



# COMMUNICATION ON PROGRESS YEAR 2019

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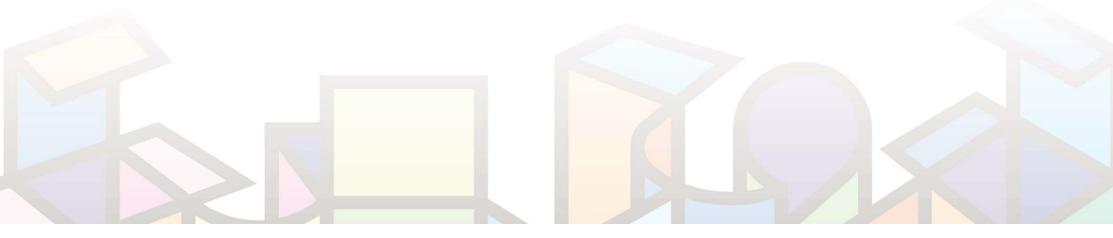
What is the Global Compact and why join it?



Our vision and the integration of the 10 principles into the group's strategy



Description of the actions implemented on the 10 principles



# What Global Compact is and why we joint it?





The world's largest corporate sustainability initiative and an organization from the United Nations.



A call to companies to align strategies and operations with universal principles on human rights, labour, environment and anti-corruption, and take actions that advance societal goals.

Joining the Global Compact means sharing the conviction that business practices - based on a number of universally recognized principles - will contribute to the emergence of a more stable, fairer, more open world market and prosperous and dynamic societies .

We believe it is our way.

# The commitment letter from the group C.E.O

Pusterla 1880 SpA Via Pusterla, 4, 21040 Venegono Inferiore VA, Italia

H.E. António Guterres Secrétaire Général Nations Unies New York, NY 10017 USA

Venegono Inferiore, 2019/12/11

Dear Mr. Secretary-General,

I am pleased to confirm that Pusterla 1880, as well as all the company in the group, renew their commitment to supports the Ten Principles of the United Nations Global Compact t on human <u>rights</u>, labor law, environmental protection and the fight against corruption.

We also express our full involvement on implementing those principles in our business area. We are committed to make the UN Global Compact and its principles part of our company's strategy, its culture and its operating methods.

We also undertake to make a clear and public statement on this subject and to inform our employees, our business partners and our customers.

In our spirit of responsibility and transparency, we will make public the results of our actions in favor of the correct application of the ten principles of the Global Compact thanks to our Communication on Progress that we write each year.

Here you will find our Communication on Progress.

Sincerely yours,

Signature:

Roberto MARINI Chief Executive Officer



# Our vision and the integration of the 10 principles into the Group's strategy





Pusterla 1880 formalized its global CSR strategy in 2018 based on its own culture from the origin of the group in northern Italy at the end of the 19th century and set out the vision for the century to come! We have a long and rich history that we want to continue for a very long time and leave our children and grandchildren a sustainable society.

This strategy is based on the four themes and integrates the 10 principles of the Global Compact.

- 1. Corporate Governance covering the four themes:
- Implementation of a CSR strategy in 2018 including the 17 Global Compact SDG's
- Drafting of the group's Ethical Code in 2019 including the 10 principles of the Global Compact
- All group's entities evaluated and targeted according to **ecovadis**
- 2. Respect for the Environment:
- Group's ambition is to achieve the goal of certifying ISO14001 all factories in a short-term period
- Eco Design is the DNA of our strategy with strong targets on the plastic consumption reduction
- Use of sustainable material source like FSC paper and cardboard
- 3. The Human pillar (Human rights & Labour standard):
- That goes through our actions to fight against social exclusion with our Solidarity Sourcing plan
- Improve employee skills to keep up with our growth and for everyone to find fulfillment in their work
- Guarantee a secure working environment for employees and continuously train them and management to take better account of workplace safety
- 4. Economic topic which is essential to ensure the sustainability of our business and its steady growth, is committed to introduce accurate actions so that economic growth is done harmoniously with other pillars.

