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Iscritta al n. 148084 del REA di Novara



# Gorgonzola

# RESPONSIBLE SOURCING POLICY





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## 1. Introduction

**IGOR S.r.l.** and its subsidiaries (hereinafter referred to as 'IGOR' or the 'Group'), long dedicated to producing Gorgonzola PDO, uphold environmental protection, human rights, and compliance with laws, regulations, and fair-trade principles as core values across all their activities.

Through this **Responsible Sourcing Policy** (hereinafter, the 'Policy' or the 'Document'), the Group aims to extend to its suppliers, principles and values it already implemented internally through corporate document, including the **ESG** (Environment, Social, Governance) **Policy**, the **Environmental Policy**, the **Human Rights Policy** and the **Code of Ethics**. In a global context where environmental, social and governance responsibilities are increasingly important, this Policy sets out **guidelines** for the Group's suppliers to uphold and promote human and labour rights, environmental protection and ethical and transparent behaviour in their operations.

IGOR is dedicated to managing its operations and supply chain in alignment with key international standards, including the **Universal Declaration of Human Rights**, the **United Nations Sustainable Development Goals** and European and national environmental, social and governance regulations. These principles, fundamental to the Group, are meant to extend beyond internal activities, fostering their promotion throughout the supply chain to build a responsible network that safeguards the environment and enhances the well-being of communities and society.

The Group's guiding values - Passion, Tradition, Excellence, Innovation and Social Responsibility - are closely connected to our commitment to sustainability and ESG issues. IGOR's **passion** for producing Gorgonzola PDO is mirrored in its care for the environment and the territory, striving to minimize the impact of its activities. **Tradition**, which preserves and respects a centuries-old recipe, is complemented by a commitment to adopting responsible practices in managing natural resources. **Excellence** is reflected not only in product quality but also in a tangible commitment to reducing environmental impact through resource-optimizing solutions. **Innovation** drives the Group to develop new approaches to enhance production processes and support a more sustainable use of resources. Finally, **Social Responsibility** is reflected in the protection of workers and support for local communities through initiatives that promote social welfare, improve living and working conditions, and promote respect for the rights and dignity of everyone involved across the value chain.



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Through this Policy, IGOR reaffirms its commitment to ensuring that every stage of the supply chain adheres to the core principles of sustainability and ethics.

## Recipients and Scope of Application

The scope of this Responsible Sourcing Policy encompasses the entire IGOR Group, including the company IGOR S.r.l., its subsidiaries and all associated offices and operating structures.

The Policy also applies to the Group's suppliers of goods and services, subcontractors and strategic partners. All stakeholders are expected to adhere to the principles outlined in this Policy, sharing the responsibility to uphold ethical business practices, respect for human and labour rights, and promote environmental protection.

In particular, the Recipients of this Policy are:

- **Suppliers, Subcontractors, Cooperatives and Direct Manufacturers:** All parties collaborating with IGOR for the supply of goods and services, including subcontractors along the production chain.
- **Commercial Partners:** Parties with which IGOR maintains strategic business relations, including distributors and other organisations that play a key role in implementing responsible sourcing practices.
- **Employees:** Everyone working within the IGOR Group, at all levels, is expected to uphold and promote the principles of this Policy in their daily activities, with particular focus on roles involved in purchasing and supply chain management processes.

In addition, all stakeholders working with IGOR to achieve the company's goals are part of this commitment, including:

- **Directors and Auditors:** People in governance roles in the company, whose behaviour must be aligned with the principles of this Policy.
- **Managers, Associates and External Consultants:** Anyone working closely with IGOR, including consultants and temporary partner, is required to uphold the principles of this policy.



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IGOR is dedicated to ensuring that the responsibility for adopting ethical and sustainable practices is shared across the supply chain, promoting behaviour aligned with the principles outlined in this Policy. Under no circumstances can the pursuit of the company's interests justify actions or decisions that violate ethical values, human dignity, fundamental rights, or environmental protection.

## Policy Objectives, Internal Policies, International Standards and References

IGOR's **Responsible Sourcing Policy** seeks to promote a responsible supply chain, based on respect for human rights, environmental protection and commercial transparency and integrity, across all the Group's activities and geographical areas, both current and future.

