

CERTIFICATE OF REGISTRATION

This is to certify that the management system of:

Rotocalco Mediterranea S.r.l.

Via Stentinello, 11, Contrada Targia, Siracusa, 96100, Italy

complies with the requirements of:

Forest Stewardship Council[®] Chain of Custody Standard

for the following scope of certification

Product Types: P2.3 Wrapping and packaging paper. Claims: FSC Mix. System Used: Transfer. Certificate Type: Single CoC Certificate- Single Site. Standard Versions: FSC STD-40-004 V3-1, FSC STD-50-001 V2-1. Certificate Number: 0206071

Original Certification Date: 26 February 2025

Certification Effective Date: 26 February 2025

Issuing Date: 26 February 2025

Issue number: 1

Certification Expiry Date: 25 February 2030

FSC[®] code: SAI-COC-013617



The mark of responsible forestry FSC[®] A000519

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assurance services international

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Company Legal Name:	ROTOCALCO MEDITERRANEA S.R.L
Division Name:	ROTOMED
Legal Registration Address:	Via Stentinello, 11- Contrada Targia Siracusa SR
State/Prov, Country:	Sicilia – Italy
Postal Code/ZIP:	96100
Contact person:	Sig. VINCENZO ASARISI

SAI File number: Audit type: Date of the report: FSC[®] certification code: Certificate registration date: Certificate expiry date: ACTY-2025-300581

Initial/transfer 12/2/2025 SAI-COC-013617 26/02/2025 25/02/2030



The mark of responsible forestry FSC[®] A000519 FSC certification services are provided in association with SAI Global Certification Services Pty Ltd.

TABLE OF CONTENT

1	SCOPE OF THE EVALUATION	3
	1.1 AUDIT TEAM	3
	1.2 AUDIT OVERVIEW	3
	1.3 NORMATIVE DOCUMENTS	
	1.4 CHANGES IN THE SCOPE OF THE CERTIFICATE	3
2	CERTIFICATE SCOPE INFORMATION	3
	2.1 Certificate Scope details	
	2.2 FSC Product Groups	4
3	CERTIFICATE SITES DETAILS	5
4	COMPLAINTS	
	4.1 COMPLAINTS RECEIVED	
5	OUTSOURCING	
6	GROUP AND MULTI-SITE (FSC-STD-40-003)	
7	CONTROLLED WOOD (FSC-STD-40-005)	
8	PROJECT CERTIFICATION (FSC-STD-40-006)	
9	RECLAIMED MATERIALS (FSC-STD-40-007)	
10	EVALUATION OF FINDINGS	
	10.1 DESCRIPTION OF THE SYSTEM AND CRITICAL CONTROL POINTS	7
	10.2 ISSUANCE OF A CHAIN OF CUSTODY CERTIFICATE BEFORE THE ORGANIZATION HAS TAKEN PHYSICAL	
	ssession of FSC-certified material	
11	AUDIT FINDINGS	11
	11.1 FOLLOW-UP ON NON-CONFORMITIES ISSUED BY THE CERTIFICATION BODY DURING THE PREVIOUS	
EVA	ALUATION	11
	11.2 Non-Conformities issued during the present evaluation and/or non-conformities	
ISS	JED BY SAI GLOBAL FOLLOWING A COMPLAINT INVESTIGATION.	
	11.3 HISTORY OF NON-CONFORMITIES FOR THIS AUDIT CYCLE	
	CERTIFICATION DECISION	
	NEXT SCHEDULED AUDIT	
	PENDIX 1: CHECKLISTS	
	PENDIX 2: TRANSACTION VERIFICATION FINDING	
	PENDIX 3: FSC ANNUAL ADMINISTRATION FEE (AAF)	
	PENDIX 4: FSC DATABASE MANAGEMENT INFORMATION SHEET	
AP	PENDIX 5: STANDARD CONVERSION FACTORS (INFORMATIVE)	16

