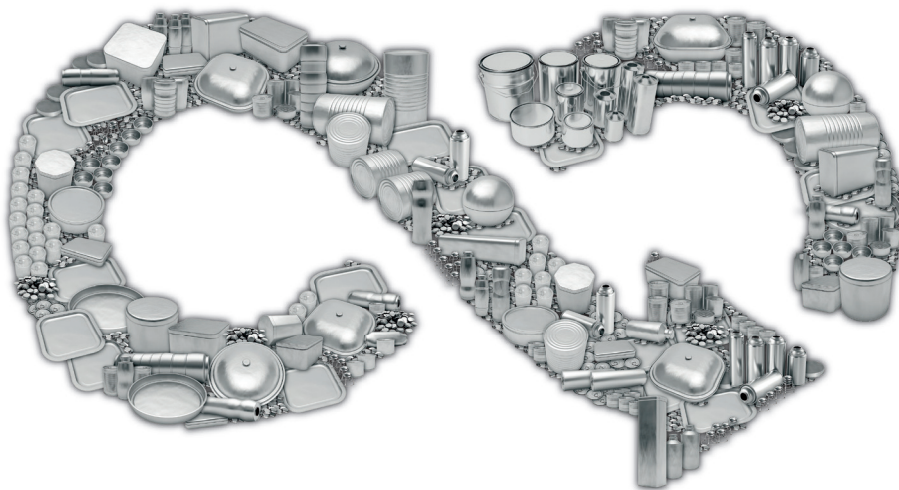




newbox

SUSTAINABILITY **REPORT** **2023**



new-box.com



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SUSTAINABILITY REPORTING IN 2023

The 'Corporate Sustainability Reporting Directive' (CSRD), a new EU directive, requires companies to report on their environmental and social impact activities. The EU has adopted European Sustainability Reporting Standards (ESRS) to meet these requirements. This 'Sustainability report' is prepared with reference to the ESRS issued by the European Financial Reporting Advisory Group (EFRAG).



GENERAL BASIS FOR PREPARATION

Frameworks and data selection

All the data points included in the E, S, and G sections have been assessed as material according to our double materiality assessment (DMA). Please see the pages below for our DMA's scope and methodology limitations. Greenhouse gas data points (GHG scope 1-2) are reported based on the Greenhouse Gas Protocol.

Measurement basis

Data are referred to the financial year (2023). Where available, we show the comparative figures of prior financial year (2022). The calculation factors used are commented on through the report.

Consolidation

The report is referred to New Box as individual legal entity.

DOUBLE MATERIALITY ASSESSMENT

METHODOLOGY

We have conducted a double materiality assessment following the ESRS Application Guidance

“Materiality assessment” from December 2023.

This approach assesses materiality by detecting two dimensions:

(1) impact materiality:

Represents the impacts of our activities on our surroundings;

(2) financial materiality:

Which represents risks to our business from the outside.

Our starting point was the impact materiality assessment of New Box’s on the environment and people. We have also conducted a qualitative assessment of the sustainability-related risks we are exposed to as a business (financial materiality).

The ESRS principles on double materiality and assessment requirements are extensive. Although we decided to limit the number and groups of stakeholders involved in assessing our sustainability-related impacts and risks, we made sure to involve representatives of all New Box’s main stakeholders.

We have conducted our first double materiality assessment this year, applying the limited guidance from EFRAG and our interpretation of the standards. We acknowledge that our methodology has limitations. We will further develop our double materiality assessment based on the final implementation guidance published by EFRAG in 2024.

The following sections detail our double materiality assessment process and results.

MATERIALITY ASSESSMENT PROCESS

1. Scope definition

As a starting point, we reviewed internal and external documentation. We analyzed strategic documents and discussed them with executive leaders and board members to link the contents with the ESG topics and various underlying sub-topics described in the ESRS data points.

We assessed our value chain impacts and risks for most topics, primarily focusing on our main first-tier suppliers and customers. Although the scope of this report is the legal entity (New Box), we assessed the impact materiality of the value chain, thus including the impact materiality of our customers and suppliers. We acknowledge this inconsistency in the report's content. However, we believe in including the value chain in assessing the materiality not only for the sake of this report but as a strategic tool to identify material topics where New Box might further engage in grasping opportunities and facing risks. This report is the starting point for a shift to be embraced in the strategy to identify and execute a plan that explicitly addresses ESG opportunities. Until now, governance has implicitly contemplated and exploited ESG opportunities, mostly for climate change mitigation and circular economy, without an explicit strategic plan. However, missing an explicit strategic plan prevents us from identifying and assessing the opportunities.

At the end of this step, we identified 34 ESG topics to be assessed.

Stakeholder engagement

We collected input from stakeholder interviews, surveys, and written sources to prioritize the relevant ESG topics.

Our executive leaders identified the most relevant internal and external stakeholders: employees, customers, suppliers, industry associations, communities, and unions. These stakeholders are most likely to be impacted by our activities and have the most influence on achieving our commitments. We engaged them through multiple mechanisms. Table 1 summarizes the type and frequency of our stakeholder engagement.

Table 1 - Stakeholder engagement

Stakeholder group	Engagement mechanisms	Engagement frequency
Employees	Surveys; meetings, trainings	Daily
Customers	Surveys; conference, meetings; calls; orders feedback	Daily
Suppliers	Surveys; suppliers audit	Monthly
Industry associations	Conferences; membership; meetings	Annually
Communities	Volunteering; community events; individual interactions	Annually
Unions	Labor management meetings; meetings	Monthly

With the specific aim of prioritizing the relevant ESG topics, we conduct two major campaigns:

- one-to-one interviews with the employees following a semi-open questions questionnaire. Employees were selected based on subject matter knowledge and, at the same time, represented diversity in terms of gender, age, ethnicity, tenure, and department belonging;
- online survey directed to customers and suppliers selected as representatives of different types of products and business sizes along the supply chain.

At the end of this step, we collected data about the perceived relevance of the identified ESG topics.

2. Assessing Impact materiality and Financial materiality

We evaluated the significance of New Box's impacts.

Following the ESRS Application Guidance "Materiality assessment", for impact materiality, the assessment was based on 'severity,' which looks at scale, scope, and remediability, and 'likelihood'. We identified potential remediation actions to assess the remediability. However, the data analysis reveals that in New Box and mostly in the value chain, there is no precise acknowledgment or enough information to assess the magnitude of the remediation actions. As a consequence, we believe that remediability measures were not reliable enough. For the sake of accuracy, we incorporate the "remediability" concept into the "likelihood" measure, estimating the probability of the impact net of the remediation actions in place.

The resulting impact materiality is the product between severity and likelihood.

We measured financial impact considering the financial magnitude - assessed qualitatively - and the likelihood.

Our executive leaders validated the assessment's results.

The assessment provided valuable feedback and helped us better understand the ESG topics most important to our business and stakeholders.

Financial Materiality

Looks Inward

Planet and society's
impact on
business operation

Double Materiality Assessment

Impact Materiality

Looks Outward

Business impact
on the planet
and society

MATERIALITY ASSESSMENT RESULTS

The materiality assessment results are shown in the Materiality Matrix reported in Figure 1. The material topics are those depicted in the top right section of the materiality matrix.

The materiality assessment revealed that the most relevant topics are:

- human and labor rights,
- health and safety,
- training and development,
- materials and products.

