



# ENVIRONMENTAL POLICY

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## 1. Purpose of the Policy

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The purpose of this policy is to provide guidance to SICIT Group S.p.A. (“SICIT”) and its controlled and affiliate companies (all together “SICIT Group”), directors, officers, employees, agents, consultants, intermediaries, controlled joint ventures, and other third-party representatives, to ensure compliance with applicable Environmental Laws and regulation.

Protecting the environment is a core value of the SICIT Group in conducting and developing its activities.

We are committed to working with and encouraging our business partners to uphold the principles in this Policy and to adopt similar policies within their businesses.

## 2. Scope

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This policy applies as a minimum set of rules to all SICIT Group companies.

Locally each company may adopt more stringent rules and procedures, as needed.

While conducting its management and coordination activities, SICIT Group respects management autonomy of each affiliate within its Group, while managing and controlling the overall business, as per legitimate interests of majority and minority shareholders, considering confidentiality requirements and local applicable laws.

## 3. Our approach to protect the environment

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We base our business activities on the respect of the values set out in our Ethics Code, in the belief that business conduct cannot disregard ethics and the protection of the environment related aspects. We are committed to complying with all applicable laws in all countries in which we do business.

We firmly believe to have the responsibility to operate in compliance with the rules of the countries where we have a presence, distinguishing ourselves as an enterprise capable of exporting the values that permeate our actions, by promoting them in the communities where we operate.

SICIT Group activities are governed by our Ethics Code and it was approved with SICIT Board of Directors motion for the adoption of the Organization, Management and Control Model as per Legislative Decree 231/2001.

SICIT considers of utmost importance the protection of the environment in which it operates and fosters the development of initiatives that gradually decrease the impact of its activities and improve the awareness and sensitivity of all stakeholders involved.

Our strategies for sustainable development pursue continuous improvement in environmental related aspects, taking into consideration the laws and regulations of each country where we operate and contained in applicable international standards, including:

- the Rio Declaration on Environment and Development;
- UNI EN ISO 14001 Standard;
- Directive 2009/28 of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources, amended through Directive 2015/1513/EC;
- Accord Européen relative au transport international des marchandises Dangereuses par Route;
- Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste;

- the Regulation 1907/2006/CE of the European Parliament and of the Council of 18 December 2006 and the Regulation 2015/830/EC of 28 May 2015 on the Registration, Evaluation, Authorization and Restriction of Chemical substances (REACH);
- Directive (EU) 2015/1513 of the European Parliament and of the Council of 9 September 2015 amending Directive 98/70/EC relating to the quality of petrol and diesel fuels and amending Directive 2009/28/EC on the promotion of the use of energy from renewable sources.

## 4. General principles

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As a general rule, in order to protect the natural environment, SICIT Group aims to reduce the environmental impact of its operations, supply chain and customer solutions, designed to comply with all statutory and voluntary standards and regulations.

In our strategies and operations, we consider the following principles.

### 4.1 Preventive approach

We are committed to assessing the current and potential impact of our activities on the environment. We take a precautionary, preventive approach to managing environmental issues and promote the use of the best available technologies and raw materials with lower environmental impact.

### 4.2 Reducing environmental impact

We are committed to reducing the impact and extent of our emissions into the air, water and soil, to reducing our waste output, to managing waste correctly and re-using and recycling it before final disposal, to protecting biodiversity, and to containing greenhouse gas emissions.

SICIT Group is constantly looking for activities to making a real and significant contribution to the mitigation of climate change and global water scarcity, reducing greenhouse gas emissions and the impact of water in the various production phases, in order to achieve a reduced level of demand and a more efficient use of available resources. We promote the responsible use of all natural resources available to the Group: in particular, the soil and water resources are managed appropriately, carefully and with the least possible impact as they are necessary for the development of future generations.

### 4.3 Continuous improvement

We are committed, where technically possible and economically feasible, to promoting environmental protection and to reducing its operations' environmental impact, by establishing improvement programs with short-, medium- and long-term objectives and targets. To this end, we want to ensure environmental protection in the design phase of new products and processes, periodically reviewing them to minimize their environmental impacts.

### 4.4 Ensuring compliance with the law

We are committed to keeping legal and regulatory developments in the environmental arena under continual review, to ensure that processes already on its sites or newly introduced there always comply with the applicable legal requirements. We constantly monitor our activities to ensure effective compliance with laws and regulations and to prevent any unlawful practices.

### 4.5 Responsible management of the supply chain

We promote environmental protection and management throughout our entire production chain, involving our business partners and suppliers and our own contractors as key players in our sustainability policy

#### 4.6 Raising staff awareness

We are committed to engaging our people at every level in implementing its environmental policy through all appropriate measures and initiatives. These include information and training efforts, specifically aimed at promoting environmentally friendly conduct, compliance with legal requirements and with the most stringent internal rules/procedures and ensuring that this policy is followed at all levels in the Group.

#### 4.8 Communication

We are committed to making our environmental policy document accessible to all interested parties, internally and externally.

SICIT Group S.p.A.  
Chairman  
Giuseppe Valter Peretti