IRSAP

SUSTAINABILITY REPORT 2025

IRSAP

LETTER TO STAKEHOLDERS

2025 was a year characterised by a global landscape that remained complex and constantly evolving. Geopolitical tensions affecting different areas of the world, the persistent volatility of energy markets, the economic uncertainty that has affected many European countries and the growing focus on ecological transition have continued to influence the context in which we operate. At the same time, the need to reduce energy consumption, improve living comfort and accelerate the decarbonisation of buildings represents one of the most important development opportunities for our sector.

In this scenario, IRSAP confirms its belief that sustainability is not only a responsibility towards future generations, but is a fundamental element of the company's strategy and long-term value creation. Our Vision – to be the benchmark in comfort solutions for the home by integrating sustainability, technology and design – guides all our choices and concretely guides the investments we make for the future. Our business model is aimed at generating measurable effects on the environment through the reduction of energy consumption and emissions, on people through the improvement of comfort conditions in domestic and professional environments and on the economy through the creation of lasting value for customers, collaborators, partners and communities, in line with objectives and results monitored over time.

Our values, customer centricity, courage, passion, winning together, innovation and proactivity, and respect, guide our commitment to preventing and mitigating negative impacts along the value chain, while promoting responsible behaviour, respect for human rights, the health and safety of people and transparent relationships with all our stakeholders.

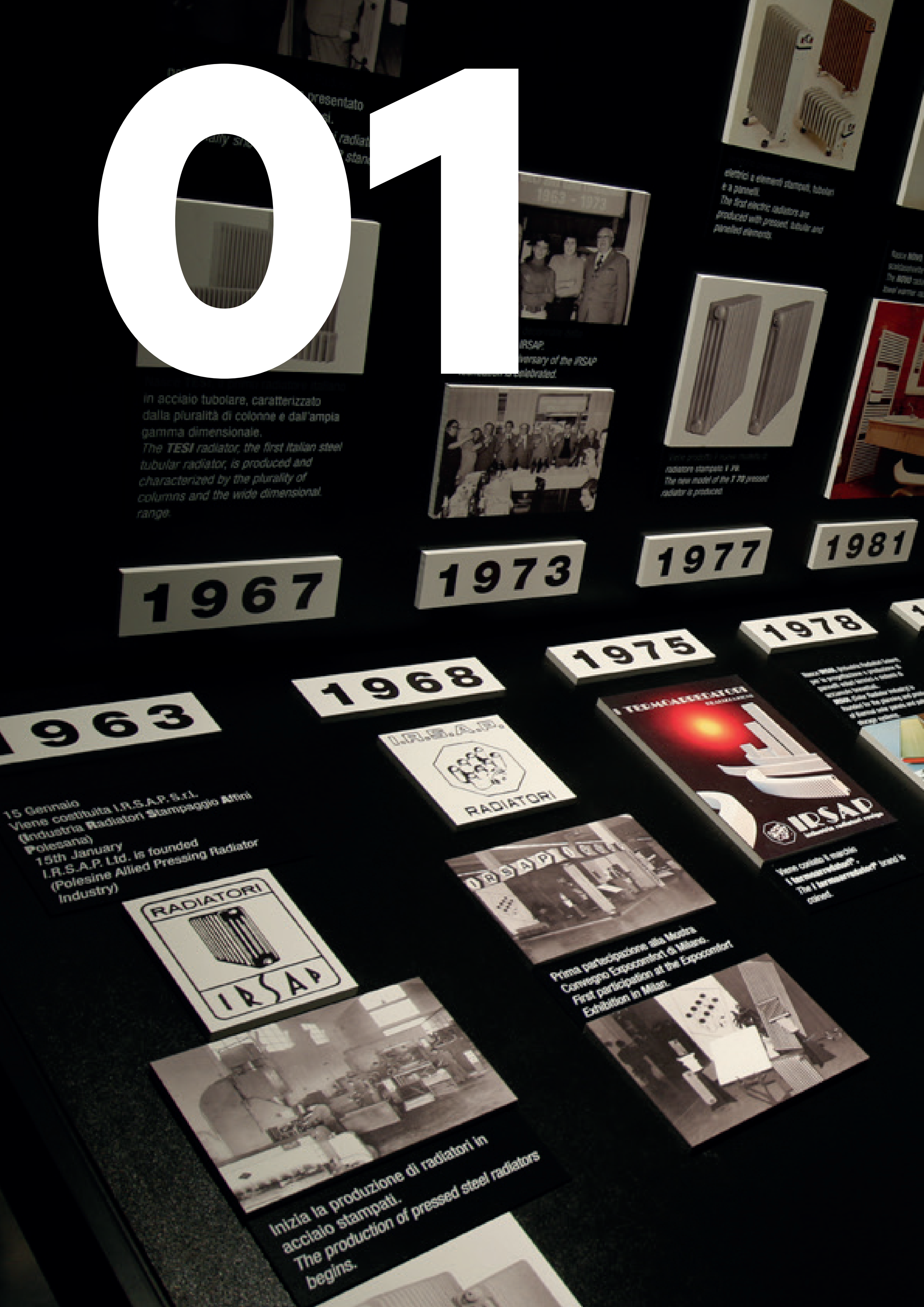
In the short and medium term, we will continue to invest in the development of technologically advanced solutions, in the efficiency of production processes, in enhancement of the skills of our people and in reduction of the environmental footprint of our activities. Our priorities are fully consistent with the goals of the United Nations 2030 Agenda, in particular those related to clean and accessible energy, industrial innovation, sustainable cities, responsible production and climate action.

We believe that sustainability challenges can only be addressed through collaboration. For this we would like to thank customers, collaborators, suppliers, partners and all the stakeholders who share this journey with us. Together we will continue to build a future where comfort, technology, design and sustainability can generate value for people, the environment and society.

Marco Rossi
CEO

CONTENTS

01



presentato
elettrici a elementi stampati, tubolari e a pannelli.
The first electric radiators are produced with pressed, tubular and panelled elements.
IRSAP
in acciaio tubolare, caratterizzato dalla pluralità di colonne e dall'ampia gamma dimensionale.
The TESI radiator, the first Italian steel tubular radiator, is produced and characterized by the plurality of columns and the wide dimensional range.
1967
1973
1977
1981
1963
1968
1975
1978
15 Gennaio
Viene costituita I.R.S.A.P. S.r.l.
(Industria Radiatori Stampaggio Affini Polesana)
15th January
I.R.S.A.P. Ltd. is founded
(Polesine Allied Pressing Radiator Industry)
I.R.S.A.P.
RADIATORI
RADIATORI
IRSAP
IRSAP
Prima partecipazione alla Mostra Convegno Expocomfort di Milano.
First participation at the Expocomfort Exhibition in Milan.
Inizia la produzione di radiatori in acciaio stampati.
The production of pressed steel radiators begins.

GENERAL INFORMATION

DRAFTING CRITERIA

BP-1 General drafting guidelines for sustainability reporting

This document constitutes the **Sustainability Reporting of the IRSAP Group,** prepared on a voluntary basis and drafted in accordance with Leg. Decree no. 125 of 6 September 2024, transposing Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 (Corporate Sustainability Reporting Directive – CSRD) and complies with the European Sustainability Reporting Standards (ESRS) developed by the European Financial Reporting Advisory Group (EFRAG) and adopted by the European Union.
Following publication of the package of proposals for the Omnibus I directive by the European Commission[1], the Community regulatory framework has introduced a revision of the application thresholds of the CSRD which does not currently determine a reporting obligation for the IRSAP Group. Nevertheless, the Group has chosen to voluntarily continue along the path of transparency and accountability, drafting the sustainability statement according to the ESRS for the second time.
The reporting has been prepared to ensure the information regarding the Group's activities is fully understandable, in accordance with the qualitative characteristics set out in ESRS 1 – Appendix B.
The document covers the **sustainability issues relevant for the 2025 financial year** (from 1 January to 31 December), in line with the scope of the **IRSAP Group Consolidated Financial Statements.** Accordingly, information of the following companies is included on a consolidated basis:

- **IRSAP S.p.A.** (hereinafter also "IRSAP" or "parent company")
- **IRSAP Industrie S.r.l.** (Romania)
- **IRSAP Iberica S.L.** (Spain)
- **IRGROUP S.a.r.l.** (France)
- **IRSAP UK Ltd** (United Kingdom)
- **BEMM GmbH** (Germany)

However, there are changes compared to the previous year, as the reporting perimeter has been **extended** and **standardised:**
- for matters related to **ESRS E1 – Climate change,** the data cover the entire scope of the Group, since commercial offices have been included in the data collection process since 2024
- for issues related to **ESR SE3 – Water and marine resources,** the perimeter includes exclusively the production plants of IRSAP S.p.A. and IRSAP Industrie S.r.l., while commercial offices are excluded as the use of water is limited to civil uses and are not significant
- for issues related to **ESRS E5-5 – Use of resources and circular economy,** the perimeter is limited to the production plants of IRSAP S.p.A. and IRSAP Industrie S.r.l., as the commercial offices do not generate significant quantities of waste
- the issues related to **ESRS S1 – Own workforce** are reported at Group level, including for the first time also the training and skills development metrics.

All changes to this reporting scope and any revisions to the information made in previous reporting periods, including the reasons for the revisions, are duly reported in the document.
The information contained in this Report includes **the material impacts, risks and opportunities** also related to **direct and indirect business relationships in the upstream and downstream value chain.** In particular, the

[1] The postponement proposal referred to in the Omnibus I package was adopted as Directive (EU) 2025/794 ("Stop-the-clock"), which postponed entry into force of the CSRD reporting obligations for certain categories of companies, and as Delegated Regulation (EU) 2025/1416 ("Quick-fix"), aimed at introducing measures to simplify the application of ESRS.

The IRSAP Group has voluntarily prepared the 2025 Sustainability Report according to ESRS standards, despite the absence of regulatory obligations. The document covers the entire Group, adopts the principle of dual relevance and provides for a progressive expansion of the information and metrics reported.

Group has analysed its value chain by structuring it **into upstream, core and downstream operating activities,** in order to ensure a broad vision consistent with the double materiality approach.
However, most of the topics reported in general refer to the Group's perimeter, both in terms of policies, objectives and actions and in terms of the scope of the quantitative metrics required.

BP-2 Disclosures in relation to specific circumstances

IRSAP has chosen to anticipate the application of ESRS with respect to the mandatory timescale which is why some **transitional provisions,** such as those relating to financial effects resulting from sustainability issues and to **Scope 3 emissions,** have not been fully implemented or are addressed in qualitative terms. These aspects will be progressively integrated in the coming years, in line with the regulatory requirements and development plan of the reporting systems [2].
All changes and any revisions to the information published in the past, including methodological changes, are duly reported in the document, as well as estimates made in the absence of direct data. In such cases, information is provided based on calculation, and, where possible, on the actions planned to improve the accuracy of the estimates in the future.

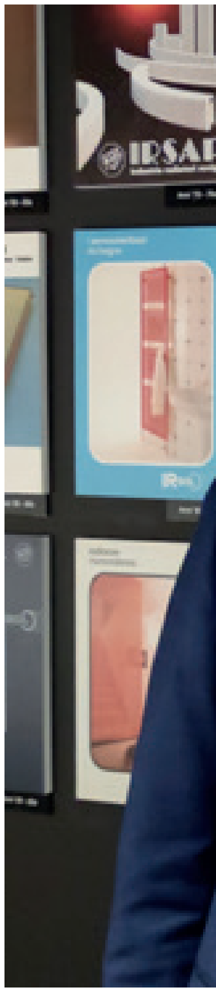
[2] According to Appendix C of ESRS 2, it is possible to report some matters in the years following the first year of mandatory reporting.

GOVERNANCE

GOV-1 Role of administrative, management and control bodies

In 2025, the governance of IRSAP was structured through two main bodies, namely the Board of Directors and Board of Statutory Auditors.
The **Board of Directors** (hereinafter also "Board of Directors") consists of three members, all male, one of whom is aged between 30 and 50 and two are aged over 50. Two of them, *Fabrizio Rossi, CEO of IRSAP, and Marco Rossi, Co-CEO,* hold executive positions as "CEO", while the third is a director without executive duties, for a percentage of independent members equal to 33.3%. The company has not adopted specific diversity policies within the Board of Directors, although it declares its commitment to exclude any form of discrimination related to ethnicity, gender, sexual orientation, religion or personal views.
The **Board of Statutory Auditors** consists of 5 **members:** 3 standing members and 2 alternate members. The Board of Statutory Auditors also entirely consists of men and represents a key component for the direction and supervision of business activities.

IRSAP's governance integrates sustainability, strategy and control, with the direct involvement of the Board of Directors and of the main company functions to ensure responsible management oriented towards continuous improvement.