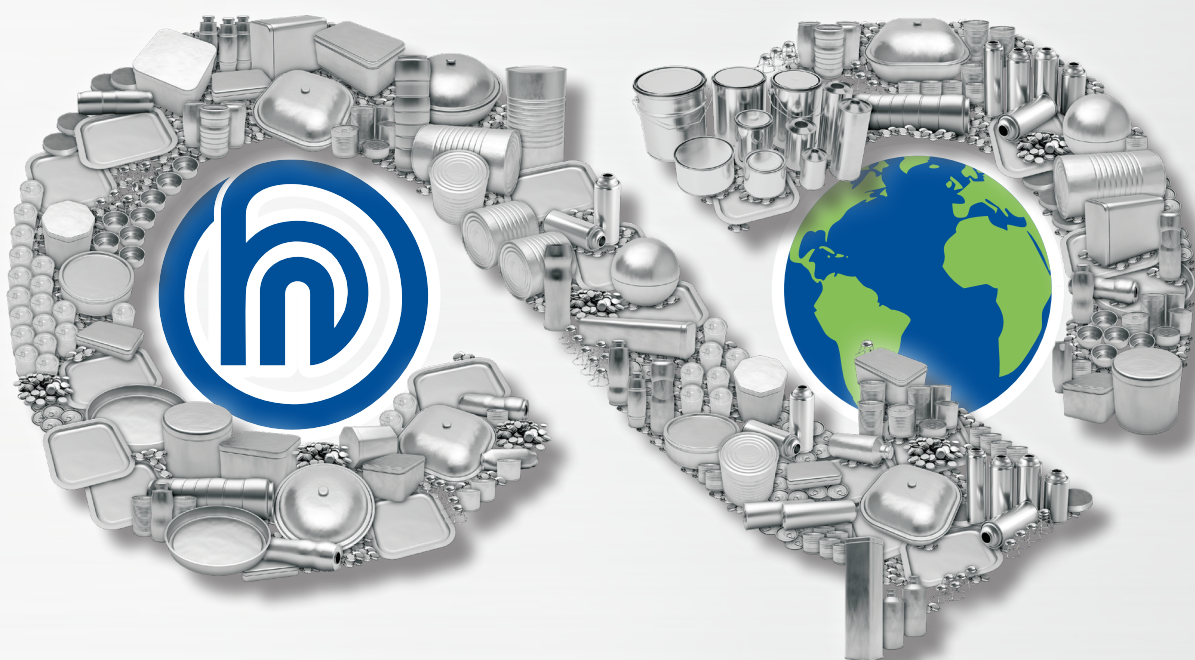
In Table 2, each material topic is associated with the connected ESRS. Table 2 summarizes positive impacts, negative impacts, and risks. It clarifies the topic and how New Box impacts its business.

In our context, the workforce and all the topics concerning workers (human and labor rights, health and safety, and training and development) are crucial to production. The business affects people, reflected in our impacts and risks within “S1 – Own workforce” and “S2 – Workers in the value chain”. We focus our efforts on making our workers safe and well-being at work, generating opportunities for people. At the same time, the significant need for people exposes the business to the risk of a shortage in the workforce.

Material and products are deemed material because our products are completely recyclable, have thriving package reusability along the supply chain, and involve consumers and end users in the recyclability orientation. Furthermore, our production process excels in using material, granting a quasi-zero waste.

The topic “products and materials” is associated to ESRS “E5 – Resource Use and Circular Economy”. Being New Box among the biggest producers of completely recyclable products, it has virtuously impacted the circular economy. Furthermore, recyclable products require significant amounts of natural resources, such as steel, with indirect negative impacts on the climate and the environment. To properly consider such impacts, we include those related to “E1 – Climate change” among our material topics. As New Box’s products are metal packaging, New Box’s inevitably affects consumers of multiple types of products. To properly consider such impacts, we include those related to “S4 – Consumers and end users” among our material topics.

The result of the materiality assessment has been reviewed , and shared the executive managers and the Board.



