

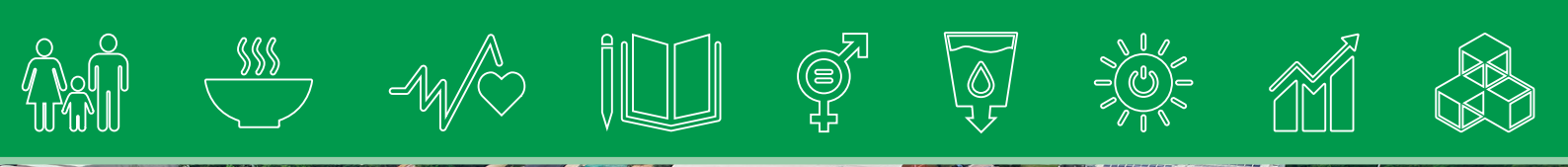


COMERIO ERCOLE

QUALITY & TECHNOLOGY SINCE 1885 ITALY



ESG SUSTAINABILITY REPORT



Report 2024







ESG

Sustainability Report

Year 2023



The ESG Sustainability Report 2023 can be downloaded scanning the QR code highlighted above





SUSTAINABILITY ESG
COMERIO ERCOLE
Since 1885 Made in Italy



Save energy, save money,
save future!



Sustainability[®]
Award
Top100



COMERIO ERCOLE
QUALITY & TECHNOLOGY SINCE 1885 ITALY



LETTER FROM THE GENERAL MANAGER

COMERIO ERCOLE is a world leader in the design, production and installation of machines and plants for the processing of plastics, rubber and non-woven fabrics: the enthusiasm, passion and professionalism that involve employees and collaborators explain the goals achieved by the company in just under 140 years of history on the various markets and stimulate us to the next challenges that await us.

In quantitative terms, 2023 saw the maintenance of the group's turnover, also by virtue of an improvement in the market conditions assumed by our main stakeholders. The great concern remains linked to the war scenarios in several parts of the world, which are variables never before considered.

In COMERIO ERCOLE, there has always been a specific strategic attention expressed by the top management and shared with the entire operational structure to social and environmental issues and which from year to year has been consolidated on the basis of the awareness of the evidence that emerges from the preparation of the sustainability report. More than fifteen years have passed since the company invested in new machinery that placed the possibility of reusing post-consumer raw materials (such as ELTs) at the center of the process, enhancing the benefits of what is now called "circular economy". Always in accordance with the logic of "sustainability" that must correlate theory and practice, we have continuously pushed in this perspective, at the time called Industry 4.0, today better identified as Industry 5.0, obtaining prestigious international appreciation for the attention paid not only to the automation and digitization of our machinery but also, for example, to the reduction of electricity consumption and production efficiency with particular attention to containment of industrial production waste.

Internally, a series of initiatives have been developed for our collaborators according to the recommendations and the WHP Lombardy network program "Workplaces that promote health", to which COMERIO ERCOLE has been adhering for some years, also implementing some special and innovative projects to support both the working environment and the territory close to us and its social communities.

These examples, chosen from among many, testify to the company's desire to independently pursue an ESG business model that is up to the challenge of the times by setting increasingly challenging goals for the benefit of the entire community.

COMERIO ERCOLE prepares the ESG sustainability report on a completely voluntary basis in order to be aware of its role in relation to the social, economic and environmental context. This document, also in light of the recent process of revision and approval of the 2023 Code of Ethics, recognizes the dedication and commitment of all those who, while diversifying their specific skills, promote conditions of ever greater inclusion, freedom and dignity of gender. All whistleblowing compliance procedures were also implemented by the end of 2023.

Riccardo Comerio



INTRODUCTORY NOTE

Over the years, ethical aspects, social responsibility and respect for human rights have conditioned the economy and social systems, increasingly increasing the role of stakeholders within the company (e.g. institutions, workers, associations, customers, suppliers, etc.).

More and more companies decide to affirm their social responsibility through the implementation of specific ethical and social management tools, with the aim of communicating transparently, clearly and completely and effectively managing ethical and social issues within the company.

COMERIO ERCOLE, as a manufacturer and installer in Italy and in the world of complex machines and plants for the processing of plastics, rubbers and non-woven fabrics, has therefore embarked on a specific path, concretized in actions such as the drafting of a code of ethics and sustainability report.

With the ESG (Environmental – Social and Governance) sustainability report, **COMERIO ERCOLE** intends to provide a report on activities, initiatives and projects, in order to provide all interested parties with a clear and precise picture:

- compliance with public responsibility;
- company performance on issues concerning social liability;
- the company's positioning with respect to the SDG 2030 objectives;
- of its social policy, objectives, strategy and guidelines for social issues.

The sustainability report is prepared in accordance with the requirements of the SA8000 standard, which is based on compliance with ILO (International Labour Organization) regulations, as well as the Universal Declaration of Human Rights, the United Nations Convention on the Rights of the Child and the UN Convention on the Elimination of All Forms of Discrimination.

In this regard, **COMERIO ERCOLE** is committed to establishing the main objectives and adopting the appropriate socially responsible behaviors to achieve them. In particular, the company's strategic and operational activities take into account respect for human rights, fair treatment, correct behavior towards the external community, protection of the environment, customers and suppliers, as well as the creation of economic but also social value. The growing international attention to sustainability and social development in the wake of the Paris Agreement, the United Nations Global Compact and the launch of the new Sustainable Development Goals (SDGs) has further increased **COMERIO ERCOLE's** awareness that these objectives must be placed at the center of the daily operations of our company to contribute to the sustainable development of the territory.



The Sustainable Development Goals, SDGs (SDGs) are a set of 17 interconnected goals, defined by the United Nations Organization as a strategy "to achieve a better and more sustainable future for all". They are also known as the 2030 Agenda, named after the document entitled "Transforming our world". The 2030 Agenda for Sustainable Development recognizes the close link between human well-being, the health of natural systems and the presence of common challenges for all countries.

The Sustainable Development Goals aim to address a wide range of issues related to economic and social development, including poverty, hunger, the right to health and education, access to water and energy, employment, inclusive and sustainable economic growth, climate change and the protection of environment, urbanization and production models.

This integrated ESG report is made in compliance with the systemic requirements of continuous monitoring and external communication. It is the direct result of the participation of the social partners in the implementation of a social responsibility system, providing quantitative and qualitative information that highlights compliance with the individual requirements of the standard, which concern the different areas of the work sphere, such as:

<i>Child labour</i>	<i>Compulsory work</i>
<i>School internships and disabled work</i>	<i>Health and safety</i>
<i>Freedom of association</i>	<i>Right to collective bargaining</i>
<i>Discrimination</i>	<i>Disciplinary practices</i>
<i>Working hours</i>	<i>Pay, etc.</i>
<i>Environmental impact</i>	<i>Waste management</i>
<i>Use of alternative energy sources</i>	<i>Projects for environmental protection</i>

METHODOLOGICAL NOTE

This sustainability report has been prepared according to the GRI Standard: Core Option of the Global Reporting Initiatives GRI. The information and reference data refer to the company **COMERIO ERCOLE** based in Via Castellanza 100 - 21052 in Busto Arsizio (VA) for the period 1 January 2023 - 31 December 2023, unless otherwise indicated. The company perimeter is defined by **COMERIO ERCOLE SPA**. The document, drawn up on an annual basis.

For any additional information related to this document, please contact us by sending a mail message to esq@comercole.it or by viewing our www.comercole.it website or by calling +39 0331 488426.



1.1 ABOUT US – COMPANY MISSION & VALUES

MISSION

COMERIO ERCOLE has always found in its one hundred and thirty-six years of experience the elements and the strength to project itself successfully into the future, always setting as its first objective the excellent quality of the product and the pre and post sales service that constantly guarantee its customers. **COMERIO ERCOLE** is already ready for the technological challenge of tomorrow, with the prerogative of a stable and constant presence all over the world and a highly prepared work staff.

The mission of **COMERIO ERCOLE** is to identify and understand the expectations and needs of the market, build reliable products and provide high quality services and technological innovation in an advantageous and competitive way, ensuring full customer satisfaction. Constantly invest in research and development of safe and innovative products and production processes.

The company VALUES are highlighted in:

- **Quality & Technology**
- **Reliability**
- **Competence**
- **Services / Assistance**
- **References**
- **Competitiveness**
- **Passion and Constancy**
- **Determination**

COMERIO ERCOLE pays particular attention to safety issues, a technical staff constantly works to comply with the most up-to-date safety regulations, laying the design foundations for increasingly safe products. Safety not only for operators, but for the product itself and for the process in which it is inserted. Only the study and research of innovative solutions guarantee increasingly reliable and safe products.

COMERIO ERCOLE has placed safety at the base of its corporate mission, aware that the constant efforts made in this area make our customers more satisfied to have products conceived, designed and manufactured to increase reliability over the years. From the dynamic activity of the "Comerio Family", arises the example and the directives to operate with the best customers in the world; This means not only acquiring important commercial positions, which are essential to see the future in real terms, but above all the ability to operate at the highest possible technical level.

COMERIO ERCOLE, with the formal adoption of a code of ethics, has set itself the goal as **CSR - Corporate Social Responsibility** to behave on the basis of solid principles including fairness and equality, protection of the person and diversity, environmental protection, transparency and health protection.

Through the **CODE of ETHICS** – updated revision 2023:

1. it defines the values and general ethical principles that inform the company's activities and relations with customers, suppliers, shareholders, employees, collaborators, administrators, public institutions and any other subject involved in the company's activities.
2. The commitment to behave based on ethical principles such as: moral legitimacy, fairness and equality, protection of the person, protection of the environment, diligence, transparency, honesty, confidentiality, impartiality, protection of health is formalized.
3. Employees, collaborators and directors are indicated the principles of conduct, values and responsibilities that are required to be promptly respected during the provision of work performance.

The **CODE of ETHICS** is an effective means to prevent irresponsible or illegal behavior by those who work in the name and on behalf of the company because it introduces a clear and explicit definition of their ethical and social responsibilities towards all subjects involved directly or indirectly in the company's activity (customers, suppliers, shareholders, citizens, employees, collaborators, public institutions, environmental associations and anyone else affected by the company's activity). The **CODE of ETHICS** is the main tool for implementing ethics within the company, aimed at clarifying and defining the set of principles to which its recipients are called to conform in their mutual relations as well as in relating to mutual stakeholders towards society. The recipients are therefore called to respect the values and principles of the Code of Ethics and are required to protect and preserve, through their behavior, the respectability and image of **COMERIO ERCOLE** as well as the integrity of its economic and human heritage.

The **CODE of ETHICS** integrates and recalls the procedures related to the maintenance of the Quality System in force with reference to the ISO 9001: 2015 standard and certified by an external SGS body. The company mission is defined by the Quality Manual.

The corporate bodies of the Company, in the awareness of their responsibilities, are inspired by the principles contained in the **CODE of ETHICS**, inspiring their activities to values of honesty, integrity in the pursuit of corporate objectives, loyalty, fairness, respect for people and rules, mutual collaboration. It is up to individuals to assess situations of conflict of interest or incompatibility of functions, tasks and positions outside as well as within the company. The legitimate manifestation of divergent positions cannot be to the detriment of the image, prestige and interests of society, which it is the responsibility of the top bodies to defend and promote. Information received for reasons of office is considered confidential and any use not deriving from the institutional performance of the functions to which each is responsible is prohibited.

The commitments of loyalty and confidentiality assumed bind persons even after the termination of the relationship with the Company. The **CODE ETHICS** does not replace and does not prevail over the laws in force and the National Collective Labour Contract in place.

1.2 POLICY

POLICY

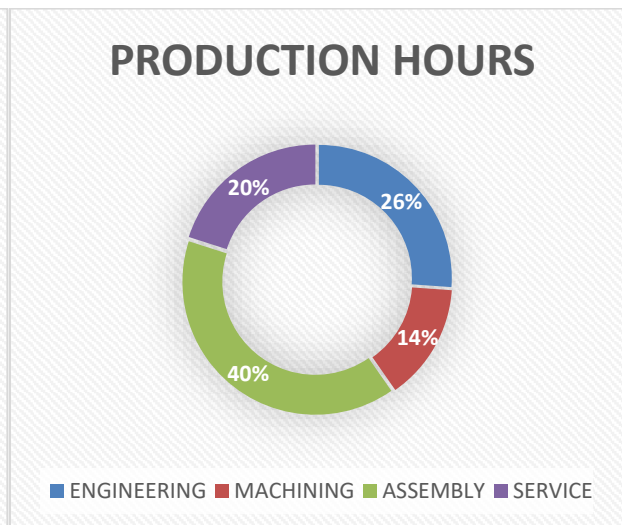
The **COMERIO ERCOLE** company management policy formally refers to the following principles:

Type	ISO reference	Date	Certification
Quality	ISO 09001:2015	03/04/2019	Certified system – in force
Environment and Health	ISO 14001:2015	03/04/2019	Certified system – in force
Safety	ISO 45001:2018	23/04/2022	Certified system – in force
Social Responsibility	ISO 26000:2010	03/04/2020	Model ready
Energy system	ISO 50001:2018	03/04/2020	Model ready
BMC Business continuity	ISO 22301:2012	03/04/2019	Model/procedures filed
Privacy	GDPR 679:2016	03/04/2019	Manual/procedures filed
Sustainable purchases	ISO 20400:2017	07/12/2023	Model ready
Whistleblowing	ISO 37002:2021 D.L 24/2023	15/12/2023	Procedures filed
LCA/EOL	ISO 14040:2021	05/03/2024	Procedures filed
DIVERSITY D&I	ISO 30415:2021	08/03/2024	Procedures filed

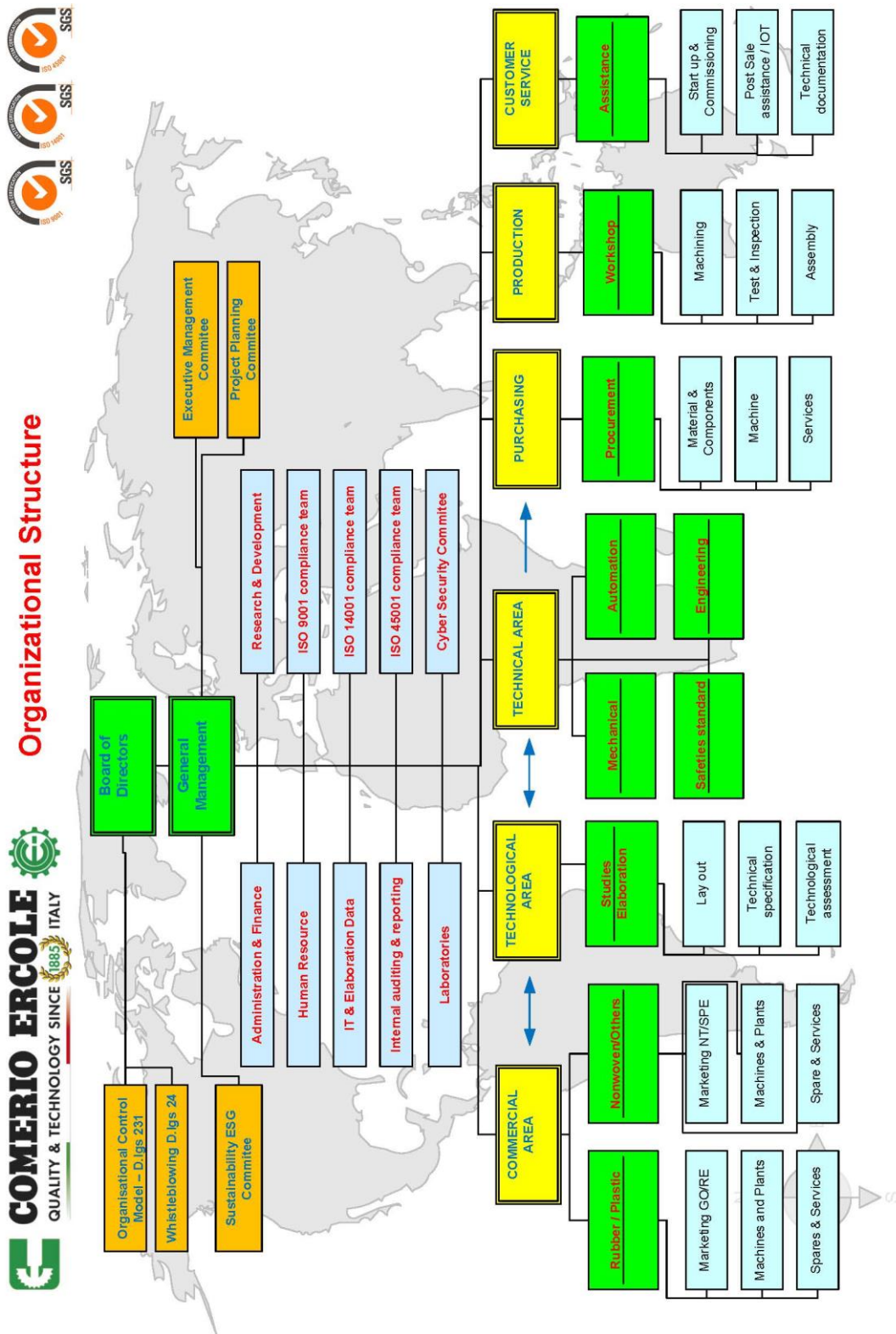
1.3 COMPANY REFERENCES

COMPANY

Name	COMERIO ERCOLE SPA
Year of foundation and statutory duration	1885 / 2050
Legal seat	Busto Arsizio (VA) – Via Castellanza 100
Productive seat	Castellanza (VA) – Via Kennedy 62
Chamber of commerce registration	VA 0011178 / 1922
VAT number	00219630126
Company	Tribunale di Busto Arsizio no. 9797



1.3 ORGANIZATION CHART



MODULO - PQ/05C-03

Info force - rev 1-01-2024



1.4 ASSOCIATIONS

PUBLIC STAKEHOLDERS



Confindustria Varese

Member since 1950
 Web: www.univa.va.it
 e-mail: info@univa.it



National Association of Manufacturers of Machinery and Plants for Plastics and Rubber

Member since 1950
www.amaplast.org info@amaplast.org

1.5 CERTIFICATIONS



EN ISO 9001 Ed.2015 obtained and maintained since 2002 and ISO 14001 Ed.2015 issued in first issue in December 2008, Purpose of **ISO 9001: 2015** certification for design, production, installation, start-up and assistance of machines and plants for: - calendering and mixing of rubber, plastics, fabrics, nonwovens and other materials that can be processed with similar technology. Certification: **ISO 14001:2015** for environmental protection. **ISO 45001:2018** for accident prevention

1.6 PUBLIC AWARDS / MIUR



COMERIO ERCOLE has been a **RESEARCH LABORATORY** officially recognized by the Ministry of Scientific Research as per the act of inclusion in the national register at nr. 77 on 10/01/2002. **Following the entry into force of Ministerial Decree no. 115, the Institute Register of Laboratories abolished in 2017.**

1.7 PUBLIC AWARDS / LOMBARDY REGION OPEN INNOVATION



QuESTIO (Quality Evaluation in Science and Technology for Innovation Opportunity), is the knowledge base on Research and Technology Transfer Centers, a tool created by the Lombardy Region. Through the collection of information, **QuESTIO** offers a showcase of the protagonists of research, technology transfer and innovation. **COMERIO ERCOLE has been accredited since 2013 in the regional system.**

This is a translation of the certificate IT08/1175

The management system of

COMERIO ERCOLE S.p.A.

Via Castellanza, 100 21052 Busto Arsizio (VA) Italia

has been assessed and certified as meeting the requirements of

ISO 14001:2015

For the following activities

Manufacturing of machinery and plants for calendering of rubber, plastic materials, fabrics, non-wovens and other materials which can be processed through similar technology, for mixing of rubber and plastic materials in general, through mechanical processing, welding, painting and assembly.

IAF Sector: 18



This certificate is valid from 31 December 2023 until 31 December 2026 and remains valid subject to satisfactory surveillance audits.
 Issue 6. Certified since 31 December 2008

Assessed in accordance with the provisions of the Accredia Technical Regulation RT-09.

Authorised by

Paola Santarelli

SGS ITALIA S.p.A.

Via Caldera, 21 20153 MILANO - Italy

t + 39 02 73 93 1 - www.sgs.com



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 Membro degli Accordi di Mutuo Riconoscimento EA, IAF e ILAC
 Signatory of EA, IAF and ILAC Mutual Recognition Agreements

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This is a translation of certificate N. IT22/0234

The Health and Safety Management System of

COMERIO ERCOLE S.p.A.

Head Office and Plant:
 Via Castellanza, 100 - 21052 Busto Arsizio (VA) - Italy
 Warehouses:
 Via Combattenti, 1 - 21058 Solbiate Olona (VA) - Italy
 Via Della Biella, 7 - 21053 Castellanza (VA) - Italy

Has been assessed and registered as meeting the requirements of:

UNI ISO 45001:2018

For the following activities:

Design, production, installation, start-up and servicing of machinery and plants for: calendering of rubber, plastic materials, non-wovens fabrics and other materials which can be processed through similar technology; mixing of rubber and plastic materials.

