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## ENVIRONMENT, HEALTH AND SAFETY

0	27/05/2026	Funzione Aziendale L.Palma	Funzione Aziendale M.Selleri	 Group CEO S.Susani	 Chairman S.Iasi
<b>REV.</b>	<b>DATE</b>	<b>PREPARED</b>	<b>CHECKED</b>	<b>APPROVED</b>	<b>APPROVED</b>
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# 1 Introduction

## 1.1 Purpose

Maccaferri Group (hereinafter also “Maccaferri” or the “Group”) operates in accordance with high environmental, ethical and governance standards, creating value for shareholders while responsibly managing the impacts generated on all stakeholders.

The Group places the protection of people’s health, safety and wellbeing at the centre of its activities and considers environmental protection - including biodiversity - and the promotion of energy efficiency as fundamental conditions for achieving its objectives and generating sustainable value for all internal and external stakeholders.

In this regard, Maccaferri is committed to environmental protection, resource efficiency, and the safeguarding of the health and safety of employees, contractors, customers and the neighbouring communities surrounding its operational sites. This Policy defines these commitments and sets out the responsibilities that all individuals and entities acting on behalf of Maccaferri are required to respect.

## 1.2 Scope and Applicability

This Policy applies to all companies of the Maccaferri Group, both in Italy and abroad, and defines the principles, objectives and minimum EHS standards to be observed across the Group.

All recipients, as well as any individual or entity acting on behalf of the Maccaferri Group - including employees, suppliers, contractors and subcontractors, consultants, agency workers and business partners - are required, without distinction or exception, to comply with this Policy and to uphold its health, safety, environmental and energy principles within their respective roles and jurisdictions.

The implementation of local procedures, operating standards and control activities must be aligned with this Policy and carried out in accordance with applicable national and international regulatory framework, relevant international HSE best practices and specific organizational context. All parties involved in operational activities for or on behalf of the Group are expected to consistently promote the protection of people, the environment and the efficient use of resources.

This Policy applies to all Group operations worldwide, as well as to joint ventures where the Group holds a controlling interest, whose governing bodies must ensure prompt adoption of its principles. Where full alignment is not feasible, companies may request partial or total derogations or adaptations, providing detailed justification and submitting the request in advance to the parent company for approval.

In joint ventures where the Group does not exercise control, Maccaferri will actively encourage adherence to the Policy’s standards.

Furthermore, the Policy must be taken into consideration when establishing new business relationships, including mergers, acquisitions, joint ventures, or engagements with new customers and suppliers. The initiation of such relationships requires an assessment of the HSE practices, risk profile and overall reliability of potential partners,

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ensuring alignment with the Group's expectations before proceeding. All strategic and operational decisions shall be supported by environmental and safety impact assessments, benchmarking against recognised sector good practices and alignment with certified international standards, thereby ensuring a consistent and integrated approach to sustainability throughout the value chain.

### 1.3 Roles and Responsibilities

Responsibilities for the implementation and application of HSE regulations and procedures include, but are not limited to the following:

<i>Role</i>	<i>Responsibility</i>
<i>CEO</i>	<ul style="list-style-type: none"> <li>• Primary responsibility for overseeing the implementation of this Policy</li> <li>• In charge of reviewing amendments to this Policy, proposed by the Chief Sustainability Officer, to the Board</li> <li>• In charge of notifying the Board in case of incidents or material non-compliances</li> <li>• In charge of reporting annually to the Board about the implementation and effectiveness of the Policy</li> <li>• Responsible for identifying the main corporate risks, taking into account the characteristics of the activities carried out by the company and its subsidiaries, and submitting them periodically to the Board of Directors for examination</li> <li>• Responsible for implementing the guidelines defined by the Board of Directors, by designing, implementing, and managing the internal control and risk management system, and verifying its adequacy and effectiveness</li> <li>• May request the Internal Audit to carry out checks on specific operational areas, giving simultaneous notice to the Chairman of the Board of Directors</li> </ul>
<i>Chief Sustainability Officer</i>	<ul style="list-style-type: none"> <li>• In charge of overseeing the periodic review process of this Policy</li> <li>• In charge of proposing amendments to this Policy to the CEO for validation and for defining the methods and timelines governing the review process</li> <li>• In charge of preparing an annual report to the Board on the implementation and effectiveness of the Policy, including relevant KPIs and KRIs as well as the reporting of non-compliances and related corrective actions</li> </ul>
<i>Audit Committee / Compliance Manager</i>	<ul style="list-style-type: none"> <li>• In charge for conducting audits on HSE matters across Group companies, periodically assessing the level of implementation and compliance with this Policy</li> <li>• In charge of reporting the results of such audits, including any</li> </ul>