10 Figure 1 – Materiality Matrix

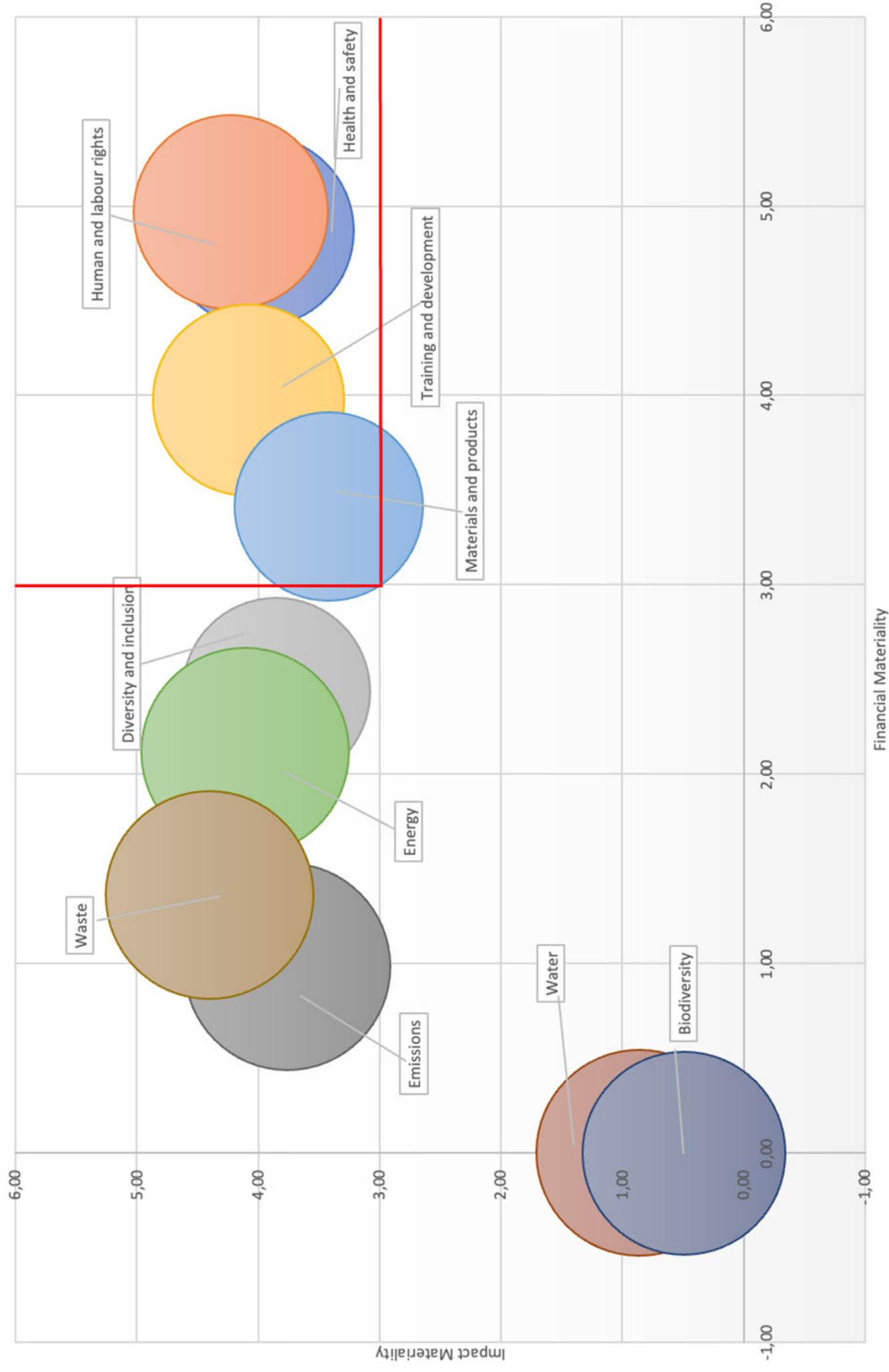


Table 2 – Materiality assessment result

Material topic	ESRS	Material impact or risks	Description
Health and safety		Positive impact	We ensure employees working in a safe environment with transparent and compliant terms and benefits. We commit to providing health support and facilities beyond those mandatorily required.
Training and development	S1 Own workforce	Positive impact	We offer development opportunities through access to multiple training programs. We commit to maximize individual propensity in developing their skills.
Human and labor rights		Positive impact	We ensure adequate management systems to identify, prevent, mitigate, and remedy potential adverse human rights impacts.
Human and labor rights	S2 Workers in the value chain	Risk	There is no material risk of forced or compulsory labor in New Box. Some of our suppliers are located in countries with low human rights protection. We do not have control over their policies. We mitigate this risk resorting to multiple suppliers. We constantly encourage our partners along all the value chain to abide by the international code of human rights and to commit to human rights protection.
	S4 Consumers and End-users	Positive impact	New Box's products are metal packaging used for many types of content (mainly food, and chemical), being as such input of several supply chain. New Box products generate positive impact allowing consumers and end users of different kind of products to recycle the packaging.
Material and products		Negative impact	Most of the resources used in our supply chain are materials that are mined, processed, and transported. Extraction of these materials can have adverse environmental impacts.
	E5 Resource use and circular economy	Positive impact	Our products are completely recyclable; thus, we maximize reuse and recycling through circularity levers. We commit to promote the use of recyclable products along all the value chain. New Box products make recyclable metal packaging to thrive globally.
	E1 Climate change	Negative impact	Recyclable products require significant amounts of natural resources, such as steel, with indirect negative impacts on the climate and the environment.

1. CORPORATE GOVERNANCE

GOVERNANCE ESRS G1

Our approach and policies

We adopted the Compliance Program in accordance with LD 231/2001 in 2020. The compliance program addresses bribery, facilitation payments, sponsorships and donations, political contributions, entertainment, and conflicts of interest. The Supervisory Board oversees the compliance program in accordance with LD 231/2001.

We adopted our Code of Ethics in October 2020 to uphold maximum integrity and guide all employees on the expected behavior at work. It contains social and moral rules drawn up by our company, which all collaborators, workers, and associates must comply with. It is the charter of fundamental rights and duties where the ethical and social responsibilities of our company and the values it embraces are defined. The Chief of the Board of Directors oversees the Code of Ethics. The Code of Ethics is integral to our corporate strategy and agreements with our business partners, covering all suppliers, joint venture partners, and counterparties. Our suppliers and business partners must adhere to our social, environmental, and ethical expectations.

We adopted a Whistleblowing Policy in December 2023 in accordance with LD 24/2023. We have established a standard operating procedure that protects whistleblowers against retaliation and ensures that allegations are rigorously and objectively investigated. Our commitment to business integrity is carried through the whistleblower hotline, which serves internal and external stakeholders. If whistleblowers remain anonymous, New Box cannot identify the reporting individuals.



Impacts

- Healthy corporate culture driving the company towards shared goals
- Protection of whistleblowers through anti-retaliation policies and procedures

Actions

- We incorporate our Code of Ethics into all business partners' and suppliers' contracts.
- We have released our anti-bribery and corruption position, emphasizing a zero-tolerance policy on bribery and corruption and describing our processes for identifying and managing bribery and corruption risks in our operations.
- We conduct periodic training to ensure employee awareness and effective communication of our policies and measures. Also, all employees must participate in an e-learning course on business conduct as part of their onboarding process. The training covers various topics, providing a good understanding of our policy on good business conduct, including anti-corruption and ethical guidelines.
- Our employees and associates may report serious offenses through our whistleblower scheme or management system, such as bribery, fraud, and other inappropriate or illegal conduct. In 2023, no substantiated cases of inappropriate or unlawful behavior were reported through our whistleblower scheme.



STRATEGY

2. STRATEGY

New Box mission is to provide its customers with high-quality products and services, operating in partnership with its suppliers to develop and use increasingly sustainable and safe technologies.

New Box operates in the production and marketing of metal packaging. We are an important European manufacturer that produces jars for edible oils, syrups, chemical products, fancy boxes for sweets, clothing, cosmetics, crown caps, cap retaining cages, and cans for preserves. We prioritize safely delivering robust, efficient, and reliable products to our customers worldwide. In delivering our products, we are also responsible for our customers, employees, communities, and shareholders to ensure this need is met responsibly.

The principles we adopted for the aspects of Quality, Food Safety, Environmental Protection, Energy Efficiency, and Worker Safety deal with:

- Process approach, determining sequence, interactions, and criteria to ensure effective and efficient management;
- Compliance with applicable laws, recommendations, and best industry practices;
- The elaboration, communication, and implementation of procedures for the safety of workers, the protection of the environment, the efficiency of energy, food safety, and the quality of the products supplied;
- The promotion of the participation and consultation of employees in the process of risk prevention, environmental protection, energy saving, and protection of health and safety towards all stakeholders;
- The satisfaction of stakeholder expectations for creating value.

We are committed in translating principles into actions:

- Promoting the application of “integrated” Management Systems for Quality, Food Safety, Environment, Energy and Worker Safety to improve processes continuously;
- Satisfying requirements specified by customers;
- Building a relationship with the customer of mutual trust, offering products and services with high added value, and guaranteeing reliability of supplies;
- Taking care of continuous training and raising awareness of management of all personnel on environmental issues, occupational health and safety, quality and food safety;
- Resorting to qualified suppliers for the aspects of quality, safety, environment, and energy and making them aware of environmental and occupational health and safety with a perspective of continuous improvement;
- Meeting authorities and communities and collaborating with the institutions, guaranteeing maximum correctness and transparency in the reports and providing complete, reliable, and clear information;
- Optimizing the resources used, adopting the best available techniques and promoting the use of renewable sources to decrease environmental impacts and reduce pollution with particular reference to the emission of gases harmful to health, the environment and the improvement of energy performance;
- Adopting analysis tools to prevent potential “accidents”;
- Protecting the health and safety of the employees and third parties who access the plants through the maintenance of healthy environments and the use of low-risk products;
- Complying with the applicable legislative requirements and with the other specific requirements subscribed by the organization regarding product quality and integrity, food safety, worker protection, environmental protection, resource conservation, and efficient energy;
- Supporting the design and purchase of energy-efficient products and services to improve performance energy.

3. ENVIRONMENT

CLIMATE CHANGE ESRS E1



Policies related to climate change

While climate change is not part of the material topics for 2023, it remains a key strategic topic for New Box upon which we are committed to voluntarily report.

At New Box we embraced two main policies related to climate change: energy efficiency and emission reductions. In doing so, we actively contribute to transitioning to an urgently needed carbon-neutral economy. We already have a plan for energy efficiency with the determination to turn to renewable energy and energy use optimization. The scope of the energy efficiency covers both heat and power consumption and process optimization savings at our plants. New Box uses a photovoltaic system to generate energy.

We are devoting preliminary efforts to the emissions reduction plan. We have embraced the project of certifying our business according to ISO 14.064 to achieve the emission reduction goals laid out in the Paris Agreement's 1.5°C

pathway. We acknowledge the need for a transition plan clarifying our goals toward the carbon-neutral target. We are investing time and effort to do our best to develop the transition plan.