This certificate is valid from 23/04/2022 until 23/04/2025 and remains valid subject to satisfactory surveillance audits.

Re certification audit due before 07/04/2025.

Issue 1: Certified since 23/04/2022.

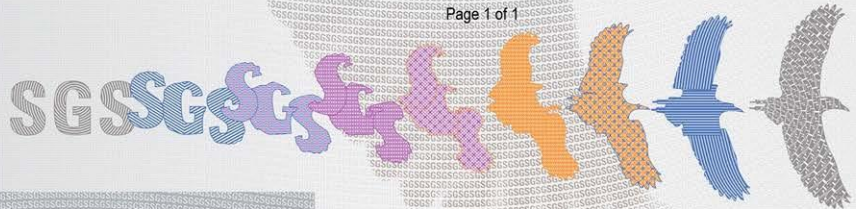
The audit leading to this certificate commenced on 30/03/2022.



Authorized by
 Paola Santarelli

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 t + 39 02 73 93 1 f +39 02 70 10 94 89 www.sgs.com

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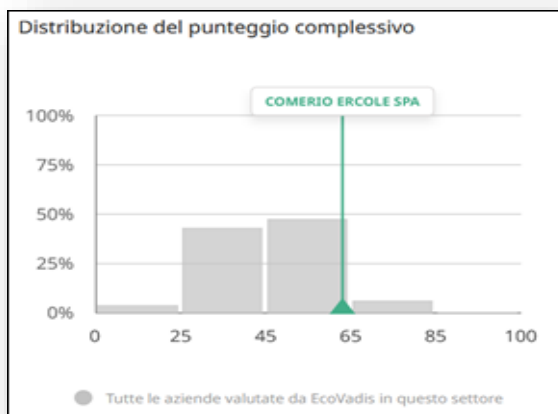


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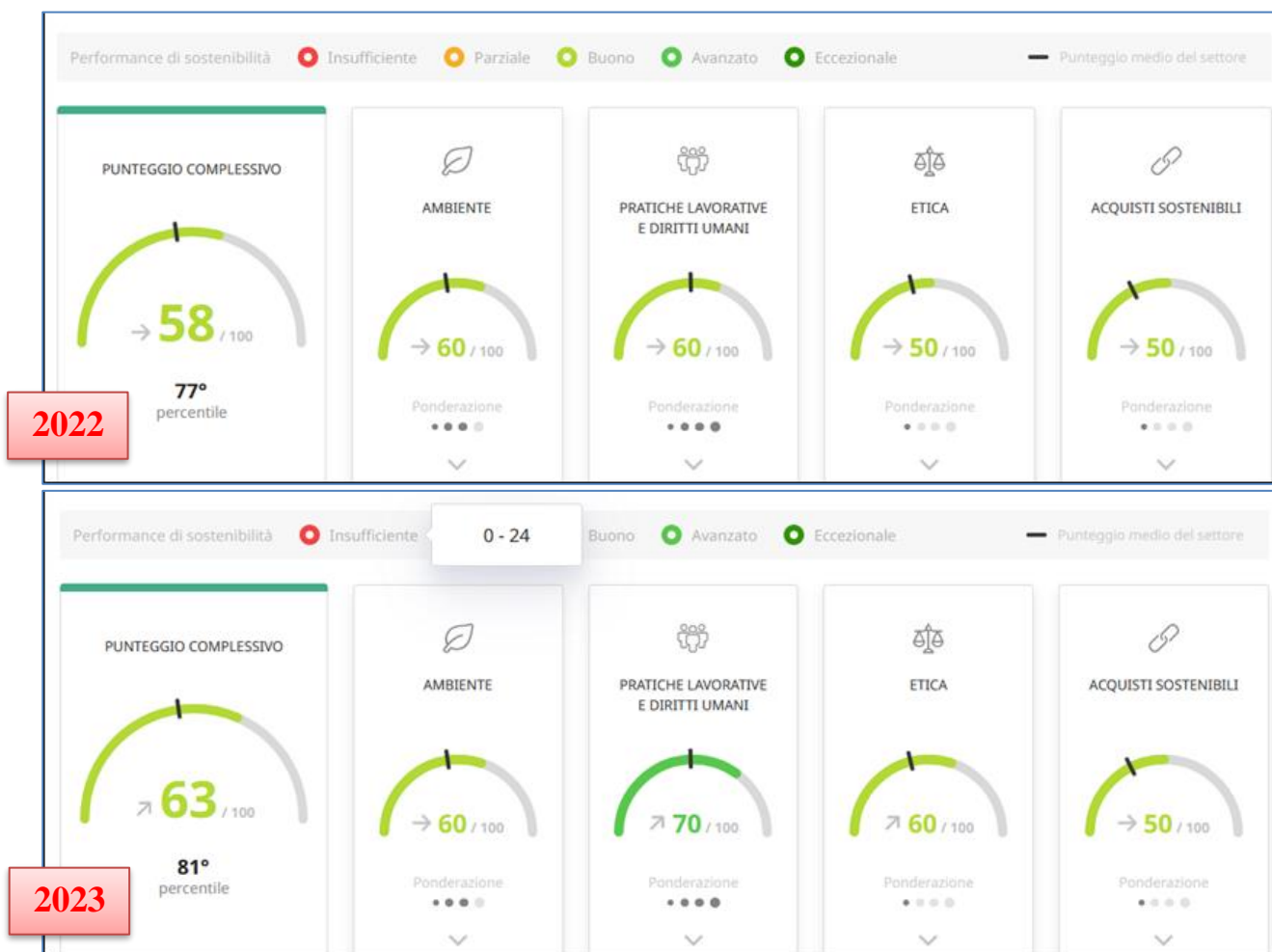


1.8 RATING PUBBLICATO 2024

ECOVADIS



COMERIO ERCOLE has achieved a score corresponding to the assignment of the BRONZE rating. Only 35% of all companies surveyed by ECOVADIS have reached a similar score. Furthermore, the completion of the ECOVADIS evaluation process is attested, demonstrating a robust management system.





2 BRIEF HISTORY

HISTORY



The activity **COMERIO ERCOLE** began in **1885** thanks to its founder Ercole with the constant support of his wife Teresa on a completely artisan plan to support the nascent and flourishing textile industry in the area. From the dynamic activity of the Comerio family, arises the example and the directives to operate with the best customers in the world, this means not only buying important commercial positions, essential to see the future in real terms, but above all the ability to operate at the highest possible technical level. From the initial dimensions of up to 800, **COMERIO ERCOLE** over the years has developed by expanding its product range to the design, construction and installation of machines and plants for the plastics, rubber and nonwovens industry.

Nowadays **COMERIO ERCOLE** is a worldwide established reality that does not exhaust its activity in the production of machines and plants but is able to make and procure Engineering and Know-How at all levels, to devote itself to scientific research programs for machines and plants and to promote collaborations in every part of the world.

COMERIO ERCOLE is a company that has always found the elements and the strength to project itself into the future by having a staff of employees, collaborators and technicians of great ability and with an experience that allows us to find the effective and timely solution to solve any technical problem submitted. The presence of the Comerio family is an important guarantee of continuity having arrived for some years to have the fifth generation operational in the company.

It is important to underline that recognition for professional merits is prevalent in the corporate environment, having a broad managerial base to make up the company team.

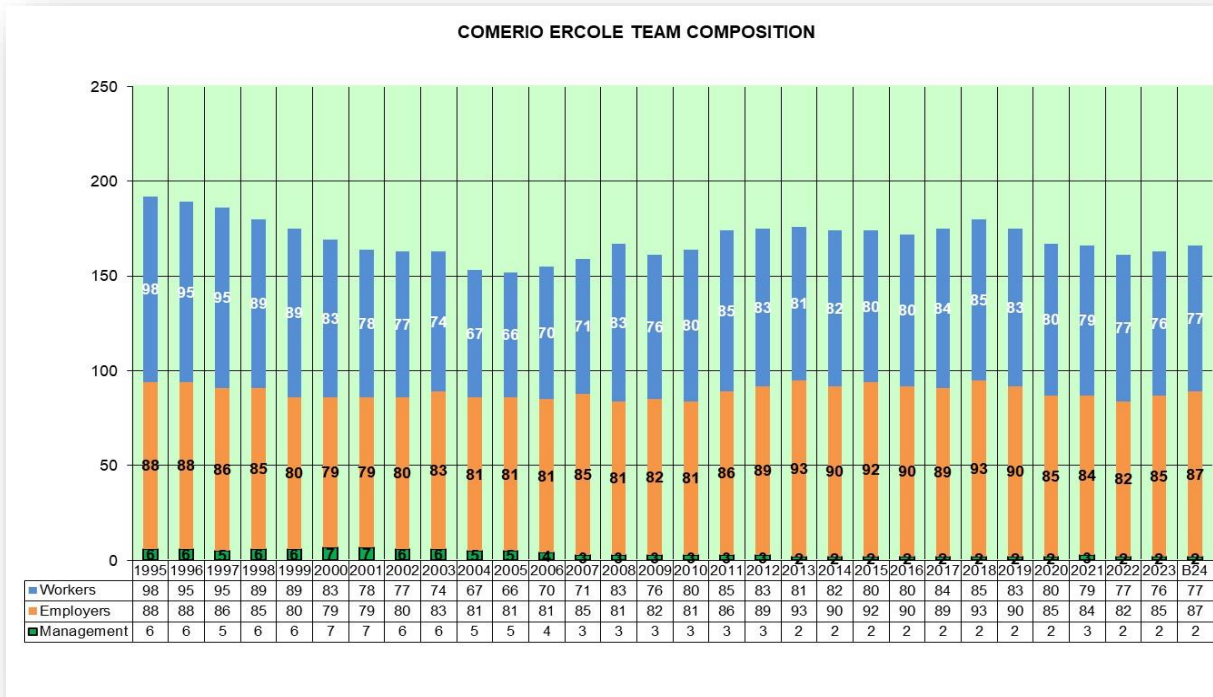




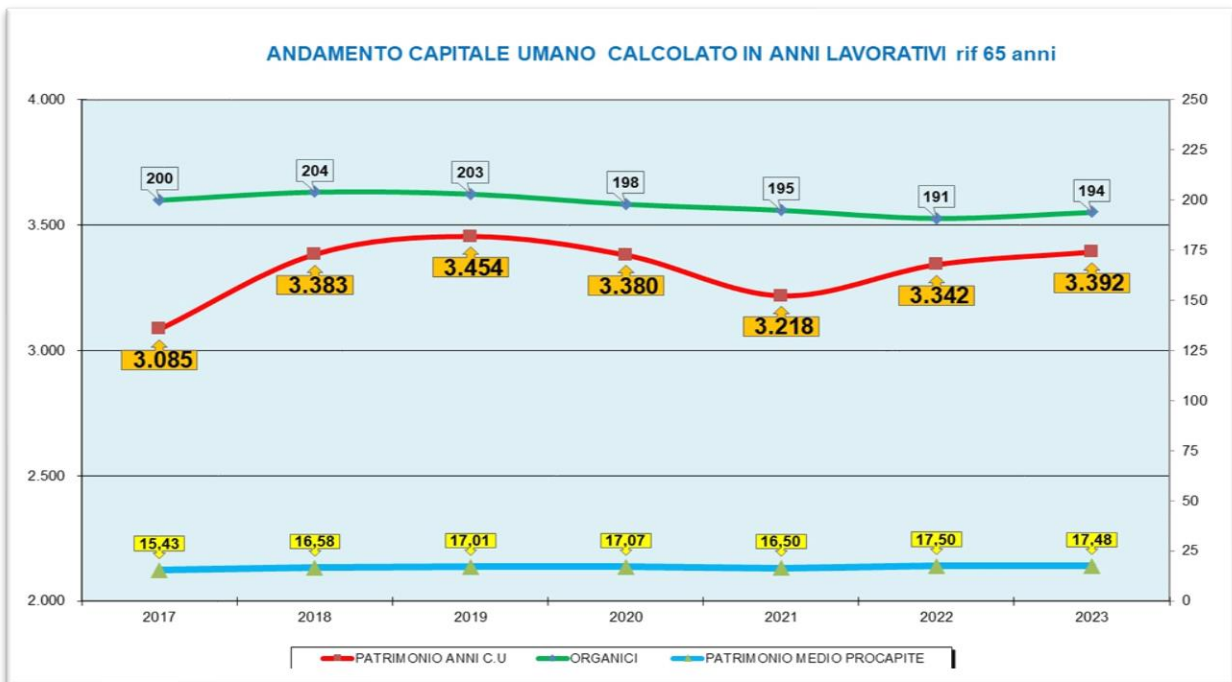
3.1 COMPANY STAFF

TEAM

The company staff **COMERIO ERCOLE** is composed on **31/12/2023** of **163** units.



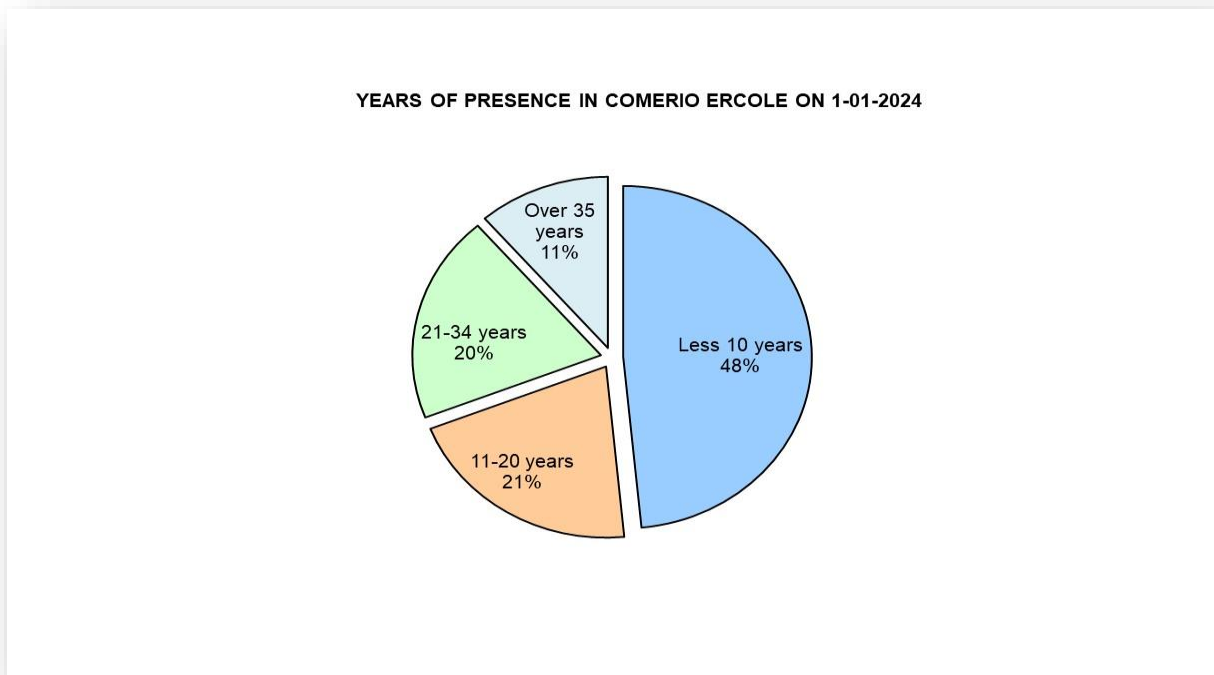
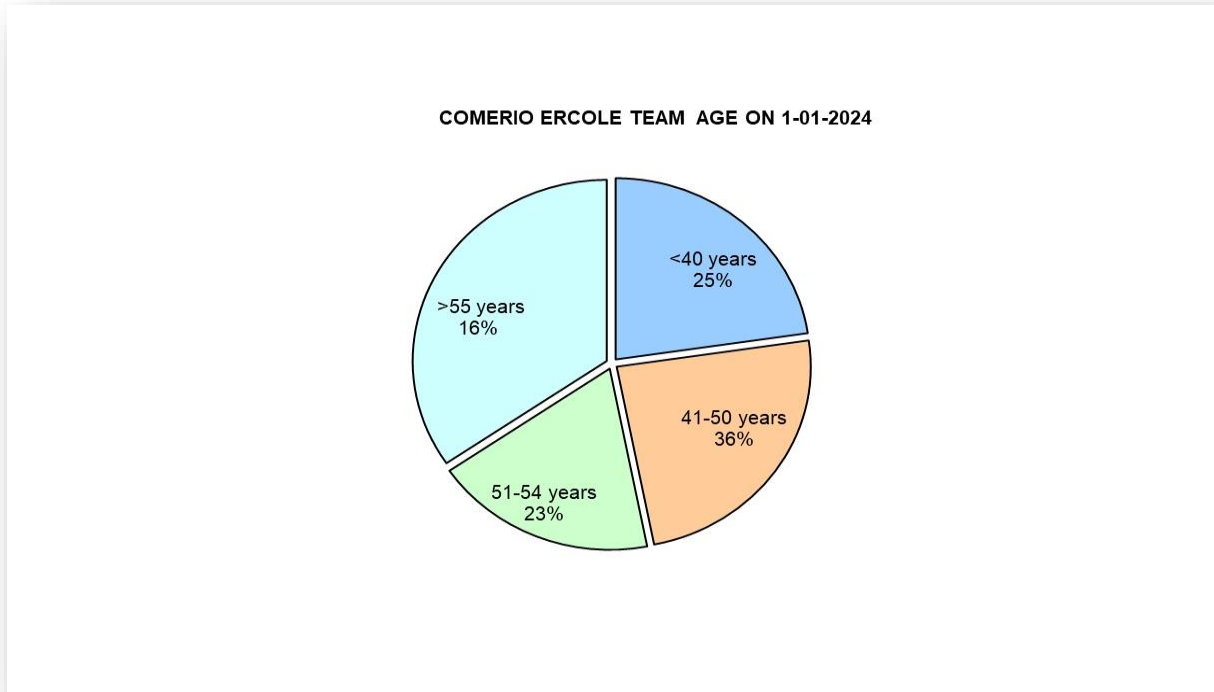
Below is a graph considered "innovative" as it calculates the value of the company's human capital in total years, **COMERIO ERCOLE** has **3.392 YEARS** of human capital considering the total staff of collaborators projected on a work expectancy age 65 years of which an average of 17.48 years to be spent for each collaborator.



3.2 STAFF COMPOSITION

TEAM

Since **COMERIO ERCOLE** has been present since the beginning of industrial development in this geographical area, the company is considered as a preferential target for the part of the qualified workers available in the area, therefore it has a good staff loyalty index.



