



SUSTAINABILITY REPORTING

2025



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Flaem Nuova S.P.A.

SUSTAINABILITY REPORTING

2025

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THE THOUGHT OF HELPING
PEOPLE IS A DRIVING
FORCE FOR CONTINUOUS
INNOVATION.

Riccardo Abate - General Manager

LETTER TO STAKEHOLDERS

Dear Stakeholders,

in 2026 Flaem Nuova Spa will celebrate **60 years**. A milestone made possible by continuous growth in foreign markets, although concerns about the geopolitical situation have not been absent and still remain today. 60 years of innovation dedicated to seeking increasingly effective solutions for the treatment of respiratory diseases. 60 years during which attention to the environment has grown along the way: from the **photovoltaic system**, to the **closed-loop cooling system** for molding, up to the project that characterized 2025: the **renovation of the office building**.

The works involved replacing the perimeter glazing with high-efficiency solutions capable of ensuring better thermal and acoustic comfort for all our employees, significantly reducing the environmental impact of our facility.

A project that did not end with 2025, but will continue in the following years, always with the aim of improving our footprint on the environment.

Throughout these long years since the foundation, we have always sought to maintain **a high level of attention toward the customer**, who we must not forget seeks care in our products, but we have also never stopped paying attention to our employees and the community in which we operate. Perhaps we have not been able to satisfy everyone, but we will continue in our commitment to listen to the needs of all our stakeholders, hoping to be able to meet them.

Enjoy the reading,

Riccardo Abate, General Manager of Flaem Nuova S.P.A.

REPORTING CRITERIA

For the year 2025, Flaem Nuova S.P.A. chose to voluntarily prepare its Sustainability Report in the awareness that sustainability represents an increasingly central factor for the company's responsible development, for the creation of long-term value, and for strengthening relations with its stakeholders.

Through this document, the company intends to share its ESG journey clearly and transparently, illustrating not only the initiatives and results achieved, but also the areas in which the path of improvement should continue. Reporting therefore represents an important opportunity for internal analysis and for consolidating a corporate culture oriented toward responsibility, awareness, and sustainable growth.

For the preparation of this Report, Flaem Nuova S.P.A. adopted the **VSME – Voluntary Sustainability Reporting Standard for non-listed SMEs** framework, published by EFRAG (European Financial Reporting Advisory Group), choosing to apply both the **Basic Module** and the **Comprehensive Module**, with the aim of providing a more complete and structured representation of the environmental, social, and governance information relevant to the company and its stakeholders.

This choice reflects the company's desire to adopt an ESG reporting approach that is increasingly transparent, measurable, and consistent with regulatory developments and with the growing information demands coming from the market, customers, financial institutions, and other relevant stakeholders.

The document was prepared according to the principles of:

1. transparency;
2. relevance;
3. truthfulness;
4. comparability;
5. understandability;
6. verifiability of information.

The reporting includes qualitative and quantitative information relating to the environmental, social, and governance aspects considered relevant to the company, also with reference to the impacts that business activities may generate on people and the environment in the short, medium, and long term.

The data and information reported refer to the financial year ended 31 December 2025, unless otherwise indicated. The collection of information took place, with the support of ESG consultants, through the involvement of the various competent company functions, by means of document analysis, extracts from internal management systems, and direct data collection on a dedicated platform.

Flaem Nuova S.P.A. has prepared its Sustainability Report continuously starting from the 2023 financial year. In line with the comparability principles provided for by the VSME reporting framework, this document includes, where available and applicable, comparative information relating to the previous financial year, in order to facilitate a clearer reading of the evolution of ESG performance and company initiatives.

This report has been prepared on an **individual basis** and includes exclusively the activities and impacts attributable to Flaem Nuova S.P.A., with registered office at Indirizzo azienda.

This Report represents a tool for transparency and dialogue with stakeholders and forms part of an evolutionary path aimed at strengthening the company's ability to monitor, measure, and report its ESG impacts.





COMPANY PROFILE

TIMELINE

- 1966** • Flaem Nuova was founded by Franco and Elena Abate. The first production plant in S. Martino Della Battaglia, Italy.
- 1970** • The assembly department in the 1970s.
- 1978** • The Intersan Exhibition in Milan.
- 1980** • The unstoppable innovation of the 1980s, marked by the first production of ultrasonic nebulizers.
- 1985** • A pioneering new business venture: the first vacuum sealer for household use, bringing our excellence beyond national borders.
- 1990** • The expansion of Flaem Nuova.
- 1993** • The introduction of Flaem Nuova's patented food-grade vacuum bags.
- 2000** • Flaem Nuova continues to grow.
- 2008** • "Universal Plus", the first ultrasonic unit as washable as a jet nebulizer.
- 2009** • "Rhino Clear Mobile", the compact, rechargeable, and always ready-to-use nasal wash.
- 2010** • The introduction of the Magic Vac Professional range, a new line of heavy-duty vacuum packaging systems.
- 2014** • A new milestone in aerosol therapy with the launch of Smarty, powered by innovative VibMesh technology.
- 2016** • The introduction of the Flaem Pro Line, a comprehensive range of medical devices dedicated to respiratory care equipment.
- 2018** • New products and brands for a three-generation enterprise. Over 50 years of experience, and still continuously expanding.
- 2019** • 1 nebulizer chamber, 4 therapies: Flaem introduces the new RF9.
- 2021** • Flaem presents LightNeb, marking the advent of the second generation of mesh products.
- 2023** • Flaem introduces AirFeel, an innovative respiratory physiotherapy device combining the benefits of PEP and OPEP therapy.
- 2023** • Flaem Nuova is among the first manufacturers to achieve the new MDR certification.
- 2024** • Same company, new name: Flaem Nuova becomes the FLAEM GROUP.
- Today** •

HISTORY

Spouses Franco and Elena Abate **founded** the company back in **1966**, with the aim of producing **compressors for electromedical equipment**, starting from the garage beneath their home in Desenzano del Garda, in the hamlet of San Martino della Battaglia.

The marketing of these particular compressors allowed the company over time to **consolidate its structure**, subsequently investing in the development of the first complete aerosol therapy devices, as well as in the first assembly lines, starting already in the early 1970s.

The company has always focused on **product innovation**, including the first aerosols with rotary piston compressors, its innovative plastic accessories, as well as the first ultra-quiet ultrasonic nebulizers.

Alongside its core business of producing products for respiratory care, in the 1980s Flaem Nuova S.p.A. "invented the **first complete system for household vacuum food preservation**", thanks to the possibility of sharing the technology developed in the pumps of medical products, as well as the specific "patented" multi-channel bag designed to facilitate air extraction.

In the following years, Flaem Nuova's two main business areas (electromedical and household appliances) experienced important phases of development, prompting the Abate spouses and their two children Lorella and Riccardo to invest significantly in the company's expansion, both in terms of **research and development** and in the production site, thus enabling the company to meet the needs of an increasingly global market.

Today, the company's products are shipped from the production site in Desenzano del Garda to almost every country in the world, guaranteeing the company **market shares of around 40%**.

THE COMPANY AT A GLANCE

Since **1966**, Flaem Nuova S.P.A. has been among the leaders in the **production of electromedical devices and household appliances** for both domestic and professional use. A forward-looking vision and solid roots in tradition characterize the company, enabling it to constantly renew every day its commitment to the pursuit of innovation and results.

Team spirit and a strong sense of responsibility toward its products are the guiding principles that distinguish the company and are shared by all employees, committed to creating **cutting-edge devices and systems**. The company is structured into various areas including administrative and commercial offices, technical offices, plastic molding, assembly, laboratories, and warehouses, organized and coordinated with one another in order to design, produce, and place its products on the national and international market. It also has an **assistance service** covering all of Italy, including the islands.

The company has developed **75 international patents**, 30 of which are active, and over 20 trademarks registered worldwide. Flaem Nuova distributes its electromedical devices and household appliances all over the world, fully complying with regulatory requirements and the needs of each individual market. In fact, the company operates **50% in the Italian market** and **50%** by exporting products to about **40 countries worldwide**.

An international company with entirely Italian production. Flaem Nuova's **Made in Italy** is an added value, synonymous with the quality and reliability of Italian industrial excellence, resulting in artisanal attention to detail, an innate elegance in design and shapes, and particular care for the safety and solidity of all the equipment it offers.

