

INTEGRATED POLICY ON QUALITY, THE ENVIRONMENT, ENERGY, OCCUPATIONAL HEALTH AND SAFETY, AND SUSTAINABILITY - GIACOMINI S.P.A. - 2026-2028

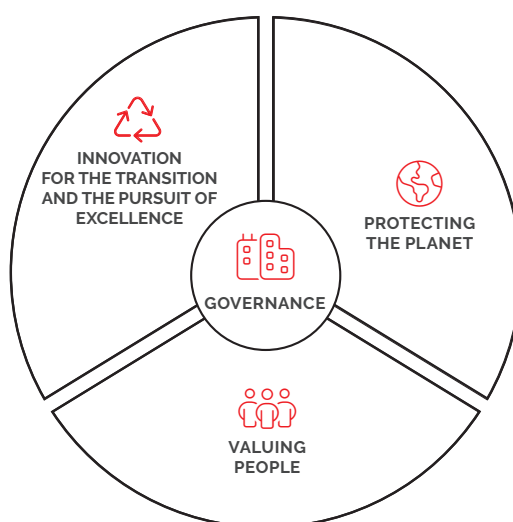
1. CONTEXT AND OBJECTIVES OF THE POLICY

This Policy defines Giacomini Sp.A.'s principles and commitments regarding quality, the environment, energy, occupational health and safety, and sustainability, in compliance with applicable regulations, to guide the company's actions toward continuous improvement.

The Group's guidelines set forth herein are consistent with the company's Mission and values, focused on developing solutions for residential comfort based on technological innovation, quality, and the efficient use of resources, with the goal of contributing to people's well-being, the enhancement of the local area and communities, and a more sustainable use of energy and water.

The Policy is also aligned with the 2026–2028 Strategic Sustainability Plan, developed based on the results of the materiality analysis and the involvement of key corporate functions and relevant stakeholders, and reflects its priorities and areas of focus over the three-year period.

In particular, the Plan identifies specific pillars of sustainability that guide our actions:



In addition to these areas, the Plan also recognizes the role of sustainability governance as a cross-cutting enabler, which includes the principles of ethics and integrity and responsible supply chain management. These aspects are also addressed through supplier selection, qualification, and monitoring processes, in accordance with the Code of Ethics, the 231 Model, and other policy and control tools adopted by the company.

Our commitments contribute to the achievement of specific Sustainable Development Goals (SDGs), in line with the identified priorities:

SDG 6: clean water and sanitation;
 SDG 7: affordable and clean energy;
 SDG 8: decent work and economic growth;
 SDG 9: industry, innovation, and infrastructure;

SDG 10: reduce inequalities;
 SDG 12: responsible consumption and production;
 SDG 13: climate action.

The implementation of these commitments is supported by management systems certified in accordance with the international standards ISO 9001, ISO 14001, and ISO 45001, as well as by an energy management system compliant with the ISO 50001 standard.

2. SCOPE OF APPLICATION AND RESPONSIBILITIES

This Policy applies to all activities of Giacomini S.p.A., including its headquarters, offices, production sites, and branches, and serves as a guideline for the conduct of all individuals working for the company. The Policy is implemented in accordance with the characteristics of the various organizational units and the nature of the activities carried out. The Board of Directors approves the Policy and defines its guidelines, ensuring its alignment with corporate strategies and sustainability objectives. Senior Management is responsible for implementing the Policy and overseeing its operational execution, promoting the integration of its principles and commitments into business processes and management systems, as well as disseminating the Policy and raising awareness of its contents throughout the organization, including through appropriate information and training activities.

All company departments are involved in fulfilling these commitments, each within its own area of responsibility, contributing to the achievement of objectives and the continuous improvement of company performance.

