

# NEWCHEM

## SUSTAINABILITY POLICY

### 1. INTRODUCTION

**Newchem S.p.A.** is a well-established company in the **chemical and pharmaceutical sector**, specializing in the production and marketing of active pharmaceutical ingredients (APIs), internationally recognized for the high quality and reliability of its products.

This document represents the Sustainability Policy (hereinafter also "Policy") of Newchem and describes the **principles of sustainability** that the company is committed to apply in conducting an ethical business, in compliance with and respecting the core principles of corporate social responsibility.

This policy integrates the principles that Newchem has set for itself regarding health, safety and environmental issues; These areas are managed through systems that include the assessment of the impacts due to the activity and the setting of objectives with a view to continuous improvement.

The importance of this Policy arises from the need to **share** with the internal reality of Newchem as well as with its stakeholders, the core values on which the company is based, values that define the daily operations of the company and whose observance is required.

The principles listed in this Policy outline the actions to be taken so that the company can contribute to achieving the targets set at international, European and national level regarding sustainable development both of an environmental and social nature.

#### 1.1. Policy objectives

This policy aims to set guidelines for the formulation of strategies and implementing improvement activities, within a process of awareness on sustainability issues that started some years ago.

In particular, the stated principles represent the basis for concretizing the mission and realizing the vision of Newchem, where:

<b>MISSION</b>	<b>VISION</b>
<i>Producing and marketing active ingredients quality pharmaceuticals, acting as one of the more competitive and reliable partners on market for industry in the sector.</i>	<i>Always be connected to the needs of market, investing to produce goods that comply with the regulations and adopt technologies capable of creating products customized, meeting the needs of customers.</i>

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## 1.2. Guiding principles of this Policy

- The 10 principles of the UN Global Compact
- PSCI Principles (Pharmaceutical Supply Chain Initiative)
- The 17 goals of the UN 2030 Agenda
- The standard governing corporate social responsibility ISO 26000
- The Charter of Fundamental Rights of the European Union or the Nice Charter
- The 31 United Nations Guiding Principles on Business and Human Rights (2011)
- Declaration on Fundamental Principles and Rights at Work of the International Labour Organization
- D.lgs. 81/2008 - Consolidated Law on Safety at Work and subsequent amendments
- D.lgs. 152/2006 - Environmental Consolidated Law and subsequent amendments
- National, Community and international instruments and laws such as:
  - the United Nations Universal Declaration of Human Rights;
  - the International Labour Organization's Declaration of Fundamental Principles and Rights at Work (ILO);
  - Convention No. 190 and Recommendation No. 206 on the elimination of violence and harassment at work;
  - the International Covenants.

## 1.3. Internal references

This policy is integrated with other company documents such as:

- Code of Ethics
- System MOG231
- Integrated Environmental Authorization
- Whistleblowing policy
- Quality system based on Good Manufacturing Practice

## 1.4. Scope and communication of the Policy

This Sustainability Policy applies to all locations owned by Newchem.

All company staff, both management and employees, are required to comply with this Policy, which is communicated internally through email and posting on company bulletin boards.

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In addition, the principles expressed in this Policy must also be respected by all entities that interact with Newchem i.e. partners, suppliers of products and/or services, clients, consultants, agents and other stakeholders to whom the Policy is communicated through specific information.

Newchem's Sustainability Policy is available at [www.newchemspa.com](http://www.newchemspa.com).

## 2. Application of principles

Sustainability for Newchem means:

- 2.1 **SOCIAL RESPONSIBILITIES** by ensuring a safe workplace where people can nurture their talents while committing to create value for the local community;
- 2.2 **INNOVATION AND EXCELLENCE OF THE PRODUCT** first by developing increasingly innovative and secure APIs, in compliance with strict quality and safety standards;
- 2.3 **PROTECTION OF THE ENVIRONMENT** by working in an environmentally friendly way, mitigating negative impacts and enhancing positive ones;
- 2.4 **ETHICAL BUSINESS PRACTICES** by managing the production and commercial activities in a transparent and legal manner, in compliance with the interests of its stakeholders;
- 2.5 **SUSTAINABLE SUPPLY CHAIN** sourcing from ethical and reliable suppliers, respectful of Human Rights and the principles of social-environmental sustainability.

### 2.1. Social responsibility

For Newchem it is essential to create value both for its own people and beyond the company's borders.