New Box is certified ISO 14.001.
This certified environmental management system secures:

- Control and maintenance of legislative compliance and monitoring of environmental performance
- Reduction of waste (water consumption, energy resources, etc.)
- Support tool in investment decisions or technological change
 - Safeguarding company assets and transparency in acquisition/merger operations (risk management)
- Guarantee of a systematic and pre-arranged approach to environmental emergencies
 - Better relationships and communication with the authorities
 - Implementation of defined methods for the prevention of environmental crimes

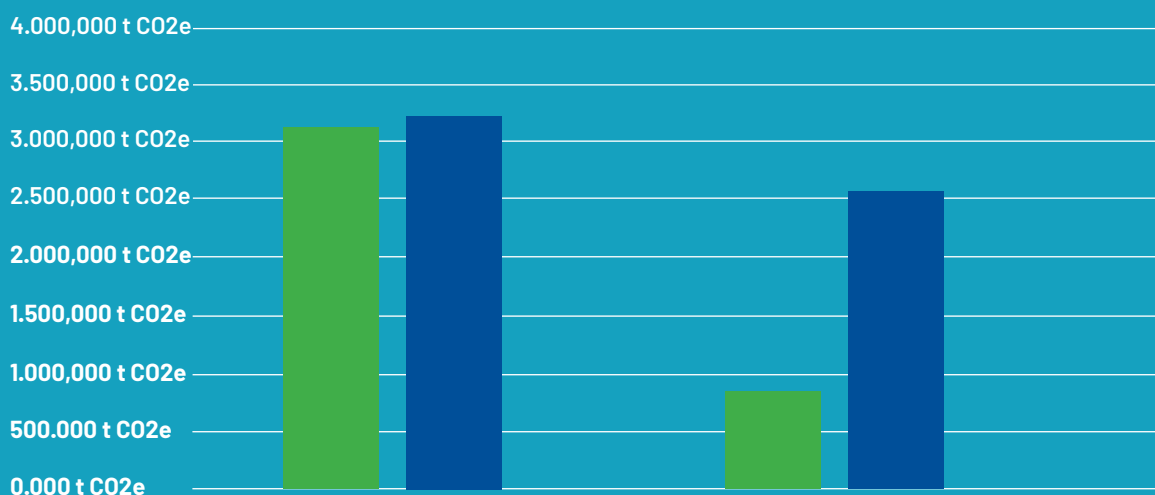
GHG emissions

We track our emissions, and we report our full Scope 1, and 2 GHG emissions shown in Table 3.

GHG emissions	2023			2022			Variation
	tonnes CO2e	Incidence per category	Total incidence	tonnes CO2e	Incidence per category	Total incidence	
Scope 1. Direct GHG emissions	3.340,09		55%	3274,878		79%	+2%
a.1) combustion of diesel vehicles - company vehicles	55,53	1,66%		64,785	2,0%		
a.2) combustion of diesel vehicles - company truck	38,36	1,15%		0,000	0,0%		
b) combustion of petrol vehicles - company vehicles	2,34	0,07%		2,022	0,1%		
c) Stationary combustion Methane - Heating and process boiler	3.164,82	94,75%		3.147,814	96,1%		
d) Stationary combustion of palm oil - cogenerator	0,80	0,02%		6,318	0,17%		
e) Stationary combustion of rapeseed oil - cogenerator	0,03	0,00%		5,861	0,18%		
f) Fugitive emissions F-Gas - R407-C	78,23	2,34%		47,51	1,5%		
f) Fugitive emissions F-Gas - R407-a				0,57	0,0%		
g) Fugitive emissions Fire prevention systems - CO2	0,01	0,00%		0,005	0,0%		
Scope 2: Indirect GHG emissions from imported energy							
a) electric energy - Net - EE location based	2.750,83	100,00%	45%	881,98	100,00%	21%	+194%

Table 3 – Greenhous gas (GHG) emissions – Scope 1 and 2

Graph 2 – Tonnes of CO2 equivalents per scope



Direct GHG emissions (GHG, scope 1)

Scope 1 emissions are reported based on the Greenhouse Gas (GHG) Protocol and include all direct emissions of greenhouse gases from New Box: carbon dioxide, methane, nitrous oxide, and sulfur hexafluoride. The direct carbon emissions are determined based on the fuel quantities used following the EU Emissions Trading System (ETS). Carbon dioxide and other greenhouse gas emissions outside the EU ETS scheme are primarily calculated as energy consumption multiplied by emission factors.

Scope 1 GHG emissions increased by 2% from 2022 to 2023. In 2023, fossil fuel-based heat and power generation was accountable for 94% of the total scope 1 emissions.

Indirect energy consumption (GHG, scope 2)

Scope 2 emissions are reported based on the GHG Protocol and include indirect GHG emissions purchased and consumed by New Box. Scope 2 emissions are primarily calculated as the power volumes purchased multiplied by emission factors. Scope 2 GHG emissions increased by 194% from 2022 to 2023. The main source of location-based scope 2 emissions was energy purchased to substitute the co-generator.

We calculate direct and indirect consumptions based on suppliers' invoices.

We are committed to measuring and tracking greenhouse gas emissions and actively working towards their reduction.

Greenhouse gas (GHG) emissions intensity

In Table 4, we report the GHG intensity regarding energy generation, turnover, and EBITDA. GHG intensity (scope 1 and 2) is calculated as total scope 1 and scope 2 emissions divided by power generation, revenues, and EBITDA, respectively.

Table 4 – Greenhouse gas (GHG) emissions intensity

Data point	2023	2022	
GHG intensity (scope 1 and 2)			
gCO2eq (1+2)/kWh generation	9.725,15	434,89	+2.136%
gCO2eq (1+2)/ revenues	40,76	28,03	+45%
gCO2eq (1+2)/EBITDA	180,02	305,09	-41%

Our GHG intensity (scope 1 and 2) of energy generation increased significantly in 2023 compared to 2022. The increase resulted from a 43% increase in scope 1 and 2 emissions and a drop of 94% in power generation (denominator). The drop in power generation is due to the dismissal of the co-generator that was in use beforehand. The intensity of GHG emissions in revenues increased by 45% due to the increase in emissions and the decrease of 2% in revenues (denominator). The intensity of GHG emissions in EBITDA decreased by 41% following the increase in GHG emissions and the 142% increase in EBITDA (denominator) due to the sudden reduction in raw material prices.

Actions

- In 2023 we started laying out the activities to plan a carbon reduction and a systematic measurement of our scope 1 and 2 annual reduction.
- We started a corresponding reduction activity, by increasing the plants' energy efficiency and producing electricity from renewable sources.
- We are investing in developing, constructing, and operating renewable energy assets, including solar panels.
- We intend to select our suppliers that integrate decarbonization strategies in their operations.
- We will continue to deploy renewable energy and reduce emissions across scope 1-2.

Targets

New Box aims to reduce energy savings to optimize the use of resources and turn to renewable energy. In particular, New Box plans to maximize efficiency by:

- Setting up a hot air recovery system from V5 oven to V6 oven
 - Starting-up of a 600 KW photovoltaic system
- Purchasing a new compressor and new dryer with relatively centralized management
 - Replacing the lighting fixtures with LED lamps
- Installing 2 new can production lines with induction oven instead of using gas

New Box contemplates the following further investments for energy saving over the years 2025 – 2027:

- Replacement of the painting oven with a new, more efficient one
 - Double existing photovoltaic system
 - Set up a gas cogeneration plant

Referring to carbon reduction, New Box aims at:

- Obtaining the ISO 50001 certification by the end of 2024
- Schedule a transition plan to carbon reduction by the end of 2024

Our material impacts and risks

We are aware that we play a role in climate change, and we deploy renewable energy and plan to extend its deployment.