GOVERNING BODIES BY GENDER	2025				
	FEMALE	MALE	OTHER	NOT REPORTED	TOTAL
Board of Directors	0	3	0	0	3
Board of Statutory Auditors	0	5	0	0	5
TOTAL	**0**	**8**	**0**	**0**	**8**
PERCENTAGE	**0%**	**100%**	**0%**	**0%**	**100%**

GOVERNING BODIES BY GENDER	2024				
	FEMALE	MALE	OTHER	NOT REPORTED	TOTAL
Board of Directors	0	3	0	0	3
Board of Statutory Auditors	0	5	0	0	5
TOTAL	**0**	**8**	**0**	**0**	**8**
PERCENTAGE	**0%**	**100%**	**0%**	**0%**	**100%**

As far as **worker representation is concerned,** in May 2023 the company Union Representation elections were held, which led to the election of six workers' representatives (3 CISL, 2 UIL and 1 CGIL). Three of them also hold the role of RLS – Workers' Safety Representatives – with mandatory training pursuant to Italian Leg. Decree 81/2008. In May 2026, elections for the formation of the new RSU (Unified Union Representation) bodies will be held at the premises made available by the company.

The Board of Directors represents the governance body with **the highest responsibility for sustainability.** In particular, the CEOs take an active role in the:

- definition and updating of the organisation's mission, vision and values, including the adoption of the new corporate vision aimed at sustainable, technological and design-oriented comfort solutions
- approval of ESG strategies and goals, as well as company policies for sustainable development
- ESG risk and opportunity assessment, integrated into the company strategy through the ESG Plan, in line with the 2023–2027 Strategic Plan
- monitoring of progress against sustainability-related goals and initiatives

Although there is no ESG commission
formally established in the Board of Directors, top management, in particular the two CEOs, **actively collaborate with the sustainability department,** ensuring continuous updating and monitoring of ESG matters.
This interaction allows the company to consciously manage impacts, risks and opportunities, translating them into policies and concrete actions: in fact, Management reviews the dual relevance matrix following a structured process that involves management and external stakeholders with specialist skills in the ESG field, ensuring
Updating of the company's strategic priorities in line with the relevant impacts, risks and opportunities.
In addition, the CEOs work with a **Sustainability Manager,** a figure who collaborates across the board with the HSE, Quality, Human Resources departments, whose tasks include **advising on, making proposals for and monitoring** ESG goals, initiatives and positioning, and who reports operationally to the **Human Resources Department.**
The departments involved in the direct management of ESG impacts include:

- HSE role
- Human Resources
- operations
- procurement
- marketing and communication
- customer service
- financial administration and control

Regarding **the impacts on health, safety and the environment,** the Board of Directors has delegated **specific responsibilities** to the Heads of the HSE, Operations and R&D departments: the department directors, in fact, consult monthly on the progress of company projects in order to examine the strategic KPIs associated with the projects and discuss any deviations.
Instead, **every six months**, the Management convenes **expanded meetings** with executives, sales managers, and project leaders to share updates on strategy, objectives, KPIs, and future actions.

GOV-2 Information provided to the company's administration, management and supervisory bodies and sustainability issues addressed by them

As also described in GOV-1, the evolution of the ESG strategy, impact monitoring and analysis of the implementation of policies, actions and related KPIs are subject to structured oversight by governance bodies and management departments.
In particular:

- the **Directors' Committee,** composed of the heads of the main company functions, meets **monthly** to verify the progress of the sustainability strategy and objectives, the correct progress of the planned actions, as well as the progress of the monitoring KPIs
- Cross-functional **thematic committees**, dedicated to specific ESG areas (e.g. energy, quality, environmental and social compliance), meet **every two months or quarterly**, in order to analyse in detail the specific operational and regulatory matters related to the topics covered
- the **extended Staff Meeting** with the Area Project Leaders takes place on average **twice a year**, or even with extraordinary frequency in case of specific needs, to ensure cross-cutting operational coordination
- the **Board of Directors**, composed of directors and members of the Board of Statutory Auditors, receives the necessary information at periodic meetings, in particular when **approving the sustainability reporting project** and in conjunction with approval of the consolidated financial statements.

In addition, as part **of the Integrated Management Review** for Quality, Environment and Sustainability Management Systems (QESMS), Management:

- approves annually the **stakeholder analysis** according to the ISO 26000 scheme
- verifies and approves the **analysis of the relevant risks and opportunities**
- analyses the **results achieved** in the previous year and **confirms or adapts future goals**
- also verifies the suitability of the human, material and economic resources made available for the implementation of ESG policies.

The complete list of impacts, risks and opportunities considered by the administrative, management and supervisory bodies in the reference period, collected in the **risks and opportunities assessment of the Quality, Environment and Sustainability Management System (QESMS),** was also the source of the double materiality analysis described in paragraph IRO-1 of the following document, which lists all the material sustainability impacts, risks and opportunities that emerged.

IRSAP's ESG governance provides for structured monitoring through committees and periodic reviews, integrating risks, opportunities and sustainability objectives into business decisions.

GOV-3 Integration of sustainability-related performance in incentive systems

Currently, there are no incentive systems or remuneration policies linked to sustainability goals or impacts for members of the administrative, management and supervisory bodies. Consequently, performance is not assessed against ESG metrics, nor are these metrics considered benchmarks within remuneration policies. Similarly, there is no definition of a share of variable remuneration linked to environmental, social or governance goals. The conditions relating to incentive systems are approved and updated according to the usual internal procedures, which do not currently include parameters specifically referring to sustainability.

GOV-4 Statement on due diligence

Duty of care is the process by which an organisation identifies, prevents, mitigates and accounts for the negative impacts, current or potential, that its activities can generate on the environment and on people.
This process is achieved through the adoption of dedicated policies, operational tools and supervisory mechanisms, as well as the formalisation of a procedure that summarises the overall approach.
Although IRSAP, to date, does not yet have a formalised and structured procedure that organically governs the entire due diligence process, it has nevertheless launched initiatives and adopted tools that reflect the essential elements of this process.

The **following table** provides an overview of the main references within this sustainability statement, highlighting the methods and sections in which the various components of the due diligence process are applied, with the aim of providing a transparent picture of the path initiated by the Group towards a more systemic integration of this approach.

FUNDAMENTAL ELEMENTS OF DUE DILIGENCE	PARAGRAPHS IN THE DECLARATIONS ON SUSTAINABILITY
Integrating due diligence into the governance, strategy and business model	Reference to: - The role of the administrative, management and supervisory bodies (GOV-1) - Information provided to and sustainability matters addressed by the company's administrative, management and supervisory bodies (GOV-2) - Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3) - Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1) - Adoption of a code of conduct and supplier code of conduct, which formalise the integration of ESG principles in supply chain governance and management (G1-1)
Engage stakeholders in all key stages of due diligence	Reference to: - Stakeholder interests and views (SBM-2) - Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1) - Active communication of the supplier code of conduct (G1-1) - Internal communication and whistleblowing channels also used as a listening tool (G1-1)
Identify and assess negative impacts	Reference to: - Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1)
Take action to address negative impacts	Reference to: - Description of whistleblower reporting channels and whistleblower management procedures (G1-1) - Processes for workers to raise concerns and manage complaints (S1-3) - Processes for affected communities or other stakeholders to raise concerns or manage complaints (S3-3) - Adoption of an ISO 14001 certified Management System (E1-2) - Customer complaint management system structured via Zendesk and Support Centres through which corrective measures are activated (S4-3)
Monitor the effectiveness of interventions and communicate	Reference to: - Description of whistleblowing channels and methods of monitoring and follow-up of reports received (G1-1) - Periodic review processes of the Code of Conduct and policies related to ESG matters - Quarterly analysis of complaints through SAP, with dissemination to sales representatives (S4-3) - External audits related to the retention of ISO 14001 certification (E1-2)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VENETO EST
IRSAP
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strumenti e percorsi per iniziare
mercoledì 11 febbraio
CONFINDUSTRIA
VENETO EST

GOV-5 Risk management and internal controls on sustainability reporting

IRSAP is currently in its **fifth edition** of the sustainability reporting. For 2025, the **Board of Directors** formally approved the reporting project, ensuring support in terms of **economic and organisational resources.** The coordination of the process was assigned to the **Sustainability Manager,** who, with the support of an **internal and cross-functional ESG team,** conducted the data collection at Group level and oversaw the preparation of the report. The progress of the project is regularly reported to the Board of Directors, which approves the final version of the report, incorporating any revisions required during the process.

IRSAP manages sustainability reporting through a process based on dual relevance analysis and integrated with certifications and ESG roadmaps.

The risk analysis is performed through an approach based on the **dual relevance process,** subsequently described in section IRO-1, which is used to identify and prioritise the main relevant issues both from the point of view of the company's impact on the environment and on society (inside-out) and from that of the risks and opportunities that these issues represent for the company (outside-in).

For the 2025 financial year, although structured mitigation **strategies** have not yet been finalised, IRSAP has concluded key initiatives launched in previous years to strengthen the management of ESG risks; these include the certification process under **ISO 14067 – Annex C** (measuring the **carbon** footprint of major product ranges), the initiation of a process to estimate the environmental impacts of other product ranges in accordance with the **PEP Ecopassport® Program Operator guidelines, and adoption of the UNI/PdR 125 reference practice** to manage and assess **social sustainability, with a third-party audit scheduled for 2026.** For aspects related to governance, **a legal risk analysis matrix is active,** subject to periodic review, and the **Organisation and Management Model** is fully implemented pursuant to **Italian Leg. Decree 231/2001**.

The results of the risk analysis, in particular those resulting from the dual relevance process, were integrated into the business processes through the definition of a **roadmap** that guided the **prioritisation of risks,** also with reference to ESG reporting. This roadmap is an operational tool to progressively guide the company functions in the management of sustainability risks, promoting consistency between the strategy and the internal control system.

The Sustainability Manager also has the task of periodically reporting to the administrative, management and control bodies not only on the progress of the reporting project, but also on the results of the **gap analysis** and of the roadmap created as part of the reporting path and regulatory adjustments planned in the near future.

STRATEGY

SBM-1 Strategy, Business Model and Value Chain

IRSAP Group recognises the importance of monitoring the structural changes that affect its sector and more generally the economic and social context. For this purpose, it regularly conducts market analysis to align its strategy with the following 6 global trends:

1. **Artificial intelligence and demographic change**
   IRSAP integrates AI solutions into its processes, in particular for operational digitisation and automation, thus responding to both technological innovation and to the evolution of the workforce

2. **Sustainability**
   The Group is a leader in the ecological transition, through eco-friendly products, green packaging projects, environmental certifications (e.g. ISO 14001) and compliance with new European regulations such as PPWR and Green Claims

3. **Customer experience**
   Customer focus in the B2B2C model, strengthening of touchpoints, development of a centralised CRM and customising of the offer to create a distinctive and valuable experience

4. **Technological development**
   IRSAP constantly invests in product innovation, digitalisation of the supply chain and the automation of industrial processes. A committee has been activated for innovation and accelerated time-to-market

5. **Quality-price ratio**
   The company aims to maintain operational excellence in order to offer products with high added value, at the at the same time optimising costs, production efficiency and after-sales service

6. **Care and health of people**
   IRSAP promotes occupational health and safety through dedicated projects, as well as initiatives for organisational well-being and work-life balance

In response to the main global trends and ESG goals, six strategic priorities have been defined that guide business action in the medium to long term. These priority areas represent the key levers driving the Group's development and serve as the common thread running through the operational initiatives implemented across the various areas of the business.

1. Sustainable **growth** is the first pillar of the IRSAP strategy: the company aims to diversify its offer, in particular towards innovative solutions such as controlled mechanical ventilation and smart systems

IRSAP orients its strategy towards innovation, sustainability, digitalisation and operational excellence. Through ESG investments, circular economy, environmental certifications and LCA analysis, the Group strengthens competitiveness, product quality and value creation along the entire value chain.

2. Another key objective is the improvement of **operational efficiency** through the adoption of a lean, high-performance management model. IRSAP aims to stand out as a reference for industrial excellence, digitising the supply chain and disseminating the Lean model throughout the organisation

3. Aware that **human capital** is a strategic resource, the company invests in the enhancement of people and organisational culture, with plans involving continuous training on several levels, initiatives of employer branding and policies aimed at promoting a work environment that is inclusive, collaborative and attentive to the psychophysical well-being of employees

4. In line with its distinctive positioning, IRSAP attaches great importance to **innovation** and **design.**
   The goal is to strengthen the brand as an icon of Made in Italy design in its sector

5. Improving the **customer experience** is a further strategic axis, which involves the integrated management of all customer contact points along the value chain

6. Finally, **environmental** and **social** sustainability is an integral part of the company's strategic choices. IRSAP undertakes to integrate ESG principles into all company decisions and along the supply chain, investing in projects such as the improvement of packaging, the performing of LCA audits, the reduction of CO_2 emissions and the obtaining of environmental certifications. Particular attention is also reserved for the culture of safety and risk assessment, with the aim of ensuring a safe and secure working environment

This environmental strategy is concretely formalised in the Environmental Policy, which represents the organisation's commitment to complying with environmental regulations, preventing and reducing environmental impacts, promoting the use of renewable energy and raising employee awareness through continuous training. The Environmental Policy states that environmental protection must be an integral part of the company culture and included in strategic decisions, actively involving all employees in the environmental management system and promoting the development of increasingly sustainable solutions. IRSAP is also committed to ensuring transparency, responsibility and reliability towards its stakeholders, constantly monitoring its environmental performance through measurable objectives and periodically updating the document as part of the Management review.