The company has a single location in **Desenzano**, as shown in the table below; in the reporting year it recorded **revenue of €17,320,006**.

Headquarters	Site type	ATECO code	Revenue (€)	Total assets (€)	Employees	Property as collateral
DESENZANO DEL GARDA - VIA DEI COLLI STORICI, 221	Registered and administrative office	26.60.01	17,320,006	22,668,177	102	No
DESENZANO DEL GARDA - VIA DEL PILANDRO, 10/A	Local unit	-	-	-	-	-

Company sites

FLAEM GROUP BRANDS / PRODUCT LINES



ELECTROMEDICAL PRODUCT LINE

A comprehensive range of safe, high-performing, reliable, and certified **electromedical products**: from aerosol therapy systems and nasal washes to surgical aspirators and innovative respiratory physiotherapy systems, FLAEM offers a **complete assortment** of products dedicated to the well-being of patients worldwide. To develop these solutions, FLAEM GROUP has established a dedicated **internal team** working to ensure the continuous supply of medical devices across all countries where they are distributed, in full compliance with government regulations and in alignment with the recommendations of the World Health Organization.



VACUUM PACKAGING SYSTEMS

Vacuum packaging represents a natural and efficient solution for food preservation. By significantly reducing the presence of air—the primary cause of food spoilage due to oxidation, as well as the growth and proliferation of bacteria and mold—this technology extends the **shelf life of food up to five times** while fully preserving the product's organoleptic properties. FLAEM GROUP offers a comprehensive range of vacuum sealing machines and a wide selection of accessories.

Driven by proprietary patented technologies and meticulous attention to the **design and development** phases, all conducted entirely in-house, the company manufactures appliances renowned and recognized for their **exceptional reliability**. Among FLAEM GROUP's patented products, vacuum bags and rolls suitable for cooking hold a place of special importance; crafted from premium-quality materials, they feature an **innovative design** with special channels engineered to ensure maximum air extraction.

Furthermore, the rigid vacuum containers—available in **various sizes and materials**—not only preserve the authentic taste of any foodstuff but also serve a wide range of culinary purposes, including marinating. The industry-leading **Magic Vac** vacuum product range by FLAEM GROUP is further completed by a variety of accessories, including bottle stoppers and universal lids.





Headquarter:

DESENZANO DEL GARDA
VIA DEI COLLI STORICI, 221

“

VISION

To be an international benchmark in the electromechanical and food preservation sectors, standing out for innovation, manufacturing excellence, and the ability to anticipate market needs.

“

MISSION

Through direct control of the entire production process, continuous innovation, and the enhancement of Made in Italy, we are committed to offering effective solutions that contribute to people's well-being, health protection, and the improvement of the daily lives of consumers who use our products.





17,320,006€

| Annual revenue



22,668,177€

| Value of total assets



60%

| Procurement from national suppliers





ESG OVERVIEW

VSME B3, B4, B5, B6, B7

CARE FOR THE ENVIRONMENT AND THE USE OF RESOURCES

In a constantly evolving context, monitoring the **environmental impact** of activities is an integral part of the **commitment** to a **sustainable model**. The growing urgency of **climate change** makes it essential to collect and analyze environmental data in a **transparent** manner. This approach makes it possible to identify areas for improvement and actively contribute to the **reduction of the impact generated**.

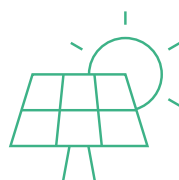
Below are the main **environmental indicators**, with the aim of promoting responsible, future-oriented growth.

CLIMATE CHANGE



638.1 MWh

Total energy consumption



39 %

Energy from renewable sources



206.3 t CO₂e

Direct Emissions (Scope 1)



83.9 t CO₂e

Indirect Emissions (Scope 2) – Location-based method



16.8 t CO₂e/M€ di fatturato

Emissions intensity

BIODIVERSITY AND ECOSYSTEMS



17,043 m²

| Occupied area

WATER AND MARINE RESOURCES



1,723 m³

| Water withdrawal

RESOURCE USE AND CIRCULAR ECONOMY



87,004 kg

| Waste generated



98.5 %

| Waste recovery rate



VSME B8, B9, B10

COMMITMENT TO OUR PEOPLE

In the company, the greatest value lies in its **people**. For this reason, it is essential to adopt an approach focused on the **protection**, **growth** and **well-being** of employees, promoting safe, inclusive, and stimulating work environments. Constantly investing in **training** and the development of **skills**, while valuing **talent**, is the key to continuous improvement.

Below are the main **social indicators**, as evidence of our concrete commitment to responsible growth.

OWN WORKFORCE

**57 %**

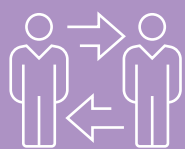
| Female employment

**87.3 %**

| Permanent contracts

**100 %**

| Employees in the national territory



8.7 %

| Employee turnover rate



0 injuries / hours worked

| Injury rate (100 FTE)



100 %

| Employees covered by a Collective Agreement



VSME B11, C9

INTEGRITY, TRANSPARENCY AND RESPONSIBILITY

Transparency, integrity and **responsibility** represent the pillars of solid and sustainable governance. Adopting ethical management practices that comply with **regulations** is essential to building trusting relationships with all **stakeholders** and ensuring long-term value creation.

Below are the main **governance indicators**, which reflect our company's commitment to responsible, future-oriented management.

**3**

Members of the governing body

**0.5**

Gender diversity ratio in the governance structure

**1**

Governance tools adopted

**0**

Convictions and sanctions for corruption and extortion



CERTIFICATIONS

Below are the main certifications obtained by the company in the social and governance areas.

SOCIAL CERTIFICATIONS

Certification	Certification body	Applicable National / International Standard	Certified Process / Product	Date of certification	Validity	Surveillance audit passed	Status
ISO 13485 - Quality Management System (QMS) - Medical	IMQ	ISO13485:2016	Design, manufacturing, commercialization, and after-sales support of electromedical devices for aerosol therapy, respiratory therapy, and rehabilitation, as well as related equipment and systems complete with their accessories.	19/03/2024	3 years	Yes	Active

GOVERNANCE CERTIFICATIONS

Certification	Certification body	Applicable National / International Standard	Certified Process / Product	Date of certification	Validity	Surveillance audit passed	Status
ISO 9001 - Quality Management System	IMQ	ISO 9001	Design, manufacturing, and marketing of medical devices for respiratory therapy and vacuum food preservation systems, including related accessories and after-sales support services.	30/04/1996	3 years	Yes	Active

Certification	Certification body	Applicable National / International Standard	Certified Process / Product	Date of certification	Validity	Surveillance audit passed	Status
ISO 13485 - Quality Management System (QMS) - Medical	IMQ	ISO 13485	Design, manufacturing, and marketing of medical devices and solutions for respiratory therapy, prevention, and personal well-being, including related accessories and after-sales support services.	19/12/1997	3 years	Yes	Active





ESG STRATEGY AND PRIORITIES

VSME C1

INTERESTS AND OPINIONS OF STAKEHOLDERS

Stakeholders are defined as individuals or groups who can affect or be affected by the company. Stakeholder engagement is fundamental to the due diligence process and to the assessment of material topics. This involvement enables the identification and evaluation of actual and potential negative impacts, which are subsequently integrated into our sustainability reporting.

The company has identified its internal and external stakeholders. While the organization does not currently engage stakeholders formally in its decision-making processes, it has expressed a clear commitment to initiating participatory processes in the future. This approach reflects a strong awareness of the importance of inclusive governance and the necessity of aligning with best practices in sustainability.

The table below outlines the Company's key stakeholders, alongside the communication tools and channels it can leverage—starting with this report—to communicate relevant activities undertaken immediately and throughout its medium- to long-term ESG journey.

In addition to the stakeholders listed, “Nature” is also recognized as a silent stakeholder. In this context, the assessment of the company’s relevance and impact is grounded on ecological data and species conservation metrics.