In accordance with the ESG principles adopted **internally** by the Group through **its internal policies** such as the ESG Policy, the Environmental Policy, the Human Rights Policy and the Code of Ethics, this Document seeks to ensure that suppliers and business partners operate in alignment with the standards outlined in these policies. IGOR strives to develop and, where possible, implement monitoring and evaluation tools to assess supplier performance, with the goal of enhancing transparency and traceability throughout the entire supply chain. While acknowledging the challenges of implementing these tools in a complex and ever-changing environment, the Group remains committed to doing its utmost to promote responsible practices and identify solutions that ensure compliance with the principles outlined in this Policy.

To further ensure the success of this Policy, IGOR relies on a set of established and recognised **international references and standards** that serve as the foundation of its commitment:

- **The United Nations Sustainable Development Goals (SDGs)**, with particular reference to goals such as SDG 3 (Health and Well-being), SDG 4 (Quality Education), SDG 5 (Gender Equality), SDG 6 (Clean water and Sanitation), SDG 7 (Clean and affordable energy) SDG 8 (Decent Work and Economic Growth), SDG 9 (Industry, Innovation and Infrastructure), SDG 10 (Reducing Inequality), SDG 11 (Sustainable



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- Cities and Communities), SDG 12 (Responsible Consumption and Production), SDG 13 (Climate Action), and SDG 15 (Life on Land), SDG 17 (Partnership for the Goals);<sup>1</sup>
- **The 10 Principles-UN Global Compact**, which provide a practical framework to guide companies in adopting responsible practices to manage their impact on the environment and society;<sup>2</sup>
  - The international instruments (such as ILO **Conventions**, UN Declarations including the **Universal Declaration of Human Rights** and International Covenants) referenced in the **SA8000:2014 Social Accountability Standard**;<sup>3</sup>
  - **The ISO 50001 Guidelines**, which provide a framework for an energy management system aimed at improving energy efficiency, optimising consumption and reducing environmental impact;<sup>4</sup>
  - Animal welfare standards, such as **Classyfarm**, an assessment system designed to ensure responsible farm management and compliance with animal welfare conditions across the entire production chain;<sup>5</sup>
  - The **BRC Food Safety Standard**, a global benchmark for food safety, defines strict procedures for quality and safety control in production processes, ensuring products that are safe and compliant with legal requirements;<sup>6</sup>
  - **Legislative Decree No. 81 of 9 April 2008** regulates health and safety in the workplace, establishing obligations for the protection of workers and the assessment of company risks<sup>7</sup>;
  - **Legislative Decree 231/2001** establishes the administrative liability of employers and companies for offences committed by their employees or managers;<sup>8</sup>

<sup>1</sup> UN Italy. [The new 2030 Agenda for Sustainable Development](#)

<sup>2</sup> [The Ten Principles | UN Global Compact](#)

<sup>3</sup> [Social Accountability 8000 \(sa-intl.org\)](#)

<sup>4</sup> [ISO - ISO 50001 - Energy management](#)

<sup>5</sup> [Classyfarm](#)

<sup>6</sup> [BRCS Food Safety Global Standard](#)

<sup>7</sup> [Official Gazette](#)

<sup>8</sup> [Legislative Decree No. 231 of 8 June Official Gazette](#)



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## 2. The Main Topics in Responsible Sourcing

To identify the main ESG impacts, including potential ones, relevant to its supply chain, IGOR considers the contextual characteristics of its business alongside key international environmental, social, and governance frameworks. These include the International Trade Union Confederation's **Global Rights Index**<sup>9</sup>, the **UN Human Rights Guidelines**<sup>10</sup>, **Human Rights Watch's "World Report 2024"**<sup>11</sup>, and informational documents such as the **European Food Safety Authority's**<sup>12</sup> analysis of key material issues in the agricultural sector, the European Commission's 10-year **"Farm to Fork"**<sup>13</sup> plan and the Food and Agriculture Organisation's agroecological references, including the **"10 elements of Agroecology"**<sup>14</sup>. Furthermore, in relation to governance, the predicate offences outlined in the management model adopted by IGOR pursuant to **Legislative Decree 231/2001**<sup>15</sup> are taken into consideration.