4 PRODUCTS AND SERVICES

PORTFOLIO & MARKET





RUBBER PLASTIC PROCESSING MACHINERY SECTOR

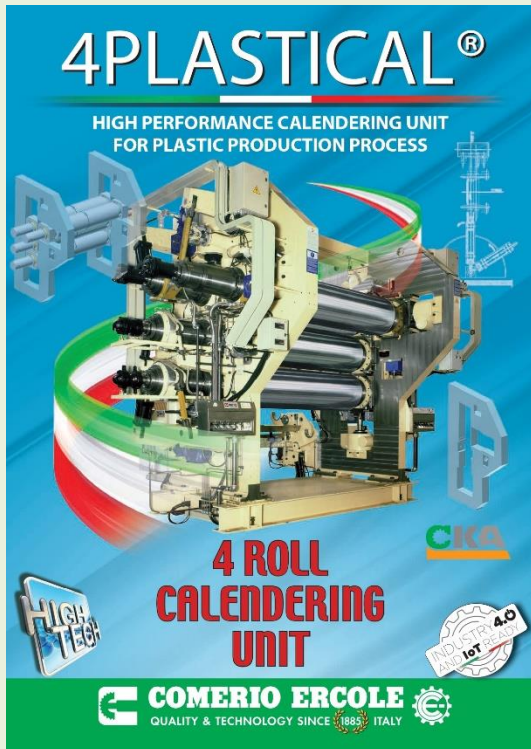
- Internal mixers
- Cylinder mixers
- Batchoff cooling systems
- Grinders and refiners, rubber
- Scrap recovery plants
- Regeneration plants
- Calenders with 2, 3, 4 cylinders
- Calenders roller head
- Spare parts
- Mixing plants
- Complete calendering lines



MAIN REFERENCE MARKETS

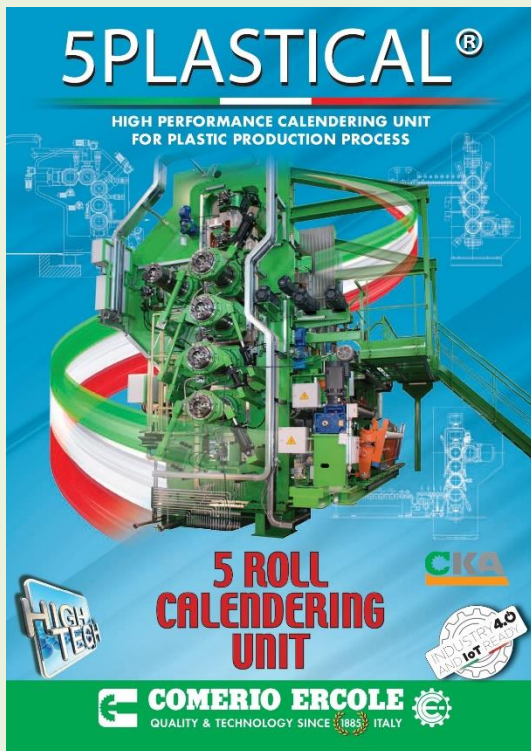
- Europe
- North America
- Far East
- Middle East
- Eastern Europe





PLASTIC PROCESSING MACHINERY SECTOR

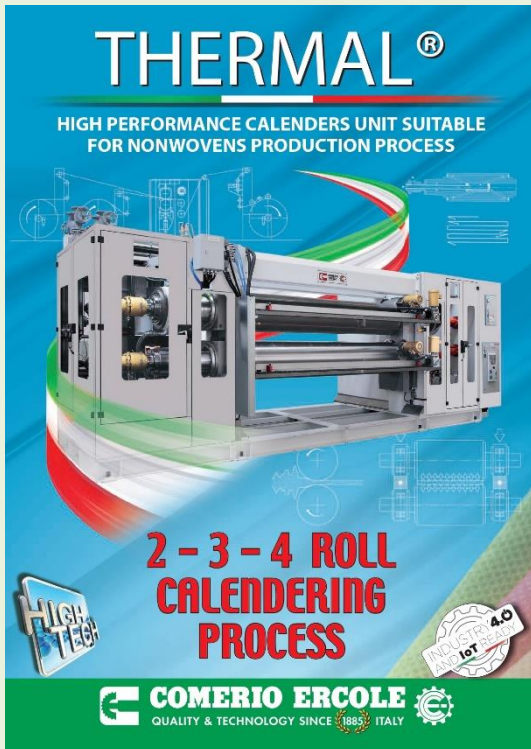
- Special extruders
- Cylinder mixers
- Scrap recovery plants
- Regeneration plants
- 3, 4 and 5-cylinder calenders
- Spare parts
- Complete calendering lines



MAIN REFERENCE MARKETS

- Europe
- North America
- Far East
- Middle East
- Eastern Europe



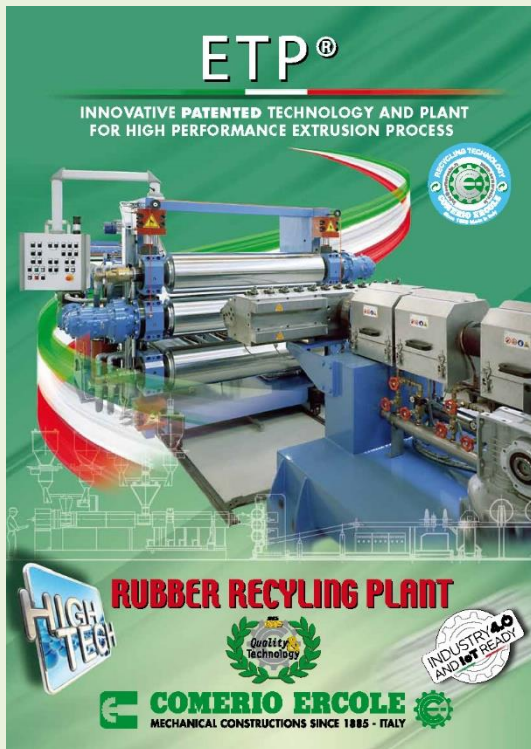


NONWOVENS MACHINERY SECTOR

- Calenders and calenders
- Calenders for calibrations
- Calenders smoothing machines
- Ultrasonic calenders
- Heat fixers
- Spare parts
- Complete plants

MAIN REFERENCE MARKETS

- Europe
- North America
- Far East
- Middle East
- Eastern Europe



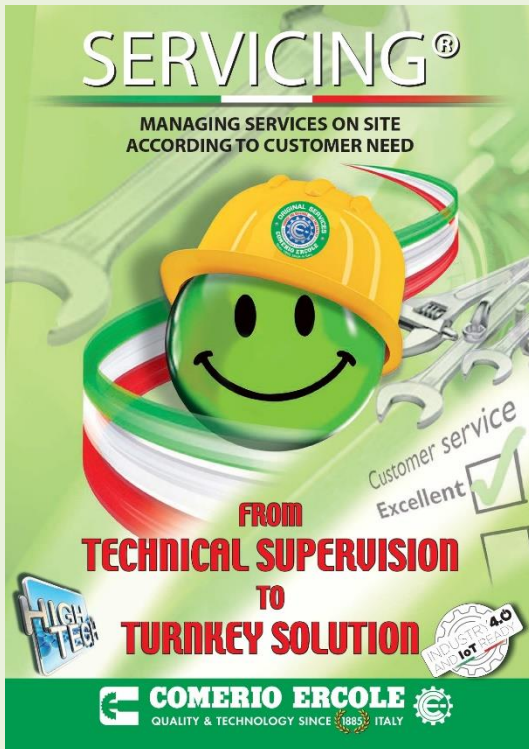
RECYCLING MACHINERY SECTOR

Special extruders for ELT recovery and waste materials in the thermoplastic field

MAIN REFERENCE MARKETS

- Europe
- North America





SPARE PARTS AND ASSISTANCE SECTOR

- Market spare parts
- Special spare parts according to drawing
- Existing machine overhaul
- Regulatory adjustments
- Markings and certifications
- H24 assistance
- 2D and 3D Engineering
- Remote assistance activities
- New digital platform

MAIN REFERENCE MARKETS

Worldwide



Different services have been offered throughout 2023, with dedicated TURNKEY85® brochures highlighting the ability to manage orders with Turnkey Installation services. This expertise was already present within the company but has been further strengthened with additional operational support networks in multiple regions worldwide.



5 – CORPORATE MEMBERS

GOVERNANCE

Board of Directors		Functions
Riccardo	Comerio	Chairman of the Board of Directors
Guglielmo	Comerio	Chief Executive Officer / CEO
Olga	Comerio	Advisory board member

Board of Statutory Auditors & Statutory Audit		Functions
Giuseppe Marcora		President
Giuseppe Merlini		Auditor
Ruggero Castiglioni		Auditor
Giovanni Giudici		Statutory auditor

Executive Board of Directors		Functions
Riccardo Comerio		CEO – coordinator
Guglielmo Comerio		CEO
Alessandro Capisani		Member / CFO
Marco Chierichetti		Member / CPO Procurement
Mario Sacchi		Member / CTO R&D
Alessandro Mentasti		Member / CTO Process
Simone Aicardi		Member / CTO Engineering
Davide Farioli		Member / CTO Engineering
Matteo Bertulio		Member / CCO Production
Alberto D'Argenio		Member / CCO Fluidic
Mauro Musetti		Member / CCO Service

Supervisory and Control Body D.lgs231		Functions
Ubaldo Guidi		Monocratic Advisor

Privacy GDPR		Functions
Guglielmo Comerio		Data processor

Protection Prevention Service T.U 81		Functions
Massimo Bombelli		RSPP
Vittorio Masina		ASPP assistant RSPP
Marco Perego / Mauro Esposito		RLS
Daniele Porro		Competent Doctor
Servizio Protezione & Prevenzione		Team
Servizio Prevenzione Incendi		Team
Servizio Primo Soccorso e BLS		Team

ESG sustainability		Functions
Riccardo Comerio		Team Manager
Andrea Comerio		Technical advice / framework
Olga Comerio		Project assistance

6 – PRECAUTIONARY PRINCIPLE AND RISK MANAGEMENT

D.LGD 231

COMERIO ERCOLE adopted (first resolution of the Board during 2009 and revision formalized in 2023) an organization, management and control model aimed at preventing the risks of committing crimes and limiting any impact in the event that illegal acts are carried out. The monitoring of the system is entrusted to a **Monocratic Supervisory Body (SB)** that performs checks. For reference odv231@comercole.it

The provisions of the Organizational Model are inspired by the general principles contained in the Code of Ethics and are integrated and compatible with it.

The Legislative Decree provides that the Organizational Model must "identify the activities in which crimes may be committed". In this regard, **COMERIO ERCOLE** carried out an analysis of the company's activities as well as the existing control procedures. This analysis was conducted by **COMERIO ERCOLE** through the examination of the activity and the main company documentation (powers of attorney, organizational provisions, etc.) and through a series of interviews with the main managers of the various functions.

In the current version of the 2023 Organizational Model, the following areas of activity are identified as Risk Processes, in relation to the Legislative Decree, and regulated for the purpose of preventing the commission of Crimes and/or Administrative Offenses:

Special Part A – CRIMES AGAINST THE PUBLIC ADMINISTRATION

Article 24 e 25 artt. 640, 640 ter, 317, 318, 319, 319 ter, 320, 322 c.p.

Special Part B – BUSINESS CRIMES

Article 25 ter agli artt. 2621 e 2622 c.c.

Special Part C – CRIMES AND SAFETY IN THE WORKPLACE

Article 25 septies artt. 589 e 590, comma III, c.p.

Special Part D – FINANCIAL CRIMES

Article 25 octies Legislativo artt. 648, 648 bis e 648 ter c.p.

Special Part E – ENVIRONMENTAL CRIMES

Article 25 undecies artt. 452, 727 e 727, comma III, c.p.

Special Part F – DATA PROCESSING CRIMES

Article 24bis agli artt. 484 e 615 comma III, c.p.

Special Part G – WHISTLEBLOWING

Article nr. 24 actualization of UE 2019/1937

**Dlgs 231/2001,
Odv e GDPR**

Integrazione dei modelli di compliance, nuova mappatura dei rischi, aggiornamento del sistema dei controlli interni, ruolo dell'Odv alla luce dei nuovi reati ex Dlgs 231 e del nuovo Regolamento privacy





ADMINISTRATIVE LIABILITY POLICY - D.LGS 231

POLICY

The COMERIO ERCOLE company management has defined, disclosed and undertakes to maintain active at all levels of its structure a model of organization, management and control, complete with principles of conduct as well as protocols that, in compliance with the system of assignment of functions and delegations of powers, as well as internal procedures, responds to the purposes and requirements of Legislative Decree 231 s.m.i., aimed at the prevention of administrative offences involving the liability of the institution. The COMERIO ERCOLE frame model consists of a series of chapters which identify and regulate the risk assessment. In COMERIO ERCOLE there is also a code of ethics that contains the principles representative of the company philosophy inspiring the choices and conduct of all those who, in various capacities and levels, act on behalf and in the interest of the company. COMERIO ERCOLE has appointed a Supervisory and Control Body which is entrusted with the fundamental task of constant monitoring mentioned above, with direct reporting to the Board of Directors and the Board of Statutory Legal Auditors.

MISSION & PURPOSES

COMERIO ERCOLE undertakes to:

1. Guarantee the Supervisory and Control Body full autonomy and discretion, as well as an expenditure budget appropriate to the nature of the audit activities entrusted to it;
2. Guarantee to the Supervisory and Control Body that it can at any time carry out acts of control and verification regarding the organizational model and individual management acts and facts;
3. Ensure compliance with the general confidentiality obligations established by law and by the CCNL;
4. Ensure that any information regarding the possible violation of the principles provided for can be immediately reported to the Supervisory and Control Body, even anonymously, by e-mail to the odv231@comercole.it address in order to guarantee the confidentiality of the whistleblower in accordance with the so-called whistleblowing procedures;

The Supervisory and Control Body draws up the annual program of its intervention activities, taking into account the periodic rotation of audits, the critical issues relating to individual processes and the presence of new processes at risk. Controls are more focused on processes where risks are potentially higher, in order to offer a balanced coverage of all potentially risky activities.

RESPONSABILITY FOR COMPLIANCE & IMPLEMENTATION

In cases where the Supervisory and Control Body ascertains the non-compliance or violation of the regulatory system, the type and extent of the sanctions will be applied in proportion to the seriousness of the deficiencies and, in any case, in consideration of the following elements:

1. subjective element of conduct, depending on intent or fault;
2. materiality of the obligations violated;
3. level of hierarchical and/or technical responsibility;
4. presence of aggravating or mitigating circumstances with particular regard to professionalism, previous work experience, the circumstances in which the act was committed and any recidivism;
5. sharing of responsibilities with other parties who have contributed to determining the lack;
6. behaviors that may compromise, albeit potentially, the effectiveness of the disease.

Busto Arsizio, 5 January 2023

The Management

WHISTLEBLOWING POLICY – ISO 37002:2021

POLICY

COMERIO ERCOLE SPA, according to current laws, in order to establish and to maintain a culture of integrity, transparency and conformity in daily life as well as in order to guarantee the effectiveness of a management system for the prevention of the bribery, has adopted a Model 231 for the protection of sensitive business processes and provides for the legal protection and instruments foreseen by the Legislative Decree 24/2023 regarding EU Directive 2019/1937 on the specific theme of Whistleblowing.

Stated what above, COMERIO ERCOLE has adopted a systematic approach in accordance with the guidelines of the ISO 37002 provisions concerning Whistleblowing management.

SCOPE & PURPOSES

COMERIO ERCOLE SPA is committed to:

- respect the laws, as well as the principles and the regulations of the Company and the Group;
- protect the stakeholders and protect the company by allowing witnesses of actions and behaviours that infringe public interest or corporate integrity, or that are not compliant with the values and ethics of the Ethic Code of COMERIO ERCOLE SPA, to report them in a safe manner;
- put at disposal of the company team and of all the people having relationships with the company a specific channel to submit and to manage doubts and reports relating to any potential breach/infringement of the Ethic Code of COMERIO ERCOLE SPA and of the current laws and regulations, as well as non-compliance situations.

This channel protects the identity of the reporter, the person involved and anyone else mentioned in the report, as well as the content of the report itself.

No revenge against the reporter is admitted.

The reporting channel is based on a secured specific IT platform which can be reached at the web address <https://comercole.trusty.report/>

The email address odv231@comercole.it is also available as additional reporting channel.

This policy is made public through the company's website www.comercole.it and it is disseminated to all levels, in particular employees, suppliers and customers, who are expressly requested to keep the same commitment.

This policy has been previously agreed with the company's trade union representatives, with a wide spreading to employees and cooperators.

COMERIO ERCOLE SPA, through the adoption and the application of this policy, contributes to the conditions for a daily life inspired by legality, a widespread civic sense and a better and more sustainable quality of life of the society, both for today's and for tomorrow's generations.

Busto Arsizio, 15th December 2023

The Management

7 - IDENTIFICATION OF STAKEHOLDER

STAKEHOLDERS

The term **STAKEHOLDERS** refers to all those internal and external subjects who have an interest of any kind towards the company itself, which takes the form of expectations, information needs, economic interests, etc.:



Internal stakeholders: Shareholders, board of directors, all employees and collaborators. In relation to the above-mentioned stakeholders, the expected expectations concern compliance with the rules, the improvement of the corporate climate, the protection of workers and their involvement in the implementation of actions aimed at improving working conditions.

The staff of **COMERIO ERCOLE** is composed of **163** employees on 31/12/2023 – 100% of the company working population is covered by a collective labour agreement for metalworking and a series of supplementary company contracts finalized with the RSU company trade union representatives.

External stakeholders: Customers, Suppliers, Research Institutions. Social security and welfare institutions, local and national institutions and authorities, trade unions both inside and outside the company, local associations and organizations (Ass Noi della COMERIO ERCOLE 1885), Trade Associations (Confindustria, AMAPLAST). With regard to external stakeholders, the social management system develops differently depending on the roles that each of them plays towards the company. Interested parties can contribute to the Management System for Social Responsibility by communicating any reports on the merits of respect for social values and on the exhibition, method chosen in drawing up the social report.

COMERIO ERCOLE believes that sustainable growth over time is closely linked to the ability to identify and respond to changes in the market and also in society.

Establishing and maintaining a constant dialogue with stakeholders over time allows **COMERIO ERCOLE** to identify the most important issues in terms of sustainability and to evaluate how best to integrate them into industrial and management activities. Constant dialogue promotes trust, creates mutual value and supports the sustainable growth of the company's business in line with stakeholders' expectations.

8 - VALUES & PRINCIPLES

STANDARDS

COMERIO ERCOLE has always considered important the continuous improvement and constant development of **ESG** organizational measures aimed at the Management of Quality, the Environment and Social Responsibility.

Since 2001, **COMERIO ERCOLE** has maintained a Quality Management System that complies with and is certified according to the **UNI EN ISO 9001** standard, as it aims to improve over time the positions already achieved on the various markets and production sectors. The attention to the environment and the territorial context has led **COMERIO ERCOLE** to develop a Management System consistent with the **UNI EN ISO 14001** standard and then recently also with a Management System for health and safety at work **UNI EN ISO 45001**.

As far as possible, the three systems referred to above have been drawn up and supplemented by developing joint documents and actions.

All company policies, including quality, environment, social responsibility and privacy have been formalized with a specific written declaration and the last revision was registered on 05/01/2023.

COMERIO ERCOLE is equipped with a manual that describes the company's quality management system with reference also to safety aspects in compliance with **ISO 9001: 2015** and **ISO 14001: 2015 standards**. During 2022, all the procedures for obtaining **ISO 45001: 2018** certification were perfected.

COMERIO ERCOLE has set itself the goal of adopting a model of organization, management and control of its Social Responsibility system, following the following general principles of conduct: compliance with laws and regulations, fairness, transparency, impartiality, professionalism, training and enhancement of human resources, confidentiality, clarity and completeness of information, protection of health and the environment, diligence and good faith.

COMERIO ERCOLE has therefore adopted an **internal company REGULATION** in order to give greater transparency and emphasis to the conduct and to the **CODE of ETHICS** (in force since 2007 with approval by the board of directors and also signed by the RSU trade union representatives) to be followed and respected in the company by all employees and collaborators. **WHISTLEBLOWING** procedure have been implemented.

Measures relating to the health and safety of workers have also been adopted in compliance with Legislative Decree 81/08 and particular importance has been given to general internal training, giving all employees access to training courses carried out during working hours (MEWP, English course, forklift drivers, safety course 81/08, etc.).

9 - PRIVACY POLICY

GDPR

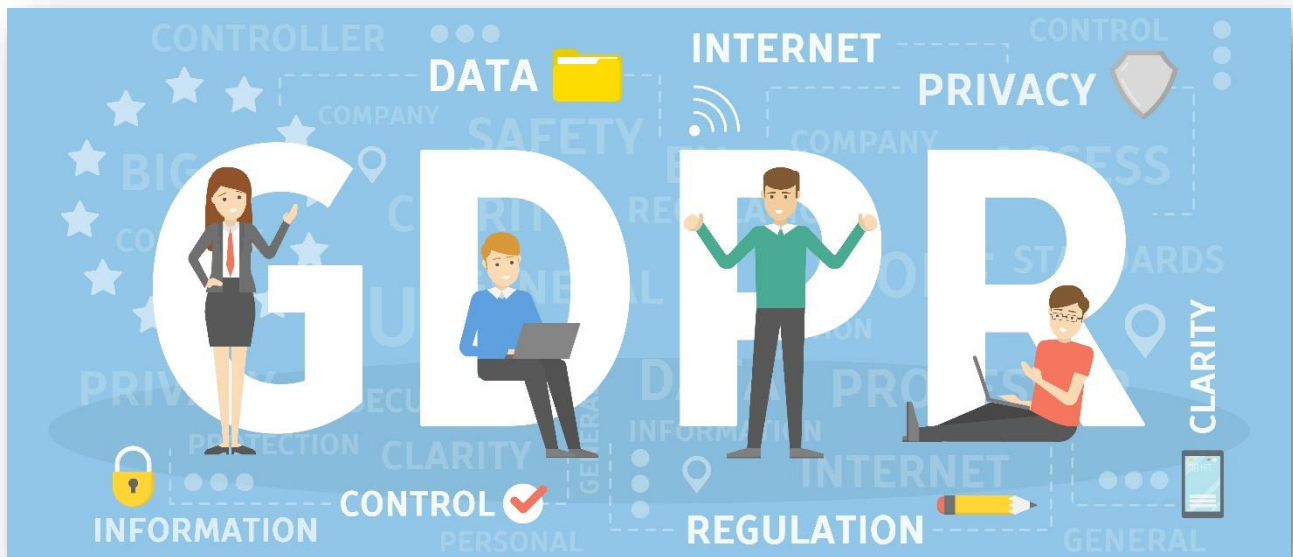
COMERIO ERCOLE has also introduced a privacy policy in compliance with EU Regulation 2016/679, known as GDPR (General Data Protection Regulation) – concerning the protection of individuals with regard to the processing and free movement of personal data, which entered into force on 25 May 2018 and is valid for all member states.

First of all, an **assessment of the risks** for the protection of personal data was made with analysis of the various business processes, data flows, treatments and subjects involved, with subsequent verification of compliance with the legislation and provisions in force.

The new regulation introduces the obligation to keep the register of processing operations. The obligation to keep the register concerns all owners and processors of personal data, with the exception of SMEs with fewer than 250 employees.

The obligation, however, also extends to small and medium-sized enterprises if the processing of data is configured as a risk to the rights and freedoms of the data subject, if the processing is not occasional or concerns particular types of data. **COMERIO ERCOLE** for its own conformation and processes processed is not required to appoint the DPO (Data Protection Officer) required by the GDPR.