[LEARN MORE](#)

VSME C1

COMPANY-SELECTED STAKEHOLDERS

Stakeholder	Functions involved	Expectations	Activities	Engagement tools	Responses / outcomes
Members and investors	Administration, Finance, Investor Relations	Profitability, Value growth, Transparency	Financial reporting, Shareholder meetings, Periodic meetings	Financial statements, Press releases, Roadshows	Information sharing, Listening to needs, Setting performance targets
Employees, collaborators, and trade unions	Human Resources, Organization, Industrial Relations	Workplace well-being, Professional development, Protection of rights	Training, Corporate welfare, Dialogue with employee representatives	Intranet, Regular meetings, Workplace-climate surveys	Improved working conditions, Investment in skills development, Openness to dialogue
Suppliers and business partners	Purchasing, Logistics, Quality	Long-term relationships, Fair contract terms, Development support	Supplier evaluation and selection, Capacity-building programs, Collaboration on innovative projects	Meetings and working sessions, Supplier portal, Audits and site visits	Development of strategic partnerships, Shared objectives and best practices, Support for continuous improvement
Customers	Marketing, Sales, Customer Service	Quality products/ services, Satisfying purchasing experience, Attention to needs and feedback	Customer-satisfaction surveys, Loyalty programs, Communication and support channels	Surveys, Focus groups, Customer portal, Social media	Continuous improvement of products/services, Customized experience, Timely handling of complaints
Community and territory	External Relations, Social Responsibility, Environment	Positive community impact, Social-responsibility initiatives	Local development projects, Volunteering, Sponsorships and donations	Public events and meetings, Local media communications, Website and social media	Active community engagement, Support for social and environmental initiatives, Enhancement of the local area
Banking and finance	Administration, Investor Relations	Financial soundness, Repayment capacity, Transparency	Financial reporting, Regular meetings, Financing negotiations	Financial statements, Corporate presentations, Company visits	Sharing of financial information, Demonstrated ability to generate cash flow, Building trust-based relationships
Public bodies and institutions	Legal Affairs, Institutional Relations, Compliance	Regulatory compliance, Project collaboration, Contribution to development	Participation in roundtables, Adherence to industry initiatives, Regulatory alignment	Official communications, Meetings and hearings, Participation in calls and programs	Compliance with laws and regulations, Contribution to sector policy development, Collaboration on shared issues



VSME C1, C3, C4

IRO ANALYSIS

Engagement with stakeholders represents a cornerstone of the company's sustainability journey. Through continuous dialogue with key internal and external stakeholders, the company is able to better understand expectations, needs, and material issues related to its operations, thereby effectively guiding its sustainability strategies and initiatives.

Building upon the insights gathered through stakeholder engagement and the analysis of our operating and industry context, the company has developed a structured analysis based on the IRO model (Impacts, Risks, and Opportunities). This approach is designed to systematically evaluate each ESG topic—in alignment with relevant reporting frameworks—in terms of generated effects, potential vulnerabilities, and development opportunities.

The results are summarized in the following matrix [o representation], which distinguishes between material topics, secondary topics, and non-material topics.

INTERSECTORAL TOPICAL PRINCIPLES		
ENVIRONMENT	SOCIAL	GOVERNANCE
ESRS E1 Climate change	ESRS S1 Own workforce	ESRS G1 Business conduct
ESRS E2 Pollution	ESRS S2 Workers in the value chain	
ESRS E3 Water	ESRS S3 Affected communities	
ESRS E4 Biodiversity and ecosystems	ESRS S4 Consumers and end-users	
ESRS E5 Resource use and circular economy		

Non-material topics

 Noteworthy topics (Voluntary disclosure)

 Material topics

MATERIAL TOPICS

Based on the conducted materiality assessment, the following ESG topics have been identified as material for the company, exhibiting both significant impact materiality (inside-out) and financial materiality (outside-in):

- **Climate Change (ESRS E1):** This topic is highly material as refrigeration, curing, cooking, and smoking processes require a substantial consumption of thermal and electrical energy, generating significant negative impacts in terms of greenhouse gas emissions (Scopes 1, 2, and 3). These impacts—compounded by physical risks stemming from extreme weather events (floods, droughts, heatwaves) that may disrupt the meat raw material supply chain or damage storage infrastructure—expose the company to transition risks linked to regulations such as the EU ETS, CBAM, and carbon pricing. Concurrently, it presents strategic opportunities in energy efficiency, renewable energy self-generation, and the development of “climate-resilient” products. This enables operating cost reductions, access to green financing, and enhanced competitiveness among Horeca (Hotel, Restaurant, and Café) and large-scale retail clients who are increasingly sensitive to ESG targets.
- **Water and Marine Resources (ESRS E3):** This topic assumes strategic relevance due to the intensive use of water in plant sanitation, raw material washing, refrigeration, and the maintenance of curing chambers. Negative impacts associated with water abstraction and wastewater discharges rich in organic matter can contribute to local water stress and eutrophication, posing operational and reputational risks in the event of stricter regulations or resource scarcity. Opportunities stem from the adoption of recycling systems, efficiency measures, and advanced wastewater treatment, which reduce costs, improve water resilience, and strengthen the company’s social license to operate.
- **Resource Use and Circular Economy (ESRS E5):** This topic is material because the company’s operations generate high input flows of raw materials (meat), energy, water, and packaging, alongside output flows of organic waste and by-products. Negative impacts linked to inefficient resource use and food waste exacerbate the environmental footprint and disposal costs, while new Extended Producer Responsibility (EPR) regulations introduce compliance risks and rising costs. Opportunities emerge from the adoption of circular models (e.g., upcycling of by-products, packaging eco-design, waste reduction), which improve efficiency, meet evolving market demands, and unlock new premium market segments.

- **Own Workforce (ESRS S1):** This topic is relevant as manufacturing activities take place in cold, humid environments, involving the intensive use of knives, heavy machinery, and shift work that expose workers to elevated physical risks. Negative impacts on working conditions, health and safety, or equal treatment can result in injuries, high turnover rates, and internal friction, with direct effects on productivity. Proactive management—further supported by the UNI/PdR 125 certification for gender equality—generates positive impacts on employee motivation, retention, and talent attraction, thereby strengthening corporate cohesion and operational continuity.
- **Consumers and End-Users (ESRS S4):** This topic plays a central role as traditional Italian cured meats are direct-consumption products. Negative impacts arising from incomplete information on ingredients and origin, microbiological contamination, or a lack of inclusivity (e.g., inaccessible pricing or formats) can lead to product recalls, loss of consumer trust, and boycotts. Conversely, advanced traceability systems, transparent labeling, and inclusive product lines generate positive impacts on reputation, customer loyalty within the Horeca and retail sectors, and the penetration of new premium market segments.
- **Business Conduct (ESRS G1):** This topic is cross-cutting and strategic, encompassing corporate culture, whistleblower protection, anti-corruption measures, animal welfare across the supply chain, and ethical supplier relations. Improper practices or a lack of transparency expose the company to reputational scandals, regulatory sanctions, and the loss of its social license to operate. Conversely, a robust governance system, rigorous auditing, and responsible partnerships strengthen value chain resilience, improve ESG ratings, and solidify long-term relationships with stakeholders, clients, and investors.