Similarly, these priorities are also embodied in projects and specific initiatives developed transversally in the various business areas. Marketing, for instance, is focused on creating value-added after-sales services and on customising the offering with a B2B2C approach. The Operations division is working on process standardisation and supply chain digitisation, while R&D develops more sustainable industrial and packaging solutions, with a clear and shared innovation roadmap.

On the people's front, IRSAP promotes a culture lean company, based on individual accountability and on-going training. The sustainability area, in parallel, oversees compliance with new reporting regulations (such as VSME, Simplified ESRs, etc.), strengthens ESG data collection systems and works on the engagement of supply chain actors. The Finance and IT functions also contribute to the achievement of strategic objectives, with digital transformation projects, including the introduction of artificial intelligence solutions in management, industrial and front office processes.

Progress is monitored through a structured planning and supervisory system, which uses performance indicators consistent with the main ESG reporting standards.

In 2025, the Group continued to strengthen its sustainability strategy, with a particular focus on integration of life cycle analysis (LCA) into product design and manufacturing. For this purpose, the Carbon Footprint certification was obtained for the **Tesi Range,** described in greater detail in the MDR-A section relating to the theme of "Product Quality and Innovation", one of the main lines of the Heat business unit, entirely produced in Italy. This process will continue in 2026 with extension of the certification to other ranges made in both production plants located in Italy and Romania.

The strategic objectives in the field of sustainability mainly focus on reducing emissions of scope 1 and 2, through the use of LCA methodologies and on obtaining environmental product certifications. These tools allow transparent communication of environmental impacts to different categories of stakeholders. Further priorities include the strengthening of circular economy processes along the supply chain, in particular through the Close the Loop **project**, also further explored within the theme of "Product Quality and Innovation", and reduction of the accident frequency index thanks to specific projects dedicated to occupational safety.

The lack of regulation on the transparency and integrity of environmental, social and governance (ESG) rating activities has created considerable uncertainty in the **ESG assessment systems** to which the company is subject. Despite this randomness, the IRSAP Group obtained an ESG Rating of 55 points out of 100 from **EcoVadis**, improving on the previous rating result. The goal for 2026 and beyond is to progressively improve the score.

In line with the developments outlined above, the main challenge for IRSAP in the future will be to maintain its competitiveness in the reference markets, leveraging sustainability and the high quality of its products as a competitive advantage. The assessment of current products and markets with respect to the sustainability goals is consistent with the findings outlined in the previous reports relating to the business units.

IRSAP's business model is based on the design, production and marketing of solutions for indoor comfort, divided into three distinct **business units**:

- **IRSAP HEAT:** It is the most traditional line, in which classic and modern merge in timelessly designed steel radiators. With over 500,000 sizes available, any domestic requirement can be met. The high construction quality, laser welds, modularity and large heat exchange surface make these radiators efficient and suitable for low-temperature systems, in line with the goals of energy efficiency and environmental sustainability.
- **IRSAP SMART:** This unit integrates advanced technology and connectivity for intelligent heating management.
  The **NOW** system**,** developed in-house in IRSAP R&D laboratories, allows temperature regulation room by room, optimising consumption and machine learning of household habits. Compatible with different types of hydraulic systems and valves, the system guarantees significant energy savings, with a reduced environmental impact also thanks to the use of FSC-certified packaging.
- **IRSAP AIR:** It focuses on **Controlled Mechanical Ventilation (CMV)**, offering solutions for indoor air health, living comfort and energy efficiency.
  IRSAP AIR systems can be single or double flow with heat recovery, also integrated with dehumidification and air conditioning (as in the **EASY CLIMA solution**). This approach enables optimal management of heating requirements, particularly in high-efficiency buildings.

The main benefits for customers, investors and stakeholders concern the supply of increasingly environmentally efficient products, reliability throughout the supply chain and the consolidation of business relationships based on transparency and accountability.

The IRSAP value chain is divided into upstream and downstream activities. In upstream, procurement plays a strategic role, particularly for the categories of raw materials and electronic components. In 2025, the global steel market faced cyclical stagnation, characterised by weak demand in mature markets, international competitive pressure and persistent production overcapacity. Growth has been concentrated primarily in emerging markets, while Europe and China have shown signs of structural slowdown. According to the assessments disseminated in trade associations, world demand remained stable compared to 2024, with limited variations differentiated by geographical area. The prices of steel products recorded a reductionof approximately 5% compared to the CRC average (Cold-Rolled Coils) compared to 2024. In 2025, the electronic components market experienced gradual growth, driven primarily by stabilisation of the supply chain following the speculative dynamics and microprocessor shortages of previous years.

IRSAP maintains established relationships with a network of strategic suppliers, loyal customers, and both direct and indirect distribution channels. Downstream, the main customers are distributors, professional installers and end customers in the residential and contract sectors. The company maintains an active role in managing the relationship throughout the value chain, implementing practices of responsible selection of suppliers and of co-innovation projects oriented towards sustainability.

SBM-2 Stakeholder interests and views

Stakeholder involvement is an essential and transversal element of IRSAP Group's sustainability strategy. Developing solid relationships, based on a structured and transparent dialogue, allows the company to strengthen its commitment to sustainable and responsible growth, in line with company values and the expectations of the socio-economic context in which it operates.
In 2025, the Group identified the main categories of stakeholders, drawn up according to the guidelines of the ISO 26000 standard. These categories include:

- IRSAP employees
- professional supply chain
- end users
- suppliers
- trade unions
- future generations
- community and society
- financial backers
- political institutions and associations

The involvement of these stakeholders is a strategic pillar for IRSAP, based on a continuous and structured dialogue aimed at strengthening the company's social responsibility and at generating shared value in the long term. The methods of engagement are differentiated according to categories and include:

- **periodic surveys** aimed at collaborators to evaluate the effectiveness of training activities
- **ESG questionnaires to suppliers,** administered for the third consecutive year in 2025, to analyse their sustainability performance
- **consultations with middle and senior management** and with the professional supply chain in the context of the **double materiality survey**, aimed at identifying and assessing the material impact matters in relation to the company.

An understanding of the interests and views of key stakeholders has emerged systematically through the dual relevance analysis process which has resulted in mapping of the expectations and priorities of stakeholders, assessing of the relevance of ESG issues with respect to the strategy, business model and impacts generated by the company and integration of the results into the strategic plan, ensuring alignment between the Group's sustainability positioning and stakeholder expectations. The Board of Directors and the management functions are informed about the results of stakeholder involvement through the results of the dual relevance analysis, which are discussed with reference to:

- mapping of the most significant sustainability impacts
- the strategic priorities that emerged from the discussion with customers, partners and suppliers
- the need for integration or revision of any ESG objectives

In particular, the IRSAP Group promotes the structured and continuous involvement of workers in defining their own strategy and business model, recognising the **value of social dialogue** as a fundamental tool to ensure transparency and inclusiveness.

In the case of the Parent Company, the discussion with workers takes place regularly through trade union meetings organised on a quarterly basis. These opportunities for discussion can be convened by both the company and by trade union representatives. During these meetings, issues relevant to the company's strategy are addressed, such as market trends, the evolution of demand and any critical issues that may have an impact on the effectiveness of the actions implemented by the organisation. The decisions taken and the agreements reached are formalised through official minutes, which ensure the traceability of information and the sharing of results.

IRSAP Industrie has also developed a system of worker involvement that is detailed and consistent with the most relevant operational needs and issues. In particular, quarterly meetings of the **Safety Committee are scheduled, involving the joint participation of** worker representatives and company managers. At these meetings, the main critical issues in the field of health and safety are analysed, and shared proposals for improvement are discussed, all regularly recorded. The initiatives proposed by the workers are collected via the trade union representatives and then brought to the attention of the Committee, thus ensuring effective listening and active participation.

In addition to this, there is a further opportunity for discussion, in the form of **monthly meetings for all employees,** focused on issues such as job protection and emergency management. These meetings are also an opportunity to collect requests, share updates on company activity and provide clarifications following the training courses carried out.

During the year, the company also organises several **briefings with trade unions and workers' representatives** aimed at outlining market trends, expected work volumes and investment plans. A particularly important opportunity for dialogue takes place during the **negotiation of the company collective agreement,** when contractual and strategic aspects are discussed in detail with the individual production units.

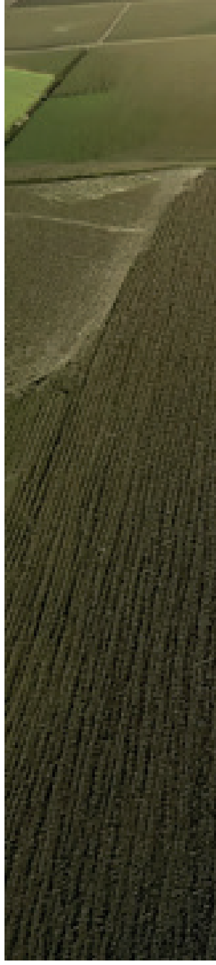
Through these tools for discussion and participation, the company ensures that the interests, views and rights of workers are constantly considered in strategic decision-making processes and in the definition of company policies, helping to build a responsible, participatory and sustainability-oriented business model.

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

The actual and potential impacts on the company's own workforce, identified in accordance with the provisions of ESRS 2 IRO-1, are closely linked to the organisational and strategic model of the Group companies.

Neither IRSAP nor IRSAP Industrie operate in geographical or sectoral contexts exposed to systemic risks of infringement of human rights, such as forced or child labour.
Conversely, they promote fair and inclusive working conditions, offering opportunities for professional growth, welfare and operational flexibility, such as part-time or agile work.

The measures adopted - from support to supplementary social security complementary to integrative health and wellness initiatives - represent significant positive impacts that strengthen the**attractiveness** and resilience of the **business model** in the medium to long term.



MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities

Continuing on its path of alignment with European regulations, the IRSAP Group has strengthened its commitment to sustainability reporting increasingly aligned with European requirements, carrying out an in-depth analysis of material matters through the so-called **"double materiality" process,** as required by the new ESRS[3] standards published *by the European Financial Reporting Advisory Group* (EFRAG), and following the guidelines included in the implementation of the assessment[4]. This process, which is a key step in defining what information should be disclosed in an organisation's Sustainability Report, is based on the combination of two perspectives:

- *Impact Materiality*, which assesses the current or potential effects generated by the Group's activities on the economy, the environment and people (*inside-out* approach)
- *Financial Materiality*, which identifies the risks and opportunities related to sustainability factors, that are able to influence the Group's economic and financial performance (*outside-in* approach)

The starting point of the analysis consisted of updating benchmark analysis, aimed at identifying a first set of potentially relevant topics:

- With regard to the impact materiality, the material matters for some companies belonging to the sectors in which the Group's three Business Units operate were taken into consideration.
- For financial materiality, reference was made to the corporate strategy, the assessment of risks and opportunities and to the IRSAP SWOT analysis. To complete the framework, the main ESG reporting frameworks applicable to the industrial and financial context (including TCFD, TNFD and SASB) were consulted, as well as authoritative sources such as the Global Risk Report 2025, the ENCORE observatory, the European Environment Agency (EEA), ISPRA, the Copernicus Climate Change Service and the World Meteorological Organisation. Lastly, the criteria adopted by the main ESG rating systems, such as EcoVadis, GRESB and CDP, were also analysed.

IRSAP has adopted the "double materiality" process to identify material impacts, risks and opportunities, integrating internal analysis, stakeholder engagement and European regulations, in order to strengthen ESG reporting and strategic coherence.

Considering that the Group's operating environment did not change significantly during 2025, the results of the analysis confirmed the validity and timeliness of the sustainability issues already identified. Therefore, it was not considered necessary to perform a new impact assessment (*Impact Materiality*).

However, the risks and opportunities (*Financial Materiality*) were updated in order to reflect any changes in the context of reference. In accordance with the provisions of the legislation, the direct involvement of stakeholders continued through a structured internal process, which involved the competent company representatives in the two main production sites, IRSAP and IRSAP Industrie, with the aim of assessing risks and opportunities from a more technical and systematic perspective.

The evaluation process involved defining specific parameters - **magnitude and probability** - to analyse the magnitude and probability of the economic-financial effects respectively, linked to each identified risk or opportunity. All the evaluations collected were then processed and

[3] The European Sustainability Reporting Standards (ESRS) were introduced in the European Union by EU Directive 2022/2464 (so-called Corporate Sustainability Reporting Directive, or CSRD) and adopted with EU Delegated Regulation 2023/2772. In Italy, the CSRD was implemented by Decree no. 125 of 6 September 2024.