We are committed to increasingly turning to renewable energy sources.

As a manufacturing company, we have unavoidable residual emissions, such as emissions from using gas in industrial processes.

RESOURCE USE AND CIRCULAR ECONOMY ESRS E5

Policies related to resource use and circular economy

New Box is actively contributing to the circular economy with its own business. New Box's products are completely recyclable and foster the reusability of the metal along the value chain, providing packaging used in multiple industries.

New Box is committed to promoting sustainable packaging, removing fossil-fuel-based plastics from all our consumer packaging. Metal is easily recycled, which fits with the global aspirations for a circular economy, as it is eco-friendly, preservative, strong, convenient, and secure brand elevation.

To promote the importance of recycling and using recyclable products, New Box participates in campaigns to help consumers better understand the key role they have to play in keeping metal in the material loop by recycling their empty packaging.

Our waste management policy covers all activities to promote waste management in our business. The policy's objective is to address our aim of maximizing the optimal reuse and recycling of our waste.

Our actions cover a product's life cycle, from production, use, and reuse to waste management.

Resource Inflows

New Box relies on significant amounts of critical raw materials, the tinplate the main one.

We optimize resource usage by using renewable energy assets whenever possible in our production process.

The main share of our upstream carbon emissions comes from extracting and processing materials for our assets. By incorporating circular principles across our business, we can reduce carbon emissions to help reach our carbon-neutral target while ensuring responsible waste management.

New Box negotiates with its raw material suppliers to reuse waste. For example, the exceeding amount of wasted copper is sold to suppliers that reuse the raw material in a true endless circular re-use.

Resource Outflows

New Box main outflows are products and waste.

Products

New Box's main outflows are its products. New Box produces packaging that ensures the preservation of the content, whatever it is (e.g., food). The metal secures the safety and inviolability of the packaging as it guarantees resistance, strength, and inviolability, as well as safety during transportation, storage, and use. New Box's products are 100% recyclable, infinite times, renewable, and permanent.

Waste

New Box produces waste, and it is committed to optimizing the recycle. New Box is consistently developing projects to transform waste into a by-product for other processing chains, reducing waste.

The total waste produced in 2023 is 7,084 tons that is increased by 3,6% with respect to 2022 (6,839 tons).

Actions

To optimize the circular use of resources, New Box:

- Designs the shapes and materials of metal packaging to minimize raw material usage;
 - Organizes production and logistics intending to maximize loads and minimize travel and consequent usage of fuel;
- Has activated the digital printing service to minimize the number of pieces to be produced for each batch, thus optimizing energy saving;
- Offers and suggests sharing and co-buying solutions for logistics and raw materials;
- Adopts best practices in waste management according to the waste classification.

Targets

We aim to promote responsible supply chains for the key metals fueling the renewable energy transition.

Our material impacts and risks

Most of the resources used in our supply chain are materials that are mined, processed, and transported. Extraction of these materials can have adverse environmental impacts. New Box's products positively impact downstream along the supply chain, providing packages that meet recyclability at best. New Box contributes to maximizing the circular resource use because metallic packaging is:

- Resistant and safe, protects the integrity of the product from contamination by external agents;
- Is reusable.



4. SOCIAL

OWN WORK-FORCE ESRS S1

Human and Labor Rights

We believe human rights are fundamental principles for protecting people's dignity and ensuring freedom and respect in our activities and the companies and communities we work with.

Our commitment to upholding human rights, including labor rights and anti-discrimination rights, is outlined in our human rights policy that was approved by the Board of Directors. The Human Rights policy complies with the United Nations (UN) Universal Declaration of Human Rights, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles, and the UN Global Compact.

This policy applies to our entire workforce and also involves most of our commercial partners, trusting that our commitment is shared to create a fair, safe, respectful, supportive, and inclusive working environment by eliminating discrimination and supporting the well-being of our workforce.

We are careful to maintain relationships with third parties who guarantee respect for childhood and adolescence according to the principles established by international conventions. We make sure that our commercial partners do not engage in child labor in the form of slavery or similar practices, such as the sale or trafficking of minors, forced or compulsory labor, servitude for debts, and servitude.

Our priority is ensuring adequate management systems are in place to identify, prevent, mitigate, and remedy potential adverse human rights impacts. In cases where we identify potential adverse human rights impacts, we are committed to promptly and effectively providing and enabling remedies. Furthermore, we are dedicated to safeguarding the labor conditions of our employees through social protection. This encompasses support for sickness, unemployment, employment injury, parental leave, and retirement.

We have established a global minimum standard of benefits for caregivers, irrespective of gender or marital status. According to national law and collective bargaining agreements, we offer various paid or unpaid family-related leaves, such as marriage and childcare leave. In addition, we offer Temporary Life Insurance in Case of Death (TCM) and Long-Term Care (LTC).

Retirement benefits are incorporated into our overall remuneration package, and all New Box employees are enrolled in a pension scheme.

Table 5 – People

Data point	Unit	2023	2022	Δ
Number of employees				
Total number of employees (as of 31 December)	Number	316	303	+4,29%
Average number of employees during the year	Number	309,5	293,5	5,45%
Turnover				
Total employee turnover rate	%	53,31%	36,46%	+16,86%p
Positive employee turnover rate	%	28,76%	21,47%	+7,29%p
Negative employee turnover rate	%	24,56%	14,99%	+9,56%p
Employees' satisfaction survey results				
Employees' well-being in the workplace	%	90,00	N.A.	
Employees' feeling of health and safety in the workplace	%	90,33	N.A.	
Employees' feeling of inclusion in the workplace	%	90,00	N.A.	
Employees' satisfaction in relation to training and development opportunities provided by the company	%	96,67	N.A.	
Employees who enjoyed family leaves during the year				
Males	Number	21	8	+162,50%
Females	Number	4	2	+100,00%



Accounting policies

Turnover: the total employee turnover rate is calculated as the number of permanent employees who left or joined the company in the financial year (i.e., the sum between the outgoing and the incoming employees) relative to the average number of permanent employees.

The positive employee turnover rate is calculated as the number of permanent employees who joined the company in the financial year relative to the average number of permanent employees. The negative employee turnover rate is calculated as the number of permanent employees who have left the company in the financial year relative to the average number of permanent employees.

Employee satisfaction survey results: For the first time in 2023, New Box conducted a comprehensive employee satisfaction survey. A sample of 30 employees was selected to participate in the initiative. In the next years, the survey will be submitted in rotation to all New Box employees.

Comment on data exposed in the table

Table 5 describes our workforce. The number of employees was 4,29% higher at the end of 2023 compared to 2022. All the company's production sites are in Italy; therefore, no employees work abroad. New Box's total employee turnover rate increased by 16,86% in 2023 as a consequence of the increase in both the number of employees who left the company during the year (+72,73%) and the number of workers who joined it (+41,27%).

All the employees benefit from social protection measures (public programs and insurance policies offered by the company) that cover the risk of loss of income when forced to leave their jobs for various reasons. In particular, they can take advantage of:

- NASPI – New Social Insurance for Employment –, which is paid by the company monthly to unemployed workers;
- INPS provides subsidies for parental leave or retirement. In 2023, 21 employees enjoyed family leave, 13 more than in the previous period.