VSME C1, C3, C4

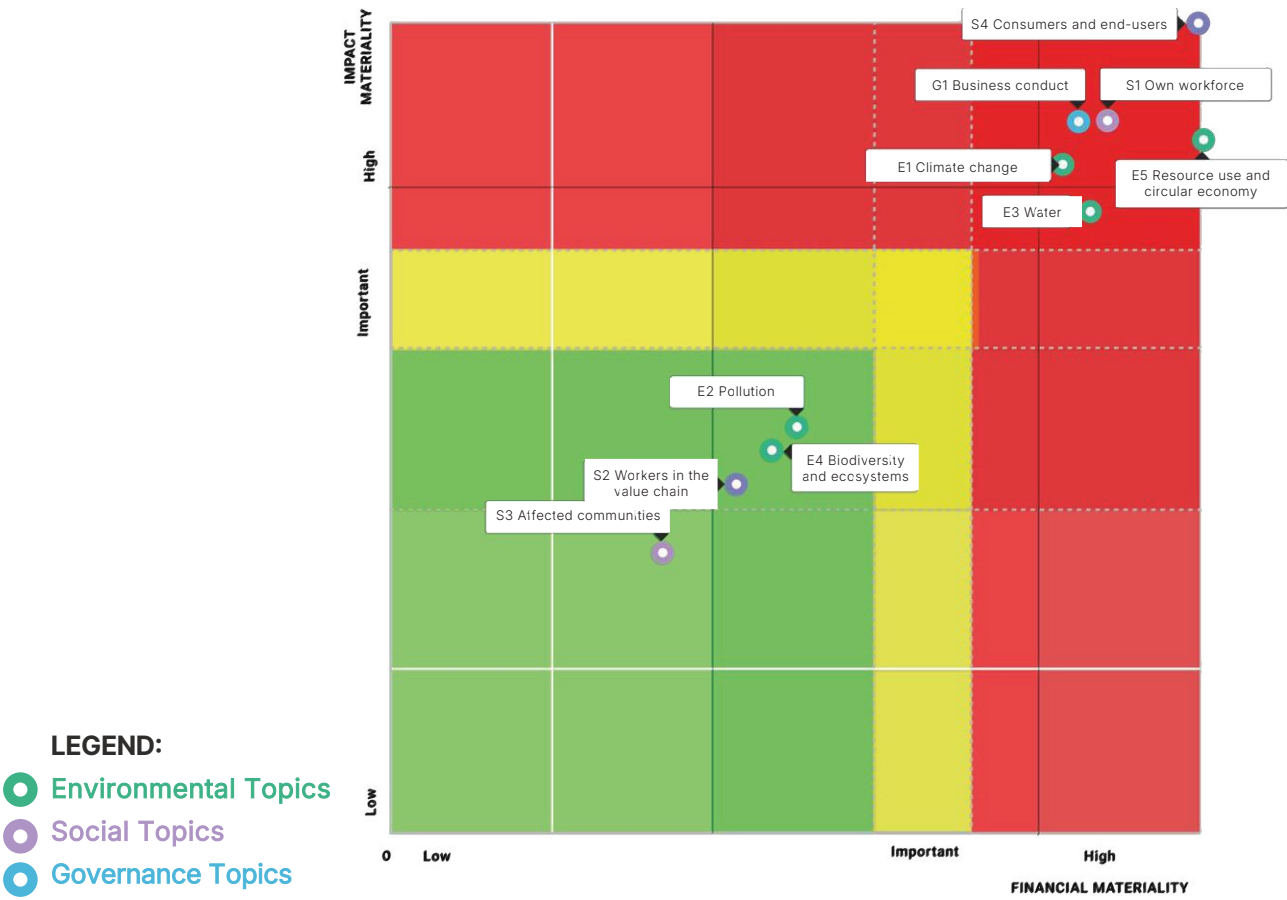
DOUBLE MATERIALITY MAP

The results of the IRO analysis were further processed through the application of the **double materiality principle**, providing a comprehensive **representation of ESG topics** from a dual perspective.

On the one hand, the **impacts** generated by corporate activities **on the environment and society** are taken into account; on the other hand, the **risks and opportunities** that these issues may pose **to economic performance and business continuity** are evaluated.

The double materiality matrix thus serves as a **synthesis tool** that enables the identification and visualization of the company's priority topics, supporting the definition of sustainability strategies and the monitoring of progress over time. The issues identified as most material are shared and validated by top management, serving as a reference point for decision-making processes and stakeholder engagement.

The resulting assessments have been graphically mapped out in the double materiality matrix shown below.



NON-MATERIAL TOPICS	NOTEWORTHY TOPICS	MATERIAL TOPICS
Pollution		Climate change
Biodiversity and ecosystems		Water
Workers in the value chain		Resource use and circular economy
Affected communities		Own workforce
		Consumers and end-users
		Business conduct





ENVIRONMENTAL INFORMATION

CLIMATE CHANGE

VSME B3, C3

During the reporting period, the amount of **electricity purchased from the grid** amounted to **388.48 MWh**. The company also has **owned facilities for the production of renewable energy**, specifically a photovoltaic system, which contributed to the production of **249.65 MWh**, for a total energy consumption of **638.1 MWh**, slightly down compared to the 2024 value.

During the reporting year, the company carried out **measures aimed at improving energy efficiency**, including **external facade refurbishment** works. For these measures, the company made total investments of **€1,500,000**, confirming its commitment to reducing energy consumption and improving the performance of company buildings.

The company's **greenhouse gas emissions** mainly derive from the use of electricity, the use of methane gas and fuel consumption for company mobility. The company fleet consists of 8 vehicles, as detailed in the table below.

Fuel type and category	Number of vehicles
Methane	0
LPG	0
Diesel	3
Euro 6 or higher	3
Petrol	0
Hybrid/Electric	5
Hybrid plug-in	3
Mild hybrid	2

Breakdown of the vehicle fleet

During 2025, total greenhouse gas emissions were divided between Scope 1 and Scope 2.

The **Scope 1** emissions include the direct emissions generated by activities under the company's control, deriving mainly from the combustion of fuels (diesel and

petrol) used by company vehicles and from natural gas consumption in the facilities. Emissions are expressed in tonnes of CO₂ equivalent (tCO₂eq) and were calculated using internationally recognized emission factors derived from official sources such as BEIS/DEFRA.

The **Scope 2** emissions, on the other hand, include the indirect emissions associated with the purchase and consumption of electricity. Specifically, in 2025 Scope 1 emissions amounted to 206.34 tonnes of CO₂ equivalent, while Scope 2 emissions stood at 83.87 tonnes of CO₂ equivalent, for a total of 290.21 tonnes of CO₂ equivalent. The calculation of emissions was carried out in accordance with the GHG Protocol, applying the location-based approach and using emission factors from nationally recognized sources (ISPRA). Compared with 2024, Scope 1 emissions remained substantially stable, while **Scope 2** emissions recorded a **decrease of about 18.5%**, highlighting the positive effects of the initiatives undertaken by the company to improve energy efficiency.

Emissions scope	Emissions (ton CO ₂ eq) - 2024	Emissions (ton CO ₂ eq) - 2025	Absolute change - Emissions (ton CO ₂ eq)	Percentage change (%)
Scope 1 (direct emissions)	203.9	206.3	2.5	1.2
Scope 2 (indirect emissions)	102.9	83.9	-19	-18.5
Scope 3 (other indirect emissions)	nd	nd	nd	nd
Total emissions	306.8	290.2	-16.6	-5.4

Change in greenhouse gas emissions by scope

In addition to the analysis of absolute emissions, the **emissions intensity** indicator was calculated, which relates total greenhouse gas emissions to company turnover. This indicator makes it possible to assess the company's environmental efficiency in relation to its economic performance and to monitor its evolution over time. In 2025, the indicator stood at **16.75 tonnes of CO₂ equivalent per million euros of turnover**, showing **alignment** with the 2024 value of 16.85 tonnes of CO₂ equivalent per million euros of turnover.

In the coming years, Flaem Nuova is committed to reducing CO₂ emissions into the atmosphere, but **has not defined a specific reduction target**.

CLIMATE RISK ANALYSIS

VSME C4

The company has conducted a **physical risk assessment** of the risks to which it could be exposed, with particular reference to the potential impacts arising from climate change.

To manage these risks, the company has taken out specific insurance coverage, including an **All Risks policy**, aimed at protecting the company against possible material damage and operational consequences also connected to extreme weather events.

During the reporting year, the company **did not record any incidents or environmental sanctions**, confirming the effectiveness of the prevention, monitoring and environmental risk management measures adopted.

WATER, SOIL AND AIR POLLUTION

VSME B4

Considering the nature of its production activities, FLAEM **does not generate significant emissions** of polluting substances into the atmosphere, nor significant releases of contaminants into the soil or water. Following the materiality analysis conducted by the company, the **topic** of pollution was therefore **assessed as not material**, as the actual and potential impacts associated with this area are limited and adequately managed within normal operational activities.

BIODIVERSITY AND ECOSYSTEMS

VSME B5

The company sites are located in areas that are neither within nor in proximity to protected areas or areas belonging to the Natura 2000 network. This location ensures that the **company's activities do not have direct impacts on natural habitats** of particular value or on ecosystems protected at European level.

The **total area** managed by the company amounts to approximately **17,043 square meters**. This extent represents all the areas directly used for carrying out the company's activities and constitutes the basis for assessing the environmental impact related to land use.