#### **Human Rights**

#### Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights

The Group undertakes to apply the laws, conventions and regulations in force in the countries where it is present. In general, it adheres to the principles of the Universal Declaration of Human Rights of 1948, the International Labor Organization (ILO) and in particular the conventions relating to the protection of workers, the prohibition of forced labor and child labor. This commitment appears in its Ethical Code which can be viewed there: <a href="http://www.pusterla1880.com/en/activities/">http://www.pusterla1880.com/en/activities/</a>

#### Principle 2: Make sure that they are not complicit in human rights abuses

Operating historically mainly in Western Europe, the growth of the Pusterla group now leads it to be more in contact with countries at risk in Asia and North Africa. The group ensures that these fundamental principles are strictly applied through external audits SMETA Sedex. All group's entities are recorded on the SEDEX database, questionnaires are completed, and an audit program is settled. For Virojanglor's partners in Asia, they are systematically audited through the SMETA Sedex standard and the improvement action plans are subject to demanding and rigorous monitoring.

All group's companies also had implemented strong processes for the supplier's evaluation including sustainable procurement, and there are Sustainable Purchasing Charters edited.





#### Work

#### Principle 3: Support free association and recognition of collective bargaining

All Companies from Pusterla 1880 Group assures its employees representative institutions of all rights provided for by the laws of the countries in which they operate. Within the group, local directors organize the healthiest and most constructive social dialogue possible in a spirit of dialogue, listening and within the local legislative framework. Therefore social dialogue is above all local management because the economic and human dimensions are significant and all the companies of the group are subject to the obligation, either to have an institution representative of the staff, or to initiate negotiations which are all places of exchange.

Since 2018, factories in the United Kingdom have implemented a harassment alert system and 2020 will see the appearance of an ethics committee responsible for hearing complaints related to poor application of the group's Code of Ethics.

#### Work

#### Principle 4: Eliminate forced labor

This principle of the Global Compact, concerning the group' industrial activities and the countries in which the entities operate, is not entirely relevant. Our activities in 5 countries of the European community is not exposed to the risk of forced labor. However, we are vigilant, and all our entities are under control. The countries that may be exposed to this risk are Tunisia, for which the factory is a very recent acquisition in the group and audits carried out have been positive.

There remains the activity of our Virojanglor entity operating mainly in Asia and in China via a network of subcontractors. The monitoring of the panel of factories via SEDEX Smeta audits and particularly precise and effective monitoring of improvement actions, places us at an exemplary level in terms of social compliance.

#### **Principle 5: Eradicate child labor**

Same as for the Principle 4, our actions to eradicate child labor are mainly focused on the factories out of the European community and are precisely implemented in the same way.

As a reminder, our Ethical Code is also very clear on this topics "Pusterla 1880 prohibits the use of any form of child or forced labour. Pusterla 1880 does not stipulates contracts with suppliers or sub-contractors that make use of it.

Pusterla 1880 forbids to employ persons below the age of 18 in positions involving dangerous work. Moreover, it forbids to hire persons below the age of 16."

#### Principle 6: Elimination of discrimination in respect of employment and occupation

From the Ethical code, it is noticed "Pusterla 1880 offers equal opportunities to all employees based on their professional qualifications and individual skills, with no discrimination of age, religion, ethnic or geographical origins, sexual, political or trade union orientation. Therefore, Pusterla 1880 undertakes to adopt criteria of impartiality, merit, competence and professionalism in any decision concerning work relationships with their employees and collaborators on any basis operating for the company itself in compliance with the current collective bargaining.

The work environment shall conform to reciprocal collaboration and shall favour a team-driven culture respectful of the moral personality of each person, and shall also be devoid of all prejudice, intimidation, illicit conditioning or undue discomfort."

In 2020, clear targets will be discussed concerning the representation of women in management and the equality report settled in France will also be part of this direction.