[4] EFRAG IG 1: Material assessment implementation guidance.

aggregated in order to define relevant thresholds that would allow a clear distinction to be made between the issues to be considered relevant in terms of possible financial repercussions for the organisation.

Lastly, the results of the two analyses – one on impacts and the other on risks and opportunities – were integrated to give a complete overview of the material sustainability matters in relation to IRSAP. This framework was subsequently validated by both the internal working group and by the
Administration Manager, ensuring consistency with the company's strategic vision and with the Group's analysis of the most "traditional" risks and opportunities.

In addition, the Group decided to involve its customers through the administration of a questionnaire during 2024, aimed at collecting their perceptions regarding the impacts generated by the company's activities. From a predictive perspective, the questionnaire was designed to identify the topics that, according to customers, would be generally relevant in the following years. The tool has been translated and sent to the customers of all six Group companies, with the intention of ensuring a representative and across-the-board view.
The results of the survey were still considered valid during 2025 and were therefore used as input to support the update of the dual relevance analysis. For the customers who participated in the initiative, a simplified assessment was prepared that entailed the assignment of a score to the relevance of the impact, considering the relevance as a synthesis between severity and probability of the impact itself.

The themes emerging from this process largely reflect issues already covered by the Group, but reinforce their relevance, constituting the areas on which disclosure has been provided
within this report on themes, sub-themes and sub-sub-themes listed by the standard and associated with the so-called *ESRs Topical* Standard. In addition, an *"entity-specific"*, issue also emerged, i.e. One that is particularly relevant to IRSAP's operational and local area situation, the subject of an ad hoc disclosure[5].

[5] For each entity-specific topic not covered by the ESRS disclosure requests, the minimum disclosure requirements were reported within the respective sections (so-called Minimum Disclosure Requirement, or MDR) included in ESRS 2 with reference to specific policies, actions and goals.

	Topic Sub-topic	Impacts, risks and opportunities	IROCATEGORISA-TION	Positive/negative impact Risk/ opportunities	Timeframe
ESRS E1: CLIMATE CHANGE					
1	**Adaptation to climate change**	Climate change can lead to a rise in temperatures and an increase in the duration of sunlight exposure, resulting in less requirement for radiators	R - Pure		**LT**
		Rising temperatures can result in a increase in situations of work discomfort during the hottest season	R - Pure		**BMT - LT**
2	**Climate change mitigation**	Production of energy-efficient radiators compatible with renewable sources, reducing CO_2 emissions in consumer buildings	I - Potential		**BMT - LT**
		Loss of competitiveness due to an increase in the price of the product resulting in the reduction of environmental impact (production or packaging)	R - Strategic		**BMT - LT**
		Development of low-emission products or services to access new sustainability-oriented markets and suppliers	O - Strategic		**BMT - LT**
3	**Energy**	High energy consumption in the melting and processing phases of metals for the production of radiators	I - Potential		**BMT - LT**
		Unpredictable and uncontrolled price increase	R - Financial		**BMT - LT**
ESRS E3: WATER AND MARINE RESOURCES					
4	**Water consumption**	Recovery and reuse of water for other uses in the plant	O - Operational		**BMT - LT**
ESRS E5: RESOURCE USE AND CIRCULAR ECONOMY					
5	**Resource inflows and outflows**	Commodity price fluctuations or shortages thereof with consequent increase in the costs of procurement	R - Financial		**BMT - LT**
6	**Waste**	Production of special waste from chemical treatments and coatings	I - Actual		**BMT - LT**
ESRS S1: INTERNAL WORKFORCE					
7	**Balance between professional and private life**	Maintaining a positive working environment thanks to flexible and WFH models for employees in the administrative and design area	I - Actual		**BMT**
		Leave/sick leave	R - Operational		**BMT - LT**
		Ability to retain talented personnel in the company with ample room for growth	O - Strategic		**BMT - LT**
8	**Training and skills development**	Ideas for improving production (equipment, cycles, tools, equipment)	O - Operational		**BMT - LT**
9	**Occupational health and safety**	Greater safety in the workplace thanks to the correct implementation of advanced personal protective equipment and automated systems to reduce the risk of accidents	I - Actual		**BMT - LT**

	Topic Sub-topic	Impacts, risks and opportunities	IROCATEGORISA-TION	Positive/negative impact Risk/ opportunities	Timeframe
ESRS S3: COMMUNITIES INVOLVED					
10	**Local area impacts**	Improvement of the social and economic conditions of the local area in which IRSAP operates and of local communities through sustainable work practices and social engagement initiatives	I - Actual	Positive	**BMT - LT**
ESRS S4: END USERS AND CONSUMERS					
11	**Confidentiality**	Risk of cyber attacks and violation of the privacy of customers using home automation systems connected to the Internet	I - Potential	Negative	**BMT - LT**
12	**Consumer health and safety**	Design of radiators and ventilation systems compliant with safety regulations and tested to minimise risks of malfunction	I - Actual	Positive	**BMT - LT**
		Receiving negative reviews/returns due to technical issues	R - Reputational	Risk	**BMT - LT**
ESRS G1: BUSINESS CONDUCT					
13	**Supply Chain Management**	Adoption of ESG criteria for selecting suppliers, encouraging sustainable practices along the supply chain	I - Potential	Positive	**BMT**
		Unreliability in deliveries	R - Operational	Risk	**LT**
ENTITY SPECIFIC					
14	**Quality and product innovation**	Improving product quality through stringent controls and adoption of high quality and safety standards and certified production processes, helping to ensure that the product meets regulatory requirements and remains safe	I - Potential	Positive	**BMT**
		Downturn in sales due to non-innovative or underperforming products	R - Strategic	Risk	**BMT - LT**
		New products, new markets	O - Strategic	Opportunities	**BMT - LT**
		Create a relationship of trust over time thanks to the high quality of the products	O - Reputational	Opportunities	**BMT - LT**

IMPACT		RISK / OPPORTUNITY		TIME HORIZON
Positive	**Negative**	**Risk**	**Opportunities**	Short- to medium-term (**BMT**) Long Term (**LT**)

IRO-2 Reporting obligations of ESRS covered by the sustainability statement of the company

To consult the complete list of disclosure obligations that the IRSAP Group has complied with in the drafting of this document, please refer to **the List of Disclosure Obligations made public,** available in the "Annexes to the Sustainability Report" section.

02


TESI:
la prima gamma prodotti a carbon footprint certificata (CFP) ISO 14067:2018 systematic approach.
TESI:
the first product range with a certified carbon footprint (CFP) ISO 14067:2018 systematic approach.

ENVIRONMENTAL INFORMATION

The IRSAP Group integrates sustainability into its strategy through environmental certifications, carbon footprint analysis, investments in photovoltaic systems and energy efficiency.

ESRS E1 Climate change

ESRs 2 GOV-3 Integration of performance of sustainability in incentive systems

Information about the integration of sustainability performance in incentive schemes is described in section GOV-3.

E1-1 Climate change mitigation transition plan

In defining its strategy, the IRSAP Group has integrated sustainability as a pillar in its vision, embarking on a path aimed at assessing and reducing its climate impact. In particular, projects have been launched for environmental certification and **carbon footprint** analysis of key product ranges using the LCA methodology, with the aim of making the company's contribution to climate change mitigation increasingly transparent and measurable. Although to date a climate transition plan with a defined time horizon

has not been formalised, with a view to adaptation, in 2025 the revamping and repowering of the photovoltaic park of the Arquà Polesine plant began, aimed at increasing the production of renewable energy for self-consumption. In addition, as further confirmation of the Group's commitment, the installation of a new photovoltaic system at the IRSAP Industrie plant is scheduled to start in 2026.

ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

With regard to the information provided in section IRO-2, following the double materiality analysis, the Group has identified a number of material climate risks that may affect its strategy and business model. The **physical risks** identified included the following:

- the rise in temperatures and extended period of sunlight, which could reduce the demand for radiators in winter months
- the increase in uncomfortable conditions for workers in the hottest periods
- the potential instability of energy costs, with unpredictable price fluctuations

With regard to **transition risks, on the other hand,** the following were found to be material:

- the possible loss of competitiveness in the face of increased costs related to the adoption of solutions with less environmental impact (both in the production and packaging phases)
- price volatility or shortage of strategic commodities

To date, a structured analysis of climate resilience in line with ESRS standards has not yet been carried out, nor have specific climate scenarios been used. However, climate change has been considered as part of the analysis of impacts, risks and opportunities integrated into the quality, environment and sustainability management system. Following this evaluation, the Group launched dedicated projects aimed at optimising and monitoring energy production processes, and at analysing the **product's Carbon Footprint** according to the LCA *(Cradle to Grave)* methodology. These projects, which are currently underway, represent the first stages of a more structured approach to assessing climate resilience, which will be strengthened on the basis of future results relating to quantification of the carbon footprint of products.

ESRS 2 IRO-1 Description of processes to identify and assess material impacts, risks and material climate-related opportunities

Information relating to the description of the processes to identify and assess relevant climate-related impacts, risks and opportunities is described in the IRO-1 section.

E1-2 Policies related to climate change mitigation and adaptation

The Group deals with the management of relevant impacts, risks and opportunities related to mitigation and adaptation to climate change.

Within its **Environmental Policy,** prepared as part of the implementation and operation of IRSAP's Environmental Management System, ISO 14001-certified, multiple issues are addressed, such as protection of the environment and the reduction of environmental impacts throughout the production cycle, the continuous improvement of environmental performance and regulatory compliance, and the development of an internal environmental culture based on staff training on environmental monitoring. More in detail, the policy stands as a guiding tool both for **mitigation** (through the reduction of emissions and using as much energy from renewable sources as possible for its activities) and for **adaptation** (through the inclusion of business investment strategies, such as efficiency and productive resilience initiatives).

During 2025, on the occasion of the audit for the maintaining of ISO 14001 certification, the addressing of climate change within the document system was reinforced. Following this, IRSAP initiated a structured review of its analytical documents, which led to the **formal integration of climate change** within the**context analysis,** Identification **of stakeholder needs and assessment of risks and opportunities.**

Specifically:

- the **context** analysis was updated, assessing the risks and opportunities related to climate change, such as the evolution of demand for low-emission products, possible infrastructure damage caused by extreme events, or the development of low-carbon technologies (e.g. photovoltaics).
- the **expectations of stakeholders** - customers, employees, suppliers, local communities, institutions, the environment - have been recalibrated in light of the challenges posed by the climate crisis.
- the **IRO assessment** has been updated to include climate change-related scenarios and impacts: both negative (e.g. business interruptions or reputational damage) and positive (e.g. market opportunities linked eco-design or energy efficiency). The results will support the definition of new targeted environmental goals and the implementation of concrete actions.
- lastly, a direct link was introduced **between significant environmental aspects and impacts** (emissions, energy consumption, waste) and the "climate change" impact category, strengthening the strategic and operational oversight of the issue.

E1-3 Climate change policy actions and resources

The commitment included in the Environmental Policy, described in section E1-2, translates into a series of actions aimed at mitigating and adapting to climate change that the Group has undertaken and planned.

The main initiatives concern:

- **the calculation of the carbon footprint of the main product ranges,** started in 2024, with the aim of obtaining ISO 14067 certification (Carbon Footprint – Systematic Approach). In particular, the certification was achieved for the hydronic TESI range in 2025, while for bathroom and design radiators the process will continue until 2026.
- **deliberate investments in photovoltaic systems,** with the installation of new systems and updating of existing ones at both Group production sites. In 2025, revamping and repowering interventions were completed at the IRSAP site (Arquà Polesine), while new photovoltaic plants will be built at the IRSAP Industrie plant, which will be launched in 2026 in order to increase the self-production of energy from renewable sources.

- development of the **circular economy project "Close the Loop" for packaging**, operational since March 2025 for the TESI range and gradually extended to the other product lines during the year. The project aims to reduce environmental impact and close the material cycle. The entire project was also evaluated by IRSAP Industrie. Following a carbon footprint calculation for the entire "Close the Loop" process, only the phase involving the supply of recycled material for IRSAP Industrie packaging was deemed environmentally preferable, demonstrating the importance of precisely measuring the carbon footprint of products and processes.
- The installation of meters at both production plants during 2025 enabled monitoring of between 93% and 95% of plant consumption.
  Implementing these measurements enables the IRSAP Group to obtain increasingly detailed data on energy management, thereby optimising future decisions regarding energy efficiency and the monitoring of production-related consumption.
- The replacement of IRSAP's pallet wrapping system with the most innovative technologies available on the market has allowed for greater energy efficiency.
- Replacing older lighting systems with **new-generation systems** featuring a profile of higher productivity has also enabled improved energy monitoring. This new technology expresses its maximum benefits at times of peak production.