As shown in the table below, which reports the breakdown of company areas according to the **type of land use in the reporting year**, the impervious surface area, equal to 15,426 m², represents the areas covered by buildings, paving or other infrastructure, while the nature-oriented surface area of the site, equal to 1,617 m², includes green areas and undeveloped spaces within the company properties.

Type of land use	Area in the year prior to the reporting year (m ²)	Area in the reporting year (m ²)	Change (%)
Total impervious surface area	15,426	15,426	0
Total nature-oriented surface area of the site	1,617	1,617	0
Total nature-oriented surface area outside the site	0	0	-
Total land use	17,043	17,043	0

Company land use

WATER AND MARINE RESOURCES

VSME B6

During the 2025 reporting year, the company monitored its water consumption. The assessment of the water risk level was carried out using the Water Risk Atlas developed by the World Resources Institute (**WRI**). This internationally recognized tool is based on a series of indicators that analyze water availability and demand, the quality of water resources, climate variability, and other local water stress factors.

The analysis conducted using the WRI highlighted for the Desenzano del Garda site a **water stress level classified as "medium-low"**, confirming that the area does not present significant critical issues in terms of water availability, while still requiring a conscious and careful use of the resource.

Water supply comes exclusively from external sources and water is used **mainly for sanitary purposes**. In the reporting year, the amount of **water withdrawn** by the company was **1,723 m³**.

Site	Site type	Water stress level	Withdrawal source	Water withdrawal (m ³)	Water discharge (m ³)	Water consumption (m ³)
DESENZANO DEL GARDA - VIA DEI COLLI STORICI, 221	Registered and administrative office	MEDIUM-LOW	Aqueducts/water services	1,723	1,723	0
DESENZANO DEL GARDA - VIA DEL PILANDRO, 10/A	Local unit	MEDIUM-LOW	-	-	-	-
Total	-	-	-	1,723	1,723	0

Water Withdrawal, Consumption, and Discharge by Site

RESOURCE USE, CIRCULAR ECONOMY AND WASTE MANAGEMENT

VSME B7

The **packaging** used by the company for packing its products is designed internally by Flaem Nuova and manufactured by third-party suppliers, mainly in **paper and cardboard**. The company adopts packaging solutions **compliant with the applicable regulatory requirements** and consistent with the technical and design specifications of the products, in order to ensure their protection, integrity and quality throughout the entire supply chain.

A central aspect of environmental management concerns the **waste generated** by company activities. During 2025, the total amount of waste produced was **87,004 kg**, as shown in the table below, which details the breakdown by type and management method. Of this, 85,714 kg, equal to 98.5% of the total, consists of non-hazardous waste, entirely destined for recycling or reuse processes.

Hazardous waste, on the other hand, amounts to 1,290 kg and is managed by specialized operators, in compliance with current regulations. The **recycling and reuse rate** therefore stands at **98.5%**, confirming the company's commitment to reducing environmental impact, proper waste management and the enhancement of resources.

Waste category	Total waste produced		Waste destined for recycling or reuse		Waste destined for disposal		Type of disposal
	Value	Unit of measure	Value	Unit of measure	Value	Unit of measure	
Non-hazardous waste	85,714	-	85,714	-	0	-	-
CER 08 03 18 - Waste printing toner, other than those referred to in entry 08 03 17	196	kg	196	kg	-	-	-
CER 12 01 05 - Plastic shavings and turnings	11,018	kg	11,018	kg	-	-	-
CER 15 01 01 - Paper and cardboard packaging	54,190	kg	54,190	kg	-	-	-
CER 15 01 03 - Wooden packaging	19,540	kg	19,540	kg	-	-	-
CER 16 02 14 - Discarded equipment, other than those referred to in entries 16 02 09 to 16 02 13	770	kg	770	kg	-	-	-
Hazardous waste	1,290	-	0	-	1,290	-	-

Waste category	Total waste produced		Waste destined for recycling or reuse		Waste destined for disposal		Type of disposal
	Value	Unit of measure	Value	Unit of measure	Value	Unit of measure	
CER 13 02 08	320	kg	-	-	320	kg	-
CER 13 08 02	700	kg	-	-	700	kg	-
15 01 10	140	kg	-	-	140	kg	-
16 05 06	45	kg	-	-	45	kg	-
20 01 33	85	kg	-	-	85	kg	-
Total	87,004	-	85,714	-	1,290	-	-

Breakdown of waste produced by type

The table below shows the trend in total waste production over the **last two years**, highlighting an **increase of approximately 21.73%**.

Waste category	Value - 2024	Value - 2025	Absolute change - Value	Percentage change (%)
Non-hazardous waste	70,731	85,714	14,983	21.2
Hazardous waste	740	1,290	550	74.3
Total	71,471	87,004	15,533	21.7







INFORMAZIONI SOCIALI

OWN WORKFORCE

OWN WORKFORCE

General characteristics

VSME B8, C5

The responsible management of human resources represents a central element in the company's sustainability strategy.

During 2025, the company workforce continued to be **entirely located in Italy**, confirming its strong local roots and its commitment to contributing to the social and economic development of the communities in which it operates.

At the end of the reporting year, the workforce employed consisted of **102 people**, of whom 44 were men (43%) and 58 were women (57%).



The company workforce shows a **balanced gender composition**, with a prevalence of the female component, which accounts for 57% of the total workforce.

Most employees are hired on **permanent contracts** (89 employees, equal to **87.3%** of the total), slightly down compared to the previous year's figure (94%), confirming the employment stability guaranteed by the company. In particular, permanent employees consist of 41 men and 48 women. Employees on fixed-term contracts, on the other hand, number 13, of whom 2 are men and 11 are women.

With reference to professional classification, the most represented category is that of **blue-collar workers**, with 60 employees, followed by white-collar employees, equal to 36 people. The presence in positions of greater responsibility is more limited, with 1 executive and 5 middle managers overall.

The gender analysis highlights a **significant female presence in both white-collar and operational positions**, while executive and middle management roles are mainly held by men.

The following table shows the distribution of employees by contract type, job classification and gender.

Contract type/job classification	Men	Women
Permanent	41	48
Executives	1	0
Middle managers	4	0
White-collar employees	10	18
Blue-collar workers	26	30
Fixed-term	2	11
Executives	-	-
Middle managers	1	0
White-collar employees	1	7
Blue-collar workers	0	4

Distribution of employees by contract type, job classification and gender

The analysis of the **distribution of contracts by working hours** shows a clear prevalence of **full-time** work, which involves 89 employees out of a total of 102, equal to **87.3%** of the workforce. In particular, 41 men and 48 women are employed full-time, mainly distributed among the categories of blue-collar and white-collar workers.

Part-time contracts, on the other hand, concern 13 employees (12.7% of the total), of whom 2 are men and 11 are women, highlighting a higher incidence of part-time work among the female component of the workforce. Flaem Nuova **does not make use of non-employee or temporary agency workers** but only multi-mandate agents.

The following table shows the breakdown of full-time and part-time contracts by job classification and gender.

Contract type/job classification	Men	Women
Full-time	41	48
Executives	1	
Middle managers	4	
White-collar employees	10	18
Blue-collar workers	26	30
Part-time	2	11
Executives	0	0
Middle managers	1	0
White-collar employees	1	7
Blue-collar workers	0	4

Breakdown of full-time and part-time contracts by job classification and gender

During 2025, **5 employment contracts were activated**, as detailed in the following table.

Age group	Men	Women
Up to 30 years old	1	0
30-50 years old	0	2
Over 50 years old	2	0
Total newly hired employees	3	2

New hires by age group and gender

In the same period, **9 terminations** were recorded. **Outgoing turnover**, equal to **8.65%**, was therefore higher than **incoming** turnover, equal to 4.81%.

Age group	Men	Women
Up to 30 years old	1	1
30-50 years old	2	2
Over 50 years old	2	1
Total terminated contracts	5	4

Terminated contracts by age group and gender

In full compliance with regulatory requirements, the company employed **8 employees belonging to protected categories** pursuant to 68/99 or disadvantaged persons pursuant to L.381/91 during the reporting year.

OWN WORKFORCE

Health, safety and human rights

VSME B9, C7

The company promotes an inclusive, respectful work environment free from any form of discrimination or harassment. To this end, it has adopted specific reporting procedures (**whistleblowing**), which allow employees to report any non-compliant behavior in a safe, confidential manner and in compliance with current regulations.