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<i>Line Management</i>	<p>identified non-compliances and recommended corrective actions, to the Management and to the Board of Directors</p> <ul style="list-style-type: none"> <li>• Provide guidance and support to the application of this Policy, including the identification of individuals responsible for its implementation and monitoring across the relevant areas</li> <li>• Accountable for the EHS performance within their respective operations and locations</li> <li>• Investigate and assess the EHS status of any company deemed as an opportunity for an acquisition, partnership or joint venture</li> </ul>
<i>Business Units and Operations</i>	<ul style="list-style-type: none"> <li>• Establish appropriate responsibility for the Policy in all facilities and set objectives for operational performance</li> <li>• Maintain overall governance process including controls, conformance reviews and compliance audits</li> <li>• Define proper investments Opex &amp; Capex to assure the policy compliance and local regulations compliance</li> <li>• Form a central register of key EHS-related regulations including required specific EHS permits and licences</li> <li>• Ensure appropriate arrangements to track and respond to anticipated changes of applicable regulations</li> </ul>
<i>People and Organization</i>	<ul style="list-style-type: none"> <li>• Provide training on this Policy regularly at local and global level</li> <li>• Promote awareness and ensure compliance with this Policy</li> </ul>

## 2 Principles

Maccaferri's sustainable development strategies pursue continuous improvement in occupational health and safety and environmental aspects, in accordance with applicable local and national regulations and international standards such as:

- the OECD Guidelines for Multinational Enterprises
- the United Nations Global Compact
- the UN Guiding Principles on Business and Human Rights
- the ILO Declaration on Fundamental Principles and Rights at Work

### 2.1 Safeguarding Health & Safety

- Provide employees and contractors with safe working conditions and ensure that they respect such conditions, including the obligation to maintain workplaces that are healthy, compliant with regulatory requirements and equipped with the necessary preventive and protective measures appropriate to their respective roles
- Promote and support the implementation of programs to maintain and improve the health and safety of

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our employees and contractors including control of industrial hazards and risks and ensure that both employees and contractors fulfil their specific responsibilities in applying safe work procedures and using protective equipment as required

- Develop products and services that do not harm the health and safety of our customers in any phase of the product life cycle (e.g. when storing, using or disposing of our products)
- Protect the health and safety of our community and neighbours, including other business premises, residents, school and other such stakeholders located in the vicinity of our operations, by adopting measures that ensure safe and hygienic operating conditions at all sites
- Provide the conditions for road safety and a secure transport of people and goods
- Contribute to the pursue of Health and Safety targets (e.g. reductions in lost time due to health and safety incidents) that can protect the value of the company for every stakeholder

## 2.2 Protecting the Environment

Elaborate a sustainable development strategy that contributes to the protection of the environment both in our own operations and across our entire value chain. The strategy should particularly consider the topics below.

## 2.3 Climate Change

- Set science-based GHG emission reduction targets, supported by specific performance indicators and climate resilience strategies to monitor progress and mitigate climate-related risks
- Implement energy consumption reduction plans, including the adoption of high-efficiency technologies, process optimization and improved energy management practices, including the design and procurement of energy-efficient products and services to enhance energy performance
- Optimize value chain logistics to reduce indirect emissions and to monitor the associated environmental impact throughout the supply network
- Increase the use of renewable energy by sourcing from certified renewable providers and, where feasible, developing on-site renewable generation systems
- Foster climate change awareness and innovation among employees and stakeholders, encouraging behaviours, solutions and initiatives that support the Group's decarbonization and adaptation objectives
- Continuously assess and transparently report climate change indicators
- Assess and plan for the potential impacts of climate change on the company's operations and supply chain, and develop strategies to enhance resilience