Specific provisions have been introduced in **COMERIO ERCOLE** (e.g. implementation plans, Privacy Impact Assessment, risk overview, information, etc.) with adjustments to processing, paying particular attention to the information on websites, emails, commercial and marketing data or data relating to employees, etc.





PRIVACY POLICY - GDPR UE 679:2016

SCOPE & PURPOSES

COMERIO ERCOLE SPA board has defined, disclosed and is committed to maintaining this Privacy Policy active at all levels of its organization. The purpose of this policy is to ensure the protection and security of the information and data managed as part of its activities from all internal or external, deliberate or accidental threats, in accordance with the guidelines provided by the EU Regulation 679/2016.

FIELD OF APPLICATION

This policy applies without distinction to all organs and levels of the Company. The implementation of this policy is mandatory for all staff and must be inserted in the regulation of agreements with any external party who, for whatever reason, may be involved with the information processing falling within the scope of the Management System Policy. The company provides communication and dissemination of information to the outside only for the proper conduct of business activities that must take place in accordance with the mandatory rules and standards.

BUSINESS POLICY CONCERNING INFORMATION SECURITY

The information assets to be protected is the set of information managed through the services provided and localized in all company's offices. It is therefore necessary to ensure:

- the confidentiality of information, that means the information should be accessible to authorized people only;
- the integrity of information, namely protection of the accuracy and completeness of the information and the methods for their processing;
- the availability of information, i.e. authorized users can access to information and related assets when they require it;

RESPONSIBILITY FOR COMPLIANCE & IMPLEMENTATION

The compliance and implementation of the policy are responsibility of:

- 1) Everyone who, for any reason, collaborates with the company and is in some way involved with the processing of data and information that fall within the scope of the Privacy Management System. All staff are also responsible for reporting all anomalies and violations they become aware of.
- 2) All third parties that have relationships and collaborate with the company must ensure compliance with the requirements of this policy.

The person in charge for the Privacy Management System must:

- manage risk analysis with the appropriate methodologies and adopt all the measures for their management;
- establish all the rules necessary for the safe performance of all company activities;
- check the security violations and take the necessary countermeasures and control the company exposure to the main threats and risks;
- organize training and promote staff awareness about everything related to quality, safety and information security;
- periodically verify the effectiveness and efficiency of the Privacy Management System.

DATA CONTROLLER AND DATA PROCESSORS

The Data Controller is COMERIO ERCOLE SPA with registered office in Via Castellanza, 100, 21052 Busto Arsizio (VA). The requests relating to the exercise of the aforementioned rights can be forwarded, in writing, also by e-mail to privacy@comercole.it. The full list of the persons in charge can be requested via e-mail at the same address.

Busto Arsizio, January 5th 2023

The Management



QUALITY POLICY - ISO 9001:2015

GENERAL SCOPE

COMERIO ERCOLE SPA pursues a quality management system, which, based on current standards, can:

- regularly supply products and services that meet customer's requirements and applicable mandatory requirements of ISO 9001;
- facilitate opportunities to increase customer satisfaction;
- address risks and opportunities associated with its context and its goals;
- demonstrate compliance with the specified requirements of the quality management system.

The aforementioned international standard uses the process-based approach that incorporates the Plan-Do-Check-Act (PDCA) and Risk-based-thinking cycle

MISSION & VALUES

The company's mission is to identify and understand market expectations and requirements, to manufacture reliable products and to supply high quality services and technological innovation in a competitive and advantageous way, ensuring full customers' satisfaction. Constantly invest in research, development and improvement of products and production processes in order to guarantee reliability, safety and innovation. In summary, the business management of COMERIO ERCOLE SPA pursues the following values:

- Quality & Technology
- Competence
- Reliability
- Services
- References
- Competitiveness

COMERIO ERCOLE SPA also pays particular attention to issues relating to product safety, to processes in which they are inserted and to their operators, complying, through a dedicated technical staff, with the most up-to-date regulations in force. Only the design and the research for innovative solutions guarantee products that are increasingly reliable and safe. A company TQA representative has direct access to what is necessary to positively reply to the requirements contained in the model ISO 9001, since this is one of the features that any business partner, active or potential, is expected by the company. This strongly contributes achieving a main step in the life of the company organization: passing from the situation in which the quality image associated with the sub-suppliers of the products ensures the quality of the company to the situation in which the quality of COMERIO ERCOLE SPA guarantees the quality of the products and sub-suppliers.

KEY STRATEGIES

COMERIO ERCOLE SPA intends to achieve company goals through:

- the empowerment of the people who manage, perform and verify the work influencing the quality of products;
 - the participation of the process managers in the continuous improvement;
 - the motivation of employees and collaborators;
 - the fulfilment of a high level of professional skills in the company;
 - the verification of customer expectations with respect to company capabilities and performances;
- Quality purposes are monitored by Management during the review of the Quality Management System through the analysis of data and the inherent in various processes in order to determine the quality improvement policies and define the targets to be achieved.

Busto Arsizio, January 5th 2023

The Management



ENVIRONMENTAL POLICY - ISO 14001:2015

POLICY

It is COMERIO ERCOLE SPA policy to improve its environmental performance in order to comply with current legislation and to improve its environmental management according ESG sustainability standards.

COMERIO ERCOLE SPA activities are manufacture and installation of rubber and plastic processing machines and machines and plants for processing non-woven fabrics.

MISSION & PURPOSES

COMERIO ERCOLE SPA undertakes:

- to comply with the undersigned consortium legislation and regulations;
- to prevent pollution;
- to maintain an Environmental Management System in compliance with the ISO 14001 standard with the aim of managing all the factors that can influence its own environmental performance, by continuously improving it.

COMERIO ERCOLE SPA has defined as its primary purposes for quality and the environment:

- to improve current consumption;
- to improve water consumption;
- to improve methane consumption and atmospheric emissions;

Achieving these goals requires the definition and periodic testing of appropriate indicators.

A company representative has the power to have direct access to what is necessary to positively reply to the requirements contained in the model ISO 14001, since this is one of the features that any business partner, active or potential, is expecting from the company.

The company's Management is committed to make available the appropriate human and financial resources to achieve these purposes.

Busto Arsizio, January 5th 2023

The Management



SAFETY POLICY - ISO 45001:2018

POLICY

It is COMERIO ERCOLE SPA policy to consider the protection of health and safety at work as an essential goal to be achieved and constantly improved, not limited to compliance with current legislation only.

COMERIO ERCOLE SPA carries out the design and construction of machines and plants for the processing of rubber and plastics and machines and for the processing of non-woven fabrics.

MISSION & PURPOSES

COMERIO ERCOLE SPA undertakes:

- to fully comply with current legislation (including any other requirements signed by the company), the relevant legislation and the company operating procedures and instructions on safety;
- to maintain a Safety Management System (SGS) compliant with the ISO 45001 standard with the aim of managing all the factors that can affect its performance of protection and safeguarding of safety by continuously improving it.

COMERIO ERCOLE SPA has defined as its primary objectives for the safeguarding and protection of safety:

- constantly improve the safety level of its production process to protect and safeguard workers;
- encourage consultation and participation of workers and their representatives, in the awareness that their active contribution is decisive for the achievement of the objectives related to safety;

The achievement of these objectives requires the definition and periodic verification of adequate indicators. A company representative is delegated to directly dispose of what is necessary to respond positively to the requirements contained in the ISO 45001 model, convinced that this is one of the business characteristics that any interlocutor, active or potential, expects from the company.

This Policy is aimed at the prevention of accidents and illnesses at work and represents the guide for the continuous improvement of safety performance and the related management system (also through the search for the constant updating of the technologies used and the best scientific knowledge).

The company management undertakes to make adequate human and economic resources available to achieve these objectives.

Busto Arsizio, 5 January 2023

The Management



LCA/EON POLICY (Life Cycle Assessment - End of Life) – ISO 14040:2021

POLITICS

COMERIO ERCOLE SPA, referring to the principles of the ISO 14040:2021 standard relating to life cycle assessment (LCA – Life cycle assessment), is committed to assessing, interpreting and reducing the environmental impacts of the products and services it provides, both during their life cycle and at the end of it (EOL – End of Life / EOS – End of Service). This implies an environment-oriented approach not only in the development and creation phase of the goods to be supplied, but above all in that of its final disposal. COMERIO ERCOLE SPA defines the guidelines in order to enhance the value of the asset that reaches the end of its useful life, according to the Reduce-Reuse-Repair-Recycle logic that avoids its mere dismantling and disposal of waste.

COMMITMENTS AND OBJECTIVES

COMERIO ERCOLE SPA is committed to complying with the following principles:

- Design and manufacture the goods to be supplied, already thinking – right from the beginning of the process – about the ways and possibilities of their valorization in the EOL phase;
- Use materials and construction solutions to facilitate the disassembly of the goods themselves at the end of their useful life, so that their components can be more easily reused and/or recycled (so-called Design & Built for Disassembly);
- Encourage all forms of maintenance of the goods supplied in the past and, in particular, propose to the end-users maintenance plans to maintain the functionality of the goods themselves over time, thus postponing the EOL phase as long as possible, also with the help of the new technologies such as predictive maintenance based on the detection of problems through artificial intelligence AI;
- Integrate into its technical-commercial offer suitable solutions for the collection, revamping, retrofitting, repowering of past supply goods, in order to relaunch their useful life and delay their waste delivery as much as possible;
- Conceive alternatives for the EOL phase consisting not only in the recycling but also in the recovery of the main components of the goods; in other words, evaluate and propose to the end-users different scenarios of future usability for the main parts of the machinery or plant that has reached the end of its useful life;
- Integrate into the technical documentation (i.e. use and maintenance manual) instructions suitable for guiding the end-users in the EOL phase (e.g. instructions for selective disassembly);
- Monitor the second-hand market in order to match the supply and the demand of second-hand machines of our past construction, encouraging the transfer of goods between different users and with different use expectations, always in compliance with the general provisions of health and safety of workers;

Through the application of this policy, COMERIO ERCOLE SPA wants to contribute to ensuring that the generations of today and tomorrow have the conditions and tools for a better quality of life to support respect and protection of the environment.

Busto Arsizio, 5 March 2024

The Management



STOP WORK AUTHORITY - SWA

POLICY

COMERIO ERCOLE is constantly committed to promoting and consolidating the culture of health and safety of all the people involved in its activities in the workplace by increasing awareness of risks and promoting responsible behavior in order to ensure the performance of its activities without accidents as every person who works represents the most precious asset to be protected.

COMERIO ERCOLE is also strongly committed to protecting the environment, convinced that preventing risks and promoting responsible behavior allows it to protect its human capital and guarantee a quality service for corporate stakeholders in various capacities involved.

MISSION & PURPOSES

The Employer, the management and all the company figures involved in the field of safety and environmental protection are increasingly committed to spreading the culture of health and safety. For this reason, COMERIO ERCOLE has introduced a specific policy called "STOP WORK AUTHORITY" which gives every employee the right and duty to intervene promptly and interrupt, if necessary, any work activity that he believes may seriously jeopardize his health and safety and / or that of his colleagues or, similarly, that may cause damage to the environment. The worker must report to his direct manager or to the safety officer any unsafe behavior, action, omission or situation that could potentially lead to an injury or environmental damage. Only when safety conditions are re-established work activities can be resumed.

The order of STOP WORK must be applied in good faith. No fault or liability will be attributed to an employee who reports a dangerous situation or applies the policy of STOP WORK AUTHORITY, even if such action subsequently proved unnecessary.

In general terms, the STOP WORK policy is implemented concretely as follows:

1. STOP specific work activity by the worker
2. Timely NOTIFICATION to the direct superior
3. CORRECTION of the work activity considered in order to restore the safety condition
4. RESUMPTION of the work activity considered

The Employer and the company management has also identified the review of the safety management system in compliance with ISO 45001 as an opportunity to verify the suitability of this document and to possibly integrate it with the necessary evolutions.

Busto Arsizio, January 5th 2023

The Management



SOCIAL RESPONSIBILITY POLICY - ISO 26000:2010

POLICY

COMERIO ERCOLE SPA supports and respects the protection of internationally proclaimed human rights in compliance with the guidelines of the ISO 26000 standard and considers the protection of integrity, health, rights and welfare of its employees and of the environment as primary and fundamental elements in performing and developing its activities.

COMERIO ERCOLE SPA prepares its own Social Report and undertakes to apply the Code of Ethics approved by the board of directors in order to constantly improve the social, ethical, environmental, health and safety aspects in the workplace.

SCOPE & PURPOSES

COMERIO ERCOLE SPA undertakes to comply with the following principles:

- to rule its activities by adopting management systems relating to health, safety at work, environment and social responsibility in compliance with national and international standards;
- to communicate and disclose information regarding health, safety at work, environment and social responsibility to internal and external stakeholders;
- to promote prevention and protection measures in compliance with the regulations in force for the protection of workers' health, for working safety and for environmental protection;
- assess and reduce the environmental impact of its processes / products;
- to use resources responsibly with the aim of achieving sustainable development, respecting the environment and the rights of future generations;
- to assess the risks of professional injuries or illnesses so as to eliminate or reduce them, complying at least with the laws in force in the various countries;
- to not use or support the exploitation of child labour and forced labour;
- to ensure equal opportunity or freedom of association, promoting the growth of each individual;
- to not engage any form of discrimination and coercion in the workplace, whether it involves hiring, remuneration, access to training, promotion, dismissal or retirement;
- to oppose any form of discrimination arising from race, class, national origin, religion, sex, sexual orientation, trade union membership or political affiliation;
- to comply with the provisions of the National Labour Contract in force in Italy.

This policy is made public and widespread at all levels, including suppliers and sub-contractors to whom the same commitment and respect are expressly requested as prerequisite for the start of a supply relationship. Suppliers and sub contractors must be available to implement any improvement actions if deemed necessary by the company, allowing it to carry out checks for assessing the above.

COMERIO ERCOLE SPA, through the application of this policy, is contributing to provide present and future generations the conditions and instruments for a better quality of life.

Busto Arsizio, January 5th 2023

The Management



DIVERSITY & INCLUSION (D&I) POLICY – ISO 30415:2021

POLICY

COMERIO ERCOLE SPA recognizes and appreciates the variety of features that make people unique, believes that diversity, in all its expressions, is a strategic advantage, that brings cultural enrichment and openness; for this reason, it favours an inclusive work environment, aimed to cooperation and growth with the support of everyone; this is achieved by encouraging people to express themselves freely, so that everyone's potential can be released and everyone's motivation can be increased. COMERIO ERCOLE SPA adopts a management strategy for "Diversity & Inclusion" (D&I), aimed to the creation of an inclusive corporate culture, based on the valorisation of everyone's differences as factors for improving personal and organizational performances.

SCOPE & PURPOSES

COMERIO ERCOLE SPA undertakes to comply with the following principles:

- **Recognize the Diversity** – COMERIO ERCOLE values all people intrinsically, individually and as a group; it appreciates how the different features of the diversity intersect, and recognizes that demographic and other personal features may possibly be protected by law and regulation;
- **Manage the Diversity Effectively** – COMERIO ERCOLE represents and promotes management's commitment to D&I through the use of inclusive governance systems, policies, processes, practices and operations;
- **Act responsibly** – COMERIO ERCOLE acts in an ethical and social responsible manner, promoting productive employment and dignified work for all the people;
- **Work in an inclusive way** – COMERIO ERCOLE promotes and develops an accessible and respectful workplace that encourages the inclusion and the sense of belonging to a community;
- **Communicate in an inclusive way** – COMERIO ERCOLE recognizes and responds to the needs of people who access, understand and relate each other in different ways;
- **Support and Defend D&I** – COMERIO ERCOLE actively inspires and promotes inclusive corporate practices and stakeholder relations.

KEY STRATEGIES

COMERIO ERCOLE SPA believes that all above stated, together with the Social Responsibility Policy and the Company's Code of Ethics, can implement a general framework for the valorisation of people as "human capital" and, to achieve this aim, it undertakes to provide all interested parties (workers, suppliers, customers, public opinion, trade unions, public authorities, etc.) a strong message for understanding, respecting and applying the requirements set out in the ISO 30415:2021 standard.

Busto Arsizio, 8 March 2024

The Management



ENERGY SYSTEM POLICY - ISO 50001:2018

SCOPE & PURPOSES

COMERIO ERCOLE SPA mainly pursues:

- to comply with legislation and regulations;
- to prevent any activity that may contribute to pollution;
- to adopt and respect an Environmental Management System in compliance with the ISO 14001 standard, with the aim of managing all the factors that can influence its environmental performance by continuously improving it;
- to continuously improve its energy performances in terms of energy efficiency, energy consumption and use, with a systematic approach, in compliance with the provisions of the ISO 50001 standard.

MISSION & VALUES

The company has defined as main goals for quality, environment and energy:

- to eliminate oil sources contaminated by PCBs;
- to improve energy consumption;
- to improve methane consumption and atmospheric emissions.

Achieving these goals requires the definition and the periodic testing of suitable indicators.

The Board of Directors undertakes to provide adequate human and financial resources to achieve these purposes.

Considering that the market position and reputation achieved by the company are based on product reliability, which is the direct result of a company organization based on people and teamwork, a specific procedure is followed to ensure constant maintainability of the organization performance level.

In particular, the company provides the following main actions:

- double presence for all key figures;
- constant theoretical and practical training on site;
- constant connection with the school and university system selected in the area with stable investments for work activities, projects for graduation thesis, etc.

KEY STRATEGY

COMERIO ERCOLE SPA has defined its EMS Energy Management System as a strategic means to satisfy the Quality Policy and the specified goals, to guarantee its customers that products and assistance services are always compliant with the specifications contractually defined and imposed by the law and, in general, with the applicable laws and regulations, to make prevail in all company activities the tendency to intervene in advance on the causes of the problems rather than merely intervening after the effects have been detected.

The Quality Policy must therefore be considered an integral part of the corporate values deriving from the vision of work in an economic and social perspective (Corporate Social Responsibility - CSR).

COMERIO ERCOLE SPA has defined as a priority the importance of its team organization for long-term business skills and knowledge, in order to constantly respect the required operational performance.

Busto Arsizio, January 5th 2023

The Management



BUSINESS CONTINUITY POLICY - ISO 22301:2019

SCOPE & PURPOSES

COMERIO ERCOLE SPA mainly pursues:

- the continuity of production activities with long-term vision;
- the customer satisfaction guarantee;
- the reputational protection of its brand in the world;
- a systematic approach in accordance with the guidelines of the ISO 22301 provisions

MISSION & VALUES

The company's mission is to identify and understand market expectations and requirements, to manufacture reliable products and to supply high quality services and technological innovation.

The purpose of this document is to illustrate the way in which the corporate organization can make its critical functions operational again within a predetermined period of time after a disaster or serious damage or more simply after natural cessation of work activities (retirement of key professional figures, illness, death, long absence, etc.)

The document therefore constitutes the tool with which the company questions itself on its strategic functions, on the measures adopted to protect them and on the procedures that can be activated for their rapid and effective recovery in the event of a particularly important accident.

The accidents considered are the most varied: not only fires or earthquakes but, in general, any event that could lead to an interruption or even just a serious hindrance to the normal company operations, consequently generating repercussions on the compliance with the production schedule and therefore on customer satisfaction.

Aim of the company is in fact to ensure the continuity of its services, with a long-term vision, even in the presence of a traumatic event that harms the integrity of its technical and human heritage.

In particular, COMERIO ERCOLE has defined a procedure as an aid to manage crises triggered by sudden and traumatic events, aiming to:

- react as quickly as possible and in the best way;
- guide intervention priorities;
- establish the procedures so that the answer is not left to chance or individual initiative;
- ensure the least possible inconvenience to customers and in general to all stakeholders.

KEY STRATEGIES

COMERIO ERCOLE SPA has defined its Quality Management System as a strategic means to satisfy the Quality Policy and the specified goals, to guarantee its customers that products and assistance services are always compliant with the specifications contractually defined and imposed by the law and, in general, with the applicable laws and regulations, to make prevail in all company activities the tendency to intervene in advance on the causes of the problems rather than merely intervening after the effects have been detected.

The Quality Policy must therefore be considered an integral part of the corporate values deriving from the vision of work in an economic and social perspective (Corporate Social Responsibility - CSR).

Busto Arsizio, January 5th 2023

The Management



SUSTAINABILITY POLICY ESG - ONU2030

POLICY

The Sustainable Development Goals are a set of 17 interconnected goals, defined by the United Nations Organization as a strategy to achieve a better and more sustainable future for all. They are also known as the 2030 Agenda. The 2030 Agenda for Sustainable Development recognizes the close link between human well-being, the health of natural systems and the presence of common challenges for all countries.

COMERIO ERCOLE, as a manufacturer of complex machines and plants, has embarked on a specific path, concretized in ESG sustainability actions.

MISSION & PURPOSES

COMERIO ERCOLE SPA is committed to drawing up an ESG sustainability report. With the social report and integrated sustainability report ESG (Environmental – Social and Governance) COMERIO ERCOLE intends to provide a report on activities, initiatives and projects, in order to provide all interested parties with a clear and precise picture:

1. respect for social responsibility;
2. corporate performance on issues concerning social responsibility;
3. the company's positioning with respect to the UN 2030 objectives;
4. of its social policy, objectives, strategy and guidelines for social issues.