E1-4 Goals related to climate change mitigation and adaptation

The IRSAP Group includes climate objectives in its strategic pillars and in its Environmental Policy, both described in paragraph ESRs 2 SBM-1, aiming at a continuous improvement of its environmental performance, with particular attention to reduction of the impact throughout the entire product life cycle and the integration of ESG criteria in decision-making processes.

Currently, the main goals laid down by the Group for climate change are:

1. Formalisation of climate goals
One of the main goals is the formalisation of specific environmental targets related to the mitigation of greenhouse gas emissions. Although these targets have not yet been definitively laid down, the company has already started the necessary preparatory work, with the intention of consolidating these commitments through the development of a **GHG** emission mitigation plan in the coming years consistent with its environmental policies.

2. Strengthening of the environmental monitoring system
To support these commitments, a structured of monitoring and supervisory system of environmental aspects has been introduced, to allow for an integrated, qualitative and quantitative assessment, which includes:
- a digital platform for reporting environmental risks
- the constant updating of the Risk Assessment Document (RDA) and emergency management procedures
- the Quality, Environment and Sustainability Management System (QESMS) manual and a schedule for the management of regulatory compliance (e.g. UAA)
- tools for calculating of the carbon footprint of the main product ranges audited by an accredited independent third party
- systematic monitoring of energy consumption
- and lastly, environmental questionnaires addressed to critical suppliers.

3. Reduction of direct emissions (Scope 1 and Scope 2)
The company has already planned specific interventions to reduce direct emissions. In particular, interventions of energy efficiency on the production plants have been initiated, described in paragraph E1-3. Further actions in this regard are also planned for 2026, confirming a continuous and progressive approach.

4. Preliminary analysis of indirect emissions (Scope 3)
Indirect emissions analyses (scope 3) were also performed during 2025, with an initial focus on emissions related to shipments from the IRSAP Industrie plant. Although still in the preliminary phase, this activity is the first concrete step towards a more comprehensive assessment of the environmental impact along the entire value chain.

5. Energy requalification interventions
Also underscoring the focus placed on infrastructure, a project to redevelop part of the building housing support services is currently under consideration for 2026. The intervention involves the replacement of obsolete equipment aimed at improving overall energy efficiency and comfort of environments earmarked for employees and visitors.

6. Extension of the environmental approach on an international level
Finally, a pre-audit was conducted to start the ISO 14001 certification process for the headquarters in Romania. During 2026 the preliminary actions will be initiated to obtain certification first and foremost with the hiring of a figure dedicated to environmental management and the performing of specific training for the correct creation of the environmental management system. The intention is to extend its environmental approach also to IRSAP Industrie and commercial subsidiaries, thus promoting greater consistency at Group level.

E1-5 Energy consumption and energy mix

In 2025, the IRSAP Group maintained the scope **of energy consumption collection** to include not only IRSAP and IRSAP Industrie but also the commercial subsidiaries.
The Group has also expanded the type of data collected, adding, alongside purchased and self-produced electricity and natural gas also the consumption of the **company's fleet** (diesel, petrol and Liquefied Natural Gas), certain **biomass** and **diesel** for emergency generators.

Renewable sources account **for 39% of total consumption** (an increase compared to 2024), a figure achieved through the use of **renewable electricity** covered by Guarantees of Origin at the IRSAP S.p.A. and IRSAP Industrie S.r.l. sites, as well as a portion of purchases by IRSAP Iberica S.L.
In the 2024 Sustainability Report, the "Consumption of self-produced renewable energy without resorting to fuels" (item 10) also included the electricity sold; in this Report, this data was broken down outside the table.

ENERGY CONSUMPTION AND ENERGY MIX[6]	2025	2024
1) Consumption of coal and coal products (MWh)	0	0
2) Consumption of crude oil and petroleum products (MWh)	2,567	2,165
3) Natural gas consumption (MWh)	23,721	20,229
4) Consumption of fuels from other non-renewable sources (MWh)	0	0
5) Consumption of electricity, heat, steam and cooling from fossil, purchased or acquired sources (MWh)	169	3,081
6) Total energy consumption from fossil sources (MWh) (sum of lines 1 to 5)	**26,457**	**25,476**
Share of fossil fuels in total energy consumption (%) (sum of lines 1 to 5)	**61%**	**66%**
7) Consumption from nuclear sources (MWh)	**0**	**0**
Share of nuclear sources in total energy consumption (%)	**0%**	**0%**
8) Consumption of fuels for renewable sources, including biomass (also includes industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.) (MWh)	22	15
9) Consumption of electricity, heat, steam and cooling from renewable, self-produced or acquired sources (MWh)	16,069	12,400
10) Self-produced renewable energy consumption without the use of fuels (MWh)[7]	717	871
11) Total energy consumption from renewable sources (MWh) (sum of rows 8 to 10)	**16,808**	**13,286**
Share of renewable sources in total energy consumption (%)	**39%**	**34%**
Total energy consumption (MWh) (sum of rows 6 and 11)	**43,264**	**38,762**

The Group self-produces 6,072 MWh through photovoltaic plants, 717 MWh of which were consumed by IRSAP, while the remaining 5,355 MWh were sold to third parties.
All the Group companies operate in sectors with a high climate impact[8]. The Group's energy intensity, equal to the total energy consumption compared to the net revenues of the Group's activities, is shown below.

ENERGY INTENSITY FOR NET REVENUES	2025	2024
Total energy consumption of activities in sectors with a high climate impact compared to the net revenues deriving from these activities (MWh / Million euros)	303.60	279.26

6 The conversion factors used to transform energy consumption into MWh were taken from the UK Government GHG Conversion Factors for Company Reporting (version 2024) document, published by the UK Department for Energy Security and Net Zero (previously developed by DEFRA). This document is acknowledged for its regular updates, high-quality data and broad coverage of energy sources, which is why it is widely used outside the United Kingdom to calculate energy consumption and Scope 1 emissions.
The energy consumption of the French branch building, powered exclusively by electricity, was estimated on the basis of square metres of surface area multiplied by the factor in MWh/m2 of the PCAF European building emission factor database.

7 In the 2024 Sustainability Report, the "Consumption of self-produced renewable energy without resorting to fuels" also included the electricity sold; in this Report, this data was broken down outside the table.

8 The sectors referred to in Annex I, Sections A to H and L, of Regulation (EC) No 1893/2006 of the European Parliament and of the Council (33) (as defined in Commission Delegated Regulation (EU) 2022/1288 (34)).

E1-6 Gross scopes 1, 2, 3 and total GHG emissions

The collection of data on **gross GHG emissions** was carried out in the same way as that for the energy consumption reported in ESRS E1-5. I.e. the commercial branches were also involved and the type of data collected was expanded; the collection of data on fugitive F-gas emissions was added to the consumption already indicated in the ESRS E1-5.

In particular, **scope 1 GHG emissions**
include the stationary combustion consumption of the Group's premises, the fuel consumption of the company's fleet cars, and fugitive emissions. Emissions from stationary and fleet combustion were obtained by multiplying the consumption of the different energy sources by the emission factors published in the UK document Government GHG Conversion Factors for Company Reporting (version 2024)[9]. The fugitive emissions of refrigerant gases (F-Gas) were calculated based on the global warming potential (GWP) of the sixth IPCC report (so-called AR6).

Scope 2 **GHG emissions include** electricity purchased for the Group's sites (including that for electrically powered cars charged at the IRSAP site). For the location-based method, emissions were obtained by multiplying electricity consumption by the emission factors published by Ispra (2024 edition)[10]. For the market-based method, the share of **electricity purchased certified renewable** generates emissions equal to 0; instead, for the share of electricity not covered by Guarantees of Origin[11], the AIB emission factor (published in 2025) was used[12].

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[9] The document is published by the Department for Energy Security and Net Zero of the United Kingdom (previously developed by the so-called DEFRA). This document is acknowledged for its regular updates, high-quality data and broad coverage of energy sources, which is why it is widely used outside the United Kingdom to calculate energy consumption and scope 1 emissions.

[10] Italian Institute for Environmental Protection and Research (ISPRA) - Report 404/2024 - Efficiency and decarbonization indicators in Italy and in the biggest European countries.

[11] The Guarantees of Origin relating to consumption were purchased in lower volumes than in 2025.

[12] Association of Issuing Bodies - European Residual Mixes 2024, published in June 2025.

GHS EMISSIONS	UNIT OF MEASUREMENT	FY 2025	FY 2024
Scope 1 GHG emissions[13]	tCO2eq	5,523	4,779
Percentage of total Scope 1 GHG emissions covered by regulated emissions trading systems (%)	%	0	0
Scope 2 GHG emissions (location-based)[14]	tCO2eq	4,689	3,677
Scope 2 GHG emissions (market-based)	tCO2eq	81	769
Total GHG emissions (location-based)	**tCO2eq**	**10,212**	**8,456**
Total GHG emissions (market-based)	**tCO2eq**	**5,603**	**5,548**

All the Group companies operate in sectors with a high climate impact[15]; the **GHG intensity based on net revenues is shown below,** equal to the total GHG emissions compared to the net revenues of the Group's activities.

GHS INTENSITY COMPARED TO NET REVENUES	2025	2024
Total GHG emissions (location-based) compared to net revenues (tCO_2eq / Million euros)	71.66	60.92
Total GHG emissions (market-based) compared to net revenues (tCO^2eq / M euros)	39.32	39.97

ESRS E3 Water and marine resources

ESRS 2 IRO-1 Description of processes to identify and assess impacts, risks and relevant opportunities related to marine waters and resources

Information relating to the description of the processes to identify and evaluate the relevant impacts, risks and opportunities related to the use of water and marine resources is described in the IRO-1 section.

E3-1 Policies related to waters and marine resources

In order to identify its impacts, risks and material opportunities related to water resources, the Company conducted an in-depth water audit during 2025 at its operational sites in Italy. The process involved the mapping of withdrawal, consumption and discharge flows, together with analysis of the local water context to identify the potential presence of areas under high water stress. Such scientific evaluation has made it possible to monitor physical risks (e.g. water shortages, supply interruptions) while defining opportunities to optimise industrial and civil processes. The findings of the water audit laid the foundations for the formalisation of interventions to improve corporate water management, aimed at ensuring sustainable use of the resource and the protection of connected ecosystems.

E3-2 Actions and resources related to waters and marine resources

In line with the results of the audit and the Policy adopted, the Company has allocated financial and human resources dedicated to the implementation of a targeted action plan. Key initiatives under evaluation will be launched during 2026 and may include the installation of monitoring and telemetry systems for the timely detection of leaks and the upgrading of internal purification systems to promote closed-loop recirculation.

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[13] The biogenic CO_2 emissions of scope 1 GHG, from biomass and the biofuel content in diesel and petrol, amount to 38 tCO_2.
[14] The emission factors used to calculate Scope 2 GHG emissions do not distinguish the percentage of biomass or biogenic CO_2.
[15] The sectors referred to in Annex I, Sections A to H and L, of Regulation (EC) No 1893/2006 of the European Parliament and of the Council (33) (as defined in Commission Delegated Regulation (EU) 2022/1288 (34)).

E3-3 Objectives related to waters and marine resources

Based on the results of the water audit, an internal monitoring system will be created following the installation of dedicated sensors. The main targets will include objectives to reduce overall water withdrawals. Further information will be provided in future reporting periods.

E3-4 Water consumption

The following table shows the water consumption of the IRSAP and IRSAP Industrie plants. The total water stored is relative to the fire water reserve.

WATER RESOURCES	Unit of measurement	2025	2024	2023
Total water withdrawal[16]	m^3	30,021	29,554	34,422
Total volume of water stored	m^3	200	200	200

[16] The Group does not have information on the amount of water discharged; consequently, only withdrawals are indicated.

ESRS E5
Use of resources and circular economy

ESRS 2 IRO-1 Description of processes to identify and assess impacts, risks and relevant opportunities related to the use of resources and the circular economy

Information relating to the description of the processes to identify and evaluate the relevant issues related to resource use and the circular economy are described within the IRO-1 section.

