

ESG Policy Giobert

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Premise

Purpose

In pursuing the objectives of its corporate purpose, Giobert SpA (hereinafter also "the Company") has decided to adopt - also on behalf of the companies of the Giobert Group (hereinafter also "the Group") - a responsible approach from economic and ethical point of view, aimed at generating sustainable value over time and oriented towards the performances' continuous improvement; for this purpose, the Group Management deals with the spreading of good environmental and social practices and the promotion of a corporate culture aware of its impacts.

From an operational point of view, the Group is committed on a daily basis to carrying out its activities in full compliance with the laws and all applicable requirements, ensuring in some areas the consulting and participation of workers and/or their representatives, according to specifically defined methods.

In line with Giobert Group mission and with the values mentioned in the Code of Ethics, this ESG Policy, inspired by the Sustainable Development Goals of the 2030 Agenda and the principles of the UN Global Compact:

- identifies the main principles that the Group commits to pursuing in its work and in relations with the various categories of stakeholders;
- guides the definition of ESG initiatives and performance objectives which are from time to time the subject of decisions taken by the relevant corporate functions.

Area of application

Giobert Group ESG Policy has been edited in compliance with the rules defined by the Code of Ethics and the Organization, Management and Control Model of Giobert SpA (edited pursuant to Italian Legislative Decree 231/2001), as well as all procedures and policies defined by the Group and by the individual companies belonging to the Group (the "Companies").

The ESG Policy applies to all Group companies through the periodic definition of specific sustainability objectives, and is made known to customers, suppliers and collaborators.

Giobert

Update, review and dissemination

The ESG Policy, as well as any modification and/or addition thereto, is approved by the Board of Directors of Giobert SpA

This Policy is updated periodically based on regulatory needs, new business strategies or if required by changes in the internal context (business processes, reorganizations, changes in the materiality matrix) and external context (sustainability context, significant changes in the Group business sectors activities).

Giobert SpA Board of Directors, supported by the Sustainability Working Group, monitors, and evaluates the suitability and consistency of this ESG Policy compared to best practices and principles applicable from time to time, the current operational implementation, as well as its update requirements.

The ESG Policy is the subject of a specific corporate communication and training plan managed by the Sustainability Working Group, aimed at stimulating the adoption of proactive and responsible attitude by all stakeholders of Giobert Group and the achievement of continuous improvement in sustainability performance.

As far as ESG Policy communication is concerned, this plan provides:

- Translation into all the languages of the countries in which the Group companies operates and into English;
- Transmission to customers and suppliers in the way considered appropriate, in terms of content and means of communication;
- Editing in the company website and intranet;
- the inclusion of a summary document on the company noticeboards, containing all the information necessary for its understanding and implementation;
- the sending of a letter to all employees, signed by the CEO about contents and methods of information/training provided within the Group;
- the delivery also via email to new employees, of an information "kit" together with the documentation required during hiring phase, that ensures they have the knowledge considered to be of primary importance.

As far as corporate training is concerned, this plan provides different actions depending on the target, towards a real personalization of the programs truly responding to the needs of the individual structures/resources.

Generally speaking, general training forms and specific in-depth forms are foreseen for each area considered strategic for the commitment to sustainable development.



Environmental

Giobert Group promotes environmental protection in compliance with set regulations and is committed to minimizing the direct and indirect impacts of its activities in the short and long term, constantly improving its performance with particular attention to the following areas.

Processes and products Decarbonization

We are committed - through constant monitoring and specific strategic choices - to reporting and reducing greenhouse gas emissions resulting directly and indirectly from the operational activities we carry out and to offering eco-sustainable products from a Life-Cycle Analysis perspective.

In this sense we share the goal of reducing greenhouse gas emissions decided at European level, to achieve Carbon Neutrality by 2050 and develop a sustainable production model.

Energy efficiency and supply from renewable sources

We promote a careful management of energy consumption to achieve a double benefit resulting from operating costs' reduction and from consequent greenhouse gas emissions reduction. We also support autonomy and energy security resulting from the use of electricity production systems from renewable sources, and we are committed to increasing self-production quotas to cover our consumption.

Water resources management

We carefully manage the water resources at our disposal: we are committed to mitigating any water risk by constantly monitoring the quality of wastewater in compliance with specific regulatory requirements and by using efficient and responsible way of use.

Use of materials

We promote responsible consumption of natural resources - committing to minimizing and reusing waste resulting from our production activities and stimulate sensitivity in the supply



chain - and we support the transition towards a circular economy, aimed at eliminating the concept of waste with eco-sustainable materials.

We are also committed to sustainable sourcing of materials to ensure the responsible management of natural resources, in particular forests, and the protection of animal welfare.

Responsible waste management

We carefully control the chemical substances used and the quantities of waste produced by our operational activities, implementing principles of reduction, recycling, reuse, and recovery in the production processes we carry out. For this reason, we have developed environmental management systems that allow us to continuously improve our performance, ensuring regulatory compliance and minimizing the risk of pollution concerning all environmental elements (water, air, soil).

Other impacts

We pay attention to the issues of air and noise pollution by constantly monitoring compliance with the specific legislative requirements in that area and implementing, where possible, the relevant best practices.