3. OUR COMMITMENTS

3.1 Innovation for the transition and the pursuit of excellence



We recognize innovation and the quality of our products and processes as key elements for the company's sustainable development, with a focus on continuous improvement. In this regard, we are committed to:

- ensuring high standards of product quality, safety, and reliability, in line with customer needs and in compliance with applicable regulations, including through structured testing, verification, and inspection activities throughout the entire production process;
- provide a high level of customer service and support, thanks to a widespread network of specialized consultants;
- develop integrated technological and systems solutions for the residential and commercial sectors, focused on energy efficiency and the use of low-emission systems, the reduction of environmental impacts, and the improvement of living comfort and indoor air quality, taking into account the evolution of energy systems and the use of alternative energy carriers such as hydrogen;
- promote research, development, and continuous innovation, leveraging internal expertise and collaborations with external partners;
- integrate environmental criteria into product design and development, using various tools for assessing environmental performance (including, for example, EPDs);
- promote research into and the use of innovative materials, with a view to progressively reducing the use of critical substances and adapting to regulatory changes, while favoring solutions with a lower environmental impact (e.g., lead-free brass);
- strengthen process reliability and operational continuity by implementing structured systems for risk management, business continuity, and information security;
- integrate energy efficiency criteria into purchasing and design decisions, promote training and energy awareness among staff, and periodically submit the energy management system to a review by management to ensure its effectiveness and the continuous improvement of energy performance.

3.2 Protecting the planet



We recognize the environmental impacts resulting from our activities and work to prevent and reduce them by promoting the responsible use of resources and the continuous improvement of our environmental and energy performance. In this regard, we are committed to:

- improving the energy efficiency of our production processes and contributing to the reduction of climate-changing emissions through continuous monitoring of consumption, the introduction and upgrading of more efficient machinery and technologies, and increasing the use of energy from renewable sources;
- optimize water consumption and promote the efficient use of water resources through monitoring and control of consumption and the use of the best available technologies;
- reduce waste generation and promote the recovery, reuse, and recycling of materials, along with the reduction of waste;
- design products that can be safely disposed of, minimizing their environmental impact even at the end of their life cycle;
- to prevent and reduce the various forms of pollution associated with business activities, with particular emphasis on air emissions, wastewater discharges, and the management of chemicals;
- gradually reduce the use of hazardous chemicals, with a particular focus on substances of very high concern (SVHCs) and other categories subject to evolving regulations;
- evaluate packaging solutions with a lower environmental impact, promoting a gradual reduction in the use of materials and, in particular, plastic.

3.3 Protection and empowerment of people



We recognize the value of our people as a key element in the company's sustainable development and growth, and we promote a safe, inclusive work environment focused on the well-being and development of our human capital, with a view toward continuous improvement. In this regard, we are committed to:

- strengthen ties with the local area and communities, contributing to the development of the local social, educational, and economic environment, in line with the company's values
- ensure safe working conditions and protect workers' health by promoting risk prevention, a widespread culture of safety, and dedicated programs aimed at achieving zero accidents;
- promote training and skills development, both within the organization and throughout the value chain, including through the Giacomini Academy, a platform dedicated to training customers, installers, designers, and technicians;
- promote well-being by helping to improve lifestyles and working conditions through dedicated programs such as the WHP—Workplace Health Promotion;
- develop corporate welfare initiatives designed to meet people's needs and support their professional development;

- promote a work-life balance and support parenthood, particularly through organizational flexibility and dedicated services, including the company-run daycare center;
- to value people and encourage their involvement and participation in company life, through tools that foster listening and dialogue;
- promote equal opportunities and an inclusive work environment based on respect for and the celebration of diversity, including through dedicated policies;
- prevent and combat all forms of harassment, discrimination, or behavior that undermines human dignity, by providing confidential, secure, and accessible reporting channels through whistleblowing mechanisms, and by ensuring the protection of whistleblowers and prohibiting any form of retaliation;
- promote respect for human rights throughout the value chain and in relations with external stakeholders, combating all forms of forced labor, child labor, and other practices inconsistent with the fundamental principles of human rights protection, through the gradual strengthening of policy and oversight tools (e.g., the Supplier Code of Conduct).

4. MONITORING AND UPDATES

The commitments set forth in this document are integrated into the company's management systems and operational processes, in line with the organization's strategies and objectives.

We monitor our performance over time through control systems and indicators and ensure periodic reporting (e.g., Sustainability Report).

The progress of the Strategic Sustainability Plan is the subject of periodic discussions between Senior Management and key business functions, aimed at verifying the status of action implementation and the achievement of planned objectives.

This Policy is subject to periodic review, with the involvement of Senior Management, to ensure its adequacy, effectiveness, and alignment with changes in the business, regulatory, and market environments.

31 July, 2026

CEO

Valentina Giacomini