The sustainability report is drawn up in accordance with and in compliance with the regulations of the ILO (International Labor Organization), as well as the Universal Declaration of Human Rights, the United Nations Convention on the Rights of the Child and the UN Convention on the Elimination of All Forms of Discrimination.

In this regard, COMERIO ERCOLE is committed to establishing the main objectives and adopting the appropriate socially responsible behaviors to achieve them. In particular, the company's strategic and operational activities take into account respect for human rights, fair treatment, correct behavior towards the external community, protection of the environment, customers and suppliers, as well as the creation of economic but also social value.

The growing international attention to sustainability and social development in the wake of the Paris Agreement, the United Nations Global Compact and the launch of the new Sustainable Development Goals (SDGs) has further increased COMERIO ERCOLE's awareness that these objectives must be placed at the center of the daily operations of our company to contribute to the sustainable development of the territory.

Busto Arsizio, January 5th 2023

The Management



SUSTAINABLE PROCUREMENT POLICY – ISO 20400:2017

POLICY

COMERIO ERCOLE SPA supports and respects human rights internationally and considers the protection of the integrity, health, rights and well-being of its employees, workers and the environment as the primary and fundamental elements in the exercise and development of its activities. In accordance with the ISO 20400:2017 standard, COMERIO ERCOLE SPA also defines the guidelines to be integrated into the company's procurement processes to ensure a sustainable supply chain that does not create negative externalities for the environment and society.

SCOPE & PURPOSES

COMERIO ERCOLE SPA undertakes to comply with the following principles:

- purchase goods and use services in line with international principles aimed at promoting and protecting Human Rights recognized by the principles of the United Nations Global Compact and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, for anyone engaged in the corporate supply chain;
- not to use or support the use of child labour and forced labour in its supply chains;
- not to use, as part of its supply chains, products or processes that are harmful to the environment, whenever a non-harmful or less harmful alternative is available;
- responsibly use materials and resources with the aim of achieving sustainable development that respects the environment and the rights of future generations;
- preferably use energy produced from renewable sources and, in general, preferably buy products from sustainable sources;
- take into consideration, where possible, the carbon footprint and water footprint of the materials and products supplied, favouring alternatives with a lower water and carbon footprint, where available;
- transuse, into the business model of procurement of materials, goods and services, specific concepts of Reduce, Reuse and Recovery also for what has been designed and/or produced by third parties;
- stimulate and encourage its suppliers to implement and implement responsibility and sustainability policies in their business models;
- preferably evaluate suppliers and subcontractors who have embedded ethical and sustainable practices within their organization and who also pursue them within their respective supply chains;
- take care to select suppliers also on the basis of the proximity of production needs to the locations, in order to support local communities and reduce the risks of supply interruption;
- progressively include sustainability criteria in the process of evaluating suppliers and contractors, starting with the most strategic ones.

This policy is made public and disseminated at all levels, in particular suppliers and subcontractors who are expressly required to make the same commitment as a requirement to maintain a supply relationship. Suppliers and subcontractors must be available to implement any improvement actions if deemed necessary, allowing checks to be carried out for the purpose of assessing the above.

COMERIO ERCOLE SPA, through the application of this policy, is contributing to provide present and future generations the conditions and instruments for a better quality of life.

Busto Arsizio, 7th December 2023

The Management



10.1 - ECONOMIC PERFORMANCES – VALUE ADDED

ECONOMICS



In This section is responsible for determining the added value related to the financial statements **COMERIO ERCOLE** and its distribution.

This magnitude derives from a process of reclassification of the income statement and allows a reinterpretation in a social key of the economic accounting.

The term added value means the difference between the value of the goods produced and those purchased, with reference also to depreciation and ancillary and extraordinary income/charges.

The added value is, therefore, that wealth that is created by **COMERIO ERCOLE** in the performance of its activity and that is divided among the subjects who have contributed to determining it with direct and indirect

contributions.

The evaluation of the added value **COMERIO ERCOLE** was made by comparing its trend during the last three years and its calculation is divided into two categories:

1. **Gross characteristic added value, understood as the** difference between the revenues of the characteristic management and the intermediate production costs, those that do not constitute remuneration for the *internal stakeholders* of the company (such as employees, Public Administration and costs that benefit the community in the form of donations or similar disbursements);
2. **Net global value added**, determined by subtracting from the gross characteristic value added the results of ancillary and extraordinary operations.

10.2 - RECLASSIFICATION MODEL

ECONOMICS

Added value is a numerical expression that represents the company's ability to produce wealth and then distribute it to the various stakeholders, it is represented in two separate prospectuses that display accounting data.

The reporting model adopted by **COMERIO ERCOLE** is inspired by the GRI (Global Reporting Initiatives) standards and in particular by the principles of preparation of the social report developed by GBS (Study Group for the Social Report)

Values expressed in the following tables = Euro

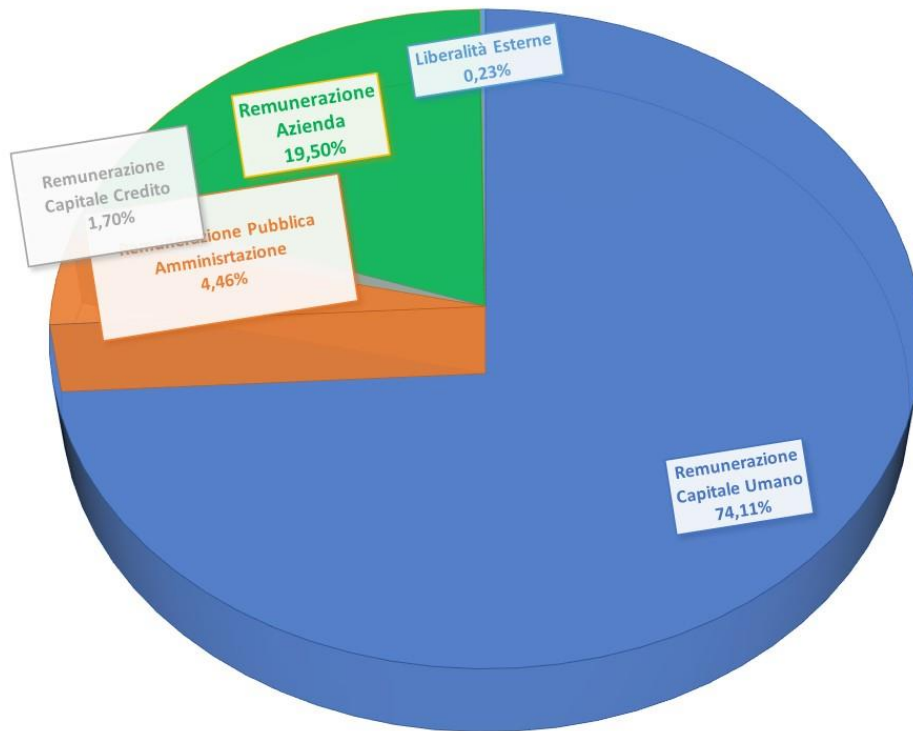
	31/12/23		31/12/22		31/12/21	
PRODUCTION VALUE	63.732.633	100,0%	58.859.221	100,0%	58.453.240	100,0%
Sales and services revenues	61.307.946		63.147.396		64.723.724	
Variations in semi-finished products RF	(91.236)		(6.246)		55.689	
Variations in finished products RF	1.1799.372		(4.854.940)		(6.855.948)	
Increases in internal work-in-progress	258.700		145.000		224.528	
Other revenues and various provisions and final dividend balance	457.851		428.011		305.247	
INTERMEDIATE PRODUCTION COSTS	48.090.895	-75,5%	44.327.605	-75,3%	43.587.771	-74,6%
Consumption	39.037.203		34.222.697		35.799.980	
Service costs	4.526.181		4.362.929		3.946.565	
Costs for the use of third-party goods/rentals	1.009.751		1.066.567		1.025.360	
Provision for credit risks	187.610		242.323		121.926	
Other intermediate production costs	3.252.392		4.418.122		3.122.293	
Balance of write-downs/use of funds	0		(70.000)		0	
Miscellaneous operating expenses	43.936		39.165		41.146	
Variations in raw materials RF	33.421		45.802		(469.499)	
CHARACTERISTIC ADDED VALUE	15.641.738	24,5%	14.531.616	24,7%	14.865.469	25,4%
Auxiliary management balance	139.686		422.877		749.078	
Auxiliary revenues	405.783		1.153.673		936.006	
Auxiliary costs	(266.097)		(730.796)		(186.928)	
Extraordinary components balance	133.592		416.866		(66.253)	
Extraordinary revenues	194.601		522.199		151.354	
Extraordinary costs	(61.008)		(105.333)		(217.607)	
AVAILABLE GLOBAL ADDED VALUE	15.922.459	25,0%	15.371.359	26,1%	15.548.294	26,6%

The distribution of the aforementioned Added Value takes place considering the following macro-categories and then represented in detail in the following table:

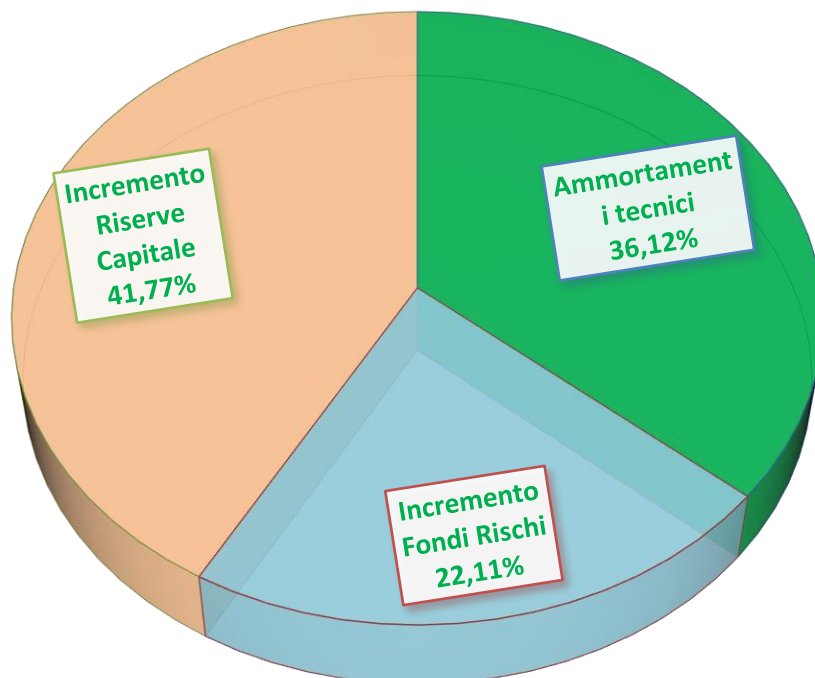
- a) **Remuneration of personnel.** It means the economic value corresponding to the company's ability to remunerate the people who work within it.
- b) **Remuneration of public administration.** It means the value given by the taxes and fees that the company pays.
- c) **Remuneration of credit capital.** This refers to interest paid for the availability of credit capital net of financial income.
- d) **Company remuneration.** Means the economic value that remains within the organization.

	31/12/23		31/12/22		31/12/21	
STAFF REMUNERATION / HUMAN CAPITAL	(11.800.688)	74,1%	(11.382.743)	74,1%	(11.343.430)	73,0%
Direct compensation and reimbursements	5.014.818		4.848.286		4.985.075	
Indirect compensation / contributions	6.271.137		5.933.527		5.819.247	
Net provision for TFR fund	514.733		600.930		539.108	
PUBLIC ADMINISTRATION REMUNERATION	(710.181)	4,5%	(565.482)	3,7%	(442.300)	2,8%
Direct and indirect taxes	710.181		565.482		442.300	
NET CAPITAL CREDIT REMUNERATION	(270.358)	1,7%	(345.852)	2,2%	(409.722)	2,6%
Financial charges	(702.649)		(598.392)		(608.229)	
Financial income	432.291		252.540		198.507	
TOTAL COMPANY REMUNERATION	(3.105.225)	19,5%	(3.040.501)	19,8%	(3.314.928)	21,3%
Total technical depreciation on machinery and company assets	1.121.656		1.200.598		1.069.955	
Balance of provisions/use of funds for prudently assessed risks	686.500		613.000		985.000	
Change in CN reserves / Result	1.297.069		1.226.903		1.259.973	
OWNERSHIP REMUNERATION	0	0,0%	0	0,0%	0	0,0%
Profit distributed to shareholders	0		0		0	
EXTERNAL GRATUITIES	(36.007)	0,2%	(36.781)	0,2%	(37.914)	0,2%
Voluntary contributions - Associations	36.007		36.781		37.914	
DISTRIBUTED ADDED VALUE	(15.922.459)	100,0%	(15.371.359)	100,0%	(15.548.294)	100,0%

DISTRIBUTED ADDED VALUE



TOTAL COMPANY REMUNERATION





11 - CARBON FOOTPRINT

CO₂



The Carbon Footprint is a measure that expresses in CO₂ equivalent the total greenhouse gas emissions associated directly or indirectly with a product, organization or service. In accordance with the Kyoto Protocol, the greenhouse gases to be included are: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), sulphur hexafluoride (SF₆) and (PFCs).

The tCO₂eq. (tons of CO₂ equivalent) allows to express the greenhouse effect produced by these gases with reference to the greenhouse effect produced by CO₂.

The measurement of the carbon footprint requires the identification and quantification of raw material and energy consumption in the selected phases of the carbon footprint's life cycle. In addition to conducting the analysis and accounting of CO₂ emissions, **COMERIO ERCOLE** is committed to defining a carbon management system aimed at identifying and implementing those economically efficient emission reduction interventions that use low-carbon technologies. Reduction measures can be complemented by emission neutralisation measures, which can be achieved through activities that aim to offset emissions with equivalent measures aimed at reducing emissions with more cost-efficient or more image-friendly actions (e.g. tree planting, renewable energy production). The greater concentration of greenhouse gases in the atmosphere is at the base of the increase in the average global temperature of the planet, with effects today found on our planet (violent floods, hurricanes, increased drought, etc.). For the reporting of greenhouse gases, 3 "Scopes" are defined that help to delineate the sources of direct and indirect emissions and to improve transparency.

In the calculation of the Carbon Footprint purposes 1 and 2 are mandatory.

1. **SCOPE 1** considers direct greenhouse gas emissions from sources that are owned or controlled by the company (VEHICLES-GAS-ELECTRICITY PHOTOVOLTAICS)
2. **SCOPE 2** takes into consideration indirect greenhouse gas emissions due to the production of electricity purchased and consumed by the company.
3. **SCOPE 3** is an optional category that allows you to consider other indirect emissions that are generated by the value chain in the company.

Defining more specifically, SCOPE 1 includes direct greenhouse gas emissions from sources owned or controlled by the organization. **COMERIO ERCOLE** in this study for SCOPE 1 considers the fuels used for company vehicles, the consumption of methane gas for heating and the CO₂ produced by photovoltaic systems). For SCOPE 2 it is considered that all the electricity purchased by **COMERIO ERCOLE** comes from renewable sources as per cancellation certificate of origin and in particular in different renewable sources for which a CO₂ production factor has been assigned.

Vehicle	LT FUEL	SCOPE 1		
EY486KN	745,01			Diesel fuel
FB228GD	937,03			Diesel fuel
FG013VR	1.600,13			Diesel fuel
FL871VP	951,14			Diesel fuel
FM522WR	538,02			Diesel fuel
GE741VS	938,99			Diesel fuel
GE824DX	4.228,59			Diesel fuel
GJ786XX	707,76			Diesel fuel
GR697HM	40,00			Diesel fuel
	10.686,67	2,64kg	28.213	TON CO2
FA904CM	658,09			gasoline
FF598LV	1.491,13			gasoline
GP988CZ	320,00			gasoline
	2.469,14	2,34kg	5,778	TON CO2
TOT. LITRES	13.155,81		33,991	TON CO2
SITE	CONSUPTION M3	SCOPE 1 Heating		
Via Castellanza	109.301,00			Busto Arsizio
Via Della Biella	1.921,00			Castellanza
Via Combattenti	5.771,00			Solbiate Olona
M3	116.993,00	1,95 kg	228,136	TON CO2
PLANT	CONSUPTION kWh	SCOPE 1 Photovoltaic		
I PLANT	48.159			
II PLANT	266,132			collaudo 23
III PLANT	0			collaudo 24
kWh	314.291	41,7gr	13,106	TON CO2
SOURCE	CONSUPTION kWh	SCOPE 2 Electricity		
SOLAR	413.000,40	41,7gr	17,222	
FOSSIL	0,00	0,65 kg	0	
HYDRAULICS	83.000,00	10,6gr	0,880	
kWh	496.301,00		18,102	TON CO2

KPI		
SCOPE 1	TOTAL	275.233
SCOPE 2	TOTAL	18.233
YEAR 2023	CARBON FOOTPRINT	293 TON CO2



2022 REF: 347 TON CO2



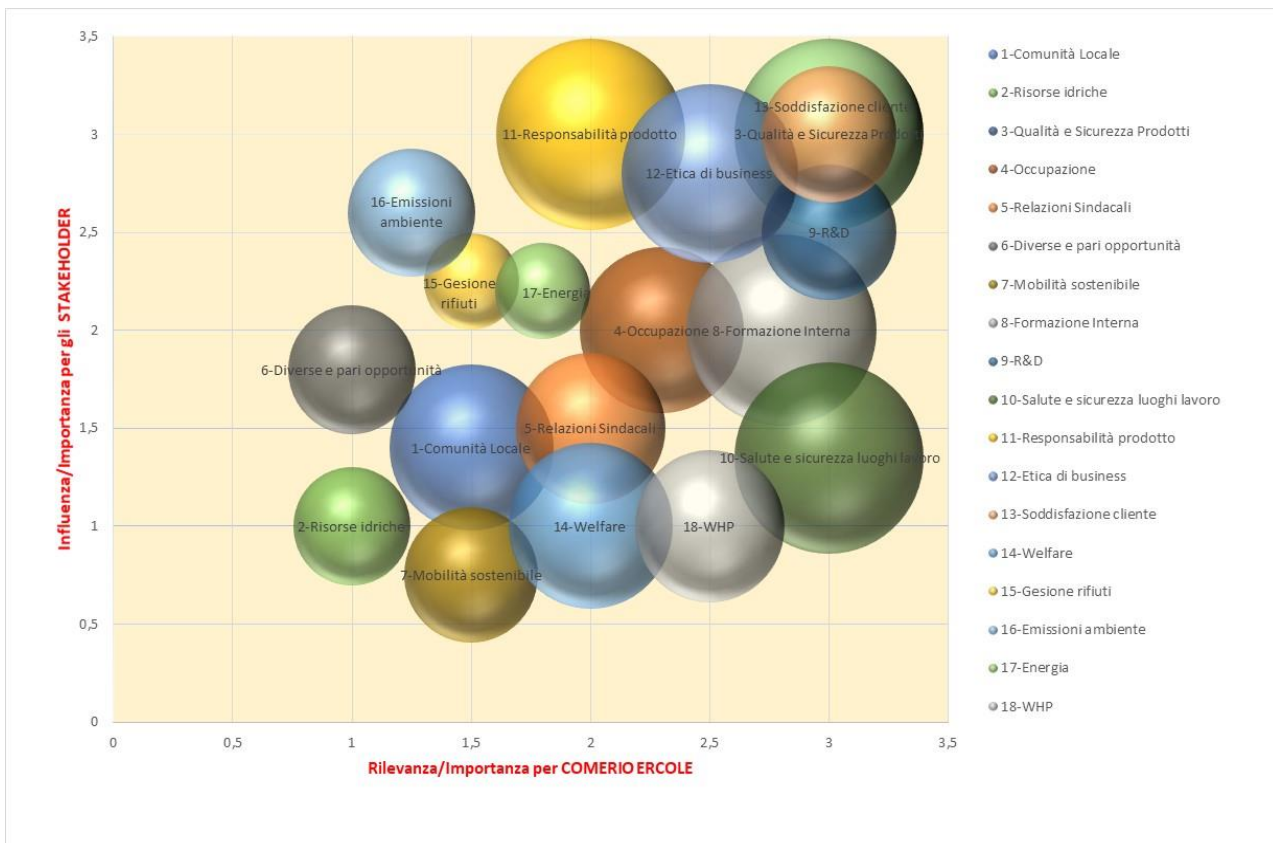
12 - MATERIALITY MATRIX

ESG MATRIX



"Materiality" is the principle that determines which relevant issues are important to make reporting essential. To define these issues, it is necessary to carry out an analysis that allows the Company to clearly bring out the relationships between corporate interests and those of *stakeholders*, highlighting the areas of sustainability of mutual interest. The materiality matrix is the graphic tool that summarizes the analysis, highlighting the stakeholders' point of view ("Importance for **STAKEHOLDER S**") and the company's point of view ("Importance for **COMERIO ERCOLE**"). Different relevant issues have been identified that have been evaluated with respect to the importance of the topic for the business of **COMERIO ERCOLE** and the possibility for the Company to generate economic, social and environmental impacts (positive or negative), strengthening or weakening its ability to produce value. **COMERIO ERCOLE** has started a process of comparison and analysis with the main *stakeholders*, external and internal, in order to assess the relevance of some issues compared to others, in order to ensure a correct prioritization of issues, this is a precise methodological choice that favours qualitative analysis over quantitative findings. The data received are analyzed and the results have allowed to elaborate the materiality matrix that provides an immediate photograph of what emerged from the materiality analysis. It is a graph that positions the relevant values for the company (x-axis) and for stakeholders (y-axis).