<u>Social</u>

Giobert Group promotes the protection of workers' rights in its value chain, by committing to minimizing the direct and indirect social impacts of its activities in the short and long term and considering the following areas.

Human rights and working conditions

We guarantee the protection of human rights and compliance with regulatory obligations, ensuring the responsible management of relations with workers and paying particular attention to the following issues:

- working conditions, including job security, working hours, adequacy of wages, social dialogue, freedom of association, possibility of collective labour agreements;
- equal treatment, opportunities, pay and training, inclusion;
- inclusion, gender equality, management of diversity and discrimination in the workplace;
- fight against child labour and forced labour.

In this context we promote the implementation of practices that comply with the best international standards.

Workers' health and safety

We protect the physical integrity of our employees, by committing ourselves to developing a healthy, safe environment that complies with current regulations, through:

- analysis of production processes design ergonomic workstations;
- training for the correct and safe use of machinery and systems and the handling of chemical substances;
- distribution and continuous review of protective equipment;
- training for the prevention of accidents, occupational diseases and the management of emergency situations and accidents;
- preparation and continuous review of fire prevention systems.



In this context, specific roles, processes, responsibilities and moments in which workers and their representatives discuss, and best practices recognized at national and international level are adopted.

Wellbeing in the workplace

We pay attention to the well-being of our employees, both in the workplace and in private life: through the definition of specific policies and procedures we are committed to guaranteeing a healthy, motivating, equal, flexible and inclusive working environment, as well as ensuring adequate benefits.

Enhancement of human capital

We enhance the human capital at our disposal by encouraging the protection and development of skills and competences: for this reason, we involve our resources in professional growth paths, we periodically organize training activities at all organizational levels, and we constantly evaluate employee performance, to identify opportunities for improvement.

Commitment to territorial development

We contribute to the development of the territory we belong to not only as for distribution of the economic value generated, but also as for creating relationships and opportunities for collective growth: for this reason, we are committed to developing collaborations and initiatives with our reference community, to promote their social, economic, and cultural development.



Governance

Giobert Group governance system is aimed at maximizing the value created in the mediumlong term and transparency towards the market, meeting the regulations of the countries in which the Group operates and in compliance with the principles established in the Code of Ethics and the internal procedures.

In particular, through the dissemination and application of the Code of Ethics (available on the website www.giobert.com) the Group monitors issues relating to the ethical and responsible management of business such as:

- corruption and money laundering;
- protection of industrial and intellectual property;
- processing and protection of confidential information;
- management of conflicts of interest;
- correct reporting of financial information;
- fair competition;
- reporting illicit conduct.

Furthermore, as evidence of its commitment to governance regarding the management of ESG aspects, the Group has equipped itself with:

- an organization, management, and control model pursuant to Legislative Decree 231/2001 adopted by Giobert SpA;
- a Sustainability Working Group consisting of the Group Managers of each corporate function, the Management Systems Managers, and the Plant Managers of the controlled companies. They have the task of assisting the Board of Directors with operational, proactive, and consultative activities on sustainability issues connected to the exercise of the activities of the company and its subsidiaries and for the preparation of strategies, also based on the analysis of relevant topics, for the generation of value in the long term.

Finally, Giobert Group's attention to the governance dimension is aimed at the following areas.

Creation and distribution of economic value

The creation of economic value and financial balance are essential conditions to guarantee the performance of our activities: we therefore work to obtain satisfactory economic/financial



performance, also to remunerate properly the risk assumed by shareholders and generate added value to be distributed to our stakeholders.

Customer satisfaction

We work to guarantee the full satisfaction of our customers, ensuring quality, availability and collaboration: thanks to our specific quality management system we can ensure that our working methods are in line with the main reference standards for automotive quality, as well as with the specific requirements expressed by our customers; the system constantly monitors the products and services offered, verifying our performance and any critical issues with a view to continuous improvement.

HSQE system certifications

We wish to achieve excellence in offering products and services, protecting at the same time our employees and the environment: for this reason, we have adopted management systems concerning quality issues, health, safety and environment, so that we can monitor all company processes; we also evaluate the introduction of new management systems to strengthen the control of company processes and improve sustainability performances.

R&D for product innovation

Taking into account the importance of the ability to innovate regularly the range of products offered in the sectors in which we operate, we periodically invest substantial resources for R&D and innovation activities, in order to anticipate and satisfy customer needs and ensure development and success of our business; we are also committed to acquiring new skills by promoting their diffusion within the organization and to expanding the customer and product portfolio with the aim of sustainable and resilient growth of the Group in the long term.

Responsible supply chain

We actively cooperate with our supply chain to promote the adoption of socially responsible behavior and ensure the protection of human and workers' rights and respect for the environment.



For this reason, we encourage and periodically monitor the commitment of our suppliers and sub-suppliers concerning all the fundamental principles stated in this ESG Policy, constantly talking, and promoting the implementation of practices compliant with the best international standards on the matter.

Conclusions

Central to this project and essential driving force to make it concrete are all the people who are part of our group.

To achieve the ambitious goals that Giobert group sets through this policy, knowledge, sharing and respect for the principles outlined are essential,

It is up to all of us to promote a corporate culture that promotes growth and excellence while respecting ethics, sustainability, and respect for people.

Giobert s.p.a. CEO Paolo Bertolino

Approval Board of Directors, 07/12/2023