

SAMMONTANA GROUP POLICY

Stakeholder Engagement Policy



SAMMONTANA
ITALIA

Edition 2025 – 2026

1. Purpose and Scope of Application

This Stakeholder Engagement Policy defines the principles, responsibilities, and methods by which the Sammontana Group identifies, engages, and interacts with its stakeholders. The goal is to ensure ongoing, transparent, and inclusive dialogue that integrates stakeholder expectations into strategic decisions, ESG policies, industrial processes, and the Group's social activities, in line with Benefit Corporation values, B Corp requirements, and European ESRS standards.

This Policy applies to:

- all Group companies, including Sammontana Benefit Corporation, Forno d'Asolo, and subsidiaries;
- all corporate functions (Production, Quality, Safety and Environment, HR, Operations, Sales, Marketing, Sustainability, Purchasing, IT);
- all processes involving relationships with internal and external stakeholders.

Stakeholders include at least the following categories:

- employees and non-employee workers;
- B2B clients, large-scale retail, Ho.Re.Ca., and end consumers;
- suppliers and logistics partners;
- local communities and territories where the Group operates;
- public institutions, regulatory bodies, and trade associations;
- social partners, trade unions, and representative bodies;
- certification bodies, third parties, auditors;
- investors, financiers, and the banking sector;
- media, schools, universities, and research centres.

2. Corporate Commitment

Engagement is carried out in accordance with the following principles:

- **Transparency:** Clear, truthful, understandable, and timely communications on performance, impacts, risks, and strategies.
- **Inclusiveness:** Consideration of different perspectives, with particular attention to vulnerable groups (women, people with disabilities, young people, migrant workers, seasonal and temporary workers).
- **Continuous dialogue:** Proactive and regular engagement, not limited to critical moments or reporting obligations.

- **Responsibility:** Integration of stakeholder contributions into decision-making processes, with periodic reports on action progress.
- **Materiality:** Focus on the most relevant issues for stakeholders and the company, through double materiality analysis and continuous updates.
- **Consistency with corporate values:** Alignment with the principles of Benefit Corporation, B Corp, Responsibility, Customer Satisfaction, Sustainability, People's Well-being, and Safety Culture.

3. Stakeholder Identification and Mapping

Stakeholder mapping is updated annually and includes:

- analysis of current and potential impacts on people, communities, and the environment;
- assessment of the level of influence and interest;
- identification of stakeholders most exposed to risks or negative impacts;
- update of the stakeholder map in line with the double materiality matrix.

Stakeholders are classified into four areas:

- Workers and worker representatives
- Clients and consumers
- Suppliers and external partners
- Communities, institutions, and territory

4. Engagement Methods

Engagement takes place through different tools for each category.

Workers – Employees and non-employees

- biennial surveys on climate and well-being
- departmental meetings and training/information sessions
- corporate intranet platform (HR, welfare, DEI, safety, training)
- whistleblowing channel managed by third parties
- HR and Safety listening desks
- annual workshops and training (voluntary participation) on sustainability and Diversity, Equity & Inclusion
- annual training on workplace safety and food safety

Clients and consumers

- customer satisfaction and complaint analysis

- periodic audits and commercial meetings
- digital campaigns and dialogue through social channels
- co-marketing initiatives and co-creation of new products
- participation in trade fairs and industry forums

Suppliers and logistics partners

- on-site audits and annual ESG assessments
- co-designed Supplier Code of Conduct
- periodic meetings for continuous improvement
- digital qualification and monitoring platforms

Communities and institutions

- collaborations with local entities for inclusion and employment
- projects with schools, universities, and local associations
- social and cultural initiatives promoted by the Benefit Corporation
- participation in public consultations and regulatory forums

Media, certification bodies, associations

- transparency communications and publication of reports
- sharing of impact analysis results
- participation in networks and working groups

5. Operational Process and Integration into Decision-Making Processes

Information collected through stakeholder engagement is:

- analysed by the Sustainability Function with support from relevant functions;
- integrated into the assessment of material, current, and potential impacts;
- used to update the ESRS double materiality matrix;
- incorporated into industrial and strategic planning;
- included in HR, Safety, Environment, and Operations Improvement Plans;
- leveraged in defining ESG and Benefit objectives;
- reported in the Sustainability Report and Impact Report.

6. Roles and Responsibilities

<i>General Management</i>	approves the Policy and supervises its application; ensures adequate resources and consistency with the Group's strategy
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<i>Sustainability</i>	supervision, maintenance, and updating, in line with any regulatory developments; coordinates the stakeholder engagement process; updates the materiality mapping and matrix; monitors the integration of feedback into ESG policies; oversees reporting in the Sustainability Report
<i>Human Resources Function</i>	manages employee engagement, surveys and DEI processes, and ensures listening and protection tools such as whistleblowing and a feedback culture
<i>Safety Function</i>	promotes dialogue on safety, health and operational risks, and collects reports and feedback related to plants and processes
<i>Operational Functions and Area Managers</i>	maintain active relationships with relevant stakeholders and report any issues and proposals to Management
<i>All Employees</i>	act in accordance with the principles of this Policy and contribute to building respectful, transparent and responsible dialogue
<i>Board of Directors (BoD)</i>	the BoD approves this Policy and supervises its implementation at least annually

7. Monitoring and Improvement

The stakeholder engagement process is monitored through:

- participation KPIs (e.g., survey response rate, number of audits completed, HR intranet usage rate);
- dialogue quality KPIs (trust, clarity, timeliness of responses);
- impact KPIs (actions implemented, improvements in Safety, DEI, welfare);
- annual analysis of requests and complaints;
- periodic review of the worker listening model.

The Policy is reviewed at least every two years, or when significant changes occur in the Group's scope, governance model, or stakeholder expectations.

8. Policy Communication

The Policy is published on:

- the Group's institutional website
- the "Sustainability" section of the website
- the corporate intranet
- the Sustainability Report and Impact Report

It is also available upon request to all interested stakeholders.

9. Lack of Due Diligence

In the event of non-compliance with this Policy, the assessment and management of any violations fall under the responsibility of the Legal Department. Any violations of this Policy may be reported through the dedicated channel available via the following link:

<https://www.sammontanaitalia.com/it/area-legal/segnalazioni-whistleblowing.html>

Empoli, November 3, 2025