During the reporting year, **no workplace accidents occurred**, nor were any cases of occupational illnesses related to work activities recorded. Consequently, no working days were lost for these reasons. This result confirms the effectiveness of the prevention measures and health and safety protocols adopted by the company, helping to ensure a safe and protected working environment for all staff.

In 2025, the company also allocated financial resources to the **improvement of the working environment**, with the aim of increasing well-being, comfort, and accessibility for its employees. The measures implemented concerned in particular the **renovation and fitting out of a new break/canteen area**, designed to offer more functional and welcoming spaces to support staff needs. As part of the same project, a new room ventilation system was also installed, aimed at improving air quality and the comfort of workspaces. The total investment allocated to workplace environment improvement measures amounted to **€350,000**, demonstrating the company's commitment to promoting

organizational well-being and the quality of the spaces intended for its employees.

OWN WORKFORCE

Remuneration, collective bargaining agreements and training

VSME B10

Flaem Nuova is committed to ensuring fair, transparent conditions consistent with the principles of equal treatment, fully applying the **National Collective Labor Agreement** (CCNL) Confapi Metalmeccanica to all employees. Confirming its attention to social dialogue and industrial relations, an **annual meeting with trade union organizations** is also planned, aimed at discussing the main issues concerning staff and work organization.

The analysis of the **gender pay gap** shows an **overall limited difference** between the average remuneration of men and women. Compared with 2024, however, there is a slight increase in the pay gap, as shown in the table below.

Indicator	2024 (%)	2025 (%)	Absolute change	Percentage change (%)
Gender pay gap	-2.1	-4.7	-2.6	125.1

Annual comparison of the gender pay differential

Work-life balance is a central element in company policies. All employees are entitled to **parental leave**, in accordance with current regulations and internal policies. During the reporting year, **7 employees** took parental leave.

The company recognizes the importance of the well-being of its employees and supplements the compensation system with a series of **corporate welfare** tools. In particular, managers and executives are provided with specific **life and accident insurance coverage**, aimed at ensuring greater personal and professional protection. The company also provides **shopping vouchers** and promotes welfare initiatives aimed at supporting employees' purchasing power and their overall well-being. During the reporting year, these benefits were granted on a structured basis and were no longer conditional upon the achievement of specific performance targets, in consideration of the consolidation of the company's high productivity levels.

Finally, with regard to **training activities**, in 2025 a total of 12 hours of training were delivered, as shown in the table below, relating to health and safety topics and cross-functional technical skills. The distribution of hours shows greater involvement of male staff.

Training area	Men	Women
Occupational health and safety	6	1
Soft Skills	-	1
Technical skills	4	-
Total training hours	10	2

Training hours by area and employee gender

Based on the data collected, during the year each employee benefited on average from 0.12 hours of training. The figure shows **an improvement compared with 2024**, a year in which no training activities were delivered. The indicator is calculated by relating the total number of training hours delivered by the company to the average number of employees present during the reference period and represents a useful parameter for monitoring the organization’s commitment to developing and updating staff skills.

WORKERS IN THE VALUE CHAIN

VSME C7 The company requires its **suppliers** to ensure compliance with the applicable regulations on occupational health and safety. To this end, suppliers sign a **formal declaration** certifying compliance with the legislative provisions applicable in the country where they carry out their production activities. This process enables the company to promote adequate standards for the protection of workers throughout its supply chain and to monitor compliance with regulatory requirements by its business partners.

AFFECTED COMMUNITIES

VSME C7 During the reporting year, Flaem Nuova did not carry out specific initiatives in support of the local community. However, the company confirms its commitment to supporting activities of social value in the local area and plans to resume sponsorship in 2026 of the event **“Gara Nasi Rossi”**, promoted by the Associazione DUTUR KAOS – Brescia ODV, an organization active in volunteering and community support.

CUSTOMERS AND CONSUMERS

VSME C7

The company pays particular **attention to the safety of end users**, adopting an integrated approach that includes quality controls throughout the production process, in-depth product testing, and monitoring activities following placement on the market. These safeguards make it possible to prevent and mitigate potential risks, monitor any defects or undesirable effects related to product use, and promptly manage any compliance incidents reported by customers or regulatory authorities.

To support this system, Flaem Nuova uses specific **performance indicators** to monitor product defect rates and identify any areas for improvement. Post-marketing surveillance activities are also accompanied by transparent communication with customers and competent authorities in the event of safety issues, as well as by the constant review of production processes in order to prevent any recurrence of critical issues. In this context, the company has developed an action plan that defines **improvement objectives** and the actions necessary to achieve them.



It has established **improvement objectives** on product defect rates and the actions necessary to achieve them.

The products offered are accompanied by **adequate information for safe use**, including information brochures, instructions for use, dedicated labeling, and international symbols shown on the product or packaging. The company also promotes **training activities for pharmacies**, with the aim of strengthening knowledge of product characteristics and encouraging proper information to end customers.

The company is also committed to ensuring the accessibility of its offering, both for end customers and healthcare professionals, even in the presence of downward pressure on prices. To this end, it adopts **competitive pricing policies** and develops innovative solutions aimed at reducing production costs, without compromising product quality, safety, and effectiveness.

Flaem Nuova has obtained and maintains **certifications** recognized at national and international level that attest to the adoption of high standards of quality,

safety, and regulatory compliance for its products and processes. In particular, the company is certified **ISO 9001** for its quality management system, **ISO 13485** for the quality management system for medical devices, and operates in compliance with the requirements set out in the **European Medical Devices Regulation** (MDR – Medical Device Regulation), guaranteeing the safety, effectiveness, and compliance of products placed on the market.



Company certified **ISO 9001** and **ISO 13485**, operating in compliance with the European MDR Regulation.

During the reporting year, it **recorded no incidents**, nor did it receive any sanctions, regarding violations against customers and consumers. This result reflects the effectiveness of the company's policies and control procedures adopted to ensure high standards of quality, safety, and transparency.







GOVERNANCE INFORMATION

GOVERNANCE AND CORPORATE CULTURE

VSME C6, C8, C9

Solid and transparent governance constitutes the foundation of the company's commitment to sustainability. To this end, the company has adopted a **Code of Ethics** that defines the principles of integrity, transparency, and professionalism that guide all company activities. In addition, the **Organization, Management and Control Model** pursuant to Legislative Decree 231/2001 (MOG 231) is currently being adopted, confirming the focus on risk prevention and the promotion of a culture of compliance. The company has also implemented policies and procedures aimed at ensuring compliance with international, national, and local regulations concerning the **prevention of fraud and abuse in the healthcare sector**.

Type of policy/procedure	Brief description of the content	Approval date	Means of dissemination	Is training provided on this topic?
Code of Ethics	The Code of Ethics defines the principles of honesty, transparency, and professionalism that guide company activities and relations with partners, also contributing to the prevention of offenses pursuant to Legislative Decree 231/2001.		Through publication on the Company's website.	The company involves staff in information and training activities

Rules of conduct and management tools

The main governing body is the **Board of Directors**, which ensures strategic oversight and the consistency of company decisions with the ethical and professional values of the business. The Board is composed of **three members** and has a female representation of 33%, demonstrating the commitment to greater gender diversity in senior roles.

The average age of the members is over 50, thus ensuring a high level of experience and maturity in strategic decisions. The composition of the Board of Directors, detailed in the table below, highlights the distribution by gender and age group.

Age group	Men	Women
Up to 30 years old	0	0
30-50 years old	0	0
Over 50 years old	2	1
Total members of the highest governance body	2	1

Members of the highest governance body by age group and gender

Ultimate responsibility for the company’s social and environmental policies is entrusted to a member of the Board of Directors, ensuring the integration of ESG issues at the highest decision-making levels and providing effective strategic oversight of sustainability matters. Although it is not subject to the obligations set out by the Corporate Sustainability Reporting Directive (CSRD), the company has chosen to **voluntarily prepare its own Sustainability Report**, as evidence of its commitment to transparency, reporting, and the continuous improvement of its environmental, social, and governance performance.