This approach allows for the identification, prevention and, where possible, mitigation of environmental, social and governance impacts linked to the supply chain, while also identifying the associated risks for the Group. The list of impacts is regularly updated based on regulatory and sectoral developments, as well as information provided by suppliers. The main impacts that IGOR aims to monitor include:

- **Negative impacts on animal welfare** resulting from irresponsible herd management practices;
- **Greenhouse gas emissions** generated by activities across the supply chain that contribute to climate change and global warming;
- **Release of pollutants** that may contaminate air, water and soil, causing harm to the surrounding environment;
- **Over-exploitation of water resources** caused by irresponsible consumption practices, potentially compromising water availability for other activities or for local communities;

<sup>9</sup> [Global Rights Index - International Trade Union Confederation](#)

<sup>10</sup> [Universal Declaration of Human Rights | United Nations](#)

<sup>11</sup> [World Report 2024 | Human Rights Watch](#)

<sup>12</sup> [EFSA | Science, safe food, sustainability](#)

<sup>13</sup> [Farm to Fork Strategy - European Commission](#)

<sup>14</sup> [10 elements | Agroecology Knowledge Hub | Food and Agriculture Organisation of the United Nations](#)

<sup>15</sup> [Official Gazette](#)



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- **Destruction of natural habitats and loss of biodiversity**, caused by production activities, endangering ecological balances and the natural richness of ecosystems;
- **Environmental impacts caused by the use of non-renewable materials** and the generation of non-recyclable waste, which obstruct circular economy practices;
- **Human rights violations**, including forced or child labour within the supply chain, which undermine workers' dignity and violate fundamental human rights;
- **Inadequate working conditions and violations of workers' rights**, which can jeopardize the safety, health and dignity of individuals employed in the supply chain;
- **Discrimination and violations of equality rights**, which can undermine inclusiveness and respect for the rights of all workers;
- **Negative impacts on local communities** caused by the exploitation of natural resources or the failure to respect people's rights, resulting in social and economic harm;
- **Supply of poor quality or unsafe products** that could endanger the health and safety of end consumers;
- **Occurrence of corruption** and unfair business practices.

In addition to addressing these specific environmental, social and governance issues, IGOR reaffirms its commitment to cross-cutting issues it considers fundamental, as outlined in the next section titled '**Principles of Responsible Sourcing**'.

The Group is dedicated to collaborating with partners and suppliers who uphold these principles, reserving the right to terminate the partnership if unmitigated violations of the ESG principles outlined in the Policy are identified.





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## 3. Principles of Responsible Sourcing

### Environmental Principles

#### Commitment to Animal Welfare Throughout the Supply Chain

IGOR recognises animal welfare as a fundamental value of its activities and is committed to ensuring that all animals involved, directly or indirectly, are treated with respect, in accordance with the highest ethical, regulatory and scientific standards. The Group promotes practices that guarantee adequate living conditions, including access to sufficient space, proper nutrition and veterinary care.

IGOR requires its suppliers, particularly those in the milk chain, to adhere to the same principles and implement responsible and animal welfare-friendly practices. The Group monitors and actively works with partners to ensure compliance with these standards, ensuring responsible and respectful behaviour towards animals.

#### Commitment to Climate Change Mitigation and Adaptation

IGOR is committed to mitigating climate change by reducing greenhouse gas emissions, promoting the use of renewable energy and optimising energy efficiency. Furthermore, where possible and applicable, IGOR integrates adaptation strategies to enhance the resilience of its operations to the impacts of climate risks.

IGOR requires its suppliers to uphold and respect these principles and, where possible, take concrete measures to reduce emissions, use renewable energy, promote responsible procurement practices, and implement mitigation and adaptation strategies.

#### Pollution Prevention and Reduction

IGOR strives to prevent air, water and soil pollution through the responsible management of pollutants and, where applicable, their reduction by adopting environmentally friendly and alternative solutions.

IGOR expects its suppliers to share the same commitment by adopting effective practices to minimise the environmental impact of their operations, with a particular focus on the management and reduction of pollutants, including microplastics.



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## Shared Commitment to the Responsible Management of Water Resources

IGOR is dedicated to promoting responsible water management by reducing waste and optimising water efficiency in its production processes. The Group implements solutions for water recycling and reuse, leveraging technologies to minimise environmental impact.

IGOR expects its suppliers to share this commitment, by adopting effective practices to optimise water resource usage and minimise waste wherever possible.

## Biodiversity Conservation and Ecosystem Protection in the Supply Chain

IGOR is dedicated to minimising direct and indirect impacts on biodiversity, land use changes and the exploitation of natural resources. The Group promotes initiatives to protect local fauna and flora, supporting projects aimed at conserving ecosystems and biodiversity. It adopts responsible agricultural and industrial practices to reduce natural resource consumption and safeguard local species.