1 Scope of the evaluation

1.1 Audit Team

Auditor(s)	Qualifications
Paolo Motto	Lead Auditor Intertek - Sai Global

1.2 Audit Overview

SAI File #	Site(s) name	Evaluation Date(s)	Onsite auditing time
ACTY-2025-300581	Via Stentinello, 11- 96100 Contrada Targia Siracusa – SR - Italy	12.2.2025	1 MD ON SITE + 0.75 off site

1.3 Normative documents

The list of normative documents used for this audit is found in the certificate scope details in section 2.1

1.4 Changes in the scope of the certificate

No change, previously certified under RINA-COC-000592 (expires 19th Feb 2025)

2 Certificate Scope Information

2.1 Certificate Scope details

Product Types: P2.3 Wrapping and packaging paper.Claims: FSC Mix.System Used: Transfer.Certificate Type: Single CoC Certificate- Single Site.Standard Versions: FSC STD-40-004 V3-1, FSC STD-50-001 V2-1.

2.2 FSC Product Groups

Output Product Type	Product Group Name	Species (Scientific and common names)	Primary Activity	Secondary Activity	Main Output Category	Control System
P2.3 Wrapping and packaging paper	Wrapping and packaging paper	mix af different species	Secondary processor	Choose item.	FSC Mix	Transfer

3 Certificate Sites details

FSC Sub- code	SAI File #	Site legal name	registration	Site Address (if different than legal address)	Site Activity Volume S	ummary	AAF class (Per site)	Project Members (only applicable	
			address			Total FSC input	Total FSC output	(rei site)	for FSC-STD-40- 006)
//	ACTY-2025- 300581	ROTOCALCO MEDITERRANE A S.R.L	Via Stentinello, 11- Contrada Targia 96100 Siracusa Sr	//	Secondary processor	from 1.1.2024- 31.12.2024 initial stock P2.3 173.943 kg FSC MIX CREDIT Input P.2.3 1.208.930 kg FSC Mix Credit Stock P2.3 FSc Mix credit 31.12.2024 292.138	from 1.1.2024- 31.12.2024 output P2.3 (prodotto e venduto) = 1.090.735 kg FSC MIX CREDIT	Class 2	//

4 Complaints

4.1 Complaints received

A description and review of any complaints, disputes or allegations of non-conformities received by the Organization and/or SAI Global, is presented here.

4.1.1 Complaint received since last evaluation

No complaints regarding the FSC Chain of Custody or Controlled Wood certification have been received by the Organization and/or SAI Global since the last evaluation.

4.1.2 Description of actions taken to address the complaint

Not applicable

5 Outsourcing

Not applicable (The organization does not outsource any of its activities).

6 Group and Multi-site (FSC-STD-40-003)

Not applicable (The organization has a single site CoC certificate).

7 Controlled Wood (FSC-STD-40-005)

Not applicable (The organization is not sourcing controlled material and is not certified to the FSC Controlled Wood standard FSC-STD-40-005).

8 Project Certification (FSC-STD-40-006)

Not applicable (The organization is not certified to the FSC Project Certification standard FSC-STD-40-006).

9 Reclaimed Materials (FSC-STD-40-007)

Not applicable (the organization does not source reclaimed materials for its Chain of Custody).

10 Evaluation of findings

10.1 Description of the system and critical control points

The following is a brief description of the system by which the organization maintains control over the Chain of Custody for all products included on its FSC product group list. Critical control points are those places or situations in the supply chain where materials from uncertified/uncontrolled sources could enter or where certified/controlled materials could leave the system.

		Non-
Control Points	Description of the critical control points	compliance

Management System	The coc management system is adequate for the company reality and the type of production	None
	The company is also certified :	
	- BRC/IOP GLOBAL STANDARD FOR PACKAGING AND PACKAGING MATERIALS	
	- IISO 9001:2015	
	- ISO 14001:2015	
	- 45001	
	The company mainly produces plastic film packaging - 10% is now required in paper material	
	The following documentation has been prepared:	
	FSC Chain of Custody Management System MANUAL and the following PROCEDURES:	
	- P-FSC001 Raw material procurement, Receipt and Storage of raw materials. FSC Balance Sheet Control	
	- P-FSC002 Sales and Shipping	
	- P-FSC003 Training	
	- P-FSC004 Non-compliance Management	
	- P-FSC005 FSC System Documentation Management	
	The company has identified the figures involved in the CoC and has carried out adequate training. The records are set up in compliance with the requirements	
	The company has adopted the transfer system and guarantees the identification of the material at each stage of processing, from the raw material warehouse to the finished product. Production management is carried out by orders with the preparation of a sheet with the relevant information.	
	Upon arrival, the raw material (rolled paper) is placed in specific areas and identified with internal labelling (delivery note and date, declaration and supplier).	
	FSC Policy and self-assessment of ILO requirements prepared	