The company has also identified and mapped its **stakeholders**, distinguishing between **internal** stakeholders – such as shareholders, the Board of Directors, and employees – and **external** stakeholders, including customers and credit institutions.

Stakeholder engagement is fully integrated into decision-making processes and strategic choices, both in management and in sustainability matters. This approach fosters constant and constructive dialogue with interested parties, strengthening transparency, accountability, and the company’s ability to create value sustainably over the long term.

In line with its corporate values and principles, the company **does not generate revenue from activities attributable to sectors considered critical** from an environmental and social perspective, such as fossil fuels, coal, tobacco, controversial weapons, and chemicals. During the reporting year, moreover, no revenue was recorded from customers operating in high-emission and high climate-impact sectors, including those identified by NACE codes A, B, C, D, E, F,

G, H, and L. This positioning helps limit the company's exposure to climate risks related to the transition to a low-carbon economy, strengthening consistency between the business model and the sustainability objectives defined by the company's governance.

Confirming the effectiveness of its control and compliance systems, the company **has never received**, during the course of its operations, **legal** or regulatory **sanctions** related to cases of fraud or abuse in the healthcare sector.



SUPPLIER RELATIONSHIP MANAGEMENT

VSME C1

Flaem Nuova adopts a strategy of **diversifying its supply chain**, working 60% with Italian suppliers and the remaining 40% with foreign partners.

The company adopts a **structured process for supplier selection**, qualification and monitoring, aimed at ensuring high standards of quality, reliability and regulatory compliance throughout the entire supply chain. The procedure applies to all suppliers, both new and already qualified, and includes a prior assessment based on technical, organizational and documentary information, as well as the possession of adequate certified management systems.

During the qualification phase, the company **gives preference to suppliers with recognized certifications**, such as ISO 9001 and ISO 13485 for medical devices, and requires evidence of compliance with the main applicable regulations regarding product safety, environmental protection, occupational health and safety, and business ethics.



Among the requirements considered are, among others, the **REACH** and **RoHS** regulations, the **ISO 14001** and **ISO 45001** certifications, and social responsibility standards.

To date, 30% of suppliers are organizations holding certifications or that have adopted specific social policies on occupational health and safety. 20% of suppliers were also selected based on the criterion of **geographical proximity**, promoting the development of the local economic fabric and reducing transport-related impacts.

Other criteria considered for selection are **reliability**, the **quality** of supplies, and the ability to meet the required **technical** and regulatory requirements. For critical suppliers or outsourced activities, Flaem Nuova may carry out assessment visits and process or product audits, including through qualified third-party bodies, in order to verify the maintenance of the required standards and the proper management of processes.

Particular attention is dedicated to **outsourcing processes** and external services that may affect product quality and compliance. In such cases, the company requires specific certifications, professional qualifications and technical

documentation, providing for verification and monitoring activities proportionate to the level of risk associated with the supplier or the service provided.

Supplier reliability is monitored over time through the collection of information on the management systems adopted, the evaluation of quality and service performance and, where necessary, through **periodic audits and inspections**.

The company also integrates social and environmental considerations into its procurement practices, providing for **specific contractual clauses** aimed at promoting responsible behavior along the supply chain.

As part of the analysis of its supply chain, the company pays particular attention to social aspects, **monitoring compliance with current legislation on working hours** and verifying that hours worked are kept within the limits established by law.



CORRUPTION AND EXTORTION

VSME B11

The company has adopted a specific policy and a **whistleblowing procedure**, aimed at ensuring the receipt, management, and handling of reports in a secure, confidential manner and in compliance with current regulations.

To support this process, the company uses a **dedicated platform**, also accessible via an application for mobile devices, which makes it possible to submit and manage reports in a structured and effective way. In order to ensure maximum transparency and impartiality in the management of reports, the company also relies on the support of an external law firm specialized in whistleblowing.

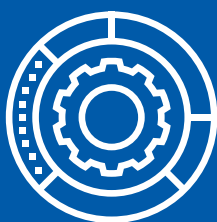
All **employees** receive adequate **communication** on how the secure and confidential reporting channels work, as well as on how to use the whistleblowing procedure.



As part of its measures to prevent corruption and extortion, the company considers the **whistleblowing** system an **essential tool** for encouraging the timely emergence of any **unlawful or non-compliant conduct**.

To complement this safeguard, the company provides training activities dedicated to employees on anti-corruption matters, strengthening the dissemination of a corporate culture based on integrity, responsibility, and transparency.

During the reporting year, the company **did not record any incidents**, legal cases, or sanctions relating to violations of law connected to money laundering or corruption. This result confirms the company's ongoing commitment to maintaining high standards of integrity, transparency, and regulatory compliance, in line with the anti-corruption policies adopted.



VALIDATED METHODOLOGY APPLIED

For information: info@finserviceesg.com





VALIDAZIONE DEL
“DISCIPLINARE FINSERVICE ESG”
VALIDATION OF
“FINSERVICE ESG TECHNICAL RULE”

RINA SERVICES S.p.A., sulla base delle valutazioni condotte dai suoi tecnici, dichiara che il
RINA SERVICES S.p.A., on the basis of the assessments carried out by its technical personnel, declares that the

“DISCIPLINARE FINSERVICE ESG”

Rev.01 del 07/04/2025

dell'Organizzazione
of the Organisation

FINSERVICE ESG S.r.l.

Via Baldassarre Castiglioni, 3 - 46100 - Mantova (MN) - Italia

è finalizzato a descrivere la metodologia sviluppata tenendo in considerazione quanto indicato in specifici documenti normativi di carattere volontario disponibili in ambito ESG quali, CDP, EcoVadis, SFDR, "Dialogo di sostenibilità tra PMI e banche" e quanto indicato nei documenti di riferimento in ambito di rendicontazione obbligatoria e volontaria quali la Direttiva CSRD, gli ESRS, il D.Lgs. 125/2024, il GRI, il SASB e il VSME. Esso fornisce una coerente rappresentazione dei dati e delle informazioni per la gestione dei processi secondo i requisiti in essa definiti.

It aims to describe the methodology developed taking into account the indications provided in specific voluntary regulatory documents available in the ESG field such as CDP, EcoVadis, SFDR, 'Sustainability Dialogue between SMEs and Banks' and the indications in the reference documents in the field of mandatory and voluntary reporting such as the CSRD Directive, ESRS, Legislative Italian Decree 125/2024, GRI, SASB, and VSME. It provides a coherent representation of information and data for managing processes according to the requirements defined therein.

Nel Rapporto di validazione N° 2025/CITBO/194 Rev. 03 dell'11/04/2025 e relativi allegati sono riportati i risultati della verifica e una sintesi delle attività svolte e delle evidenze oggettive acquisite. L'attività svolta non comprende la validazione della piattaforma digitale "Finservice ESG" v2025.10.3 su cui è stata implementata la metodologia "Disciplinare Finservice ESG" in versione finale rev.01 del 07.04.2025.

The validation Report No. 2025/CITBO/194 Rev. 03 dell'11/04/2025 and related annexes, contains the results of the verification and a summary of the activities carried out and of the objective evidence acquired. The activity carried out does not include the validation of the digital platform 'Finservice ESG' v2025.10.3 on which the methodology 'Disciplinare Finservice ESG' in its final version rev.01 on 07.04.2025 has been implemented.

Data di rilascio/Date of issue: 14/04/2025

Form: SR_STM-G4 (02/201

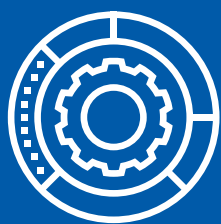
Marco Gandini

Head of Lombardy & Emilia-Romagna Certification

Form: CERT-02/2018

The calculation methodology has been subject to methodological validation by RINA, limited to the scope and purposes set out in the methodological documentation. This validation does not constitute certification, assurance, a declaration of conformity, validation of the data provided by the company, or an ESG rating for the individual company assessed.

The organisation uses artificial intelligence tools solely to support its research, analysis, verification and drafting activities. The data used for ESG reporting is collected and validated by authorised staff through traceable processes. All content generated or modified with the aid of AI is subject to human review and approval prior to publication.