The key objectives of the materiality analysis developed by **COMERIO ERCOLE** are to strengthen relations with stakeholders so as to refine the sustainability strategy by analyzing social and environmental risks and opportunities.





13 - SDG OBJECTIVES – APPLICATION AREAS PANEL



The 17 Sustainable **Development Goals (SDGs)** and the 169 sub-goals associated with them form the vital core of the 2030 Agenda. They shall take balanced account of the three dimensions of sustainable development, namely economic, social and ecological. For the first time, a single policy document brings together sustainable development and the fight against poverty. The Sustainable Development Goals must be achieved globally by 2030 by all UN member countries. This means that every country on the planet is called to make its contribution to facing these great challenges together.

A careful analysis of the macro objectives has been made, selecting those applicable and on which it is believed that we can commit ourselves to contribute, directly and / or indirectly to the specific realization, of which in particular:



SDG3: ensuring health and well-being

What does it consist of: SDG 3 aims to reduce global mortality rates, ensure health coverage for all and reduce deaths related to smoking, alcohol and road accidents.

Role of enterprises: Companies have an active role in implementing actions that ensure occupational health and safety for all employees.

TARGET COMERIO ERCOLE

Company project name reference "SOCIAL"

A	Promote a healthy lifestyle among its employees	SPECIAL WELFARE PROJECT – HEALTH PROTECTION PLAN "WHP"
B	Promote habits against sedentary lifestyle	SPECIAL PROJECT "PEDALA CHE TI PASSA"
C	Introduce and maintain occupational safety systems	SPECIAL PROJECT "SAFETY FIRST OF ALL – STOP WORK AUTHORITY & TRAINING BREAKS"



SDG5: Achieving gender equality and empowering all women and girls



SDG4: Provide quality, equitable and inclusive education and learning opportunities for all



SDG8: Stimulating lasting and sustainable economic growth, full and productive employment and decent work for all

What does it consist of: SDG 5 aims to guarantee equal access to education and medical care for women, in the workplace and within political and economic decision-making bodies.



SDG 8 aims to achieve sustainable and inclusive economic growth, from which everyone can benefit and which does not harm the environment

Role of enterprises:

Businesses play a key role by promoting and investing in education and training. They can contribute to this goal within their own organization through employee training programs and externally through investments in the education system and programs. Companies are called to adopt internal policies and procedures that guarantee the same rights and job opportunities to women compared to the male component

TARGET COMERIO ERCOLE		Company project name reference "GOVERNANCE"
D	Special	GOVERNANCE AND ETHICS PROJECT
E	Promote school-work alternation paths by activating collaborations with secondary schools and vocational training centers	SPECIAL PROJECT ALTERNATING SCHOOL WORK – ITS

SDG9: Building resilient infrastructure and promoting innovation and fair, responsible and sustainable industrialization



What does it consist of:

SDG 9 aims to boost a new business model that respects the principles of sustainability and adopts clean technologies and industrial processes, to promote innovation and the achievement of equal access to information, especially through the Internet.

Role of enterprises:

Companies must promote industrial processes that do not impact the environment, incorporating small and medium-sized enterprises into their value chain. In other words, the private sector is called upon to promote the expansion of sustainable communication infrastructure and technologies and to support innovation and research within its scope.

TARGET COMERIO ERCOLE		Company project name reference "GOVERNANCE"
F	Investing in research and development and innovation to promote technological development and innovation	ETP PROJECT - ELT RECOVEY PLANT





SDG12: Ensure sustainable production and consumption patterns

What does it consist of: SDG 12 aims to ensure the well-being of the population through access to water, energy and food, while reducing the excessive consumption of natural resources. With SDG 12, the United Nations aspires to change the current model of production and consumption to achieve efficient management of natural resources by setting in motion, for example, processes for the elimination of food waste, the use of eco-sustainable chemicals and the reduction of waste in general.

Role of enterprises: Companies that want to contribute to SDG 12 and gain a competitive advantage have many options for action. Companies could reduce those products that require excessive energy and natural resources, progressively encouraging the use of recyclable and biodegradable materials.

TARGET COMERIO ERCOLE	Reference	company	project	name
G Train employees on sustainable consumption patterns, environmental education	SPECIAL PROJECT		"PLASTIC FOR THE ENVIRONMENT"	
H Train employees on sustainable consumption patterns, environmental education	SPECIAL PROJECT		"DISPOSE OF AND RECOVERY"	



SDG17 Strengthening means of implementation and renewing the global partnership for sustainable development

What does it consist of: SDG 17 therefore promotes the emergence of alliances between all actors of sustainable development so that the SDGs are achieved.

Role of enterprises: The private sector plays a key role in achieving this SDG, by establishing sustainable development alliances with the public sector, civil society, academia and other businesses, aligning the new global agenda with corporate goals, and investing more resources in developing countries.

TARGET COMERIO ERCOLE	Reference	company	project	name
I Support and collaborate with local	SPECIAL PROJECT ASSOCIATION		"NOI DELLA COMERIO ERCOLE 1885"	



	associations for social promotion territorio	
L	Special	SPECIAL PROJECT TO SUPPORT THE RECOVERY OF FOOD SURPLUSES
M	Special	SPECIAL PROJECT ANVVF SUPPORT



SDG6: Ensure sustainable availability of water and sanitation for all

What does it consist of: SDG 6 aims to achieve universal and equitable access to safe drinking water and sanitation and to improve water quality globally.

Role of enterprises: Companies must sustainably manage their water residues from product processing and service delivery.

TARGET COMERIO ERCOLE Reference company project name
"ENVIRONMENTAL"

N

Raise awareness and train employees on sustainable water management
SPECIAL PROJECT " WATER"



SGD7 Ensure access to affordable, reliable, sustainable energy systems for all

What does it consist of: SDG 7 aims to ensure universal access to sustainable, reliable and modern energy, to improve the living conditions of millions of people. Through this objective we want to increase the use of renewable energy instead of fossil fuels and promote energy efficiency, creating a fully sustainable economy, for the benefit of society and the environment.

Role of enterprises: The private sector has a central role to play in pursuing this objective, especially in the energy sector. Companies can invest in clean energy sources, such as solar, wind or thermal, focus on technologies that reduce electricity consumption in buildings and industries, and implement projects that help provide energy to the most disadvantaged local communities.

TARGET COMERIO ERCOLE Reference company project name
"ENVIRONMENTAL"

O

Install energy-efficient technologies
SPECIAL COOGENERATOR PROJECT



- P** Investment in clean and renewable energy sources **PHOTOVOLTAIC PROJECT**
- Q** Training employees on energy efficiency **SPECIAL ENERGY EFFICIENCY PROJECT**

- SDG11 Making cities and human settlements included, safe and durable and sustainable**
- SDG13 promote action to combat climate change**

What does it consist of: SDG 11 aims to transform urban centres into sustainable cities through access for the entire population to adequate, affordable and safe housing, basic services and means of transport, especially for the most vulnerable. In addition, the cities of the future must be green, an objective achievable through the reduction of negative impacts on the environment, the strengthening of green areas and safe and inclusive public spaces, with specific attention paid to urban suburbs. Finally, the preservation of the common artistic and cultural heritage must be guaranteed.

Role of enterprises: Companies can adopt production processes that take into account the protection of the cultural and natural heritage of the place where they operate; promote green mobility internally and externally; invest in projects and initiatives for the protection and support of populations exposed to possible environmental disasters.

	TARGET COMERIO ERCOLE	Reference company	project name
R	Encouraging the use of electric vehicles by promoting sustainable mobility	"ENVIRONMENTAL"	SUSTAINABLE MOBILITY SPECIAL PROJECT



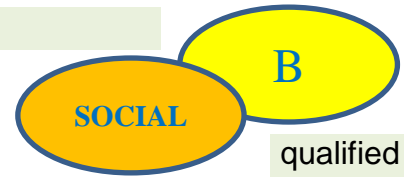
WHP Reporting Table		Year 2022
Area 1 – Feeding area	Company canteen Definition with the manager for the supply of menus oriented to an offer of healthy and balanced foods (bread with reduced salt content, fruit and vegetables)	
Food vending machines	Offer at least 30% healthy products	
Competent medical activity	Minimal advice activities for overweight workers	
Area 2 – Physical activity	Use of stairs Promotions of the bicycles for work-home Realizations of covered racks Supply of bicycles for free loan to employees Corporate walking groups Availability of company spaces for physical training Start of dedicated park; Spartan Race Park	
Area 3 - Tobacco smoke area	Information activity for smoke reduction Factory medical counseling activities	
Area 4 – Work life balance area	Membership of the Middle Valley Olona conciliation network Facilitation of entry and exit times Insurance company agreement Grant of funding for “Work-Life Balance” Factory medical participation in the course "The professional skills of the competent doctor in supporting the change of lifestyles at risk"	
Area 5 – Road Safety	Logbook for company vehicles Safe driving course	

6 aree tematiche





Special project “Pedala che ti passa”



COMERIO ERCOLE, on inspiration and in collaboration with a international customer, has benefited from an important recognition for the quality of the products and services rendered over the years, obtaining an endowment of 50 personalized "mountain bikes". In the picture you can see two of the fifty bicycles available in the company.

Benefici della bicicletta



The internal trade union representatives who immediately proved available to support the company initiative by carrying out an initial provision of a certain number of bicycles (30 in use + 20 in stock) that can be freely used, according to an internal management procedure also designed to guarantee insurance coverage during use, during the lunch break in the areas surrounding the company headquarters that is close to the Alto Milanese park and seize So the benefits of a ride, especially in the summer. The project was launched in 2021 and has been in place to date, enjoying great success and generating enthusiasm among employees, many of whom are super passionate.



COMERIO ERCOLE believes that the project is an excellent way to increase "team building" also on a business level. Other forms, on an experimental basis, are already in place to extend this possibility of use to the families of employees who can obtain one or more bicycles for defined periods for example during their holidays, etc. Using the bike is good for your health, reduces stress, helps you save money and is fun.



Special Project "Safety First"



COMERIO ERCOLE places the health and safety of its workers among the primary corporate objectives, this attention is also proven by the fact that the company undertakes to comply with the provisions of **Legislative Decree 81/2008** and subsequent amendments, in particular:

- appointment and training of a Head of the Prevention and Protection Service;
- appointment of the Competent Doctor, specialized in occupational medicine;
- drafting of the risk assessment document;
- drafting of appropriate procedures for emergency and evacuation situations and related simulations;
- stipulation of insurance policies in favor of workers supplementary to the coverage of the law (travel accident policy, personal accident policy for certain categories of workers such as drivers and couriers);
- delivery of PPE with appropriate training and information on their use;
- training of personnel in occupational health and safety.

These activities have allowed over the years the almost total absence of accidents at work, as can be seen from the table:

INJURIES	Year 2021	Year 2022	Year 2023
Events in the administrative area	0	0	0
Events in the technical-eng. area	0	0	0
Events in the production area	0	0	0
Current events	1	1	0
TOTAL EVENTS	1	1	0

Table 1 – Labor injuries

In the field of health and safety at work, the following hours of training have been carried out in the last three years:

TRAINING D.lgs 81/08	Year 2021	Year 2022	Year 2023
Total training hours	332	835	548
Number of employees involved	52	120	67

Table 2 – Safety training (D.Lgs. 81/08)

DISABLED AND PROTECTED CATEGORIES	Year 2021	Year 2022	Year 2023
Disabled	11	10	10
Protected categories	01	01	01



In addition to the medical examinations carried out at the beginning of the employment relationship, periodic health surveillance visits are carried out by the competent doctor with reference also to the task to be covered and to the achievement of the required suitability.



In order to mitigate the risk of workplace injuries, **COMERIO ERCOLE** has implemented a specific safety policy called **Stop Work Authority**, which empowers each worker to halt work activities within the company when, in their judgment, they are being conducted unsafely. The primary purpose of this policy is to prevent any type of accident from occurring.

The right of action of STOP WORK or also indicated below SWA must obviously always be exercised in good faith as is a prerequisite of principle by **COMERIO ERCOLE**.

Actions instrumentalized and / or arbitrarily taken for the sole purpose of causing damage or generating unjustified panic in the working community are not accepted: for this area and for the respective sphere of competence **COMERIO ERCOLE** will maintain a dialogue of maximum transparency and collaboration with the company RSU and the RLS and the competent DOCTOR as far as of any specific interest in order to correctly apply and achieve the objective of this procedure.

COMERIO ERCOLE, as defined by the existing regulatory framework, undertakes to inform and constantly train its workers and collaborators about this procedure and the risks deriving from its activity. **COMERIO ERCOLE** ensures that each worker receives sufficient and adequate training in health and safety.

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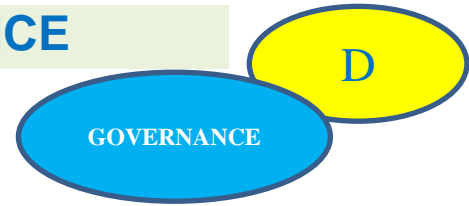
The **TRAINING BREAK** is an innovative training methodology carried out no longer in the classroom but directly within the departments and at the workstations, with the teacher (the function of teacher can be assumed by several figures in the company as better specified below) for short periods (15-20 minutes) and for small groups of workers and based on individual safety aspects typical of the specific work activity.

The company supervisor, after consulting the Employer, together with the RSPP, consulted the RLS, proposes and plans the TRAINING BREAKS deemed necessary through:

The provision of a BREAK TRAINING module is always implemented with the prior agreement of the RLS sharing with the same purpose and method of disbursement. **COMERIO ERCOLE** participates in the first panel referred to in the agreement between Confindustria Varese and the CGIL-CISL-UIL trade unions signed on 29/4/2022 for the development of Training Breaks; panel managed by the provincial joint organization of Varese.



GOVERNANCE



1.1 Child labour

COMERIO ERCOLE does not use or provide child labour (children under 16 years of age). The average age is just over **49** years and an **average seniority in the company** of just over **14** years.

To date, there have never been cases of child labor.

If a child worker is detected at the suppliers' workplaces, the company will contact the territorially competent Social Services, giving the necessary support so that an adequate remedy plan is activated for the child and / or his family members.

At 31.12.2021 the youngest worker in COMERIO ERCOLE is 23 years old and the oldest 68.

1.2 Forced labour

COMERIO ERCOLE refrains from resorting to or supporting the use of forced or forced labor (ref. ILO 29-105 International Labour Organization), in fact all the people employed within the company provide their work voluntarily complying with all the requirements of the SA8000 standard and in compliance with the employment contracts in force in Italy.

Arbitrary deductions are not made on employees' salaries except in the cases provided for by law or against voluntary reasons communicated by the worker (such as union deductions, pension funds, assignments of the Fifth, private loans, foreclosures, etc.).

The company requires the worker to copy the documentation necessary for the purposes of the original obligations such as identity card, tax code, family status, any residence permit, bank details, the TFR destination form, the form for tax deductions, etc.

COMERIO ERCOLE grants, when requested by workers, advances on severance pay in order to meet the specific economic needs of the staff, in compliance with the provisions of the law and, in some particularly serious cases, also consenting to practice better treatment.

The following table shows the sums set aside and disbursed in the last three financial years:

AMOUNTS IN EURO	Year 2021	Year 2022	Year 2023
Set aside to the fund	39.517,22	75.128,79	11.551,99
Paid to INPS treasury	69.151,30	69.328,97	80.566,03
Disbursed into CPL funds	370.443,07	369.889,73	365.022,49
Disbursed (terminations, advances, transfer)	158.387,25	364.839,10	132.944,48

Table 1 – Amounts on severance pay

The employees registered with the union are currently 69 (about 42% of the total): 68 are members of the FIOM-CGIL and 1 to others.

The company climate is considered objectively serene and the satisfaction of the staff for the work done is also evidenced by the average number of years of seniority shown in the table:

SENIORITY	N. employees in 2021	N. employees in 2022	N. employees in 2023
Less than two years	13	23	23
From 2 to 5 years	36	37	35
From 5 to 10 years	14	13	19
From 10 to 20 years	43	38	37
Over 20 years	60	50	49
Total	166	161	163

Table 2 – Year of staff seniority

NB:

- Average age 49 years
- Medium average seniority 14 years
- Youngst worker 23 years
- Oldest 68 years

Workers are fully aware of the rights and duties deriving from their employment contract and **COMERIO ERCOLE** for this purpose distributes to all employees a copy of the CCNL. The Human Resources Office is however collaborative and always available in the explanation of any new regulations.

1.3 School internships and disabled work

COMERIO ERCOLE usually collaborates with universities and schools of secondary education and ITS/IFTS for internships and school-work alternation courses.

Furthermore, in the field of compulsory placement (Law 68/99), in addition to the timely fulfillment of legal obligations regarding *reserve quotas*, the company collaborates with local administrations to carry out training internship and job orientation experiences in favor of workers affected by conditions of disability or socio-family difficulties.

Non-shift working hours mean possible flexibility on entry time. In addition, salaries are on average higher than those established by the CCNL and the company provides its employees with several areas for paid refreshment breaks, as well as a company canteen.

In addition, **COMERIO ERCOLE** is sensitive to aspects related to the **reconciliation of family and work** and takes specific measures in this regard, such as reduced hours (part-time) and flexibility in entry (30 min in the morning and 15 min in the afternoon).

1.4 Freedom of association and the right to collective bargaining

COMERIO ERCOLE respects the right of employees to freely join trade unions and the right to collective bargaining.

There are currently 75 employees registered with the union (about 46% of the total): 74 are members of the FIOM-CGIL and 1 of others.

In the company there is the RSU elected directly by the employees and there is the availability to speak freely with the union representatives and the union delegations to discuss any classifications, employment contracts, production decentralization, employment trend and internal organization.

	Year 2021	Year 2022	Year 2023
Strike hours per capita (average)	06	01	03
Number of trade union licences	123	186	168

Table 5 – Strike

The level of trade union conflict is generally low. The last year of union leave is in line with that of previous years. The strike hours are exclusively related to factors external to the company and mainly to national bargaining or for events always organized at national level as a metalworkers category.

1.5 Not discrimination

COMERIO ERCOLE does not implement and does not favor any kind of discrimination against its workers, guaranteeing equal opportunities, and does not interfere with their private or religious life or in any case linked to race, social class, origin, sex, sexual orientation, politics, union membership, etc.

For the type of activity carried out, the company to date has not received applications or C.V. from non-EU personnel, it is currently looking for technical personnel who can, specifically, also come from outside Europe precisely for a greater cultural contamination at company level this also considering the company presence on all major foreign markets.

In addition, the company seeks to guarantee everyone the opportunity to achieve career goals, rewarding those who demonstrate technical skills and qualities of collaboration, motivation, resourcefulness, and ambition.

1.6 Disciplinary practices

COMERIO ERCOLE as required by the CCNL applies disciplinary procedures to the staff such as:

- Verbal admonition;
- Written warning;
- fine not exceeding 3 hours of hourly wage calculated on the minimum table;
- suspension from service and remuneration up to a maximum of 3 days;
- dismissal.

The company guarantees that no measure will be taken without having previously ascertained the actual existence of the alleged infringement and without having heard the worker beforehand.

The latter may also present his defense, with the possible assistance of a representative of the trade union.

All disciplinary measures are recorded in the employee's personal file filed with the Human Resources Office.

1.7 Working hours

The duration of the working activity is fixed, according to the CCNL, in 40 hours per week. Normal working hours are:

- from 08.00 to 13.00
- from 14.00 to 17.00

Flexibility of entry in the morning from 08.00 to 08.30 and in the afternoon from 14.00 to 14.15 with recovery of minutes in the day. Ordinary and overtime hours of work are recorded by means of an electronic attendance system.

Based on the specific operational needs for the best functioning of the company departments, there are also shift schedules, carried out by the Machine Tool Department. Employees work shifts respecting their working hours of 40 ordinary hours per week.

1.8 Pay

The remuneration paid to workers is on average higher than the minimum table set by the National Collective Labour Agreement. Salary, payroll and type of contract are managed and monitored by the Administration which also verifies the relative degree of satisfaction with the staff.

In addition to the provisions of the **National Collective Bargaining Agreement**, the company pays the following additional remuneration:

- performance bonus;
- canteen allowance;
- travel allowances.

The company pays the salary by bank transfer with currency 15 of the following month and any deposit on the 27th of the current month.

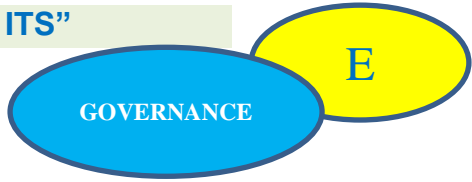
The remuneration of overtime hours is regulated according to the provisions of **the CCNL**. Every year the Management assigns a performance bonus to all workers by comparing it to some variable indicators regulated by specific internal company agreements.