Purchasing/Sourcing	The company has qualified the suppliers of certified raw materials and the materials to be used (Input/output). List of qualified suppliers Mod 11 A with all the information required. The registration documents and record of validity and scope are available. The incoming material consists of FSC mix reel packaging paper (specifically single-gloss, single-coated and Kraft paper of variable thickness). The possible FSC provided codes are P2 - P2.3 or P9 depending on the classification made by the suppliers Single claim defined as FSC Mix The Supplier List currently contains qualified suppliers located in Europe The control of the incoming material is carried out by the acceptance manager by	None
	checking the transport documentation and the correspondence with the unloaded material. All the purchase of paper raw material is FSC certified (limited compared to other raw material used of plastic origin)	
	On the reels, in addition to the supplier's label, an internal label is applied with the FSC acronym and a barcode used for loading into the warehouse, showing the unique progressive reel number that acts as traceability of the individual reel.	
Receiving/Storage	The purchased material, after the appropriate documentary checks, is stored in dedicated areas with a specific identification label.	None
	Logistics management is carried out by internal staff. The same goes for finished products.	
	The next phase consists of:	
	• printing	
	• cutting	
	During the production phase, the order is managed by batch number; the processing sheet (a worksheet for each semi-finished product created in each department) defines all the production aspects and the information on the paper used for the order	

Volume control and System for controlling FSC claims Sales/Shipping	FSC CoC MANUAL paragraph 8.3. "Volume control" The methods for managing the balance register between inputs and outputs for the purposes of FSC volume control are reported in the dedicated system procedure (P-FSC001). The responsibility for the activities carried out with the volume control for FSC purposes lies with the FSC Management Control Officer. Using the Max Roto management software, LA ROTOCALCO manages its own "Balance Register" for FSC certified material. Excel registers of: INCOMING RAW MATERIAL USED RAW MATERIAL SHIPPED PRODUCTS There are records of: - Loading warehouse history - Unloading warehouse history - finished product warehouse already made upon customer order, - shipped product warehouse possibility of filtering via FSC field the batch number allows traceability from the raw material to the finished product. The P-FSC002 Sales and Shipping Procedure contains information relating to sales documentation (DDT and invoices)	None
	The claim inserted on the finished product is FSC MIX credit Invoicing uses the Max Roto management system The company's products are mainly marketed in Italy. The finished products are transported by external carriers	
Labelling (If applicable)	The company use the logo on the product and for promotional purposes on the website, DDT and FT and has prepared a specific procedure in the FSC Manual without an internal approval system on the product applied its own logo and customer logo No auto approval system The procedure is in compliance with FSC requirements.	None
Outsourcing (if applicable)	No use of third parties	None
FSC trademark (if applicable)	Not applicable	None
Control of project Members (if FSC- STD-40-006 is in scope)	Not applicable	None

10.2 Issuance of a Chain of Custody certificate before the Organization has taken physical possession of FSC-certified material



Not applicable (the current evaluation is not an initial audit)

Applicable to initial audit only: a Chain of Custody certificate may be issued before the company has taken physical possession of FSC-certified material if the certification body is satisfied that an operational Chain of Custody system is in place. In such cases, the company shall notify SAI Global as soon as FSC-certified stock is available, or the production of FSC-certified material has started.

Physical possession	Status #1: FSC material was on site or the production of FSC material had started.					
status:	Initial /Transfer audit : the organization currently is certified by RINA					
When status #3 above is selected, the auditor shall inform the company that SAI Global will carry out a						
(second) site visit or cor	econd) site visit or conduct the first surveillance audit within three months of the reception of FSC-					
certified products by th	certified products by the company.					