GLOSSARY

This appendix summarizes the acronyms used within the ESG Report



Acronym	Definition
CDP	Carbon Disclosure Project
CO2	Carbon Dioxide
CSRD	Corporate Sustainability Reporting Directive
GOV-1 Disclosure Requirement	Disclosure Obligation - The Role of Administration, Management, and Oversight Bodies
GOV-5 Disclosure Requirement	Disclosure Requirement - Risk Management and Internal Control Management on Sustainability Reporting
SBM-1 Disclosure Requirement	Disclosure Requirements - Market Position, Strategy, Business Model, and Value Chain
IRO-1 Disclosure Requirement	Disclosure Requirement - Description of Processes to Identify and Evaluate Material Impacts, Risks, and Opportunities
DNSH	Do no significant harm
EFRAG	European Financial Reporting Advisory Group
EMAS	Eco-Management and Audit Scheme
ESRS	European Sustainability Reporting Standards
ESRS 1	European Sustainability Reporting Standard 1: General Requirements
ESRS 2	European Sustainability Reporting Standard 2: General Information
ESRS E1	European Sustainability Reporting Standard E1: Climate Change
ESRS E2	European Sustainability Reporting Standard E2: Pollution
ESRS E3	European Sustainability Reporting Standard E3: Water and Marine Resources
ESRS E4	European Sustainability Reporting Standard E4: Biodiversity and Ecosystems

ESRS E5	European Sustainability Reporting Standard E5: Resource Use and Circular Economy
ESRS G1	European Sustainability Reporting Standard G1: Corporate Conduct
ESRS S1	European Sustainability Reporting Standard S1: Own Workforce
ESRS S2	European Sustainability Reporting Standard S2: Workers in the Value Chain
ESRS S3	European Sustainability Reporting Standard S3: Affected Communities
ESRS S4	European Sustainability Reporting Standard S4: Customers, Consumers, and End Users
EU	European Union
GHG	Greenhouse Gases
GRI	Global Reporting Initiative
IFRS	International Financial Reporting Standards
ISO	International Organization for Standardization
ISSB	International Sustainability Standards Board
SDGs	Sustainable Development Goals

Table of terms defined by the ESRS	Definition	ESRS
Actions	The actions refer to: 1) actions and action plans (including transition plans) undertaken to ensure that the enterprise achieves its set goals and through which the enterprise seeks to address material impacts, risks, and opportunities; and 2) decisions supporting these actions with financial, technological, human, or other resources.	ESRS 1 General requirements
Stakeholders in the value chain	Value chain actors are individuals or entities upstream or downstream of the value chain. An entity is considered downstream of the enterprise (e.g., distributors, customers) when it receives products or services from the enterprise; it is considered upstream of the enterprise (e.g., suppliers) when it provides products or services used in the development of the enterprise's own products or services.	ESRS 1 General requirements
Administrative, management and supervisory bodies	The governing bodies with the highest decision-making authority in the enterprise, including its committees. If there are no administrative, management or supervisory bodies of the enterprise, the chief executive officer and, if such a function exists, the deputy chief executive officer should be included. In some jurisdictions, governance systems consist of two levels, where supervision and management are separate. In such cases, both levels are included in the definition of administrative, management and supervisory bodies.	ESRS 2 General Information

Affected communities	People or groups living or working in the same area that has been or may be affected by the operations of a reporting enterprise or its value chain. Affected communities can range from those living near the company's operations (local communities) to those living at a distance. Affected communities include both indigenous populations directly and potentially affected.	ESRS S3 Affected communities
Atmospheric pollutants	Direct emissions of sulfur dioxide (SO ₂), nitrogen oxides (NO _x), non-methane volatile organic compounds (NMVOCs), and fine particulate matter (PM _{2.5}) as defined in Article 3, points 5 to 8, of Directive (EU) 2016/2284 of the European Parliament and of the Council; ammonia (NH ₃) as indicated in that directive; and heavy metals (HM) as indicated in Annex I of that directive.	ESRS E2 Pollution
Corruption	To induce someone dishonestly to act in one's favor by giving them a gift of money or another incentive.	ESRS G1 Business Conduct
Business Model	The system of transforming inputs by the enterprise through its set of business activities into outputs and outcomes aimed at fulfilling the strategic objectives of the enterprise and creating value over the short, medium, or long term. The company may have one or more business models.	ESRS 2 General Information
Trade relations	The relationships that the enterprise maintains with business partners, entities within its value chain, and any other non-state or state entity directly connected to its business operations, products, or services. Business relationships extend beyond direct contractual relationships and include indirect relationships within the enterprise's value chain, beyond the first level, and equity positions in joint ventures or investments in corporate entities.	ESRS 1 General requirements
Carbon dioxide equivalent (CO₂)	The amount of carbon dioxide (CO ₂) emissions that would cause the same integrated radiative forcing or the same temperature change, over a specific time horizon, as a quantity emitted of a greenhouse gas (GHG) or a mixture of GHGs. CO ₂ eq is the universal unit of measurement used to indicate the global warming potential (GWP) of each greenhouse gas, expressed in terms of the GWP of one unit of carbon dioxide. It is used to assess whether releasing (or avoiding releasing) different greenhouse gases has an equivalent impact on a common basis.	ESRS E1 Climate change
Child labor	Child labor refers to work that deprives children of their childhood, potential, and dignity, and is detrimental to their physical and mental development. It includes work that: i. is mentally, physically, socially, or morally dangerous and harmful to children; and/or ii. interferes with their schooling: depriving them of the opportunity to attend school; forcing them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work. For the purposes of this definition, a child is defined as a person under the age of 15 or the completion of compulsory schooling, whichever is higher. There may be exceptions in some countries where economies and educational structures are not sufficiently developed, and a minimum age of 14 years is applied. These exceptional countries are specified by the International Labor Organization (ILO) in response to a special request from the concerned country and in consultation with representative employers' and workers' organizations.	ESRS S1 O wn workforce
Circular economy	An economic system in which the value of products, materials, and other resources of the economy is maintained for as long as possible, improving their efficient use in production and consumption, thereby reducing the environmental impact of their utilization, minimizing waste, and the release of hazardous substances throughout their life cycle, including through the application of the waste hierarchy.	ESRS E5 Resource use and Circular economy

Principles of the circular economy	The circular economy is based on three principles, guided by design: (i) Eliminate waste and pollution; (ii) Keep products and materials in use at their highest value; and (iii) Regenerate natural systems.	ESRS E5 Resource use and Circular economy
Climate change adaptation	Climate change adaptation refers to the process of adjusting to actual and expected climate change and its impacts. (based on Regulation (EU) 2020/852)	ESRS E1 Climate change
Climate change mitigation	Climate change mitigation refers to the process of reducing greenhouse gas emissions and containing the increase in global average temperature well below 2°C and pursuing efforts to limit it to 1.5°C above pre-industrial levels, as stipulated by the Paris Agreement. (based on Regulation (EU) 2020/852)	ESRS E1 Climate change
Collective bargaining	Collective bargaining encompasses all negotiations conducted between an employer, a group of employers, or one or more employers' organizations on one side, and one or more trade unions or, in their absence, worker representatives duly elected and authorized by them in accordance with national laws and regulations on the other side, for: determining working conditions and terms of employment; and/or (i) determining working conditions and terms of employment; and/or (ii) regulating relationships between employers and workers; and/or (iii) governing relationships between employers or their organizations and a workers' organization or workers' organizations.	ESRS S1 O wn workforce
Consumer	Consumers are individuals who purchase, consume, or use goods and services for personal use, either for themselves or others, and not for resale or commercial purposes. Consumers include both actual and potential end-users.	ESRS S4 Consumers and end-users
Corporate Culture	Corporate culture expresses goals through values and beliefs. It guides the company's activities through the sharing of group conventions and norms, such as values or mission statements or a code of conduct.	ESRS G1 Business Conduct
Corruption	Abuse of entrusted power for private gain, which may be instigated by individuals or organizations. It includes practices such as facilitation payments, fraud, extortion, collusion and money laundering. It also includes the offering or receiving of any gift, loan, reward or other advantage to or from any person as an inducement to do anything dishonest, illegal or a breach of trust in the conduct of the company's business. This may include benefits in cash or in kind, such as free goods, gifts and holidays, or special personal services, provided in order to obtain an improper advantage, or which may involve moral pressure to receive such an advantage.	ESRS G1 Business Conduct

Glossary:

Italian

English





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