E5-1 Resource use and circular economy policies

Although it does not currently have a policy specifically dedicated to the use of virgin resources or the use of secondary resources, the IRSAP Group addresses these issues within the broader **Environmental Policy** adopted by the parent company. This document, shared internally and subject to annual review, defines the organisation's general commitments on environmental matters, including:

- compliance with applicable environmental regulations and compliance obligations
- the **progressive reduction of environmental impacts,** also through the adoption of advanced technologies and practices
- the promotion of **responsible consumption of natural resources**
- the adoption of **models inspired by the circular economy,** such as the recycling of materials and the streamlining of production processes
- **environmental training of personnel** as a lever for continuous improvement and active involvement
- **optimised waste management,** with a focus on the prevention and reduction of waste

In addition, a document was updated in 2025 for the management of risks and opportunities related to resource use, also focusing on the value chain. In particular, an in-depth study was included on the **"environmental risk for unreliable suppliers"**. To mitigate this risk, the company has planned specific actions, including:

- **avoiding single-supply situations**
- **monitor the environmental performance of suppliers** through:
  - the administration of environmental questionnaires and consequent analysis of the responses
  - media screening activities
  - applying for environmental certifications

E5-2 Actions and resources related to resource use and circular economy

During 2025, the Group followed up on numerous concrete actions aimed at **reducing the use of virgin resources,** optimising the materials used in packaging and **increasing the use of recycled materials.** Among the main initiatives are:

- a new configuration of pallets, which has already allowed an **18% reduction in the use of wood** for each unit handled since 2024.
- the **replacement of polypropylene** (PP) straps with **recycled PET straps,** with significant impacts on the reduction of virgin plastic.
- continuous implementation of the **Close the Loop project,** aimed at the recovery and recycling of plastic for the creation of new packaging. This project allows IRSAP to reuse heat-shrink film with a percentage of 50% recycled plastic from IRSAP's own waste and IRSAP Industrie to use heat-shrink film with 50% recycled material. Thanks to the strategic partnership with the suppliers involved in the project, C_2 reduction data attributable to the project, calculated using the LCA methodology, are also used for internal analysis purposes.
- **interventions on renewable sources:** in 2025 the obsolete photovoltaic panels at the IRSAP headquarters were replaced to increase energy capacity and, in parallel, a

new photovoltaic park was installed at the IRSAP Industrie site. The environmental benefits related to the use of photovoltaic parks for self-consumption will be reported from 2026.

These projects involve **different actors in the company and in the value chain:** from packaging suppliers, to technical departments, to end customers. The interventions are part of the **upstream and downstream phase** of the supply chain and represent a first concrete step towards circular transition.

E5-3 Targets related to resource use and circular economy

To date, no specific or structured targets related to resource use and circular economy have been formalised. The actions implemented are, in fact, the result of the initiative of the individual operational or project functions, and progress has been assessed **in terms of perceived economic and environmental benefit**, but not yet tracked through consolidated quantitative indicators.

Although no measurable targets have been set, the company **monitors the effectiveness of these actions through internal management,** evaluating the results achieved subsequent to the general objectives of its Environmental Policy. In this context, we plan to include indicators relating to:

- the use of recycled materials in packaging
- reducing the consumption of virgin wood and plastic
- **the circular design** of products and packaging

E5-4 Resource inflows

The IRSAP Group has monitored the main inflows of resources used in its production activities, with a particular focus on the materials used, water resources and relevant technological assets. Although water is not a raw material directly used in primary industrial processes, it is used for ancillary purposes, such as system cooling, sanitation and cleaning. Water consumption is monitored through management systems, with the aim of ensuring its efficient use and of containing any waste already reported in E3-4.
The Group's production plants employ a wide range of plants and machinery for production, including painting lines, laser cutting and bending systems, presses and assembly machines: during 2025, investments were concluded for the installation of **new laser centres** and for the **revamping of photovoltaic systems** at the Italian site.

In this sense, the Group monitors its resource inflows as they are closely linked to the responsible management of raw materials, production efficiency and reduction of the environmental impact throughout the entire life cycle of the products.

The **technical materials** used, which represent approximately **42.9% of the total materials used,** mainly include steel pipes, metal accessories, steel sheets, metal components, cardboard and wood packaging, painting powders, brass valves, plastic packaging and electronic components. These elements represent the material basis of the production of IRSAP and IRSAP Industrie and are used both in the production of finished products and in packaging and shipping operations.

Of these, recycled materials, such as recycled steel and plastic (PET straps), used both in the production and packaging of products, represent a significant share of the total. For these materials there are also specific certifications: LEED and EPD for steel and SLP (Second Life Plastic) for some cardboard and plastic packaging. Overall, recycled materials amount to **11,384 tons,** corresponding **to 57% of the total materials used.**

There is also a significant commitment to the use of biological materials from a sustainable supply chain, which represent 14% of the total materials used.

Thanks to the sustainability questionnaire addressed to critical suppliers, a notable improvement can be appreciated in the reporting of materials certified from recycled supply chains. The certifications required for monitoring of the quantities of recycled materials include: LEED and EPD, Second Life Plastic and r-PET, Recy and others.

This improved monitoring and information collection activity and made it possible to report the improvement data from 2024 to 2025.

Certifications used to certify sustainable origin include **PEFC** (Programme for the Endorsement of Forest Certification) for wood and FSC for cardboard.

MATERIALS USED BY WEIGHT	UNIT OF MEASUREMENT	2025	2024
Total weight of materials used	t	19,952	26,475
Of which from biological materials from a sustainable supply chain	t	2,808	4,105
Of which recycled materials	t	11,384	2,983

E5-5 Resource outflows

Even in 2025, the IRSAP Group continued to carefully monitor the production and destination of waste generated by its activities, recognising in this area an essential component of its sustainability strategy. The data in this section refer to the IRSAP and IRSAP Industrie facilities, where the main production activities take place and, consequently, most of the waste generation.

Almost all of the waste produced consists of non-hazardous waste, while **hazardous waste** represents a marginal share, equal to approximately **1% of the total.** Overall, about **87%** of the waste generated was sent to **recovery operations,** confirming the Group's commitment to reusing and maximising resources. Within this share, recycling is one of the main methods adopted, alongside other forms of recovery.
The remaining 13% of the waste was instead destined for disposal, through incineration, landfill or other methods.

WASTE GENERATED (t)	2025								
	OF WHICH EARMARKED FOR RECOVERY				OF WHICH EARMARKED FOR DISPOSAL				Total waste generated
	Preparation for reuse	Recycling	Other recovery operations	**Total waste recovered**	Incineration	Landfill	Other disposal operations	**Total waste for disposal**	
Hazardous waste	**0**	**1**	**7**	**8**	**11**	**0**	**37**	**49**	**57**
Non-hazardous waste	**0**	**926**	**1,990**	**2,916**	**46**	**19**	**340**	**404**	**3,320**
Total waste produced	**0**	**927**	**1,997**	**2,924**	**57**	**19**	**377**	**453**	**3,377**

Compared with previous years, there is an **overall decrease in the production of waste produced:** in 2025, in fact, waste production stood at around **3,377 tons,** compared to 3,576 tons in 2024 and 3,702 tons in 2023.

WASTE GENERATED (t)	2023			2024			2025		
	Total waste recovered	Total waste for disposal	**Total waste generated**	Total waste recovered	Total waste for disposal	**Total waste generated**	Total waste recovered	Total waste for disposal	**Total waste generated**
Hazardous waste	**15**	**17**	**32**	**11**	**32**	**43**	**8**	**49**	**57**
Non-hazardous waste	**3,282**	**388**	**3,670**	**3,099**	**434**	**3,533**	**2,916**	**404**	**3,320**
Total waste produced	**3,297**	**405**	**3,702**	**3,110**	**466**	**3,576**	**2,924**	**453**	**3,377**

03

A representation of the Maintenance team of the Arquà Polesine plant next to the red bench, made by them, on the occasion of the International Day for the Elimination of Violence against Women.

SOCIAL INFORMATION

ESRS S1
Own workforce

ESRS 2 SBM-2 Stakeholder interests and views

Information about stakeholder interests and views is described in section SBM-2.

ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

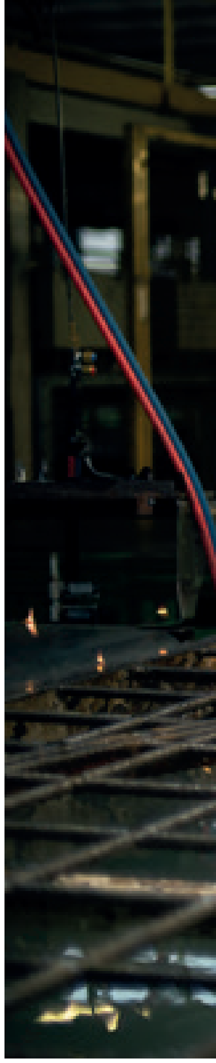
Information about material impacts, risks and opportunities and their interaction with strategy and business model is described in section SBM-3.

S1-1 Policies related to own workforce

During 2025, the IRSAP Group continued to manage its human resources through consolidated procedures, formalised in the code of conduct adopted by the Group. Although no site-specific policy has been formalised, the H.R. practices implemented reflect a concrete focus on the welfare and rights of the workforce, in line with the main sustainability regulations and expectations.

In its **Code of Conduct,** in fact, the Group recognises in human resources a fundamental and irreplaceable asset for the success and development of the company. For this reason, IRSAP selects the employees it hires in a transparent manner, taking into account only the specific expertise related to the role, while rejecting any improper conditioning, either external and/or internal, protecting professional growth and development in order to grow the skills of each employee, through the delivery of suitable training, in order to increase the overall quality of the service and improve the performance of the structure. In managing employment relations and collaboration, IRSAP is guided by full respect for workers' rights, with particular regard to the moral and physical integrity of employees, promoting their full development and refraining from any discriminatory behaviour.

In terms of **health and safety,** IRSAP has, in fact, defined a management system for accidents at work in accordance with national legislation (Italian Law 319/2006). Accidents are classified according to the assessment of the Territorial Labour Inspectorate, which in the event of an assessment implements corrective actions. A "Thematic Training Plan" is prepared annually, which includes monthly meetings on health and safety, divided into sections such as purpose,



In 2025 IRSAP strengthened its social commitment through training, gender equality and inclusion initiatives, promoting professional growth, well-being and work-life balance.

field of application, regulatory references, description of training activities, expected dates and responsibilities. In addition, safety responsibilities are defined in the role sheets of each operator.

In the field of **diversity & inclusion,** in 2025 the Group started the path towards UNI/PdR 125:2022 certification, by adopting a management system for gender equality. The project aims to promote equal opportunities, diversity and inclusion through concrete actions, such as the publication of a Gender Equality Policy
aligned with the **Manifesto for Gender Equality** that already since 2023 has collected the fundamental principles aimed at promoting collaboration between colleagues and overcoming gender stereotypes through effective, non-violent and non-discriminatory communication, fostering growth paths based on merit, regardless of gender. Particular attention is paid to parenting, considered a value to be protected through concrete measures of **work-life balance.** The company also encourages **the personalised development of competencies** and is committed to ensuring balanced representation in key roles and decision-making processes. IRSAP intends to overcome the traditional division of roles in the workplace through training and awareness-raising initiatives accessible to all. Finally, it adopts a **zero-tolerance policy** towards any behaviour detrimental to the dignity of the person, calling all staff to respect the principles expressed in the Code of Business Conduct.

In addition, the Group, with the aim of protecting its workforce and of promoting an ethical and safe environment, has adopted a **Whistleblowing Policy** in accordance with Leg. Decree 24/2023, which guarantees employees, collaborators and other subjects related to the company the possibility of reporting, in a confidential and protected manner, illegal conduct or irregularities. The instrument strengthens the culture of legality and represents an essential safeguard for the protection of the rights of anyone who works in or in collaboration with the Company.

S1-2 Processes for engaging the workforce and employee representatives on impacts

During 2025, the IRSAP Group adopted a structured and ongoing approach to engaging its workforce and their representatives, as previously outlined in ESRS 2 SBM-2, aimed at managing and improving material impacts on the work environment and on employee well-being.

Engagement takes place mainly through workers' representatives (directly elected by the workforce or appointed by the union) who act as intermediaries in communications with the company. The procedures **include periodic meetings** between RSUs (Unitary Trade Union Representation) and company representatives that take place on a quarterly basis and serve to provide information and advice, and to deliberate. In addition, paid monthly meetings are held, during working hours, in dedicated premises made available by the company, where workers are informed about decisions and can express their needs.
In addition to structured meetings, there will be opportunities for ad hoc discussion to address critical issues or proposals

for improvement, with the full support of the employer. At company level, the figures responsible for the correct performance of these processes of involvement and integration of results in company decisions are the Chief Operations Officer and the Chief People Officer for IRSAP, while for IRSAP Industrie this task is entrusted to the General Manager and to the Head of Human Resources.

The engagement of the workforce also translates into concrete agreements: in Italy, there is a supplementary company agreement in place that provides for advanced welfare measures, including extended paternity leave, financial support for parental leave and initiatives to promote gender equality. IRSAP Industrie has also entered into a supplementary agreement that includes benefits for significant family events and financial support for thermal spa therapy.

Consistent with the described engagement processes, IRSAP adopts an approach aimed at**listening** to and **assessing the needs** expressed by the company's population, also with reference to personnel management and the development of welfare initiatives. The measures adopted stem both from proposals that emerged in the dialogue with employees and their representatives and from initiatives promoted by Management. These welfare tools are attributable to two main areas: on the one hand, economic contributions and benefits, on the other, services to the person, aimed, for example, at promoting well-being and work-life balance. To support these initiatives, a welfare policy has been published, outlining their objectives and operational procedures, thereby ensuring a structured approach to corporate welfare management.

