

HSE&SA POLICY

APPROVED BY THE CHIEF EXECUTIVE OFFICER OF THE MAIRE GROUP
ON 16 DECEMBER 2025



1 SCOPE

The MAIRE Group's HSE&SA Policy is aimed at guaranteeing health, safety, environmental protection and social accountability within the Group, with the aim of continuously improving working conditions, minimising environmental impact and promoting a culture of safety and sustainability. This Policy is consistent with the commitments defined by the Group in the Sustainability Policy, which it joins for the protection of the health and safety of people, the environment and social issues along the value chain.

In addition, the Policy incorporates the principles and values of the Code of Ethics and the Policies adopted by the MAIRE group, which define its identity and culture, as detailed in the references section of the document.

1.1 Applicability and dissemination

This Policy applies to MAIRE and to all Group companies that are committed to promoting its principles to all stakeholders in upstream and downstream activities, along the value chain.

All employees, interns, collaborators, temporary workers and anyone performing work activities for a MAIRE Group company, acting in its name and on its behalf, must strictly observe and actively apply these principles in all interactions with colleagues, clients, suppliers, partners, local communities and any other individual or entity involved in their activities.

This Policy is communicated to all individuals working for the Group, including through dedicated training opportunities, and is made available on MAIRE's corporate website to all stakeholders, to ensure full awareness and enhance its dissemination.

1.2 Approval and Review

The HSE&SA Policy is approved by the Chief Executive Officer of the MAIRE group.

The document is revised whenever regulatory updates, strategic developments or contextual changes require or recommend revisions, involving the competent corporate functions.

1.3 Governance

MAIRE is committed to actively orienting its corporate "*purpose*" towards the integration of sustainability and *stakeholder* expectations within its business model, acting on both internal and external dimensions of the company.

MAIRE's *corporate governance* system is structured to ensure an effective and transparent management and control model, oriented towards sustainable success. In line with the best international practices and the principles and recommendations of the Corporate Governance Code of Borsa Italiana S.p.A. to which MAIRE adheres (the "**Code**"), the Company's approach to sustainability is integrated into the corporate strategy, with the aim of generating long-term value for the benefit of shareholders, taking into account the interests of relevant *stakeholders*.

MAIRE's sustainability governance is based on a system of roles, responsibilities and decision-making processes that ensures the oversight of environmental, social and *governance issues* within the organisational structure. This system promotes the effective integration of sustainability factors into strategic decisions and in the Company's operational and management management, contributing to the creation of shared value and the mitigation of risks related to the environmental and social impacts of the Group's activities.

MAIRE adopts a structured approach to sustainability management, which involves the Board of Directors, the Control, Risk and Sustainability Committee, management and operational functions, ensuring effective oversight of sustainability issues and, thanks to the Functions in charge, constant monitoring of sustainability performance, in line with the strategic objectives and commitments undertaken by the Group.

In particular, it is the responsibility of the Board of Directors to define and approve, on an annual basis and with the support of the Control, Risk and Sustainability Committee, the so-called "Double Materiality Matrix"

for the identification of the impacts, risks and opportunities to be placed at the basis of the Group's long-term sustainability strategies and, consequently, of the MAIRE Group's Sustainability Reporting.

In addition to the above, the Board of Directors monitors the progress of the results with respect to the sustainability objectives, ensuring alignment with the industrial strategy and reference scenarios. In addition, with the support of the Control, Risk and Sustainability Committee, it annually updates the MAIRE Group's Sustainability Plan, defining the Group's strategic objectives in relation to significant sustainability issues in the medium and long term. These objectives are integrated with the Group's long-term industrial strategies, which are also updated annually by the MAIRE Board of Directors, which, to this end, takes into account, among other things, the evolution of the geopolitical context, the markets and *the business sectors* in which the Group operates, at a global level.

The proposals for the Board of Directors and the Control, Risk and Sustainability Committee relating to the so-called "Double Materiality Matrix" and the related strategies are defined with the support of MAIRE's Group Sustainability & Corporate Advocacy Function on the basis of the so-called "*stakeholder engagement*" activities carried out annually by the latter with the involvement of both *stakeholders* internal and external. The same Function is also assigned the task of planning and monitoring the Group's sustainability initiatives. This Function operates in close coordination with MAIRE's Sustainability Reporting, Performance and Disclosure Function, which is responsible for preparing, with the support of the Group Sustainability and Corporate Awareness Function, the Group's Sustainability Reporting.

