSTANTIATED COMPLAINTS CONCERNING BREACHES OF CUSTOMER PRIVACY AND LOSSES OF CUSTOMER DATA	
TOPIC: SOC	IOECONOMIC COMPLIANCE	
	NAGEMENT METHODS IOECONOMIC COMPLIANCE (2016)	
419-1	SUBSTANTIATED COMPLAINTS OR PENALTIES REGARDING NON- COMPLIANCE WITH LAWS AND REGULATIONS IN THE SOCIAL AND ECONOMIC AREA	

DISCLOSURES

PAGE NUMBER/NOTES

OMISSION

No complaints concerning breaches of customer privacy were recorded in 2021

Fines COIM received in 2021 for EUR 3,931.59 and in 2020 for EUR 1,880.58; these were for delays in paying various taxes and duties (accounting journal duties, amendments to IMU, IRES, IRAP (production, income and council taxes)

We would like to thank everyone who was actively involved in drawing up THE FIRST SUSTAINABILITY REPORT FOR COIM S.P.A. AND NOVOTEX ITALIANA S.P.A.

Giuseppe Librandi C.E.O. C.O.I.M. S.p.A.

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