



DOCUMENT OF INTEGRATED POLICIES (ETHICS, QUALITY, ENVIRONMENT, CUSTODY OF FOREST RESOURCES, HEALTH and LABOR SAFETY AND SOCIAL RESPONSIBILITY)

The High Management of Clean Paper Inc, in pursuing its objectives, considers as fundamental values of the organization and as a reference for all the activities, the principles listed below that become an integral part of the policies of the integrated management system adopted by the Company.

1.1. Ethical principles in the conduct of business and corporate activities

Legality

The collaborators (meaning the administrators, the employees and more in general all those who operate on behalf of the High Management of Clean Paper Inc. for any reason and without distinctions and exceptions, also by virtue of mandates or powers of attorney) are required to respect the laws and regulations in force in the countries in which they operate, the Code of Ethics and company rules. In no case the conviction to act in some way for the benefit of the company justifies the adoption of conducts contrasting with the aforementioned regulations.

Integrity

In relations with third parties, the senior management of Clean Paper Inc. undertakes to act in a correct and transparent manner, avoiding misleading information and instrumental behavior to take advantage of other people's weakness or lack of knowledge. In the pursuit of increasing the value of the company and in supporting business development, the top management of Clean Paper Inc. is committed to establishing correct commercial relationships with third parties, lasting relationships with customers and suppliers based on the confirmation of the best conditions respectively practiced and obtained, adequate recognition of the contribution of its employees.

Loyalty

All reports from the top management of Clean Paper Inc. with collaborators and third parties they are informed by the principle of loyalty which consists in the coherence and sense of responsibility in the conduct, enhancement and safeguarding of company assets, good faith in choices and actions.

Transparency

The senior management of Clean Paper Inc. acts and relates to third parties by providing correct, clear and timely information in good faith and according to the specific context.

Respect for dignity and enhancing diversity

The senior management of Clean Paper Inc. respects the rights of the human person, protecting their moral and physical integrity and guaranteeing equal opportunities. No discrimination or harassment based on political and union opinions, religion, race, language, nationality, age, sex, sexual orientation, state of health and generally any intimate characteristic of the human person is permitted. Divergent opinions and differences are a source from which to draw inspiration for reflection and improvement.

Relations with shareholders and valuing the investment



The senior management of Clean Paper Inc takes the necessary steps to ensure that the participation of shareholders in their decisions is fully aware. It works to safeguard and increase the value of the company.

1.2. The ethical principles of work and protection and enhancement of employees

Commitment to improvement

Collaborators undertake to carry out their activities to the best of their professional ability and to improve themselves by taking advantage of the training opportunities offered by the Company.

Confidentiality

The collaborators undertake to treat any information obtained in relation to the performance of the work activity as confidential and therefore not to disclose it except in compliance with the company policy on information security and only to the extent necessary for the proper conduct of their work.

Absence of conflict of interest

The collaborators confirm that every business decision is taken in the interest of the Company, undertaking to avoid any situation of conflict of interest between personal affairs and activities carried out in the fulfillment of their duties for the Company that may affect the judgment and choice.

Safety and protection of health and the work environment

The senior management of Clean Paper Inc. undertakes to maintain a work environment suitable for maintaining the psycho-physical integrity of the collaborators, which therefore favors positivity, assertiveness, ability to work in teams and assumption of responsibility.

Equal opportunities

The professional development and management of employees are based on the principle of equal opportunities. The recognition of the results achieved, the dedication, the professional potential and the skills expressed are the factors considered for career advancement and remuneration.

1.3. Responsibility towards the community

Environmental Protection

The senior management of Clean Paper Inc. promotes initiatives so that the performance of its activity takes place in respect of the external environment.

Responsibility towards the community

The senior management of Clean Paper Inc. it operates in the community of belonging and in the world aware that in the accomplishment of the activity aimed at obtaining the social object, it can contribute to economic, social and civil development.