Towards its employees, Newchem undertakes to:

- respect **fundamental human rights** and promote **freedom of work**, condemning all types of illegal work such as forced labor, child labor or exploitation, according to the core principles adopted by international conventions;
- ensure a **safe and healthy workplace** by monitoring the issue of safety at work in accordance with current provisions and by preparing plans and methodologies for assessing the quality of the working environment. It is also the company's job to ensure that staff:
  - is adequately trained and educated on safety and health issues to be able to perform his work safely;
  - is equipped with the means necessary for collective and individual protection;
  - is subject to a health surveillance protocol;

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- ensure **well-being at work**, through the promotion, encouragement and financing of initiatives that allow:
  - harmonize work life with family care through the tools of parental leave, job flexibility, possibility of part-time;
  - access to welfare programs;
  - have the right to rest;
- **to enhance human capital**, offering opportunities for professional development through continuous and specialized training;
- monitor **overtime hours** and remunerate them in accordance with the collective bargaining agreements;
- ensure respect for **diversity**, applying the principles of **equal opportunity and fairness** to all professional development opportunities, including both educational and remunerative. Newchem in particular:
  - promotes a work environment where every person can feel valued and included;
  - during the **selection phase**, it implements impartial and fair processes for each type of job sought;
  - monitors, with scheduled frequency, **career management** and **employee pay**, ensuring equality of opportunity and remuneration;
  - adopt an **inclusive communication** so that all recipients of policies and procedures can understand what is described;
- allow **free dialogue** and **freedom of association** between people through trade union representation;
- **oppose all forms of discrimination and abuse**, verbal, psychological and digital, adopting zero-tolerance policies towards any form of harassment and violence, as regulated in the Company Code of Ethics and the Whistleblowing Policy.

Towards the *local community* Newchem undertakes to:

- support institutions and projects of a social, environmental and/or cultural nature;
- operate with respect to the territory, considering their environmental impacts in order not to cause negative effects on the community and the surrounding environment as well as prevent and reduce as much as possible such impacts in case of occurrence;
- integrate the company's activity as much as possible in the local and environmental context in which it operates, including through awareness of the needs of all stakeholders;

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- ensure the systematic evaluation of the company's environmental performance, through the implementation of a risk assessment system and the use of a monitoring system, in order to implement continuous improvement actions.

## 2.2. Innovation and product excellence

The excellence, quality and innovation of the product is the foundation of the company.

For this reason, Newchem undertakes to:

- Support scientific research:
  - collaborating with research bodies and universities to develop innovative products
  - providing new knowledge to the global community, through its own patents
- Designing sustainable products:
  - formulating solutions to reduce the use of solvents and promote their reuse through circular economy principles
  - opting, where possible, for the use of packaging, used for the packaging of Newchem products, certified and with reduced environmental impact
  - trying to reduce the use of hazardous substances in their production processes
- Ensure a safe and reliable product:
  - applying all the controls and regulations required by the legislation and Good Manufacturing Practices for the pharmaceutical industry (GMP).

## 2.3. Protection of the Planet

In general, Newchem is committed to protecting all environmental aspects through the following activities:

- continue to operate in compliance with the current environmental legislation by constantly monitoring and controlling its environmental impacts;
- continue to improve its environmental management system in order to identify the major impacts and propose solutions for change;
- pursue the reduction of non-conformities, if present, and compliance with regulations;
- to carry out any changes or new activities by first checking the interactions with the various environmental compartments, with the territorial context of the site and consequently the

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risks related to the performance of this activity, in order to keep under control and minimize its impacts;

- maintain the efficiency of workplaces and work equipment in order to protect workers and optimize consumption;
- establish environmental protection as a clear responsibility of all workers and ensure that everyone is aware of and participates in the company's efforts to manage it.

To ensure that all company personnel operate in compliance with the environmental management system, Newchem undertakes to:

- train and involve all staff regarding the Environmental Management System and its application within the entire company organization, so that they are able to identify and reduce the environmental impacts and risks arising from the activities carried out, promoting a widespread sense of responsibility at every level;
- pursue the maximum involvement of staff by facilitating the timely and correct flow of information necessary for the various operators to carry out their tasks.

Regarding specific environmental aspects, Newchem undertakes to:

- limit their **energy consumption** through the adoption of more efficient and less energy-intensive production technologies; monitor consumption and implement energy efficiency actions;
- combat **climate change** by monitoring its emissions along the supply chain and implementing decarbonization actions such as renewable energy use;
- monitor hybrid consumption by evaluating reduction actions;
- supervise the monitoring of **emissions into air, water and soil**, through monitoring and analysis actions in accordance with integrated environmental permits;
- to combat **atmospheric pollution** by adopting technologies that reduce diffuse emissions;
- **avoid the release of API** in process waste, by recovering production waste and disposing of it according to current regulations;
- properly manage the **rejects** according to the procedures indicated in the integrated environmental permits, reduce their quantity through the use of productive technologies that allow to minimize the waste, promote the recovery of process waste and ensure safe disposal of hazardous waste;
- reduce the **use of natural resources** by promoting, both in production and in offices, the recovery of materials and/or the choice of recycled or reclaimed material;

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- **protect habitats and biodiversity** by assessing the impact on local ecosystems of any plant modification and sourcing raw materials not from areas with land use, deforestation or biodiversity degradation;
- properly manage the use and impact of **hazardous chemicals** through specific procedures;
- carry out the appropriate monitoring of processes and obtain improvements in indicators.

## 2.4. Ethical Business

Working in compliance with regulations and ethics is the founding principle of Newchem.