PLEASE NOTE: As per the client obligations contained within the Sector Specific Requirements FSC (referenced in your contract): Where physical possession has not been taken at the initial audit AND you have received non-conformity/s raised to a critical control point (status #3 will be shown above), you must inform us within

10 days of receipt of FSC material via forestry@intertek.com, to schedule a follow-up audit.

11 Audit Findings

11.1 Follow-up on Non-Conformities issued by the certification body during the previous evaluation

Not applicable (No open NC from previous evaluation)

11.2 Non-Conformities issued during the present evaluation and/or non-conformities issued by SAI Global following a complaint investigation.

NC #:	2025-01	Grade:	Major		
Standard Requirement:		FSC-STD-40-004v 3-1 clause 1.3			
Description of No	Description of Non-conformity and Objective Evidence:				
ETLA to be signed	ETLA to be signed by the legal representative Mr. Vittorino Loreto				
Justification for Major or Minor:					
Major: Prevent achieving the objective fo the criteria					
Justification for closing the non-conformity:					

eTLA ROTOCALCO CH has signed the eTLA ^{MEDITERRANEA Sign(}		
Timeline for Conformance:	Prior to recertification	
NC Status:	Closed	

11.3 History of Non-Conformities for this audit cycle

NC #	Standard requirement	I/RR	S1	S2	S3	S4
2025-01	FSC-STD-40-004 V3-1 Clause 1.3	Major				

12 Certification Decision

Based on the review of the company's documentation, and the audit results, the following recommendation is made:

Initial / Recertification audit – with NCs

Based on the results of this Initial evaluation / recertification audit it has been determined that the Chain of Custody system is not effectively implemented and does not fully meet the standard requirements based on the area(s) of non-conformance summarized in this report. A recommendation for registration to the standard requirements and to the scope of registration identified in this report is on hold pending the receipt, review, and acceptance of the corrective action taken and closure of the major non-conformances. The certification decision is confirmed with the registration and issuance of the certificate.

13 Next Scheduled Audit

Date(s): 13/2/2026

Type of Audit: S1

Appendix 1: Checklists

Systematic presentation of findings demonstrating conformity or nonconformity to each element of all applicable FSC normative document(s) used for the evaluation are included in the checklists below.

Standard	Insert the applicable checklist as "object"
FSC-STD-40-003 Multisite or Group	
FSC-STD-40-004 Chain of Custody	Rotocalco%20Medite rrane%20FSC%20CO
FSC-STD-40-005 Controlled Wood	
FSC-STD-40-006 Project Certification	
FSC-STD-40-007 Reclaimed	
Other	

APPENDIX 2: Transaction Verification Finding



Not Applicable

0r

In the case that one of the following situation prevails. The FSC Portal (section New Transaction Verification Finding) must be completed. Indicate which situation applies	 A. The organization has not sold any FSC product since last audit
	 B. Non-conformities, suspensions, terminations, and removal of participating sites <u>due to false claims</u> <u>and/or fraud made by organizations</u>
	C. Recommendation of organizations that should be investigated by ASI and the justification (e.g., evidence suggests that records are being hidden from the certification body, complaints received about the organization, potential volume mismatches between the organization and its trading partners).

Appendix 3: FSC Annual Administration Fee (AAF)

Revenue and Forest Products Turnover in USD

The auditor <u>shall confirm</u> with the CH the annual Forest Products Turnover in **USD** for the most recent completed fiscal year. <u>A documented evidence</u> (ex: financial statement, annual report) must support the information provided and <u>be referenced</u> <u>below</u>.

Currency converter provided by OANDA shall be used <u>www.oanda.com</u> or the figure from the National bank in the country if OANDA site is not available.