2.1 Policies on quality, environment, conservation of forest resources, occupational health and safety, corporate social responsibility

The top management of Clean Paper Inc. considers it necessary to maintain the right balance between social, environmental and economic responsibility. In order to favor the achievement of the Company Mission, it has prepared specific policies on the subject of:

Product / process quality

The top management of Clean Paper Inc. pursues the following general lines of quality policy:

1. ensuring customer satisfaction by ensuring that it is guaranteed:
 - to. maintaining the agreed quality levels of the service / product;
 - b. maintaining agreed deliveries;
 - c. the provision of a service appropriate to the needs of the client companies;
2. periodically carry out an analysis of the environment in which it operates in order to monitor the state of competition, prevent the risks associated with it by examining the changes taking place and enhancing strengths and weaknesses with respect to competitors, verifying the opportunity for developing new products and / or services present in order to improve their competitiveness levels in relation to market changes and needs;
3. consolidate and implement the quality standards of the process / products through:
 - to. a constant control of all the phases of realization assured by the consolidated experience in the sector;
 - b. use of the best plant engineering and process management technologies;
4. continue with the continuous updating of the collaborators to enable them to carry out their own activities with awareness in order to guarantee the achievement of the objectives indicated above;
5. operate with a structured Quality Management System, effective and compliant with the standards, aimed at preventing risks and undesired effects, carrying out a punctual and constant analysis of failure to seize the opportunities for development and growth verifying the achievement or not of the defined objectives, with a view to continuous and sustainable improvement of company performance.

Top Management plays a strategic role in the full implementation of this Policy, ensuring the involvement of all workers and those who work with Cartografica Galeotti.

Environment

The Top Management of Clean Paper Inc. considers it necessary to maintain the right balance between social, environmental and economic responsibility, for this reason I manage with particular attention and



rigor the organizational and technical changes linked to new activities or new projects to ensure that the level of environmental protection is maintained and improved over time.

Furthermore, the Top Management constantly promotes the following principles:

- compliance with the laws in force and the applicable regulations as well as other agreements and provisions voluntarily signed by the organization on environmental matters;
- compliance with the environmental objectives set with a commitment to continuous improvement of environmental performance, favoring, where possible, the prevention of pollution;
- attention to research and development of finished products with low environmental impact from a life cycle perspective;
- careful prevention of behaviors that could lead to dangerous situations for the environment or violations of the law;
- the promotion of participation, the involvement of all employees and collaborators in activities related to environmental protection and pollution prevention.

To achieve these results, based on its environmental management system, which has long been integrated with the other quality and safety systems and is currently implemented the 'Alta Direzione firmly promotes the values and principles described above also through the following actions:

1. to monitor the environmental effects deriving from the activity with particular reference to checking the state of conservation of asbestos roofs, aiming at reducing the quantity of waste produced, trying to favor forms of recovery and / or recycling;
2. optimize the use of raw materials, water resources and energy, trying to reduce consumption in particular with the development of innovative systems for energy saving;
3. provide employees with all necessary means and adequate training for the proper performance of their work, keeping them constantly updated on the environmental effects deriving from their type of activity;
4. involve the suppliers of goods and services in such a way as to obtain a common improvement in the reduction of the environmental impact;
5. bring public opinion to the attention of those who are the intent, the results achieved and the environmental policy; this document will be made available to anyone who requests it;
6. periodically review the projects, systems and objectives, in the light of the results of internal audits, technological developments and any changes in the production process and / or current legislation;
7. inform and appropriately sensitize all customers regarding the correct management of the product supplied so that they respect the environment more.

Custody of forest resources



The Top Management of Clean Paper Inc. believes that the development of its activities must take place in compliance with environmental compatibility and the correct use and exploitation of forest resources, thus ensuring that the supply of forest-based raw materials takes place at sustainably managed sources, for this purpose it has adhered to the PEFC™ custody chains (Program for Endorsement of Forest Certification Schemes) and FSC® (Forest Stewardship Council). Furthermore, to obtain these results, the Company believes it must follow the principles summarized below with determination:

1. to operate in compliance with what is stated in this document in compliance with the laws in force and the other agreements and provisions voluntarily signed by our organization regarding the custody of forest resources;
2. monitor the research and evaluation process of the suppliers of raw materials of wood origin necessary for the realization of our products to be sold with the PEFC™ and / or FSC® logo; keep our production process under constant control;
3. to provide our collaborators with all means and adequate and up-to-date training for the proper performance of their work, in order to promote the best involvement in the management of the chain of custody of the products of forest origin used by us;
4. periodically review our projects, systems and objectives, in light of the results of internal audits, technological developments and any changes in the production process and / or current legislation.