In particular, Newchem undertakes to:

- oversee the **respect of fundamental human rights** in every company activity, operating in compliance with national legislation and voluntary codes of conduct and control such as MOG231;
- manage **their business** in a legal and transparent way, through the MOG231 management and control system adopted;
- **communicate company information** of any kind, whether regulatory or voluntary, in a fair and transparent way, without the possibility of misinterpretation;
- carry out **subsidiary due diligence** activities by tracking critical raw materials purchased in accordance with industry rules and GMP guidelines;
- adopt a **risk-based approach** to the assessment of company activities, whether they are financial, social or environmental and safety;
- oversee the adopted **complaint mechanisms**, governed by the Whistleblowing procedure and its own Code of Ethics;
- protect the **security of data** and information of its stakeholders, adopting clear procedures and updated IT monitoring systems.

## 2.5. Sustainable supply chain

Sustainable sourcing for Newchem means:

- adopt good practices within their own establishments;
- apply sustainability principles in the selection and qualification of its strategic suppliers;
- build partnerships to make the pharmaceutical supply chain more sustainable.

Regarding *internal* good practices, Newchem undertakes to:

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- adopt policies that encourage the purchase of goods and services with reduced environmental impact;
- Sourcing from local suppliers for goods and services used in the offices, in order to reduce transport impacts and promote the socioeconomic development of the territory;
- train the purchasing staff in adopting sustainability principles in procurement choices.

With regard to raw material sourcing policies for production, Newchem undertakes to:

- qualify its suppliers, in addition to the traditional parameters such as transparency, quality, safety and price, also through environmental and social sustainability principles adopting specific evaluation methods;
- adopt principles of equal opportunities and non-discrimination in the selection processes of its suppliers, which are selected solely on the basis of the parameters expressed above;
- adopt socio-environmental sustainability criteria in the audit process with its suppliers;
- assess the ESG risk associated with its suppliers of goods and services, in order to identify risk situations and provide improvement measures;
- spread good sustainability practices among their suppliers.

Finally, Newchem requires its suppliers to adhere to the Code of Conduct and comply with the principles listed through the contractual clauses of business relationships.

### 3. Final provisions

#### 3.1. Monitoring, reporting and request for information

Each recipient of this Policy is required to monitor compliance with the principles listed. Any person interested in pursuing the purposes of this Policy is obliged to report any violation or anomaly by writing to [sustainability@newchemspa.it](mailto:sustainability@newchemspa.it). The reporting subject, who must act in good faith, is guaranteed without reservation the protection of anonymity and privacy pursuant to EU Regulation 2016/679 (GDPR), protecting the subject from any form of retaliation, discrimination or penalization.

In general, for questions and comments regarding the Newchem Sustainability Policy please contact [sustainability@newchemspa.it](mailto:sustainability@newchemspa.it).

#### 3.2. Accountability and review

The Sustainability Working Group, established by management, is responsible for drafting and reviewing the Sustainability Policy, with final approval from management.

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In each company location, a dedicated sustainability officer will oversee the implementation of this policy.

This Policy is reviewed annually and updated or amended in the presence of changes related to sustainability management in the company. Each revision or update carried out will be communicated to the stakeholders in the manner indicated in the paragraph *Scope of application and communication of the Policy*.

**Date**

19/02/2026

NEWCHEM S.p.A.  


**CARLO CARTASEGNA**

C.E.O.

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## *A path to ensure continuous improvement of Newchem Spa's sustainability performance*

It is with pleasure that we share with you the beginning of a path of improvement in relation to corporate sustainability issues.

Practicing corporate sustainability means:

- operate in respect of the environment, reducing and mitigating impacts where present;
- offer a job that ensures well-being and professional growth within a healthy and safe environment;
- apply proper governance in accordance with our Organization, Management and Control Model MOG231.

For the management of these activities, a dedicated work group has *been* defined, which will also deal with the drafting of policies, codes of conduct and procedures, which will have to regulate corporate behavior.


At the operational level, we have identified the following priority activities to be carried out in the short term:

- monitoring the organization's **CO2 emissions** to define mitigation and/or decarbonization actions in the global goal of combating anthropogenic climate change;
- achievement of the certification for **gender equality**, in accordance with **Reference Practice UNI/PDR 125:202**, in order to ensure equal opportunities, spread inclusive culture and awareness, through the **monitoring of balance indicators, welfare policies, the enhancement of female leadership and training and awareness**;
- monitoring the **sustainability of the supply chain**, starting over the next few months to integrate environmental and social sustainability parameters into the normal purchasing practices and evaluation of suppliers.

These specific activities will be carried out in parallel with projects already started at Newchem, such as the preparation, on a voluntary basis, of the **Sustainability Report 2025** and adherence to the **Ecovadis rating**.

To achieve these goals we ask for the participation of all and for any information or suggestions we ask you to contact the HSE office.

**Date**  
19/02/2026

  
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