The effectiveness of these tools is monitored through participation in corporate climate surveys, such as the **Great Place to Work® questionnaire,** which is an organisational climate analysis model based on the analysis of different aspects of corporate culture, including employee confidence in leadership, the fairness and impartiality of organisational practices, sense of belonging and well-being of employees, as well as through monitoring the use of the welfare platform. IRSAP has also adopted transparent procedures for the dissemination of company agreements, by emailing documents and posting them on the bulletin board.

Lastly, particular attention is paid to understanding the perspectives of the most vulnerable groups, such as women, migrants and people with disabilities, also through specific tools for listening and detecting organisational welfare.

S1-3 Processes to remedy negative impacts and channels that allow the workforce to raise concerns

The Group has set up a structured system to address and resolve the material negative impacts that may affect its own workforce. If the company causes or contributes to causing a negative impact, a formal process of evaluation and management of the problem is activated through the direct involvement of H.R., workers' representatives and, where necessary, trade union parties. The disciplinary procedure is managed in compliance with the timeframes provided for by the National Collective Labour Agreement (CCNL), concluding within a maximum of 11 days from notification, and aims to ensure fairness and transparency. The effectiveness of the remedies is assessed by monitoring the resolution of the case and collecting feedback in subsequent meetings with workers' representatives.
Workers can communicate their concerns through:

- **quarterly meetings** with workers' representatives
- **monthly meetings on occupational safety,** where issues related to well-being and working conditions also emerge
- **a company whistleblowing channel,** as required by the specific policy adopted by the Group, which allows reports to be made anonymously or by name, and to be addressed **to the Supervisory Body** (SB).

The whistleblowing channel can be accessed via the online platform and used by all the Group's employees, in accordance with current legislation and Italian Leg. Decree 24/2023.

All employees are required to comply with the disciplinary code defined in the National Collective Labour Agreement (CCNL) and with the Internal Organisational Regulations (ROI), both of which are provided to every worker and displayed in an accessible location. In the event of formal reports, the appropriate disciplinary procedure is activated by H.R. To ensure workers are familiar with and use the available channels:

- every employee has received a copy of the National Collective Labour Agreement (CCNL) and Internal Organisational Regulations (ROI), containing information on rights, duties and disciplinary procedures.
- training is carried out **twice a year** for department managers on the disciplinary code and correct use of communication and reporting channels.
- each request or complaint is accompanied, at the request of the worker, by a union representative, to protect the individual.

The Group's whistleblowing system also enables independent handling of reports, through a process that includes the management of whistleblowing reports, preliminary verification and possible initiation of internal investigations in compliance with current legislation, with a guarantee of anonymity, confidentiality and protection against retaliation.

S1-4 Taking action on material impacts on own workforce and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

During 2025, the IRSAP Group implemented a series of interventions aimed at the structured management of the material impacts on its own workforce, while pursuing development and welfare opportunities for its employees. These interventions are part of a broader strategy of responsible management of human capital, consistent with the goals outlined in the Group's **People Strategy**.

In terms of health and safety, the Group continued to propose preventive initiatives such as influenza vaccination and specific training programs, including **GYMHUB**, actively involving workers' representatives.
In addition, the **"IRSAP SAFETY DAY"**event was organised at IRSAP during working hours for all employees. The event, open to all employees, took place at the Teatro Sociale in Rovigo, where attendees watched the show "Ocjo, la sicurezza è di scena" (Ocjo: Safety Takes Centre Stage), an initiative organised by Sviluppo Formazione aimed at promoting a culture of safety in both the workplace and everyday life. At local area level, IRSAP is one of the most important industrial companies in the province of Rovigo, offering inclusive and non-discriminatory job and professional development opportunities. With this in mind, welfare measures aimed at all employees have been strengthened. These include: the annual coverage by the **Metasalute,** health fund, support from the HR department managing health-related paperwork, the promotion of adherence to supplementary pension funds through the timely payment of contributions, the willingness to enter into part-time contracts beyond the provisions of the national collective labour agreement (CCNL) and the adoption of flexible working arrangements for all compatible tasks.

With regard to the inclusion of individuals belonging to vulnerable groups, the Group is committed to job placement of people with disabilities. At IRSAP Industrie, already in the second half of 2024, a partnership was initiated with authorised Romanian companies that employ workers belonging to protected categories, in particular for the supply of company clothing.

These measures are complemented by further economic support initiatives aimed at the company population, including a daily meal voucher for all employees, a gift voucher on the occasion of holidays and a monthly attendance bonus, aimed at enhancing work assiduity.

From the point of view of work organisation, the internal regulations relating to smart working came into force throughout the Group in 2025 which provides for the possibility of working remotely for up to a maximum of 10 days per month for the entire employee population.
At the same time, a half-hour flexible scheduling arrangement was introduced for office staff in response to a specific need identified through analysis of the corporate climate, with the aim of fostering a better work-life balance.

To assess and improve organisational welfare, the Parent Company initiated a collaboration with **Great Place to Work®**, concluded at the end of 2024, conducting an employee climate survey; the results were benchmarked against national standards, shared within the company, and led to the launch of nine improvement projects aimed at boosting satisfaction, productivity, and the company's appeal. Notable examples include the **IRSAP Mentor Academy** for professional development, the organisation of the annual **IRSAP Family Day,** the introduction of a **Lean Manufacturing** and **Lean Office System program,** initiatives to improve internal communication and the adoption of digital information tools.

The improvement plan also included specific initiatives for employees of the IRSAP Industrie plant, where the working hours have been diversified according to the municipality of residence, in order to reduce traffic and to improve work-life balance. Participation in collective events, such as the Color Run and corporate sports tournaments, was aimed at strengthening inter-departmental ties and a sense of belonging. In addition, cultural initiatives have been introduced, including the company library service **Bookster**, which allows staff to access educational and cultural content through a subscription that is fully financed by the company, in support of personal growth. All the projects concerned all the employees of the site where they were organised and involved, in addition to staff, also trade union representatives, training bodies and, in some cases, the local territory. The activities have different time horizons: some, such as management of absences due to illness or training programs, are continuous while others have a start or implementation planned from 2025, such as extended smart working or flexible hours.

No damage resulting from actual negative impacts on the own workforce were identified during the reporting period; therefore, it was not necessary to implement specific corrective actions. However, a proactive approach has been adopted to prevent risks and promote positive impacts, in line with the **2025 strategic goals,** which include attracting and retaining talent and developing key skills through continuous training.

S1-5 Objectives related to the management of relevant impacts, the enhancement of positive impacts as well as risks and opportunities

IRSAP has defined a set of results-oriented strategic goals for managing its workforce, described in paragraph ESRS 2 SBM-1. These goals are aimed at reducing potential negative impacts, strengthening positive ones and proactively managing risks and opportunities related to human capital, in line with its own path of integrating ESG criteria into the company strategy.

In particular, the people strategy is structured along four main lines:

- **talent management:** In 2025 IRSAP launched a strategic project dedicated to the identification, development and enhancement of internal talents, with the aim of improving internal communication, increasing a sense of belonging and encouraging employees to stay with the company. This intervention aims to strengthen the capacity of the organisation to attract and retain key resources, contributing to the mitigation of the risk of turnover.
- **work-life balance:** in order to enhance the positive impact on the well-being of workers, initiatives have been launched aimed at improving the balance between professional and private life, including through the adoption of new leadership and people management models. The goal is to increase employee satisfaction and engagement by combating work-related stress and absenteeism.
- **training and development:** IRSAP has defined a multi-level training program which includes courses aimed at both internal staff (such as, for example, the provision of technical/specific training on environmental certifications of the product and on the LCA methodology) and at high school and university students. The aim is to attract young talent, encourage their inclusion and promote a process of continuous upskilling and reskilling of staff, thus strengthening the company's competitiveness and organisational resilience.
- **company culture:** IRSAP undertakes to spread a corporate culture geared towards efficiency, reducing bureaucracy and empowerment at all levels. These values support worker autonomy and help create a more flexible, collaborative and inclusive work environment.

In addition to these medium- to long-term strategic goals, the company has also defined specific actions to prevent and manage risks related to the workforce's welfare and psychological safety.
Formal guidelines for the prevention of violence and harassment, including sexual abuse, **were adopted in 2025** with the aim of promoting a safe, respectful and inclusive work environment. A **whistleblowing channel and a procedure dedicated to handling reports of** moral and sexual harassment are already active in IRSAP Industrie: the goal is to also gradually extend these tools to the commercial branches.

IRSAP has started a **process of implementing a management system for gender equality,** which involves the formalisation of procedures aimed at preventing and managing cases of discrimination. The company, in fact, believes that gender equality is a fundamental value for its success. In 2024, with the aim of developing an engaged and efficient organisation, **the Observatory for Gender Equality** was created, a group made up of male and female colleagues seeking to actively engage in this issue. During 2024, the observatory published the first IRSAP Gender Equality Manifesto, proposing and implementing specific activities and initiatives. In 2025, the process for certification of the management system for gender equality was launched with the aim of conducting the third-party audit during 2026.

The **goal-setting process** is led by management, with the progressive involvement of H.R. functions and internal representations. In particular, in relation to some initiatives (e.g. training programmes), direct involvement of the workforce has already been initiated, aimed at meeting the needs and expectations of employees. This participatory approach will also be progressively extended to the results monitoring phase, to ensure that the goals are aligned with the real needs of individuals and to identify any areas for improvement, through tools that assess their effectiveness, such as the adoption of **social KPIs** and the systematic collection of feedback.

S1-6 Characteristics of company employees

In the three-year period 2023-2025, there is a trend of progressive reduction in the total number of employees, which affects both male and female staff, while maintaining a stable gender composition over time: the female share stands at around 25% of the total.

	2023	2024	2025
GENDER	**NUMBER OF EMPLOYEES**		
Men	789	739	740
Women	263	251	253
Other[17]	-	-	-
Not stated	0	0	0
TOTAL EMPLOYEES	**1,052**	**990**	**993**

Analysing the type of contract, the year 2025 shows the greater use of fixed-term contracts compared to 2024. However, it remains a minority form of contract with respect to the number of permanent contracts that represent the constant attention of the company to the employment stabilisation of its people.

In terms of working hours, most employees continue to work on full-time contracts. However, the increase in the part-time component, particularly in 2024, stabilised in 2025. In any case, the Group favours and guarantees the tool of part-time to anyone who requests it and well beyond the provisions of the National Collective Labour Agreement (CCNL), with the aim of meeting the needs of its people as far as possible.

	2025				
	WOMEN	**MEN**	**OTHER**	**NOT STATED**	**TOTAL**
NUMBER OF EMPLOYEES					
Number of employees with open-ended contracts	242	702	-	0	944
Number of employees with fixed term contracts	11	38	-	0	49
TOTAL	**253**	**740**	**-**	**0**	**993**
Number of full-time employees	236	727	-	0	963
Number of part-time employees	17	13	-	0	30
TOTAL	**253**	**740**	**-**	**0**	**993**

	2024				
	WOMEN	**MEN**	**OTHER**	**NOT STATED**	**TOTAL**
NUMBER OF EMPLOYEES					
Number of employees with open-ended contracts	247	731	-	0	978
Number of employees with fixed term contracts	4	8	-	0	12
TOTAL	**251**	**739**	**-**	**0**	**990**
Number of full-time employees	228	715	-	0	943
Number of part-time employees	23	24	-	0	47
TOTAL	**251**	**739**	**-**	**0**	**990**

[17] In Italy, it is not possible to legally register as belonging to a third gender, for this reason the "other" category is not applicable.

	2023				
	WOMEN	MEN	OTHER	NOT STATED	TOTAL
NUMBER OF EMPLOYEES					
Number of employees with open-ended contracts	257	755	-	0	1,012
Number of employees with fixed term contracts	5	35	-	0	40
TOTAL	**262**	**790**	**-**	**0**	**1,052**
Number of full-time employees	237	778	-	0	1,015
Number of part-time employees	26	11	-	0	37
TOTAL	**263**	**789**	**-**	**0**	**1,052**

Finally, the data for 2024 showed a negative turnover rate of 11%, higher than the rate of new hires (5%), while in 2025 between the positive and negative turn-over rate the difference is only 1%.

	2025				
NEW HIRES AND TURNOVER	**No. of employ-ees**	**No. of new hires**	**No. of termina-tions**	**Rate of positive turnover**	**Rate of negative turnover**
Total	**993**	**128**	**135**	**13%**	**14%**

	2024				
NEW HIRES AND TURNOVER	**No. of employ-ees**	**No. of new hires**	**No. of termina-tions**	**Rate of positive turnover**	**Rate of negative turnover**
Total	**990**	**49**	**107**	**5%**	**11%**

S1-7 Characteristics of non-employee workers in the company's workforce

In 2025, the IRSAP Group continued to monitor its non-employee workers. In particular, 43 interns and trainees were involved, testifying to the Group's commitment to promoting training courses and career opportunities.