1.9 Labour contract

COMERIO ERCOLE adheres to and applies the National Metalworkers Contract in force last renewal 2021-2023. 100% employees are classified in accordance with the declarations referred to in the aforementioned CCNL contract



Special project “**Alternanza Scuola Lavoro e ITS**”



COMERIO ERCOLE adheres to the enhancement program promoted by Confindustria to enhance the commitment of companies in the training of the new generations by recognizing two stamps: the Bollino **per l'Alternanza di Qualità** (BAQ) and the **Bollino Impresa in ITS** (BITS).

The BAQ 2023 rewards companies that stand out for the quality of the school-work alternation paths activated by promoting virtuous collaborations with secondary schools and vocational training centers.



BITS 2023 rewards companies engaged in the dissemination of technical culture and STEM disciplines thanks to the support and promotion of ITS Foundations present throughout the country.

The Stickers are valid for one year and are renewed by **COMERIO ERCOLE** by updating the necessary documentation. Confindustria confers and renews the stamps on the basis of the activities carried out and documented by the company each year. The objective of the project in place for some years in **COMERIO ERCOLE** is to recognize and enhance the commitment of companies in the provision of high quality training courses and in the fight against the phenomenon of mis-matching of skills due to the misalignment between demand and supply of labor that slows down the economic and social development of the country.





TECHNOLOGY DEVELOPMENT R&D



Technology development

The high level of competition that characterizes the sectors of **COMERIO ERCOLE** today makes innovation and sustainable development crucial for the creation of value for the company organization, customers and the surrounding area in a broader sense. The combination of different attitudes and the investment in human capital and in Research and Development have been part of the DNA of **COMERIO ERCOLE** for over 50 years. Innovation is the transformation of new concepts and insights into applications that succeed in the market. This can only be achieved by establishing a close correlation between the identification of market opportunities and the development of technical skills. Since innovation is also one of the main competitive advantages of **COMERIO ERCOLE**, it continues to invest in Research and Development and in the portfolio of innovative proprietary technologies in order to strengthen the position of **COMERIO ERCOLE** as a supplier of machines and plants but also of technology in the field of processing of elastomers and polymers.

The creation of an efficient R&D structure that is able to help and support **COMERIO ERCOLE** to always provide innovative products and new technologies, and support operational optimizations aimed at increasing productivity is at the center of the commitment of the entire company organization. In the next five years innovation will focus mainly on three "pillars", which will demonstrate the great commitment to innovation of **COMERIO ERCOLE**.

These pillars are:

R&D and Innovation: Sustainable and low environmental impact technologies are given top priority. To play an important role in the promotion and achievement of the United Nations Sustainable Development Goals (SDGs), providing its contribution, **COMERIO ERCOLE** has launched a new POLYGUMMI business unit in order to study and research processes for the regeneration of post-consumer waste such as ELTs and rubber or plastic packaging waste.

EPC innovation: The application of innovative methodologies for the design of machines and plants as positive for both the manufacturer and the customer, as it shortens the timing of the project and tends to minimize errors and consequent rework for the benefit of all parties involved.

Digital innovation: **COMERIO ERCOLE** has launched a digital transformation program with a vision defined in an Industry 4.0 perspective in order to improve its positioning to support customer needs also by monitoring individual issues with environmental impact such as electricity consumption, water consumption, lubrication oils, etc.





Special project “Plastic for the environment”



Bottled water sales are growing strongly worldwide. And consumption is increasing every year. But, come to think of it, bottled water is undoubtedly a senseless consumer product: a liquid available from the tap for free, packaged and shipped at high costs to the environment and sold at high prices.

Studies suggest that fears about water pollution are one of the main reasons for consumption. Andrew Szasz, a sociologist at the University of California who has studied the phenomenon of bottled water for more than a decade, argues that the bottled water industry has grown because people have begun to distrust their local water sources. Attracted by marketing, consumers turned to bottled water to protect themselves from health threats. Il 70% in single-dose plastic bottles, typically made of polyethylene terephthalate or PET. About 20 billion plastic water bottles are used every year. Only 54 percent of these are recycled.

In **COMERIO ERCOLE**, starting from 2021, an internal project has been launched to share the importance of the recovery of plastic bottles and in separate form of the caps of the same. The barrel of the bottle is 100% PET while the cap is HDPE (High Density Polyethylene). To obtain one kilogram of HDPE, 1.75 kg of oil is needed in terms of energy and recycling of raw material. Precisely because of these high recycling characteristics, the collection of plastic caps is a way for several voluntary associations to raise funds.

COMERIO ERCOLE decided to support the voluntary association **APAR ONLUS** linked to the Municipal Kennel of Busto Arsizio that with the structured form of internal collection of HDPE caps will have economic resources useful for its associative purpose. In the company at defined points there are binders dedicated to PET bottles and separately HDPE caps. A personalized and general information has also been created to determine a full sharing of the project and which will be monitored at KPI level on the basis of the quantity collected.





Special project “Dispose of waste and recovery”



COMERIO ERCOLE manages and supports the **URBAN WASTE** plan of the MUNICIPALITY OF CASTELLANZA aimed at a development increasingly focused on the optimization of separate waste collection.

The Sustainability Plan plans to invest in multiple information sessions for employees in order to explain and share the reasons why the behavior of the individual is the one that then determines the final result. Separate collection stations in the company are now active and a constant improvement in the individual user is already evident.

A much more articulated reasoning is instead related to the collection of **INDUSTRIAL WASTE** related to the production process referred to in the summary representation below.

YEARS	2021	2022	2023
Ferrous recycled waste (kg)	107.270	66.930	54.030
Wood recycled waste (kg)	11.440	18.360	24.310
Waste of another nature RECOVERED and NOT (kg)	24.975	8.655	17.033
TOTAL KG	143.685	93.945	95.373
Ferrous recycled waste (kg)	74,66%	71,24%	56,65%
Wood recycled waste (kg)	7,96%	19,24%	25,49%
Waste of another nature RECOVERED and NOT (kg)	17,38%	9,21%	17,86%
TOTAL KG	100,00%	100,00%	100,00%

In **COMERIO ERCOLE** the predominant share of process waste is given by ferrous waste for a constant share of more than 70% of the total and for which we proceed to a full recovery of the related economic value of which contracted with a specialized company, ferrous waste is a 100% recyclable material by its own characteristic.

Ditto for wood waste (mainly from residues of industrial packaging) for which recycling is guaranteed and for which an in-depth study is underway for direct recycling in the company. For all other materials (cables, oils, paints) recovery is guaranteed through specialized companies referred to in the waste identification code R13. Only 5 classes of materials are not recovered and for these categories we proceed to disposal with the support of specialized companies.

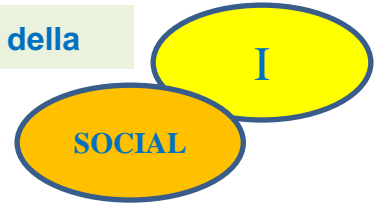
Below is the analytical detail of the summary table of all the CER codes classified on the farm with the relative quantitative trend (expressed in kg) for the last three years.



Code CER	RECOVERY	Waste description (KG)	2021	2022	2023
080112	YES	Different waste paints and varnishes	70	0	140
080120	NO	Aqueous suspensions containing various paints and varnishes	11.160	1.320	9.180
080318	YES	Out of print toner	0	80	73
120101	YES	Filing and chips, ferrous materials	80.440	51.680	44.180
120105	YES	Filings and chips, plastic	1.150	1.030	1.380
120107	YES	Halogen-free mineral oil for machinery	835	420	200
120109	NO	Emulsions and solutions for machinery, halogen-free	4.380	2.290	3.870
120112	YES	Spent waxes and fats	0	15	0
120118	NO	Metal sludge (grinding, sharpening and lapping sludge) containing oil	150	280	230
120121	YES	Spent tool bodies and grinding materials	230	0	0
120301	NO	Aqueous washing solutions	5.000	2.800	1.200
150103	YES	Wooden packaging	11.440	18.360	24.310
150104	YES	Metal packaging	485	340	340
150111	YES	Metal packaging with solid matrices	35	90	100
150202*	YES	Absorbents, filter materials, rags and oil-contaminated clothing	355	410	280
160214	YES	Discarded equipment	160	0	0
160216	YES	Components removed from end-of-order apps	95	0	0
160305*	NO	Organic waste contains hazardous substances	0	110	0
170401	YES	Bronze, Copper, Brass	940	0	0
170405	YES	Iron and Steel (Scrap)	25.680	14.220	9.460
170411	YES	Cables	1.080	0	0
170603*	YES	Other insulation materials	0	0	40
170604	YES	Insulation materials	0	500	0
		TOTAL WASTE DISPOSED (KG)	143.685	93.945	95.373



SOCIAL: Special project: Associazione Noi della Comerio Ercole 1885



Associazione Noi della COMERIO ERCOLE 1885



During the first months of 2017 the COMERIO ERCOLE Management supported and contributed to the foundation of a social promotion association called NOI DELLA COMERIO ERCOLE 1885 strong in the conviction of how it is increasingly important in a complex world that the great business traditions of **COMERIO ERCOLE** With its wealth of life experience lived by hundreds of people who for over a century have participated in the work activity should not be lost.

A plaque for the 30th anniversary of one's career and for other special events and/or occasions is presented during the usual Christmas party, which is also attended by members for an increasingly valuable exchange of experiences. Below is the link to the association, also present on major social networks (Instagram, Facebook, etc.): www.noidellacomerioercole1885.org. From the website, you can stay updated on major events, initiatives, and agreements.

Therefore, setting itself the aim of keeping alive the history of this industrial reality through the memory of the people who in various capacities have had a role and presence in **COMERIO ERCOLE over the years** so that the new generations have knowledge and can learn and guide them.



It is also worth noting COMERIO ERCOLE's usual practice of making charitable contributions to selected nonprofit organizations each year, sometimes with the support of the association. Additionally, COMERIO ERCOLE systematically collaborates every January with

partisan associations and the municipal administration of Busto Arsizio to hold the commemorative ceremony for the deportation of the internal commission on 10/1/1944. The sharing of principles and values, based on a common vision and specific objectives that focus on people and the planet, underpins the collaborative relationship developed with the association.





The “Noi della Comerio Ercole Association”, with the constant support of COMERIO ERCOLE, completed in 2023 the placement on the sidewalk at the entrance of the original headquarters of the company's historic site of six stumbling stones in memory of the deportees of 1944.

World War II was an armed conflict between 1939 and 1945. Nations from all continents participated, and the military operations affected much of the planet; it is considered the largest armed conflict in history, costing 55-60 million lives.

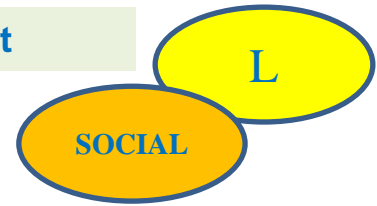
THE HISTORY

COMERIO ERCOLE, a pillar of the mechanical industry in Busto Arsizio, forced into war production since the end of 1943, had over a thousand workers who participated in the protest by refusing to work despite the control of the German authorities. At dawn on January 10, 1944, the Germans intervened by sending a unit of SS troops from Milan, surrounding the company with armored vehicles, preventing anyone from leaving. By evening, the operation ended, and the threatened individuals were loaded onto a truck and sent to the San Vittore prison in Milan and subsequently interned in the Mauthausen concentration camp: Vittorio Arconti, Arturo Cucchetti, and Ambrogio Gallazzi did not return, Alvisio Mazzon, once back home, died from the suffering endured, while Giacomo Biancini and Guglielmo Toia managed to return.

During 2024, an **OPEN DAY** event is planned to be held at the company's headquarters to promote associative activities and give the family members of company employees the opportunity to visit the company and hear from former employees who are now associates.



SOCIAL: Food surplus recovery project



The project was born in collaboration and sharing with the company canteen commission and the **COMERIO ERCOLE** management in order to recover in a useful and sustainable way the food surpluses that are created daily in the canteen management.

On the basis of an agreement reached with the manager of the company canteen company BIBOS we proceed, in this still experimental phase, on a daily basis to collect the surplus of fresh bread in fact left over from the day service and send it to the voluntary association VITADACANI ODV which uses it to cover its needs of associative management in support of animals.

The project took shape in **COMERIO ERCOLE** by exploiting the GADDA law also called "anti-waste" on donations and reduction of food waste. The measure reorganizes the regulatory framework that regulates the donations of unsold food with simplification, harmonization and incentive measures; but above all, it establishes the priority of the recovery of food to be donated to the poorest people in our country. The rationale of the law is not to sanction and punish, but to encourage and promote virtuous behavior. In fact, in short, the Gadda law provides a series of incentives. Virtuous behaviors and positive models in the field of food waste are promoted in order to raise public awareness, companies, restaurants and schools regarding the adoption of anti-waste practices to protect people, food and the environment..



SOCIAL: Support project ANVVF



The mutual collaboration project has been initiated many years ago at **COMERIO ERCOLE** with the provincial section of the National Association of Volunteer Firefighters ODV in order to facilitate the various associative activities carried out in accordance with the associative mission of ANVVF and implemented on the territory. The associative activities of ANVVF span across various social sectors, from educational to charitable, with the realization of multiple initiatives aimed at a variety of subjects present in the territory.

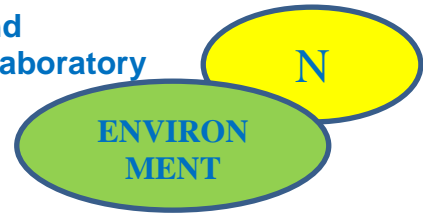


In the development of the collaboration plan, there has also been an opportunity to directly involve the NOI DELLA **COMERIO ERCOLE** 1885 Association in the implementation of more than one territorial initiative, which has also involved a wide range of employees and collaborators of **COMERIO ERCOLE**. The 70th anniversary of the foundation of the ANVVF ODV of the Province of Varese was concluded in 2023, and distinct joint initiatives were completed in line with the planned activities to support the territory and the local population.





WATER FOOTPRINT Special project “training and containment of process water consumption for laboratory tests”



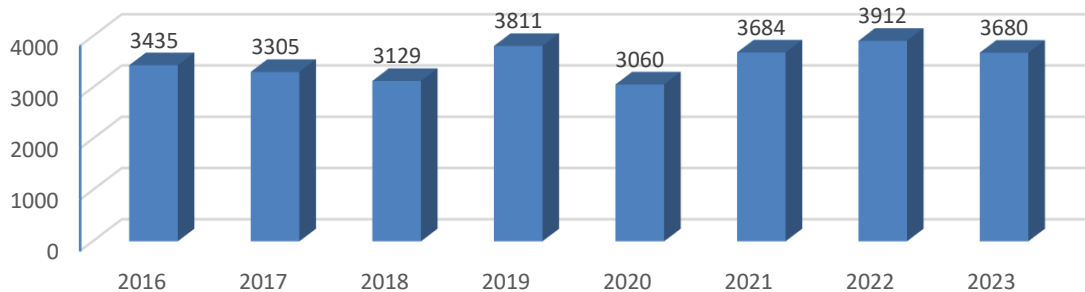
The Water Footprint is an indicator of freshwater consumption that includes both direct and indirect use of water. A company's water footprint is defined as the total volume of fresh water used to produce goods and services, measured in terms of volumes of water consumed.

The global calculation of the water footprint is given by the sum of three components:

- **BLUE WATER:** refers to the withdrawal of surface and groundwater. It is the amount of fresh water that does not return downstream of the production process to the same point where it was taken or returns, but at different times;
- **GREEN WATER:** it is the volume of rainwater that does not contribute to surface runoff and refers mainly to evapo-transpired water;
- **GREY WATER:** represents the volume of polluted water, quantified as the volume of water needed to dilute pollutants to the point that water quality returns above quality standards.

The use of the three components of water affects the hydrogeological cycle differently. For example, the consumption of green water has a non-invasive impact on environmental balances. It is a volumetric measure of water consumption expressed in M3. It does not, therefore, measure the severity of the impact at the local level, but provides an indication of the spatiotemporal sustainability of the water resource used.

BLUE NET WATER CONSUPTION M3



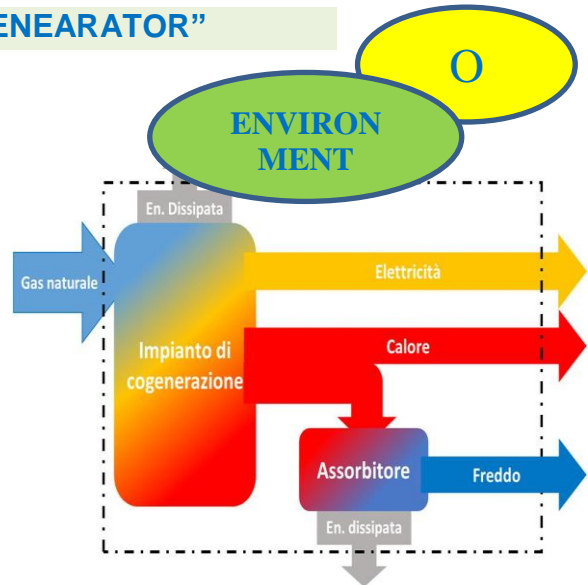
COMERIO ERCOLE is focused exclusively on the monitoring and use of BLU water. The project is developed in two directions, one on improving information and procedures to employees so that there is increasingly a responsible use of water (use of showers, taps, washing, garden, etc.) and in parallel with a program of internal investments aimed at reducing if not completely avoiding the use of water for production processes (typically for occasional laboratory tests) with the installation of a small energy-efficient refrigeration unit that allows a "closed circuit" use containing..





Special project “METHANE GAS COGENERATOR”

COMERIO ERCOLE installed, long time ago, a small methane gas co-generation plant which, however, only recently, during 2022, has had a clear definition of use in order to recover specific energy efficiency. Cogeneration plants allow electricity and heat to be generated simultaneously, with fuel savings compared to a separate production of the two carriers which translates into an economic and environmental advantage. Cogeneration systems allow to recover the heat produced and dispersed during the electricity generation process, using it to cover the heating needs.



The **COMERIO ERCOLE** plant consumes (assuming 24h/day of operation for 6 months of winter season) a total of 9,000 m³ of methane gas (equal to 17,550 kg of CO₂) but contributes in the period to a **THERMAL** production equivalent to 6,400 m³ of methane gas and an **ELECTRICITY** production of 23,760 kWh (energies that, in the absence of a cogenerator, they should therefore be supplied separately from traditional sources).

For the calculation of the equivalent CO₂ savings, **COMERIO ERCOLE** therefore considered a factor of 0.65 kg/kWh for electricity (15,444 kg of CO₂ saved) and 1.95 kg/m³ for gas (12,530 kg CO₂ saved).

The annual environmental operating balance of the cogenerator is therefore largely positive and quantifiable in a saving of approximately 10.40 tons of CO₂ (that is, 17,550 kg - 15,444 kg - 12,530 kg = -10,424 kg CO₂). The graphical representations below represent, in the form of KPIs, the result achieved in the years 2022 and 2023 and the target for 2024 on three distinct variables, namely the equivalent CO₂ saved, the average corresponding mileage in kilometers, and finally also the number of corresponding saved trees.

DATA RELATED TO THE METHANE GAS COGENERATION PLANT
 Consumption 9000 M³ = thermal production 6400 M³ + electricity production 23760 kWh

SAVING +/-		SAVING +/-	
69.190 KM		69.160 KM	
10,40 TON CO₂		10,40 TON CO₂	
53 TREES		53 TREES	
ACHIEVED RESULT 2023		TARGET 2024: MANTAIN	



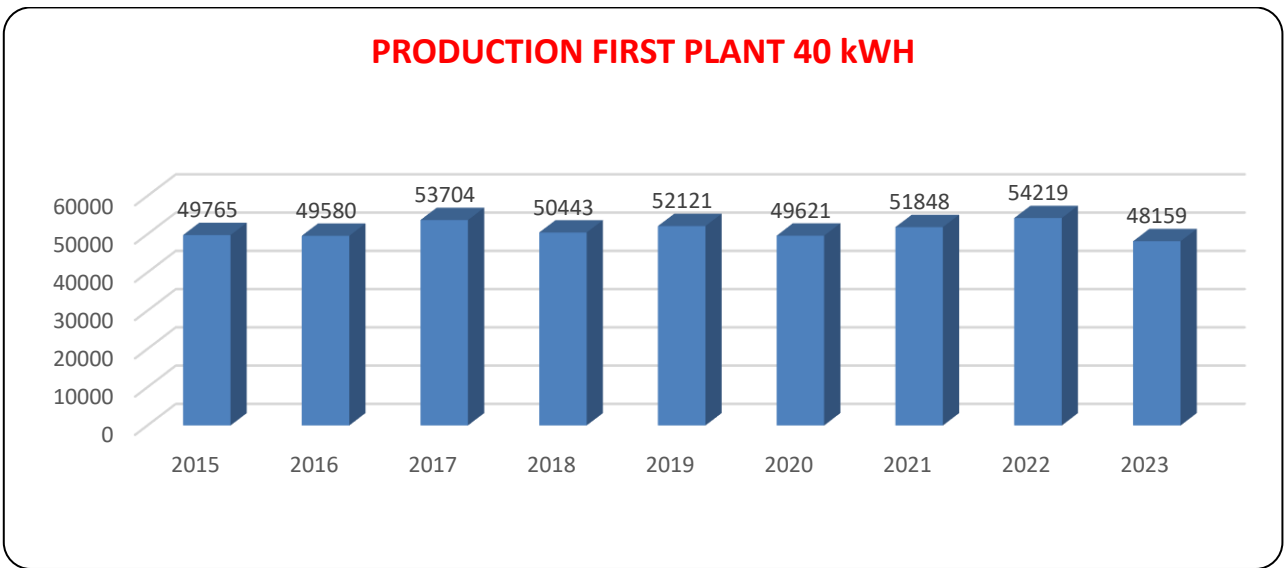


Special project “Green Energy” PHOYOVOLTAIC



COMERIO ERCOLE launched a project of strong implementation of the already existing **first** plant with a production capacity of 40 kW of photovoltaic production installed in 2014 with a **second plant with a production capacity of 200 kW** started in 2023 and finally, a third power plant with a capacity of 100 kW to be commissioned during 2024.