The senior management of Clean Paper Inc. guarantees not to be involved in the following unacceptable activities:

1. illegal logging and trade in illegal timber products or forest products;
2. violation of human rights in forest operations;
3. destruction of high conservation values in forest operations;
4. significant conversion of forests into plantations or other non-forest uses;
5. introduction of genetically modified organisms in forest operations;
6. violation of one of the foundations of the ILO Conventions.

Health and Safety in the workplace

The top management of Clean Paper Inc. believes that the protection and improvement of the safety and health of all the employees involved in the production activities of both Divisions, are the primary values of the entire work of the Company; this commitment, promoted by the Management, actively involves all the collaborators according to the correct application of the provisions of the internal management system procedures.

Furthermore, the Top Management constantly promotes the following principles:



- compliance with the laws in force and the applicable regulations as well as other agreements and provisions voluntarily signed by the organization regarding health and safety;
- compliance with the objectives set with a commitment to continuous improvement of health and safety performance in the workplace, favoring prevention where possible;
- careful prevention of behaviors that could lead to dangerous situations for themselves or for others or violations of the law in the sphere of health and safety;
- the promotion of participation, the involvement of all employees and collaborators in accident prevention activities;
- the development of the abilities and skills of the collaborators.

To achieve these results, based on its own health and safety management system in the workplace, which has long been integrated with other quality and environmental systems and is currently implemented in compliance with the requirements of the BS OHSAS 18001: 2007 standard, the Top Management promotes with determination of the values and principles described above also through the following actions:

1. the implementation and maintenance over time of a Safety Management System (SGS) in an integrated form with the Business Organizational model that allows a rigorous planning of health and safety improvement activities;
2. the careful and complete risk assessment that must be reviewed and integrated whenever changes occur in the organization;
3. careful planning of checks and maintenance aimed at maintaining the compliance conditions of machines, systems and structures over time;
4. information, training and updating of all personnel on occupational health and safety issues;
5. a precise definition of the tasks based on a non-hierarchical distribution but "by competence" of the tasks;
6. transparency with regard to public opinion in order to make the intentions, results achieved and health and safety policy known and disseminated to all stakeholders; this document will be made available to anyone who requests it;
7. Periodic review of projects, systems and objectives, in light of the results of internal audits, technological developments and any changes in the process.

Corporate social responsibility

1. The commitment of the senior management of Clean Paper Inc. to comply with all the requirements of the SA8000: 2008 standard and to all those otherwise signed by the company, and in particular to:
 - a. not to admit child labor;
 - b. not to admit forced labor;
 - c. provide a safe and healthy work environment;



- d. respect the freedom of association and the right to collective bargaining;
- is. avoid forms of discrimination;
- f. avoid disciplinary procedures against workers;
- g. respect a working time in compliance with the laws;
- h. guarantee a salary that is not inferior to the standards.

2. the commitment to comply with national laws and other applicable laws and to comply with the international provisions listed in the Standard;

3. the commitment to maintain this effectively documented, implemented, active, communicated and accessible policy in a comprehensible form to all Company collaborators;

4. the commitment to continuous improvement;

5. the commitment to testify and publicly disseminate the ethical and social principles of the company.

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The Integrated Policy is distributed to all the collaborators of Clean Paper Inc., is available to the public and to the institutions and provides the reference framework for establishing and reviewing the objectives and goals of the Integrated Management System.

Madison 28/06/2019

The direction

BOD

A handwritten signature in black ink, appearing to be "BOD" followed by a stylized signature, is written over a horizontal line.