#### Environment

 $The group \ Pusterla \ 1880 \ has \ a \ voluntary \ and \ ambitious \ approach \ in terms \ of \ respect \ for \ the \ environment.$ 

There are two main axes:

- Control and improvement of the environmental efficiency of our sites by ISO14001 site certification
- Investments for several years in Research & Development to offer our markets and our customers zero plastic boxes, via the Caléco patents



This principle is affecting our activity mainly through the raw material origin like paper and cardboard. Our purchasing policy impose for most of the global volume paper coming from European certified paper Mills with a significant part of this paper which is FSC certified.

#### Principle 8: Undertake initiatives to promote greater environmental responsibility

To produce the boxes and secondary packaging in a clean way, in accordance with all regulations and to stimulate continuous improvement, we launched a global ISO14001 certification plan for our sites. In 2020, half of the group's factories representing more than 60% of production capacity will be certified. It is 3 more factories than in 2019.

This certification process also allows the setting up of environment committees in the entities in order to carry out actions to reduce energy consumption, reduce the volume of non-recycled waste or implement actions to reduce the risks of fire for example.

#### Principle 9: Encourage the development and diffusion of environmentally friendly technologies

We are committed to provide plastic-free products to our markets through our eco-design policy and with the patented concept of tray: This new system, implemented since few years in our rigid boxes, is replacing the plastic-based vacuum formed trays by a cardboard structure and from this year with molded cellulose or cardboard cavities.

Pusterla 1880 group is already the first company from these markets to propose such system and wants to develop the global offer and industrial organization able to produce the greatest volume of boxes not only without plastic but with 100% recycled and recyclable paper and cardboard.



Caleco

#### Anti-Corruption

#### Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

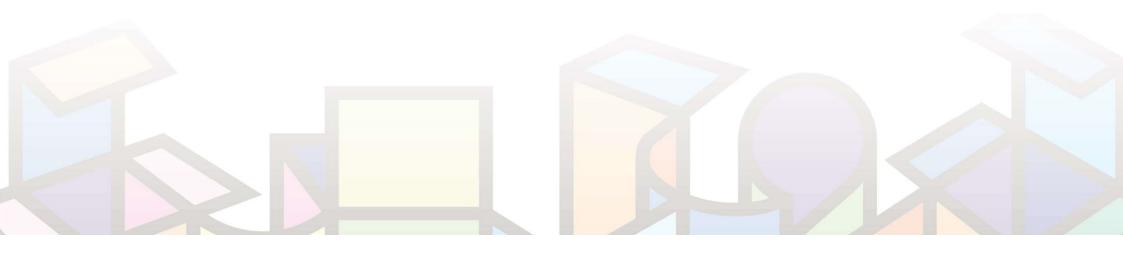
In this area, the Pusterla 1880 Group, as well as all the entities of the group, have implemented a new code of ethics (http://www.pusterla1880.com/en/activities/) and responsible purchasing charters considerably strengthening the rules in different areas. In its business relationships, Pusterla 1880 models itself on and abides by principles of loyalty, fairness, transparency, efficiency and opening to the market, without distinction as to the relevance of the deal. All the actions, operations and negotiations performed and in general the behaviors adopted by people from Pusterla 1880 group in performing their own working activity must conform to the utmost fairness, completeness of information, formal and substantial legitimacy, and clarity and truthfulness of the accounting documents pursuant to the regulations in force and the internal procedures.

Acts of commercial courtesy such as free gifts or forms of hospitality are allowed where they are of modest value and anyway such as not to compromise the integrity or reputation of any party and such as not to be possibly interpreted, by any impartial observer, as aimed at acquiring advantages in an improper way. In any case, this type of expenses must always be authorized by the position defined by the procedures and appropriately documented.

In 2020, a distribution to each of the group's employees will be carried out in order to ensure good knowledge and to commit everyone to respect them. This new document will also appear in the welcome booklet for all new employees.















en France et en Chine depuis 1989