The Board of Directors also periodically supervises, with the support of the Control, Risk and Sustainability Committee and the Functions in charge: i) the status of implementation of the strategic sustainability initiatives defined for the Group, on the basis of the so-called "Double Materiality Matrix" approved, and ii) any updates made to the assessments relating to risks and opportunities.

MAIRE is also equipped with an internal control and risk management system intended as the set of rules, procedures and organizational structures aimed at effective and effective identification, measurement, management and monitoring of the main risks, in order to contribute to the sustainable success of the Company defined in line with the Company's strategies, including those of sustainability, whose adequacy and effectiveness are verified every six months.

In addition to the Board of Directors and the Control, Risk and Sustainability Committee, the subjects of the internal control system described above also include - among others - the Board of Statutory Auditors, the Chief Executive Officer (in his capacity as *Chief Executive Officer* of MAIRE), the Manager responsible for preparing the company's financial reports and the Group Risk Management, In Country Value and Special Initiatives Function of MAIRE; this Function which, *inter alia*, has the role of supporting in the process of identifying impacts, risks and opportunities relevant to the updating of the MAIRE Group's Sustainability Plan.

The Company, in defining its *governance system*, has also established:

- an Internal Sustainability Committee, a strategic advisory body at the service of MAIRE's Chief Executive Officer, with the task of providing support in the definition of policies and strategies aimed at sustainable management of the *business*, development programmes, guidelines and objectives, including in terms of *Corporate Giving*, monitoring their achievement, as well as analysing the dynamics of interaction with stakeholders.
- an Internal Committee to oversee the Internal Control and Risk Management System, with advisory functions, in which the main corporate functions part of the System participates, at the service of the *Chief Executive Officer* of MAIRE, with the task of supporting the corporate functions involved in the internal control and risk management system (including those related to sustainability issues).

2 COMMITMENT

MAIRE is committed to providing workplaces that comply with the applicable legal requirements and the highest international standards of health, safety, environment and social accountability. The Group therefore pays particular attention to the protection of the environment, the health and safety of employees and third parties involved in its activities. MAIRE is committed to improving the working conditions of its staff, recognizing employees as a key resource, defending their rights and fostering their professional and personal growth throughout the Group.

MAIRE is dedicated to preventing emergency situations in the workplace and creating comprehensive emergency response plans to quickly manage incidents and prevent harm to people and the environment. In addition, for the management of high-risk substances, the Group establishes comprehensive and rigorous guidelines that cover the entire life cycle of substances, from entry to handling to disposal, in order to prevent, monitor and manage any emergency situations and minimize negative impacts.

MAIRE's approach, promoted by the "Safethink HSE Awareness Program", aims to facilitate the general strengthening of awareness on health, safety, environmental and social accountability issues and to ensure that the HSE&SA vision is applied by everyone in every single activity. Through a series of training activities, seminars and information campaigns, the program aims to create a shared culture of security and social accountability.

"Safethink" emphasizes the importance of conscious and proactive behavior on the part of everyone, so that each individual can contribute to maintaining a safe and sustainable work environment. The "Safethink" vision translates into tangible actions that involve all levels of the company, promoting a strong awareness of risks and best practices to prevent them.

Compliance with all the commitments made is guaranteed by the presence of the HSE&SA Management System applied by the companies of the Group, according to the international standards UNI EN ISO 14001, UNI EN ISO 45001 and SA 8000, and aimed at the continuous improvement of all processes relating to HSE and Social Accountability issues.

The Group is committed to promoting compliance with HSE&SA principles throughout the value chain, requiring its suppliers to operate in compliance with the requirements of this policy, the Supplier Code of Conduct and the relevant regulations.

The Policy, in addition to ensuring full compliance with national and international laws, local regulations, agreements with authorities and the customer's contractual requirements, incorporates the principles and values of the Code of Ethics, the Human Rights, Human Resources, Diversity, Equity and Inclusion, Supply Chain and Sustainability Policy policies adopted by the MAIRE group and which define its identity and culture.

The Group's commitment to these issues is periodically renewed by adhering to the Ten Principles of the United Nations Global Compact and implementing a clear vision of Sustainability with specific commitments and objectives in line with the related Sustainable Development Goals (SDGs).