The employees' satisfaction survey results have revealed that most of the corporate population is pleased to work in New Box, feels safe and well-integrated in the workplace, and appreciates the training and development opportunities offered by the company. Almost all employees declared extremely satisfied with their working conditions and grateful to the management for considering their interests and requests. Their rights are also asserted through workers' representatives, who cover 18,35% of the total corporate population. New Box pays close attention to the actual and potential impacts of its managerial decisions on its workforce, especially when dealing with the interruption of an existing business relationship. In those cases, New Box is used to thoroughly assess the different scenarios and find alternative business solutions to reduce the consequences of its choices on its employees. Moreover, the company promotes inclusion and guarantees equal treatment and opportunities to the whole workforce.

The following data confirms its strong commitment:

- At the end of 2023, 16 people with disabilities (13 men and 3 women) were working in the company;
- In 2023, as in the previous years, no incidents of discrimination, including harassment, towards employees on the grounds of gender, race or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination involving internal and/or external stakeholders occurred in any of New Box's business operations.



Targets

- Prevent negative impacts such as conflicts and tensions within the Company caused by inequalities, sanctions due to the violation of human rights, and loss of productivity caused by motivational dissatisfaction of its workforce;
- Achieve positive impacts such as improving corporate reputation, reducing legal risks due to the adoption of unethical practices, and improving operational efficiency due to greater employee well-being

Actions

- We monitor compliance with internationally recognized human rights standards by continuously collecting information to ensure timely identification.
- We engage with our business partners to ensure they consistently comply with internationally recognized human rights standards.
- We regularly assess the human rights impacts of our operations, supply chain, and projects. The assessments involve employee interviews, document and policy reviews, and experts. These assessments guide the development and implementation of mitigating action plans, and we continually monitor their progress.

Health and Safety

Our approach and policies

We prioritize and protect everyone's physical, social, and psychological safety in the workplace. Personal health and well-being are fundamental drivers for living a balanced life where people can realize their potential. Therefore, it is fundamental to our activities that we have a robust health and safety management system and foster a culture that promotes our employees' health and safety.

We have established a safety and health policy, setting the standards for protecting and ensuring the well-being and safety of our employees and operations. The policy covers all our employees, and accountability lies with our Board of Directors. We aim to incorporate safety and health in all our decisions and actions, and we have implemented workplace accident prevention procedures to ensure the safety and well-being of our employees.

We are constantly committed to improving safety conditions within the work environment to reduce accidents and protect our workforce. We promote developing a corporate culture that guarantees a healthy working environment by constantly promoting responsible behavior, training, preventive actions, and periodic checks.

We comply with ISO standards, including ISO 9001 (quality management system) and 45001 occupational health and safety management system), to maintain a robust management system that aligns with international best practices.

We have a range of support systems and offer our employees health insurance.

Accountability for our well-being lies with the Chief Human Resources Officer.

Table 6 - Safety

Data point	Unit	2023	2022	Δ
Total recordable injuries (TRIs)	Number	12	9	+33,33%
Ongoing on 31st December	Number	2	3	-33,33%
Lost time due to injuries	Days	295	61	+383,61%
Hours worked	Hours	538.599	530.616	+1,50%
Accident incidence rate	Injuries per 100 employees	3,80	2,97	27,85%
Total recordable injury rate (TRIR)	Injuries per million hours worked	22,28	16,96	31,36%
Fatalities	Number	0	0	0%
Permanent disability cases	Number	0	0	0%

Accounting policies

Accident incident rate indicates the recordable injuries per 100 employees and is calculated by dividing the total recordable injuries by the number of employees at the end of the financial year.

Total recordable injury rate (TRIR) is calculated as the number of injuries occurred in the financial year per one million hours worked.

Permanent disability cases are injuries resulting in irreversible damage with permanent impairment, which is not expected to improve.

Fatalities are the number of employees who lost their lives as a result of a work-related incident.

Comment on data exposed in the table

Table 6 shows data about safety for our workforce. The entire New Box workforce (100%) is covered by the company's health and safety management system according to legal requirements and/or recognized standards or guidelines. The company applies the CONFIMI National Collective Bargaining Agreement for Metalworkers and strict procedures per ISO 45001. As a result of its policy, New Box has never recorded any fatality or permanent disability due to work-related injuries.

Nevertheless, in 2023, the total number of recordable injuries increased by 3 units compared to 2022. Injuries grew from 61 to 295 days due to an injury unrelated with equipment's manage. These performances enhanced the accident incidence rate (+27,85%) and the total recordable injury rate (+31,36%).

Even though the health and safety indicators worsened, in 2023, New Box continued to assess and monitor risks through an appropriate Risk Assessment Document (DVR), continuously updated and compliant with Legislative Decree n. 81/2008 ("Testo Unico sulla Sicurezza"). The company promoted actions to continuously improve its integrated system and activated tools to allow its employees' participation and consultation in risk prevention, environmental protection, energy saving, and health and safety protection. If necessary, New Box does not hesitate to apply proper disciplinary sanctions in case of non-compliance with the company's regulations. Moreover, it provides adequate training to its workforce.

All the employees are covered against the risk of loss of income due to illness through INAIL public programs. The company has also taken out:

- A Long Term Care policy covering all the injured or ill employees with a monthly annuity of 1.500 euros – whether the incident occurs at work or during leisure time – if they prove to be unable to carry out at least 4 of the 6 elementary activities of daily living (bathing and showering, maintaining personal hygiene, dressing, feeding, continence and moving around);
- An additional TCM – Temporary in Case of Death – policy guarantees a 70.000 euro payment to heirs in case of the insured's death.

Targets

- Preventive and mitigating efforts such as inspections, personal risk dialogues, emergency drills, and safety training with the aim to preserve our robust health and safety record.
- We keep exploring approaches to support our employees in leading fulfilling lives, both within and outside the workplace. This includes promoting employee benefits, upgrading meal facilities, and workplace accessibility.

Actions

- We have established additional internal procedures beyond the legal requirements as we care about the health and safety of our workforce.
- We constantly monitor performance with audit activities.
- We have enlarged the plant, allowing greater space for trolley movement lanes for the sake of the safety of our workers.
- We provide adequate training, delivering mandatory and voluntary courses.

Diversity and Inclusion

Our approach and policies

Our code of ethics asserts that we condemn prejudice and offer all employees equal opportunities based on their professional qualifications and abilities. Every violation of the code of ethics is severely punished. The board of directors is accountable for the code of ethics.

We are dedicated to offering equal opportunities regardless of ethnic background, race, religion, age, gender, disability, sexual orientation, outlook, or social status. Therefore, we select, hire, remunerate, and manage human resources based on merit and competence criteria, comply with current collective bargaining, and adopt a reward system based on objectivity criteria and reasonableness.

Our approach describes commitments related to initiatives for people from vulnerable groups, such as inclusive recruitment and promotion, coaching, mentoring, and sponsorships.

Table 7 - Gender diversity and pay gap

Data point	Unit	2023	2022	Δ
Board of Directors Gender with lowest representation (female)	Number %	5 20	5 20	0% 0%p
Executive Team Gender with lowest representation (female)	Number %	3 33	3 33	0% 0%p
Heads of department Gender with lowest representation (female)	Number %	8 0	8 0	0% 0%p
People Leaders Gender with lowest representation (female)	Number %	29 3,45	29 3,45	0% 0%p
All employees Gender with lowest representation (female)	Number %	316 20,25	303 17,16	4,29% +3,09%p

Accounting policies

The **Board of Directors** consists of members elected at the annual general meeting.