## 2.4 Air, water, soil, and waste

- Apply principles of precaution and prevention and rectify pollution at source when identified
- Establish specific measures for the monitoring, and reduction of atmospheric emissions, the protection of water resources, and the sustainable management of soil, ensuring their effective implementation across all operational sites
- Provide dedicated training programs to ensure awareness and proper application of these measures by

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employees and contractors

- Use every resource sparingly, avoiding unnecessary waste and encouraging the development of circular economies as much as possible both in own operations and throughout the value chain
- Ensure safe management and disposal of waste, especially hazardous waste
- Include guidelines for the efficient management of water resources, setting specific targets for consumption, reduction and wastewater treatment
- Implement land use practices that protect soil quality and prevent erosion and pollution
- Conduct periodic assessments and audits of air, water, soil, and waste management practices to identify areas for improvement

## 2.5 Biodiversity

- Commit to protecting and conserving biodiversity by identifying and assessing any negative impacts on ecosystems, species, and habitats associated with company activities and applying a mitigation hierarchy approach (avoid, minimize, restore and offset) to all operations including those of any suppliers involved
- Implement sustainable land use practices to minimize habitat destruction and consider the impacts of land use changes on biodiversity
- Source raw materials and products responsibly, giving preference to suppliers who follow sustainable and biodiversity-friendly practices
- Prevent or otherwise remedy environmental damage to protected species or to natural habitats

## 2.6 Integrating Environment, Health & Safety in production and operations

- Ensure that EHS considerations are integrated into all operational phases, including product development, process design, procurement, manufacturing, and capital investment projects at an early stage
- Take account of and [meet/aspire to attain or exceed] recognised industry good practice on EHS issues in our specific sector
- Meet the requirements of any EHS-related external certification schemes (e.g. ISO certifications) that the company has committed to obtain/maintain

## 2.7 Forming a network of responsible business partners

- Meet any specific EHS-related criteria or 'green procurement' policies established by our customers, where the company has been informed of these and has made corresponding warranties and commitments
- Prioritize suppliers and business partners that actively minimize the environmental impact of their activities and products and respect health and safety requirement of Maccaferri
- Promote good EHS management practices with business partners

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### 3 Breach of this Policy

Knowledge and compliance with the principles outlined in this Policy is part of the obligations arising from the employment contract with Maccaferri, which means that the relative violation constitutes a disciplinary offence and exposes employees to the relative consequences.

All employees, contractors and third parties who become aware of conduct that is not compliant with this Policy are required to report it immediately through the company's established channels.

Maccaferri ensures the confidentiality of the whistleblower's identity and adopts all protections required by applicable whistleblowing legislation, including the prohibition of any form of retaliation against those who report concerns in good faith.

### 4 Reporting

#### Incident reporting

The CEO will notify the Board as soon as possible in the event of:

- any material breaches of this Policy
- any significant breaches of applicable EHS regulations including enforcement notices, legal proceedings or fines
- any major environmental incidents
- any health and safety incidents resulting in serious injury or fatality
- any negative media articles, stakeholder complaints, consumer campaigns or NGO activity related to EHS issues at the company, which may damage the company's reputation and brand

#### Annual reporting

The CEO will provide the Board with a short annual report on the company's implementation of this Policy. The format and content of this annual report shall be agreed with the Board in advance but at minimum is likely to include:

- Confirmation that the company has complied with the Policy during the reporting period or, if this is not the case, information on those aspects of the company's operations where challenges or problems have been encountered, the impact of these issues and details of the corrective action taken and its effectiveness
- Any external developments relevant to this Policy that could be of strategic importance in the near future including any EHS issues with significant financial, legal or commercial implications
- Any suggested changes or improvements to this Policy for Board consideration
- Performance against any EHS objectives and targets and other relevant indicators including Health and safety statistics (e.g. lost time incidents).

### 5 Queries

Should you have any questions regarding this Policy or the supporting principles please contact:

[L.palma@maccaferri.com](mailto:L.palma@maccaferri.com)

Approved: 27<sup>th</sup> May 2026

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