IGOR expects its suppliers, especially those in the milk supply chain, to embrace this commitment by implementing practices that minimize the environmental impact of their operations on biodiversity and actively contribute to the protection of ecosystems.

## The Circular Economy and Resource Optimisation

IGOR is dedicated to promoting the circular economy by implementing practices of reuse, recycling, and waste reduction within its production processes, while adopting solutions to optimize resource use and minimize environmental impact. The Group's commitment also extends to the use of environmentally friendly packaging, emphasising plastic reduction and resource efficiency.

IGOR expects its suppliers, particularly packaging suppliers, to adhere to these principles by adopting practices that prioritise the use of recyclable and recycled materials, minimise waste and ensure the responsible use of resources.



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## Social Principles

### Decent Working Conditions in the Supply Chain

IGOR is dedicated to promoting and protecting the human rights of all workers, including its direct employees and self-employed throughout the supply chain. Every workplace must be based on the principles of respect, fairness and protection, ensuring conditions that safeguard the physical and mental well-being of all individuals.

The Group considers the right to decent wages, sustainable working hours, a safe environment and respect for the right to freedom of association as essential for all workers. Consequently, IGOR requires its suppliers to adhere to these principles and to align with the best human rights practices, ensuring that workers' rights are fully respected across all their operations.

### Non-Discrimination, Equal Treatment and Opportunity along the Supply Chain

IGOR places respect for diversity, inclusion and equal treatment for all, regardless of ethnicity, sexual orientation, gender identity, disability or other personal characteristics, at the core of its corporate culture. IGOR condemns all forms of discrimination, fostering an environment where merit, talent and skills are the primary criteria for professional success.

The promotion of gender equality and equal pay for work of equal value are essential pillars of IGOR's vision. The Group expects its suppliers to uphold these values by implementing equal opportunity policies and promoting continuous training to develop skills and foster integration.

### Condemnation of Forced Labour, Child Labour and all Forms of Violence

IGOR firmly condemns all forms of forced labour, child labour and any kind of violence. It is committed to ensuring that no employee or associate, whether directly or indirectly involved in its activities, is subject to exploitative conditions or coercion.

Accordingly, IGOR requires its partners and suppliers to implement strict practices and policies to prevent and condemn forced labour, child labour, and any form of violence in its working environment. Cooperation across the supply chain must be founded on the protection of fundamental human rights, ensuring the complete absence of child labour



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and forced labour are completely absent at every stage of the value chain. This commitment is a core element of IGOR's social responsibility and a fundamental prerequisite for collaboration.

## Protecting the Economic, Social and Cultural Rights of Communities

IGOR is dedicated to protecting the economic, social and cultural rights of the communities in which it operates and actively promoting these rights throughout the value chain. The Group is committed to fostering the well-being of local communities by driving initiatives that expand access to decent work opportunities, promote training and development, and enhance social and cultural conditions.

IGOR encourages its suppliers to embrace this commitment by adopting practices that foster social inclusion, respect for the economic rights of communities and support for economic self-sufficiency, where possible and applicable.

## Protecting the Civil and Political Rights of communities Across the Supply Chain

IGOR is dedicated to respecting and promoting the civil and political rights of the communities it engages with, ensuring the protection of the right to freedom of expression and political participation. The Group operates in full compliance with local and international laws protecting fundamental human rights. Consequently, IGOR expects its suppliers to share and uphold these values by promoting civic engagement in the territories in which they operate and guaranteeing the full protection of the civil and political rights of the communities involved.



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## Principles of Governance

### Ethics, Transparency and Compliance

IGOR is dedicated to operating in accordance with the highest ethical and transparency standards, fully adhering to local and international regulations, including those related to anti-corruption and fair competition. The Group promotes transparent and responsible business management, ensuring the adoption of ethical business practices across all its operations.

IGOR requires its suppliers to uphold these same principles, ensuring clear and transparent communication in all aspects of their business operations. Suppliers must fully comply with all regulations, thus contributing to a supply chain defined by integrity and regulatory compliance.

### Respect for Privacy and Data Protection in the Supply Chain

IGOR is dedicated to protecting privacy and ensuring the security of personal data by implementing organisational measures to prevent unauthorised access, loss or data breaches. The Group operates in full compliance with applicable regulations, handling all sensitive information with confidentiality to protect and maintain the trust of all stakeholders.

IGOR requires its suppliers to strictly adhere to the same principles by implementing policies and procedures for the protection of personal data and IT security, where applicable. Suppliers must handle all sensitive information with confidentiality and implement appropriate measures to ensure compliance with privacy and data security regulations.