The **Executive Team (ET)** is composed of employees who are accountable for strategic decisions.

Heads of department are people in charge of managing a department of the company.

People leaders are all people with direct reports (responsibilities for staff).

All employees data is recorded at the end of the financial year.

Comment on data exposed in the table

Table 7 shows gender diversity across the management and governance in New Box. The male component of New Box's Board of Directors and Executive Team is much larger than the female one. The prevalence of men is even more pronounced among Heads of Departments and People Leaders. The proportion between the two genders at the top levels of the organization remained unchanged in 2023 compared to 2022.

The whole workforce's gender distribution approximately reflects the composition of the management bodies: in 2023, women represented 20,25% of the total employees, but this percentage has increased significantly compared to 2022 (+3,09 percentage points). In 2023, the company hired 20 women (15 in 2022) and 69 men (48 in 2022), while 9 female employees (6 in 2022) and 67 male workers (38 in 2022) left the company. Generally, the company hires more men than women to fill certain tasks because their physical characteristics are better suited to the assigned tasks.

The differences in pay and bonus between men and women are highly impacted by:

- Objective factors such as the type of job assigned;
- The differences in gender mix across organizational levels, with a trend toward the share of women not increasing at the same pace in the higher-level leadership positions as in the remaining part of the organization.

In any case, by applying the CONFIMI National Collective Bargaining Agreement for Metalworkers to all its employees, the company guarantees them a minimum wage adequate to ensure decent living and working conditions.

Table 8 - Own workforce's age

Data point	Unit	2023	2022	Δ
Board of Directors				
Members aged under 30	Number	0	0	0%
Members aged between 30 and 50	Number	2	2	0%
Members aged over 50	Number	3	3	0%
Executive Team				
Members aged under 30	Number	0	0	0%
Members aged between 30 and 50	Number	2	2	0%
Members aged over 50	Number	1	1	0%
All employees				
Members aged under 30	Number	44	58	-24,14%
Members aged between 30 and 50	Number	187	162	+15,43%
Members aged over 50	Number	85	83	+2,41%

Comment on data exposed in the table

Table 8 shows detail about the workforce age.

The Board of Directors includes two members aged between 30 and 50 and three over 50. The composition has remained unchanged over the last year.

The Executive Team includes two members aged between 30 and 50. Its composition has remained unchanged over the last year.

In 2023, 59,18% of the employees were aged between 30 and 50. They increased by 15,43% compared to 2022, at the expense of the younger fringe of the workforce (composed of employees under 30), which decreased by 24,14%. The average age of incoming employees (36 in both 2023 and 2022) is equal to that of outgoing workers (37 in 2023, 36 in 2022).

Table 9 - Characteristics of the employment contracts

Data point	Unit	2023	2022	Δ
Employees by role in the organization				
Executives	Number	2	2	0%
Middle managers	Number	4	4	0%
White collars	Number	43	41	+4,88%
Blue collars	Number	267	256	+4,30%
Part-time employees	%	3,16%	2,64%	+0,52%p
Employees on a fixed-term contract	%	12,34%	11,22%	1,12%p
Temporary employees	%	0,63%	0,00%	+0,63%p

Accounting policies

The number of employees is determined at the end of the period.

Executives manage relevant and autonomous branches of the company and perform their duties with general supremacy and broad powers and autonomy.

Middle managers continuously perform a significant role in developing and implementing corporate objectives.

White collars are office workers entrusted with organizational or technical-administrative duties.

Blue collars operate in production functions and carry out operational tasks.

Temporary workers are hired through a temp agency.

Comment on data exposed in the table

Table 9 shows the characteristics of the employment contracts.

The workforce can be divided into four categories (executives, middle managers, white collars, and blue collars) based on the role played in the organization. The proportion among those groups remained fundamentally unchanged in 2023 compared to 2022: the company recorded only small increases in the number of white collars (+4,88%) and blue collars (+4,30%), while the number of executives and middle managers did not undergo any variations. In detail, in 2023, New Box hired 2 new white collars (7 in 2022) and 87 new blue collars (56 in 2022), while no white collars (3 in 2022) and 76 blue collars (41 in 2022) left the company.

In 2023, we also observed slight increases in the share of part-time employees (+0,52 percentage points) and employees on fixed-term contracts (+1,12 percentage points), representing a minority component of the total workforce.

While in 2022, New Box did not use temp agencies' intermediation services, in 2023, it hired 4 full-time temporary employees; 2 of them were still working in the company at the end of the year. This decision is instrumental in meeting seasonal productivity peaks. It also responds to a new hiring strategy that has been adopted permanently because of its efficiency, as it allows the transfer to temp agencies all the burdens connected to the hiring process. The company applied to temporary employees the same CONFIMI National Collective Bargaining Agreement for Metalworkers that regulates the contractual conditions applicable to the rest of the workforce. New Box also avails of the services provided by workers sent by cooperatives to cover temporary specific production needs, specifically to carry out activities like end-of-line canning and manual loading of containers.

Table 10- Executive Team and Board of Directors

Data point	Unit	2023	2022	Δ
Boards of Directors				
Members	Number	5	2	0%
Average seniority	Years	19,20	18,20	+5,49%
Independent Board members	%	0	0	+0%
Board meetings	Number	10	8	+25%
Board meetings' attendance	%	100%	100%	+0%
Remuneration of the Board	EUR thousand	230	190	21,5%
Executive Team				
Members	Number	3	3	0%
Average seniority	Years	24,33	23,33	4,29%
Incentives pay directly ascribed to ESG targets	%	0	0	0%

Accounting policies

The **Board of Directors** consists of members elected at the annual general meeting.

The **Executive Team (ET)** is composed of employees who are accountable for strategic decisions.

Average seniority is the average number of years the Board of Directors / Executive Team members have been part of the respective corporate body.

Independent Board members: for their identification, we follow the Recommendations on Corporate Governance.

Comment on data exposed in the table

Table 10 shows Executive Team and Board of Directors.

The company is a family business, where owners and executives are family members.

All the board directors have been working in the company for at least a decade, so the average board seniority is particularly high (18,4 years in 2022, 19,4 years in 2023). All of them attend assiduously the Board meetings scheduled during the financial year (10 in 2023, 8 in 2022), and the total remuneration of the body increased by 15,79% in 2023. All the ET members are also Board directors and members of the owner's family. The Board and the ET composition did not change during the financial year.

Since there is no separation between ownership and management, there is no need for incentives to align the manager's goals with those of the owners. The family members are strongly committed to ESG topics, which inspires the business strategy. Therefore, no incentives have been paid directly referring to ESG targets.