- FIRST PLANT	PRODUCTION YEAR	2023 48.159 kWh
- SECOND PLANT	PRODUCTION YEAR	2023 266.132 kWh*



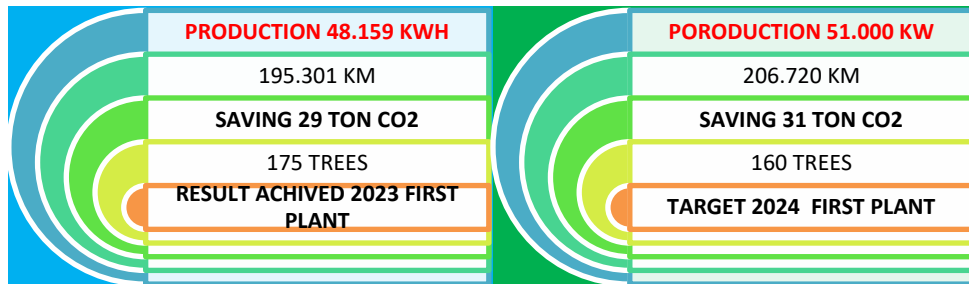
The first plant installed in 2014 actually produced an average of 51,000 kWh per year, while the second plant installed in 2022 produced 266.000 kWh on an annual basis for 2023. The third plant is expected to produce 120.000 kWh on an annual basics starting from 2024 .

For the calculation of CO2 equivalent, COMERIO ERCOLE considered a factor of 0.65 kg/kWh saved for electricity produced on a mixed fossil basis against emissions deriving from the photovoltaic system of only 42 gr/kWh.

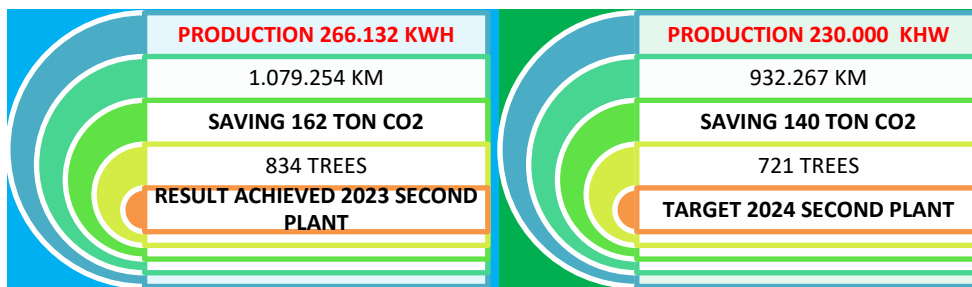
The graphic indications below represent in the form of KPIs the result achieved in the year 2023 and the objective for 2024 on 3 distinct variables, namely the CO2 equivalent saved, the KM of corresponding average distance and finally also in number of corresponding saved TREES.



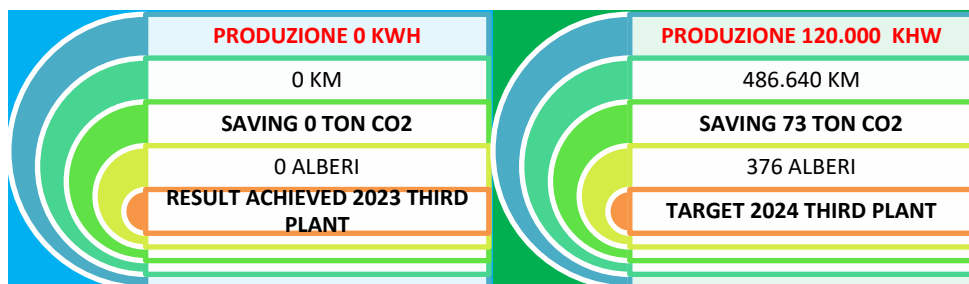
DATA RELATED TO THE FIRST IMPLANT – POWER 40 KW
 48.159 kWh Production achieved in 2023 and goal confirmed 51.000 kWh in 2024



DATA RELATED TO THE SECOND PLANT – POWER 200 KW
 266.132 kWh Production achieved in 2023 and goal confirmed 230.000 kWh in 2024



DATA RELATED TO THE THIRD PLANT – POWER 100 KW



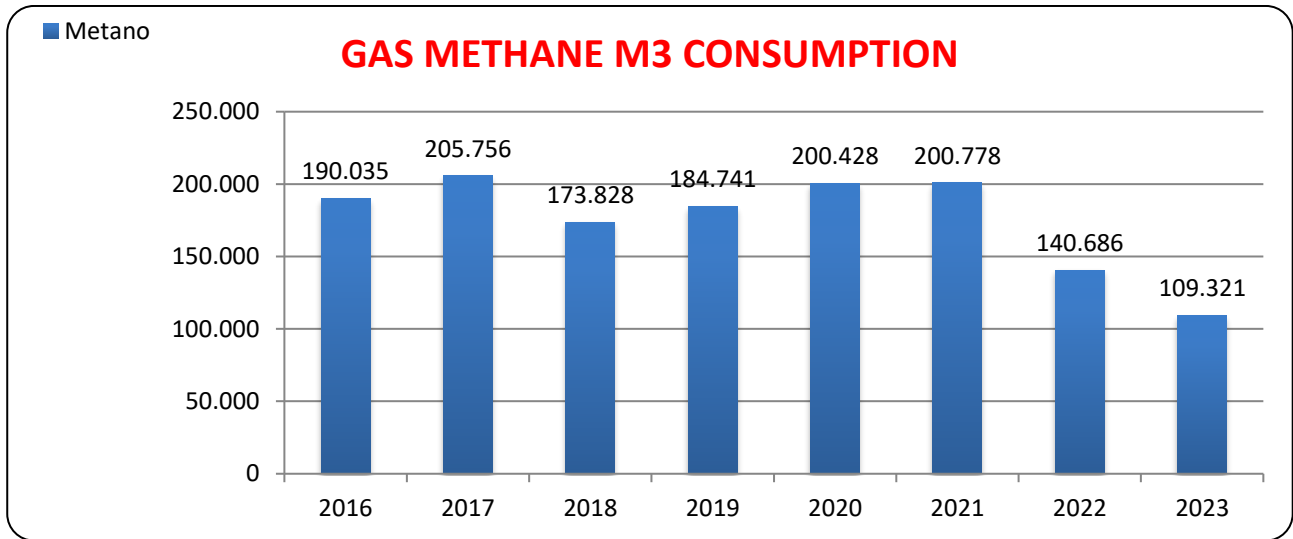


SPECIAL PROJECT "Efficiency"

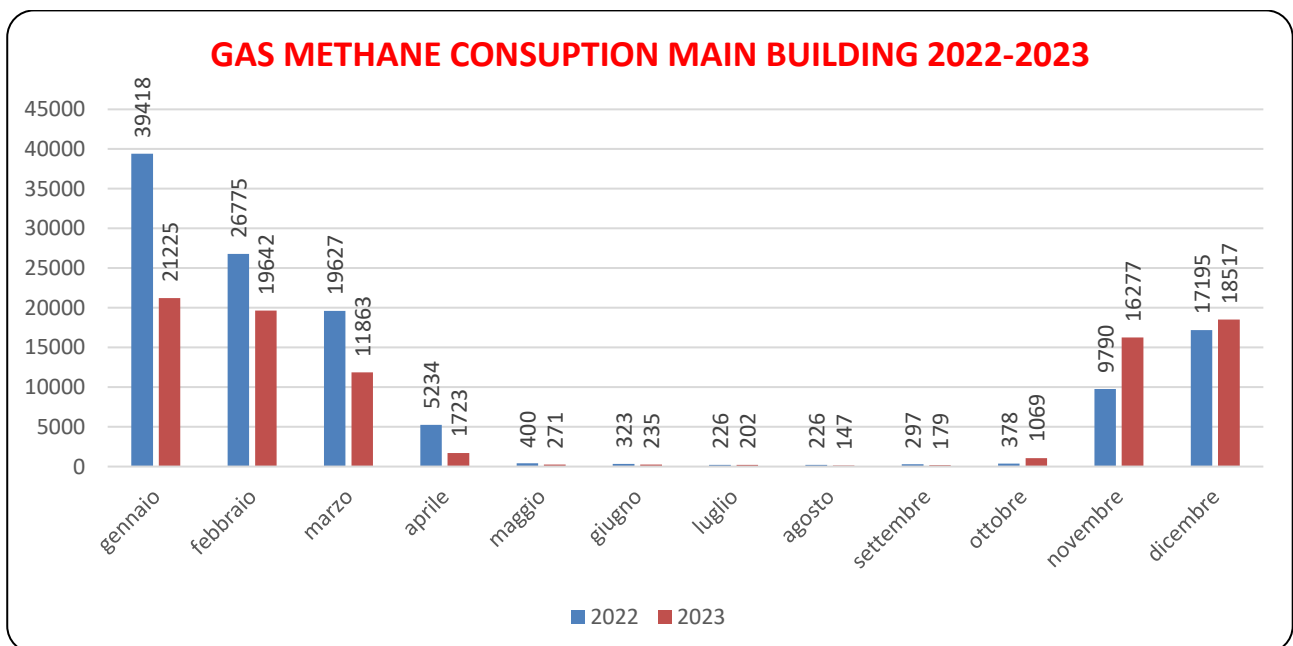


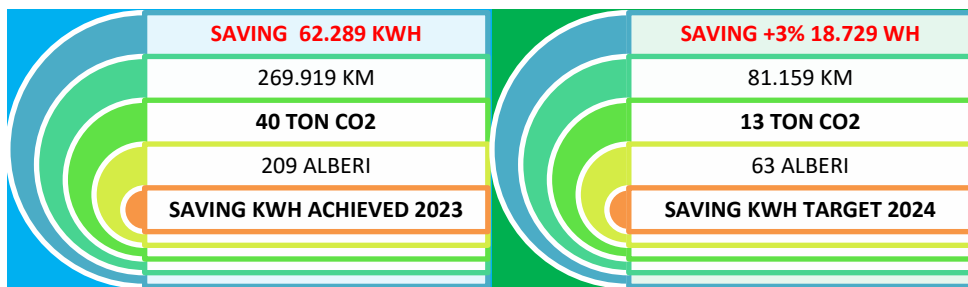
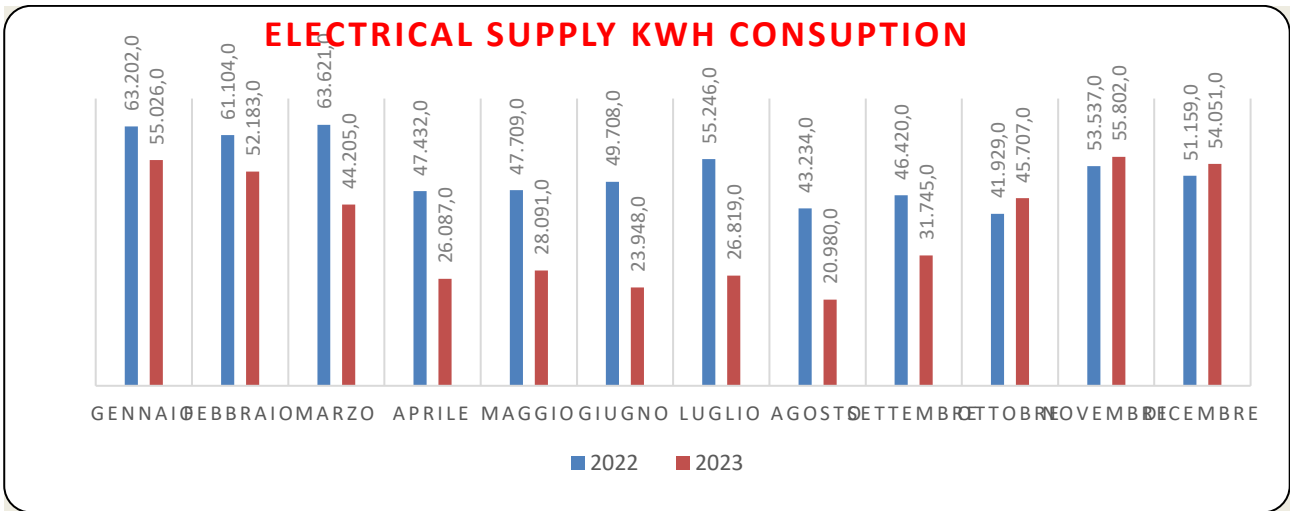
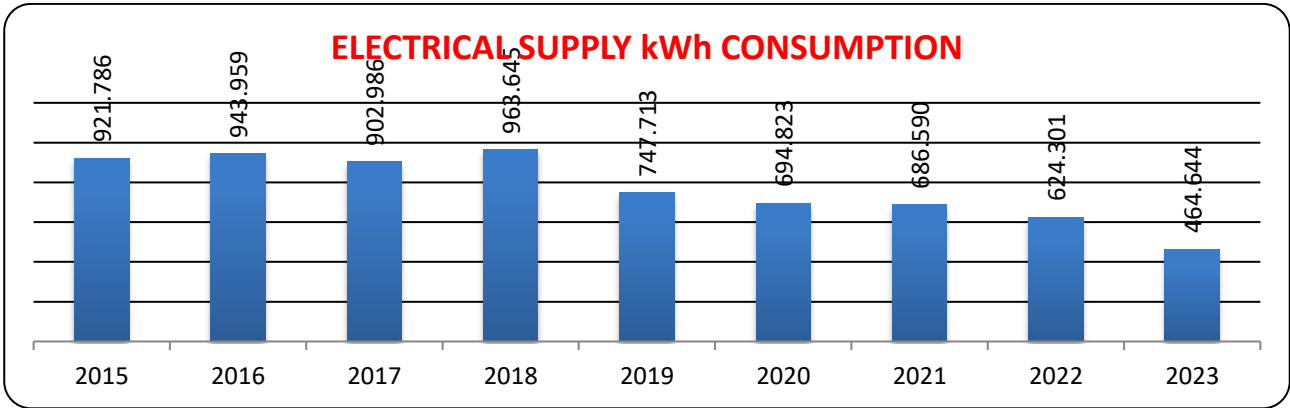
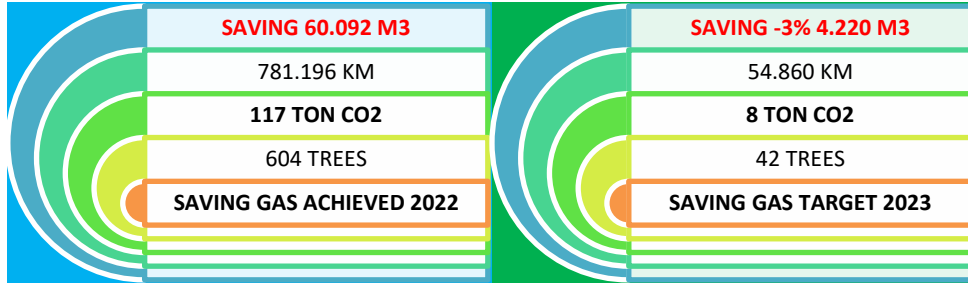
COMERIO ERCOLE launched in 2022 and maintained in 2023 in the face of increased costs energy sources related to the war scenario.

has drawn up an energy efficiency plan that involved the whole company and its staff both for the methane gas heating component and for the LIGHT / ELECTRICITY component.



In particular, the interventions focused on the main shed of greater dimensions and criticalities related to heat loss factors





The **COMERIO ERCOLE** energy efficiency plan was already in the first drafting phase fully shared with the company trade union representatives who also supported it with distinct additional food for thought.

In particular, the 2022-2024 **COMERIO ERCOLE** energy efficiency plan is developed on the following main points of intervention:



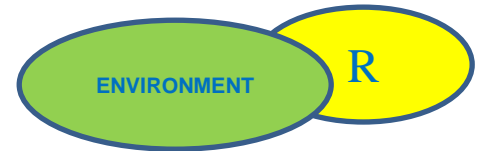
1. Energy audit entrusted to a specialized company with the launch of two internal energy training courses extended to all company staff;
2. Replacement of the 2 medium voltage transformers with high energy efficiency and yield with dispersion less than 15%;
3. Reactivation of methane gas co-generation plant;
4. Installation of industrial plant with "fixed" infrared lamps with presence detectors on machine tools, changing rooms and some specific "mobile" stations of the department with related reduction in the use of conventional heating for all environments;
5. Replacement of the door on the main shed to contain heat loss;
6. Operating timer for food and snack refrigeration units and hot beverage dispensers;
7. Definition of protocols for use of heat pumps for office use;
8. Definition of protocols for on-off light controls and boiler ignition timers;
9. New thermal clothing;
10. Efficiency recovery with intervention on pneumatic dispersions of the system
11. Overall insulation north wall dining room;
12. Investment extension of the new photovoltaic system + 100kW with energy efficiency improvement.







SPECIAL PROJECT “Sustainable Mobility”



The expression sustainable mobility indicates modes of travel (and in general an urban mobility system) capable of reducing the environmental, social and economic impacts generated by private vehicles, namely:

- Air pollution;
- noise pollution;
- road congestion;
- accidents;
- degradation of urban areas (caused by space occupied by vehicles to the detriment of pedestrians);
- land consumption (caused by the construction of roads and infrastructures);
- travel costs (both borne by the community and by the individual).

In this regard, **COMERIO ERCOLE** intends to gradually introduce the use of electric vehicles into its fleet of machinery and vehicles. **COMERIO ERCOLE** has just completed the conversion of all internal forklifts, which are now electric, thus emitting no gas emissions. Now, the company aims to explore the possibility of introducing the same technology for vehicles used for transporting people and goods.



The vehicle fleet also includes a 'hybrid' electric vehicle whose batteries can be recharged by connecting them to an external electric power source, even without the use of the internal combustion engine.

Additionally, **COMERIO ERCOLE** has already installed two double electric charging points, both for the aforementioned vehicle and for external use by visitors and/or employees.



FINAL NOTES

During 2023, **COMERIO ERCOLE** carried out an in-depth overall internal review of the procedures in implementation of Legislative Decree 231, for which the approval of 2007 and 2009 was reviewed to re-verify the adequacy and effectiveness of the policy, procedures and results achieved during the year in the field of administrative responsibility.



In particular, in 2023 the company's Code of Ethics was revised, with the new content fully shared with the trade union representatives. From April 12, 2024, the company has a sole shareholder, while maintaining indirect control by the same historic shareholders, **COMERIO 1885 Holding Srl SB**.

The collaboration of each stakeholder represents an effective means to achieve improvements in working conditions.

The company is not subject to the appointment of an **ENERGY MANAGER** (ref. art.19 law 10/91) as it has an overall energy consumption of 234 TEP for the year 2023, therefore well below the threshold imposed by the regulations (10KTPEP).

The structure of this document, with the distribution of various projects into three main categories: **SOCIAL, ENVIRONMENTAL, and GOVERNANCE**, allows for the identification of ESG sustainability objectives to focus on for the current year 2024 and the years to come. This includes measuring the results that will be achieved and formulating new challenging objectives for creating a society that is more human-centered even in the industrial and productive environment, which is the natural habitat of **COMERIO ERCOLE**.

At the beginning of 2024, **COMERIO ERCOLE**, in accordance with ISO 14040, introduced two new policies. The first one is to assess the environmental impacts of its industrial products throughout their life cycle, particularly during their end-of-life phase ("LCA" and "EOL"). The second one is to recognize diversity for greater inclusion based on ISO 30415. Also in 2024, **COMERIO ERCOLE** launched a program of "distributed training," involving all staff in the form of TEAM COACHING. The purpose is to improve interactions between different work groups with the assistance of a professional facilitator and identify actions to invest in for process improvement within the company.



Each reader of this document is invited to express their judgment and provide advice and criticisms regarding the **social, environmental, and governance performances described**, as well as the **clarity and presentation method used**.







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Document prepared adopting the principles of materiality, inclusiveness, sustainability context, completeness, accuracy, balance, clarity, comparability, reliability and timeliness in accordance with the international standard GRI. Coordination and address of Andrea Comerio – Executive Master Strategy and Corporate Sustainability Management

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