Initial	Start and End date of the company fiscal year (Day /Month/Year):	1/1/2024-31/12/2024
	Total Revenue ¹ :	26750000 € converted on OANDA.com as of 31/12/2024 27861730 USD
	Total Forest Product Turnover in USD:	4400000 € converted on OANDA.com as of 31/12/2024 4582864 USD
	Source of information:	provisional annual report, signed by Administrative Director Amelia Loreto
	Organization type (Processor or Trader):	Processor, class 2
	For company that do not want to provide either the Forest	NA
	Products Turnover or Revenue, insert what the AAF class was	
	from the previous year ²	

Forest Products Turnover: Forest Products Turnover means the Revenue of <u>all certified</u> and <u>uncertified</u> forest products and products containing wood or fibre components. (i.e., all wood products, pulp and paper products, and non-timber forest products according to FSC-STD-40-004a). It does not refer to 100% non-forest products companies might produce. For clarification, Forest Products Turnover does not refer to related services.

Revenue: Revenue means the total revenue of an organization derived from the provision of goods and services, less trade discounts, VAT, and any other Taxes based on this Revenue. This is also less intracompany sales (i.e., after any consolidation where a financial group is existing). Revenue refers to the most recently completed fiscal year and means the total Revenue, which is the exact number to the nearest whole USD. The conversion rate upon entering the data into the FSC Certification Database is the respective rate on the date of the CH's fiscal year-end as per the mid-market rate on OANDA.

¹Note to Auditors: If the Forest Products Turnover figure <u>does not</u> involve an element of estimation, meaning there is clear and convincing evidence that it is accurate and has been obtained <u>through a proven reliable process</u>, we may waive the requirement to collect the Revenue.

²Note to Auditors: If the organization <u>does not want</u> to provide the information about the Forest Products Turnover <u>and or</u> the Revenue, SAI Global will use the process elaborated by FSC to calculate the AAF. Process is described in FSC-FAQ-20-005

Appendix 4: FSC Database Management Information Sheet

Instructions:

1. Auditor shall verify the FSC database annually (info.fsc.org) to ensure the information is up-to-date

2. Indicate with an **X** in the table below the type of changes require and briefly explain the changes needed as well as where the information can be found in this report.

Please select:

□ Initial audit. Database entry needs to be created

□ No update required. FSC database information is accurate and up-to-date.

☑ Update required:

Type of update required	Check	Indicate precisely what need to be added or removed, and where the information can be found in this report.
Certificate holder name or main address		
Normative standards listed		
Product type		
Species		
Main Output Category		
Change in the list of participating sites (addition, removal, address change)		
Change in the FSC AAF class (not visible, but must be entered into FSC database)		
Others (specify)	\boxtimes	Certificate code number and issue date

Appendix 5: Standard Conversion Factors (Informative)

	<u> </u>	
1 mfbm = 2.36 m ³	1 pound = 0.4536 kg	1 square foot = 0.0929 m ²
1 cord = 2.55 m ³	1 US ton = 907.185 kg	1 acre = 0.405 hectares
1 inch = 2.54 cm	1 UK ton = 1016.047 kg	1 mile = 1.60934 km
1 foot = 0.3048 m		
1 yard = 0.9144 m		Other:
1 gallon (US) = 3.78541 liters		

FSC® Certificate of Registration

Good afternoon,

A copy of your SAI Global/Intertek FSC[®] Certificate of Registration is attached.

In order to reduce our environmental footprint, we will not automatically provide a hard copy of your certificate.

You will receive an email from FSC which will include a link giving you access to the logo generator. Your registration provides an invaluable edge in the marketplace. You may want to review the Marketing Guidelines document attached to ensure you are using the appropriate labels/logos.

IMPORTANT: All use of FSC^{*} trademark (On product or Off-product) must be approved by SAI Global. Please send any request to: <u>fsclabel.approvals@saiglobal.com</u>

On your certificate you will find your CoC number that must be used on your invoice and shipping document when selling material with an FSC[°] claim. The format of this number is: **SAI-COC-123456**.

If your scope of registration includes the Controlled wood you will also find the Controlled wood number on your certificate. The format of this number is: **SAI-CW-123456**. It must also be include on your invoices and shipping document for material sold with an FSC Controlled wood claim.

If your certificate is for a certified forest management unit (FMU), the format of this number is **SAI-FM/COC-123456**

Thank you for being our customer; we appreciate this opportunity to serve you.