3 OBJECTIVES AND STRATEGIES

With the implementation of the HSE&SA Management System, MAIRE is able to effectively monitor and address the requirements and expectations of all the Group's key stakeholders, including employees, customers, suppliers and other relevant parties. This commitment is realized through a series of specific actions aimed at:

- Support an approach to reduce the risk of accidents and their impact, while continuously assessing and mitigating health and safety impacts. Provide specific training, sharing lessons learned and best practices. Promote awareness programs to improve skills and engagement, develop and maintain safety values, and promote HSE initiatives among all personnel and workers in the value chain.
- Provide internal and external stakeholders with a dedicated channel for sending comments, recommendations, reports or complaints to improve the work environment. This commitment is further demonstrated by the implementation of digital and physical channels, managed through a comprehensive process that ensures maximum transparency.

In this context, the Group defines a process to correctly identify and manage high-risk substances through appropriate controls and adequate reporting, while monitoring potential HSE emergency situations, planning actions to mitigate or prevent the environmental consequences of accidents in line with the compliance requirements of the HSE&SA Management System. It also ensures a prompt response to emergencies at all levels, defining all the resources necessary to manage the various situations.

To translate the Group's principles into concrete actions, MAIRE is committed to:

- **To ensure the full adherence** of the Group companies to the Policies, Plans, and Objectives defined by MAIRE.
- **Constantly monitor** the effectiveness of the HSE&SA Management System and promote its continuous improvement.
- **Manage hazards**, reduce health and safety risks and minimize environmental impact, and promote a prevention-based approach.
- **Apply a zero-tolerance policy** for unsafe or non-compliant behavior, applying the guidelines of the "Safethink HSE Awareness program". MAIRE applies the Stop Work Authority on site work for everyone to promote a proactive approach to safety to make every activity more aware and safer;
- **Provide continuous training** to ensure the know-how, information sharing and best practices of personnel in the field of health, safety, and social accountability. MAIRE is committed to organizing training activities for the entire Group.
- **Select suppliers and subcontractors** based on the requirements of the Group's HSE&SA Management System, ensuring that they operate in accordance with the requirements of the HSE and SA8000 standards and the Supply Chain Policy.
- **Collect and share** data on the HSE&SA performance of all Group Companies to all stakeholders through Sustainability Reporting.
- **Implement the Behavioral and Leadership approach** that measures the safety and performance of leadership on site, to provide feedback, coaching and reinforcement of safe behaviors;
- **Implement new market technologies**, including Artificial Intelligence, to facilitate the implementation of the requirements of the HSE&SA Management System and adherence to the Safethink rules for life. This allows for improved controls and immediate information on the dynamics that drive workforce behavior, preventing conditions that lead to accidents.

4 TRANSPARENCY AND REPORTING MECHANISMS

Stakeholders who become aware of any violation of the principles set out in this Policy are invited by the Group to make a report.

These reports can be made - even anonymously - through the following channels:

- Whistleblowing platform, available at: [MAIRE Group - Whistleblowing](#);
- Form SA 8000, available at the link [Human Rights and Social Accountability | MAIRE](#);
- Ordinary mail: MAIRE S.p.A., Group Corporate Affairs, Governance, Ethics & Compliance Department, Via Gaetano De Castillia 6/A, 20124, Milan, (Italy).

Reports are managed as required by the Group's "Whistleblowing" Procedure and by the Social Accountability 8000 management system for certified MAIRE group companies.

Any form of direct or indirect retaliation, discrimination or penalization is prohibited against those who have made a report, for reasons linked, directly or indirectly, to the report itself.

5 REFERENCES

This Policy is based on internationally recognised principles and standards and is integrated with the policies and regulatory instruments adopted by the Group.

In particular, the Policy is inspired by:

- ISO 14001 – Environmental Management System
- ISO 45001 – Occupational health and safety management systems
- Social Accountability 8000 Standard
- UN 2030 Agenda for Sustainable Development, for sustainable development and the related United Nations Sustainable Development Goals (SDGs)
- The Ten Principles of the United Nations Global Compact
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and Fundamental Conventions
- Universal Declaration of Human Rights
- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights

This Policy is supplemented by the following Group strategic documents:

- Code of Ethics
- Supplier Code of Conduct
- Sustainability Policy
- Human Rights Policy
- Human Resources Policy
- Diversity, Equity and Inclusion Policy
- Supply Chain Policy
- Whistleblowing procedure

This Policy is implemented in the Manual of the HSE&SA Management System and related internal organisational procedures of the MAIRE Group.

In addition, this Policy contributes to the implementation of the management systems to support the sustainability reporting required by Directive (EU) 2022/2464 (CSRD) and the commitments provided for by Directive (EU) 2024/1760 (CSDDD).