### Whistleblower Protection and Report Management

IGOR has implemented a whistleblowing procedure to enable the safe and confidential reporting of ethical or legal violations. The Group is committed to protecting whistleblowers from any form of retaliation or discrimination, ensuring a work environment where misconduct or wrongdoing can be reported freely and responsibly.

IGOR requires all relevant suppliers to establish similar whistleblowing systems, ensuring the protection of whistleblowers and fostering a culture of transparency and accountability across the supply chain.



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## 4. Responsible Supply Chain Management

IGOR endeavours to ensure that its suppliers respect the ESG principles set out in its Responsible Sourcing Policy. To achieve this goal, the Group has established a clear and structured process to ensure sustainable supply chain management, consisting of several key steps outlined below.

### ESG Risk Analysis

IGOR's responsible supply chain management is grounded in an ESG risk assessment, designed to identify key impacts, including potential ones, related to environmental, social, and governance issues within suppliers' activities. To this end, the sector and region of origin of suppliers are carefully assessed, considering laws, economic dynamics, and social conditions that may impact their ability to comply with ESG standards. This process generates a comprehensive list of ESG risks categorized into three areas: environmental, social, and governance. The list is periodically updated to reflect changes in the regulatory environment and information provided by suppliers.

### Supplier Analysis and Selection

Based on the ESG risk assessment, IGOR utilises self-assessment questionnaires, which are distributed to suppliers at regular intervals. This system enables the Group to monitor suppliers' compliance with the principles outlined in the Policy and to take prompt action where necessary, ensuring ongoing alignment with the Group's ESG values.



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## Supply Chain Monitoring and Evaluation

This stage of the process involves continuous monitoring of supplier performance. Based on the risk analysis, IGOR reserves the right to take corrective measures proportionate to the identified risks. These measures include:

- Request for declarations of adherence to the Code of Conduct;
- Request to complete the self-assessment questionnaire;
- Request for targeted corrective action;
- On-site audits at suppliers' facilities.

## Staff training and Awareness-Raising

Sustainable supply chain management is reinforced by an internal system that offers **targeted training programmes** for Group employees involved in supply chain management or procurement. Employees attend courses focused on ESG issues, equipping them with the skills needed to identify and address environmental, social and regulatory risks. This contributes to strengthening the company's commitment to sustainability and ethical practices.



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## 5. Policy Dissemination

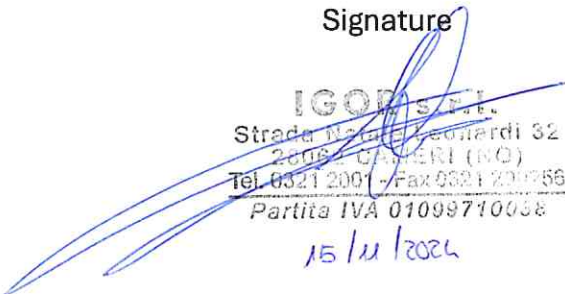
The **Purchasing** and **Quality Control** functions are responsible for disseminating the Responsible Sourcing Policy within the Group and ensuring that all relevant employees and associates fully understand the principles it outlines. In addition, the Policy is made available to all employees in printed format, ensuring visibility and ease of reference.

All suppliers are informed of the Responsible Sourcing Policy through dedicated communication channels and are requested to review and sign the document, confirming their commitment to its principles. Acceptance of this Policy is regarded as a fundamental requirement for establishing and maintaining business relationships with the Group.

This Document was approved by the IGOR Board of Directors on *15 November 2024* and is regularly updated to ensure alignment with evolving regulations and legal developments. Any revisions or amendments are subject to the approval of the Board to ensure that the content remains current and aligned with industry best practices.

Finally, the Policy is publicly available at [Gorgonzola DOP Dolce e Piccante | IGOR Gorgonzola Novara](#), ensuring maximum transparency and accessibility to all stakeholders. Furthermore, to gather stakeholders' opinions and suggestions regarding the Policy and to promote continuous improvement, all Addressees are encouraged to share their feedback and proposals for updates by contacting the following email address: [giulialeonardi@igornovara.it](mailto:giulialeonardi@igornovara.it). The comments and observations received will be carefully considered during the periodic review of the Policy, with the aim of ensuring that the Policy remains abreast of regulatory changes and continues to reflect IGOR's commitments to human rights.

Signature

  
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