



# ENVIRONMENTAL POLICY

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## 1. Purpose and Objectives of the Policy

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This Policy reflects the philosophy of SICIT Group S.p.A. (“SICIT”) and its subsidiaries and affiliates (collectively, “SICIT Group”) and is intended to provide general guidance for the responsible and sustainable protection of the environment.

Through this document, the Group aims to preserve natural resources and promote sustainable development, ensuring that both present and future generations can enjoy a healthy environment.

Environmental protection is a core value for SICIT Group and a key element of its organizational culture, both in the conduct and development of its business activities.

Specifically, this Policy establishes directives for directors, managers, employees, agents, consultants, intermediaries, controlled joint ventures, and other third-party representatives of SICIT Group, to ensure full compliance with applicable environmental laws and regulations.

By adopting this Policy, SICIT Group commits—throughout the course of its business relationships—to encouraging its business partners to uphold the principles outlined herein and to promoting the adoption of similar policies within their own organizations.

## 2. Scope of Application

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This Policy establishes a minimum set of environmental protection rules that apply to all companies within the SICIT Group.

At the local level, each company may adopt stricter rules and procedures, as needed, based on its specific operational context.

While exercising its oversight and coordination activities, SICIT Group respects the managerial autonomy of each affiliated company within the Group, while maintaining overall governance and control in line with the legitimate interests of both majority and minority shareholders, and in compliance with applicable local laws and confidentiality requirements.

## 3. SICIT Group’s Approach to Environmental Protection

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SICIT Group places the highest importance on protecting the environment in which it operates and promotes the development of initiatives aimed at progressively reducing the environmental impact of its activities, while raising awareness among all stakeholders.

This Policy, aligned with the principles set out in the Group’s Code of Ethics and consistent with its internal regulatory framework, reflects SICIT Group’s integrated vision of environmental responsibility in the conduct of its business operations, in compliance with the laws of the countries in which the Group operates.

## 4. Relevant Regulations and Standards

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SICIT Group’s sustainability strategies are aimed at the continuous improvement of environmental performance, in full compliance with applicable laws in each country where it operates, as well as with relevant international standards and regulatory frameworks, including:

- The **Rio Declaration on Environment and Development**;
- The **European Green Deal**, a strategic initiative package from the European Union designed to drive the EU toward a green transition, with the ultimate goal of achieving climate neutrality by 2050;
- **UNI EN ISO 14001** standard;
- The **European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR)**;

- **Regulation (EC) No 1013/2006** on shipments of waste;
- **REACH Regulation (EC) No 1907/2006** and **Regulation (EU) 2015/830** on the registration, evaluation, authorisation, and restriction of chemicals;
- **Directive (EU) 2015/1513**, amending Directive 98/70/EC on fuel quality and Directive 2009/28/EC on the promotion of renewable energy;
- The **Ten Principles of the United Nations Global Compact (UNGC)**;
- The **eight core conventions of the International Labour Organization (ILO)** (Nos. 29, 87, 98, 100, 105, 111, 138, and 182);
- **Italian Legislative Decree 231/2001** and the **Organisational, Management and Control Model** adopted by SICIT Group in accordance with that decree and subsequent amendments.

## 5. Principi di comportamento

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As a general approach to environmental protection, SICIT Group is committed to reducing the environmental impact of its activities, supply chain, and customer solutions, in accordance with applicable mandatory and voluntary standards and regulations.

Within its operations and strategic planning, SICIT Group adheres to the following principles of conduct:

### 5.1. Preventive Approach

SICIT Group is committed to assessing both the actual and potential environmental impacts of its activities. The Group adopts a precautionary and preventive approach to environmental management, promoting the use of the best available technologies and raw materials with lower environmental impact.

### 5.2. Reduction of Environmental Impact

SICIT Group is committed to reducing the scale and impact of its emissions into air, water, and soil; minimizing waste generation; ensuring proper waste management; and promoting reuse and recycling before final disposal, with the goal of protecting biodiversity and limiting greenhouse gas emissions.

The Group continuously seeks to develop new initiatives that contribute meaningfully to mitigating climate change and global water scarcity by reducing greenhouse gas emissions and its water footprint across the various stages of production, thereby decreasing demand and enabling more efficient use of available resources.

SICIT Group promotes the responsible use of all natural resources. In particular, soil and water resources are managed with the utmost care and minimal impact, as they are essential to the development of future generations.

### 5.3. Continuous Improvement

SICIT Group considers quality and innovation to be fundamental pillars of its business activities. In this context, the Group is constantly committed to delivering high-quality products by applying rigorous quality standards and continuous improvement processes. At the same time, it embraces innovation as a driver of progress, investing in research and development to anticipate market needs. Where technically and economically feasible, SICIT Group also integrates environmental protection into the early stages of product and process design. The Group works to reduce environmental impact by establishing improvement programs with clearly defined short-, medium-, and long-term objectives.

### 5.4. Compliance with Environmental Laws

SICIT Group is committed to continuously monitoring legal and regulatory developments in the environmental field to ensure that both existing and newly introduced processes at its facilities remain fully compliant with applicable legal requirements.

All Group activities are subject to ongoing oversight in order to prevent unlawful practices and to ensure effective compliance with relevant environmental laws and regulations.

### 5.5. Responsible Supply Chain Management

SICIT Group promotes environmental protection and responsible environmental management throughout its entire supply chain, involving business partners, suppliers, and contractors as key actors in its operations.

To this end, the Group establishes and promotes specific standards of conduct in its commercial relationships, based on fairness, transparency, and collaboration—encouraging good governance practices and the development of a sustainable business model.

## 6. Segnalazioni

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SICIT Group encourages anyone who becomes aware of actions or behaviors that violate this Policy—or applicable environmental laws and regulations—to file a report.

For activities within Italy, SICIT Group has established a dedicated internal whistleblowing channel to ensure the confidentiality of the information provided and the protection of the whistleblower's identity: Reports can be submitted by filling out the form available on the GLoBaLeaks platform: <https://whistleblowing.sicitgroup.com/#/>

For foreign subsidiaries, the management of reports concerning violations of this Policy is governed by internal rules and procedures, which guarantee protection against retaliation and define the actions and measures necessary to investigate and, if appropriate, take corrective action.

## 7. Implementation and Monitoring

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SICIT Group is committed to assessing the environmental implications of its activities.

Given the potential impacts of violations of this Policy, the Group prioritizes actions aimed at identifying, preventing, or mitigating such impacts across its value chains.

SICIT Group periodically reviews and updates the progress of its environmental commitments and communicates results annually through the Sustainability Report and other communication tools.

## 8. Review, Communication, and Training

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This Policy is subject to periodic review to ensure its continued relevance and effective implementation. Any revision will be submitted to the Board of Directors for approval.

SICIT Group is committed to making this Policy accessible and available to all relevant stakeholders, both within and outside the company, through internal communication channels and publication on the corporate website:

<https://www.sicitgroup.com/policy-di-gruppo/>

Employee engagement is considered a key starting point to ensure the full implementation of this Policy. For this reason, SICIT Group provides training and awareness programs to promote understanding of the principles set out herein, as well as of applicable legal requirements and the most rigorous internal standards and procedures.

SICIT Group S.p.A.

Chairman

Rino Mastrotto