Actions

- Employees are involved in the decision-making process of the main projects that could significantly impact them. In the case of a project, employee involvement usually takes place for top management figures and, if necessary, for the entire production department. For the planning of normal production activity, the front lines' involvement occurs constantly and regularly, generally with exceptions, weekly.
- When installing a new production line, the workforce's suggestions were considered, and specific training courses were carried out to increase competence and prevent risks.
- The administration office's access is currently under renovation to include a ground-floor entrance and a lift to encourage inclusion.
- Meetings involving employees are held during normal working hours to allow all participants to participate and express themselves freely.
- All employees are allowed, guaranteeing the right to confidentiality, to express their opinions using a communication channel through which its workers can communicate their concerns or needs.
- We foster constructive dialogue with the unions that actively collect employees' concerns and needs through their representatives.
- We established an internal communication channel pursuant to the Legislative Decree. 24/2023 relating to the regulation of whistleblowing. This tool aims to guarantee an anonymous communication route for all those (not only employees but also customers, suppliers, institutions, etc.) who are aware of crimes or unethical acts that have occurred within the organization. This channel aims to improve its transparency towards its employees and stakeholders, creating relationships based on trust and, therefore, long-lasting.
- We adopted a Privacy and Data Security Policy, adapting to the personal data protection measures introduced by the GDPR (General Data Protection Regulation) about Privacy.
- As part of our training program, we include specific modules on our grievance and complaints handling policy.
- The company constantly monitors the number of employees for each department and role employed to determine the minimum number of workers below which internal production could be compromised.
- Worker retention, as well as worker attractiveness, is a top priority in New Box.
- New Box agreed with the social partners' "absenteeism" objectives. A reward production bonus will be paid

Targets

- We are working on offering additional facilities to make Network an attractive company for potential future candidates
- The Company will monitor absenteeism performance by analyzing data recorded and collected.
 - Negotiations with the social partners will involve setting objectives about energy saving, safety, and production quality.

Health and Safety

Our approach and policies

We recognize that human resources are key to our success. We firmly believe that for employees to thrive, perform effectively, and experience growth, they need to understand their role within the organization and be aware of future opportunities that may arise.

We are improving and increasing our workforce's skills, competencies, and know-how. Accountability for this policy lies with our Chief Human Resources Officer.

Table 11 - Training

Data point	Unit	2023	2022	Δ
Training hours	Hours	1.714	2.743	-37,51%
Mandatory	Hours	1.164	1.167	-0,26%
Provided by the company on a voluntary basis	Hours	550	1.576	-65,10%

Comment on data exposed in the table

Table 11 shows training initiatives.

In 2023, New Box delivered mandatory and voluntary courses, even though these latter ones have been reduced compared to 2022 (-65,10%). Despite this small reduction, the continuous training of employees keeps representing a key value driver in New Box's overall business strategy, which aims to safeguard corporate know-how by transferring skills and competencies.

Actions

- We make an English, firefighting, and first aid course available yearly to all its employees, who can join voluntarily to increase their skills. We aim to facilitate competence growth and ensure fair access to career development opportunities.
- We monitor course planning through internal questionnaires disseminated to the workforce and process course progression data on internal databases.
- We value our workforce as a relevant corporate asset to protect as we struggle to find skilled staff. We create incoming opportunities through supporting and training personnel capable of acquiring them and passing them on to new generations. In the value chain, this can also happen through acquisitions.

Our material impacts and risks

Impacts

- Secure employment and a safe workplace for our employees
- Diversity resulting in including and valuing individual contributions
- Career progression and personal development through multifaceted training programs
- Recruiting and advancing women and under-represented groups and working
- We ensure adequate management systems to identify, prevent, mitigate, and remedy potential adverse human rights impacts
- Intra-generational knowledge transfer to retain know-how
- An inclusive culture where people with different abilities can thrive

Risks

- Due to the type of activity carried out by the company, the products, and reference markets, there are no positive or negative impacts on its workforce that may be derived from transition plans to reduce negative environmental impacts.
- There is no material risk of forced or compulsory labor in New Box
- Only employees employed on a fixed-term or permanent contract and temporary workers are subject to significant impacts due to accidents (the type of cutting and/or crushing accident being the activity of the metalworking company). Temporary workers started when a new fixed-term and/or permanent staff recruitment policy was issued.
- One material financial risk for the company is the shortage of skilled workforce members with suitable know-how.

WORKERS IN THE VALUE CHAIN

ESRS S2

Our approach and policies

The Company likes to consider itself a partner of its customers, supporting them in the design and development of products. Building solid and long-lasting customer relationships is a strategic lever that has allowed New Box to grow and position itself well in the reference market.

The Company boasts a significant presence in the markets and operates according to a rigorous Quality System that refers to globally recognized standards such as:



The Company's main business areas are crown caps, general line jars, food containers, fancy boxes and lithography.

New Box's main market is Italian, representing approximately 51% of the total turnover.

The Company has always selected its supply chain with suppliers suitable to guarantee reliability and efficiency and who use production technologies compatible with the environment and safety.

The growing sensitivity to social and environmental aspects of the supply chain has led New Box to identify selective supplier criteria. Their selection and evaluation are based on transparency, correctness, and sustainability, together with quality, cost, and service, with the aim of creating relationships based on mutual trust.

New Box adopts Smeta certification (Sedex Members Ethical Trade Audit), the largest platform in Europe that collects and analyzes ethical supply chain behavior data.

New Box's main suppliers are selected from those possessing environmental and social (health and safety) certifications and then subjected to audits by third-party bodies. Some of New Box's main suppliers are now preparing ESG sustainability reports.

New Box ensures that all workers in the supply chain are treated fairly and ethically per the provisions of its Code of Ethics. The standards to which New Box refers are inherent to working conditions such as working hours, fair pay, health and safety in the workplace, social dialogue, freedom of collective association, equal treatment and opportunities for all and other rights related to work (child labor and forced labor).

Food-related products are subject to traceability obligations. All possible disputes are immediately reported to the supplier and managed to find the most efficient and effective solution to satisfy the customer fully.

Our material impacts and risks

Some suppliers are located in countries with different laws that enforce health and safety and condemn forced labor. Therefore, we do not have complete visibility nor enough reporting on the matter from the supplier. The company tries to mitigate this risk by diversifying the suppliers, procuring the aforementioned raw materials from European steel mills, and preparing sustainability reports.

Our approach with the workers in our value chain regarding our material impacts is described in the section devoted to our workforce. It includes references to our human rights policy commitments relevant to value chain workers, specific activities we are running to manage actual and potential impact, and our general approach to negative impact and remedies.

CONSUMERS AND END-USERS

ESRS S4

Our approach and policies

The policies adopted by New Box to manage relevant sustainability issues concern all final consumers and/or end users.

New Box's mission is to provide its customers with high-quality products and services by partnering with suppliers to develop and use more efficient or environmentally and safety-friendly technologies. New Box positions itself as a leader in the environmental field. The company's metal containers are sustainable packaging because they are 100% recyclable. Metal packaging protects the environment throughout its life cycle as it is eco-sustainable and eco-compatible.

Focusing on sustainability is proving to be a recipe for global success for brands. Sustainably marketed products are growing 7.1 times faster than conventionally marketed products. Consumers are losing their tolerance for products in packaging that are not easily or fully recyclable. A 2021 survey of more than 15,000 consumers

conducted by the Boston Consulting Group found that

- 57% are very likely to purchase products in packaging that is harmful to the environment;
- 44% refuse to buy products in packaging that is harmful to the environment;
- 73% are willing to pay more for eco-friendly packaging. 20% are willing to pay more than 10% more.

Actions

- New Box wants to partner with its customers before becoming a supplier.
- The site provides information on the channels available to customers, consumers, and/or end users who want to communicate with the company.

Our impact and risks

Attract the consumer's attention toward recyclable packaging.

New Box's products are metal packaging used for many types of content (mainly food and chemical), as input from several supply chains.

New Box products generate a positive impact, allowing consumers and end users of different kinds of products to recycle the packaging





SUSTAINABILITY
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