LUCEFIN
Holding industriale

INTEGRATED COMPANY POLICY

(Quality, Environment, Health and Safety, Social Responsibility, Data Security)
rev.05 of 17/11/2025

The Chairman of the Lucefin Group promotes the commitment of all affiliated companies to comply with the principles expressed in its Integrated Corporate Policy.
In line with the Sustainability Communications, drawn up in accordance with international guidelines, the Mission, Vision and strategies in material areas guide investments, which are pursued responsibly through actions in ESG (*Environmental, Social, Governance)* areas, thus involving environmental, social and governance aspects.

The integration of documentation between the Company's Management Systems and other organisational models regulates the processes carried out within the Group in a planned and documented manner, aimed at increasing and pursuing:

E	ENVIRONMENTAL PROTECTION and the fight against climate change to eliminate and limit environmental impacts

Through actions such as:
1. Pursuing business efficiency to eliminate and limit environmental impacts (e.g. pollution, consumption of resources, etc.) associated with its core activities
2. Considering the entire life cycle of products in the decision-making process in order to reduce pollution
3. Assessing CO_2emissions and implementing reduction and containment policies
4. Pursuing the production and use of renewable energy
5. Improving waste management (e.g. diversification, reduction) by prioritizing recycling and recovery over disposal
6. Raise environmental awareness and sensitivity among all company personnel and suppliers through ongoing training, information and communication
7. Promote the use of suppliers who demonstrate attention to environmental protection and seek/purchase products and materials from recycling

S	SOCIAL COMMITMENT to promote the integration, health and well-being of workers, expressed through

Spreading a culture of prevention and protection in health and safety, in the workplace and beyond. In particular:
1. Considering health and safety aspects as essential when defining new activities or reviewing existing ones (e.g. when starting new production processes, purchasing new machinery or substances)
2. Taking the necessary measures to prevent accidents and occupational diseases in the workplace
3. Involve and consult staff on issues relating to health and safety in the workplace, including through Workers' Safety Representatives
4. Promote awareness-raising activities on prevention and protection, so that all workers adopt healthy and safe behaviors not only in the workplace
5. Schedule periodic inspections to assess the performance and effectiveness of workplace health and safety improvement programs

Employee involvement and professional development
1. Plan the growth of resources, to adapt professional skills to technological evolution and market regulations
2. Encourage inclusion and integration among employees and promote their well-being
3. Promote awareness within the company among all employees of their role and responsibility in order to achieve customer satisfaction and pre-established quality objectives.

Active presence in the local community
1. Designing, organising and supporting cultural activities and activities that promote the local community

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G	The GROWTH of corporate governance to ensure business continuity in compliance with legality, transparency, honesty and dignity.

1. Conscious and competent leadership. Creation of a management team capable of ensuring continuity of roles and functions and cooperating in the pursuit of economic and financial balance aimed at increasing the company value, with a focus on the material issues that emerged from the sustainability surveys.
2. Customer satisfaction. To strengthen our image and reputation in the market by pursuing customer satisfaction through the supply of quality products in compliance with implicit and explicit contractual requirements through a professional and reliable relationship.
3. Organisation of resources. Optimally plan production, including the maintenance of lines, plants, equipment and vehicles, and ensure the presence of qualified personnel.
4. Search for solutions that are appropriate and functional to the needs of customers and workers, promoting technological innovation, identifying sustainable and more efficient solutions, including in the prevention of environmental impacts and for the health and safety of workers.
5. Monitoring of products, services and processes supplied by other companies, in order to have a selection of supplier-partners that guarantee compliance with agreed requirements and optimal order fulfilment times, in accordance with product and market regulations.
6. Respecting regulatory requirements and legal and regulatory provisions in force in the countries in which the Group operates. In particular, through the systematic monitoring of regulatory developments with a proactive approach and not just compliance.
7. Prevention of offences through the adoption of specific protocols and organizational models that integrate company management system procedures.
8. Computerization and data protection Ensuring information management to guarantee operational continuity, addressing threats that can lead to data loss (device failure, disasters, human error or cyber attacks), including through:
    - Updating systems and adopting disaster recovery procedures for data recovery
    - Adopting company regulations to define operational procedures for damage prevention
    - Training staff on recommended behaviors to reduce the risk of data loss
9. Reciprocity. Maintaining and promoting open dialogue with stakeholders (local communities, supervisory bodies, staff, etc.) and a transparent and collaborative relationship with public authorities and/or supervisory bodies. Encouraging the exchange of information and growth with stakeholders.
10. Continuous improvement pursued through actions arising from management reviews, internal and external audits, third-party reports, risk and opportunity assessments (e.g. Business Continuity Risk Assessment, Environmental Impact Assessment, DVR and Health and Safety Improvement Plans).

During the Company Review, and in other planned discussion activities, the Management:

- ⇨ Verifies the adequacy and effectiveness of the Company Policy through the degree of application of systems and their compliance with the Code of Ethics and Organisational Model (where applicable).
- ⇨ Assess the adherence of indicators for measuring the performance of company processes and examine the evolution of the objectives defined in the company strategy plans in terms of results and resources.
- ⇨ Considers the needs of all stakeholders and the organizational context, including climate change factors, promoting actions to mitigate their impact.

In carrying out their work duties, each employee must promote the dissemination of and compliance with the above principles. The Management ensures that all process managers have the necessary resources to implement this Policy.

The Policy is communicated to all relevant stakeholders by posting it on the company website (www.Lucefin.com).

The Chairman
(Giorgio Buzzi)