	2025				
	WOMEN	MEN	OTHER	NOT STATED	TOTAL
NUMBER OF NON-EMPLOYEES					
Temporary workers	2	16	-	0	18
Interns and trainees	13	30	-	0	43
TOTAL	**15**	**46**	**-**	**0**	**61**

S1-13 Training and skills development metrics

The IRSAP Group considers **continuous training** and the **development of strategic asset skills** fundamental to ensure the professional growth of its people and competitiveness of the business in the long term. In order to monitor the effectiveness of development policies, from this edition of the reporting a system of tracking of the hours of training provided has been implemented, divided by professional category (executives, middle managers, employees, workers) and by gender. The training programmes cover key areas such as occupational health and safety, technical and digital skills, ESG issues, as well as leadership, communication and soft skills pathways. For the provision of training, the IRSAP Group uses different methods including:

- an e-learning platform that allows the use of content in a flexible and traceable way
- face-to-face courses with internal and/or external teachers both for mandatory training and for the training identified in the annual training plan
- on-site training for versatility in the operational departments
- language courses in hybrid mode, both in person and remotely
- IRSAP Mentor, the corporate Academy
- external courses at specialised schools, universities or business schools, such as CUOA Business school of which IRSAP is a supporting member.

2025					
AVERAGE HOURS OF TRAINING	**WOMEN**	**MEN**	**OTHER**	**NOT REPORTED**	**TOTAL**
Executives	-	23.4	-	0	23.4
Middle Managers	18.3	14.3	-	0	14.9
Employees	11.5	11.0	-	0	11.2
Workers	40.1	129.2	-	0	75.6
Total	**33.8**	**72.2**	**-**	**0**	**53.1**

In addition, the Group regularly monitors the percentage of employees who receive a formal performance and career development assessment, promoting a meritocratic, equitable and inclusive approach. The periodic performance review is a review of which employees are aware, conducted at least once a year on the basis of criteria shared with both employees and function managers and is performed with the guidance and support of the human resources function.

2025					
PERCENTAGE OF EMPLOYEES WHO PARTICIPATED IN PERIODIC REVIEWS OF PERFORMANCE AND CAREER DEVELOPMENT BY PROFESSIONAL CATEGORY AND BY GENDER	**WOMEN**	**MEN**	**OTHER**	**NOT REPORTED**	**TOTAL**
Executives	-	20%	-	0	20%
Middle Managers	33%	100%	-	0	89%
Employees	41%	41%	-	0	41%
Workers	1%	6%	-	0	3%
Total	**9%**	**25%**	**-**	**0**	**17%**

S1-14 Health and Safety Metrics

The protection of workers' health and safety is a priority for the Group, which ensures the coverage of 100% of its employees through an occupational health and safety management system. This commitment is also reflected in the Organisational, Management and Control Model pursuant to Italian Leg. Decree 231/2001 adopted by the parent company, which includes an organisational structure dedicated to health and safety, in accordance with Confindustria Guidelines and current prevention regulations. In particular, the Company has drawn up of the Risk Assessment Document (RDA) for each site and secondary unit as well as the clear and formal definition of the subjects responsible for safety in the workplace with the aim of eliminating – or, where this is not possible, at reducing and managing – occupational risks. The clerical, middle managerial and executive categories are considered **low risk** in terms of occupational health and safety. Workers, instead, are classified according to the **specific risk associated with the task performed,** as defined in the Risk Assessment Document.

In the three-year period 2023-2025, no deaths related to occupational injuries or diseases were recorded among Group employees. With regard to accidents, there is a decreasing trend compared to 2023 both in their absolute number and in the rate of accidents at work that can be recorded[18] but stable compared to the previous reporting period. The reporting scope includes the entire IRSAP Group.

EMPLOYEE HEALTH & SAFETY METRICS	2023	2024	2025
Number of deaths due to occupational injuries and illnesses	0	0	0
Number of work-related accidents	28	18	21
Work-related accident rate	18.54	11.73	12.77
Number of work-related illnesses	0	0	0

[18] The occupational accident rate is calculated using the following formula: (Number of accidents / Hours worked) × 1,000,000.


MUSEUM

S1-15 Work-life balance

100% of the Group's workers are covered by collective bargaining agreements, except for employees of BEMM GmbH and IRSAP UK Ltd, which are regulated by specific national regulations. Attention to employee well-being is also reflected in improved **parenting support.**
Pictured on page 52 is the IRSAP employee who became a dad in 2025. Thanks to internal surveys, the number of days of paternity leave was increased (from 10 to 15) and the amount of optional maternity leave was increased by 20%.

Employee benefits have also been formalised in commercial branches in line with the respective regulatory contexts. In particular, IRSAP UK has provided for the extension of parental leave. Although regulatory differences do not allow the adoption of a single website for corporate welfare, IRSAP ensures that all benefits are formalised and accessible to staff in each country.

Even in 2025, all employees were entitled to **parental leave,** confirming an ongoing commitment to work-life balance. In 2025, **4%** of eligible employees took leave, a slight increase compared to the previous reporting period. Until 2024, in the calculation of parental leave, BEMM was excluded from data collection as they were not available. During 2026, the leave scheme will be the subject of extensive information initiatives aimed at increasing awareness and uptake among all personnel across the IRSAP Group.

2025					
FAMILY LEAVE[19]	**WOMEN**	**MEN**	**OTHER**	**NOT REPORTED**	**TOTAL**
Total employees	253	740	-	0	993
Employees entitled to parental leave	253	740	-	0	993
Percentage of employees entitled to parental leave	100%	100%	-	0	100%
Eligible employees who took parental leave	11	25	-	0	36
Percentage of eligible employees who took parental leave[20]	5%	4%	-	0	4%

2024					
FAMILY LEAVE[19]	**WOMEN**	**MEN**	**OTHER**	**NOT REPORTED**	**TOTAL**
Total employees	237	705	-	0	942
Employees entitled to parental leave	237	705	-	0	942
Percentage of employees entitled to parental leave	100%	100%	-	0	100%
Eligible employees who took parental leave	5	15	-	0	20
Percentage of eligible employees who took parental leave[20]	2%	2%	-	0	2%

2023					
FAMILY LEAVE[19]	**WOMEN**	**MEN**	**OTHER**	**NOT REPORTED**	**TOTAL**
Total employees	244	750	-	0	994
Employees entitled to parental leave	244	750	-	0	994
Percentage of employees entitled to parental leave	100%	100%	-	0	100%
Eligible employees who took parental leave	7	6	-	0	13
Percentage of eligible employees who took parental leave[20]	3%	1%	-	0	1%

[19] Family leave includes maternity leave, paternity leave, parental leave and caregiver leave included in national legislation or collective agreements.
[20] The percentage of eligible employees who actually took parental leave is calculated by dividing the number of beneficiaries by the total number of eligible employees, then multiplying the result by 100.

ESRS S3
Affected communities

ESRS 2 SBM-2 Stakeholder interests and views

Information about stakeholder interests and views is described in section SBM-2.

ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

Information about material impacts, risks and opportunities and their interaction with strategy and business model is described in section SBM-3.

S3-1 Policies related to affected communities

IRSAP Group undertakes to generating a positive impact on local communities through the **IRSAP FOUNDATION ETS, a** business foundation established in 2022 by IRSAP S.p.A. and the Red and Zen Families, founding partners. The Foundation represents the evolution of the consolidated social commitment of the founders, with the aim of strengthening the link between the company and the local areas in which it operates, promoting inclusion, culture and environmental sustainability.

The IRSAP Foundation pursues, on a non-profit basis, **civic, solidarity and social utility purposes** through the exercise, exclusively or mainly, of activities of general interest pursuant to art. 5 of Leg. Decree 117/2017 (Third Sector Code). Its statutory purposes constitute in all respects the Group's policy regarding the management of material impacts, risks and opportunities related to affected communities. In particular, the Foundation aims to:

- support the most fragile social categories
- protect and enhance nature and the environment
- promote culture and historical and artistic heritage
- reduce the cultural and digital divide, encouraging access to new technologies.

The governance of the policy is entrusted to the **Board of Administration of the Foundation,** which meets at least twice a year to evaluate the interventions performed and to plan future ones. In addition, during the year the board members maintain constant relations with the beneficiary associations, monitoring the continuity and quality of the projects supported.

The Foundation's scope of action mainly concerns the local communities where the Parent Company and its companies are based, also extending to international contexts where the Group is present. The main stakeholders are, therefore, associations, third sector entities and the direct beneficiaries of social activities.
The Foundation is **registered in the Italian National Register of the Third Sector (RUNTS),** implementing Articles 45 et seq. of the Third Sector Code. The statute is publicly available on the RUNTS portal. Among the initiatives supported during the year, a notable highlight is the signing of an agreement with the Municipality of Arquà Polesine (RO) as part of the “In-CASTRA – Il Castello per gli Altri” project, in accordance with the “Luoghi (non) comuni” call for proposals issued by the Cariparo Foundation. This call is aimed at supporting territorial regeneration projects with the purpose of enhancing underused communal spaces. The project involves the creation of spaces in the Castle of Arquà Polesine dedicated to socialisation and training through the organisation of musical, cultural and educational events, as well as of workshops open to all age groups.

The community policy is not currently included in the IRSAP Code of Conduct, but formalised in the Foundation's bylaws. IRSAP, as a majority shareholder, actively participates in achieving the stated goals, thus making the IRSAP Foundation an instrument consistent with the Group's corporate values and ESG approach.

S3-2 Processes for engaging with affected communities about impacts

IRSAP Group, through the activities of the IRSAP Foundation ETS and the iGreen initiative, adopts a structured and continuous approach to the engagement of the communities affected, both local and non-local, in order to responsibly manage material social impacts.

The Foundation is contacted directly by third-sector associations operating in the areas where the Group is present. They propose their own projects in order to receive financial support.
The selection of initiatives to be financed is carried out internally by IRSAP Foundation on the basis of criteria of social merit, consistency with the statutory goals and economic sustainability. During these six-monthly meetings, the projects presented are assessed and those already supported are monitored: in doing so, the member of the Board in charge maintains a constant dialogue with most of the funded associations, collecting updates and assessing new proposals.

The point of view of the affected communities is taken into account through direct contact with the representatives of the organisations involved, who help to guide the Foundation's philanthropic activities. A prime example is the support provided to the San Cassiano Voluntary Organisation (OdV) as part of a project offering accommodation and employment to former inmates. The initiative involved the renovation of a former warehouse, transformed into a workshop, offering the people involved a safe environment from which to start again to build a dignified future. This activity testifies to the Foundation's attention to people in a condition of social fragility and at risk of marginalisation, in

line with the principles of inclusion and promotion of social reintegration.

The functions responsible for the organisation and monitoring of the involvement of the communities are the Foundation's Board of Directors and, operationally, the director responsible for relations with associations.
The effectiveness of these processes is assessed in terms of quality, through the degree of continuity and impact of the projects supported over time, as well as through direct feedback from the beneficiaries.

In parallel, the **iGreen project,** active for over five years, represents an internal participatory activation tool for the promotion of social and environmental sustainability, both inside and outside the company. The iGreen group consists of approximately 20 volunteer collaborators, who are at the forefront of raising awareness on crucial issues such as energy saving, optimising resources, reducing waste and rejections, but also on social issues such as violence against women. The objectives of iGreen are to strengthen **internal awareness** and encourage the development of a **sustainable corporate culture,** at the same time promoting the involvement of the largest number of people and an understanding of the positive impact that can be generated through collective actions. These aims are pursued through concrete projects developed in the short, medium and long term. At the beginning of each year, the themes to be explored and the thematic days to be organised are identified. The events are assessed beforehand from an economic point of view, to ensure consistency with the available budget, and afterwards, in terms of results achieved, also based on the level of **engagement generated** among workers and the continuity of the projects supported.

The activities promoted by the iGreen group include a number of significant environmental and social initiatives. To address the issue of bee conservation, a topic of particular importance to the group's members, a special event was organised at the "Bosco delle Api" (Bee Forest), located near the parent company's headquarters. During the event, employees and their families learned more about the vital role bees play in maintaining ecosystem balance, thanks to a presentation by an expert beekeeper. The initiative also included opportunities for active participation, including the construction of hives and tasting of the honey produced. In the social sphere, the group promoted three initiatives to mark the International Day for the Elimination of Violence against Women. In particular, a day of training and awareness-raising on the subject was conducted in collaboration with the Peter Pan Centre in Rovigo, the design and construction of a new red bench by the maintenance team and a self-defence course for employees and the wives and daughters of employees, held at the end of working hours, which was attended by over thirty people.

S3-3 Processes to remediate negative impacts and channels for affected communities to raise concerns

IRSAP Group adopts an approach based on transparency and social responsibility also the management of any negative impacts that could affect the communities with which it interacts.

Firstly, the Group makes its whistleblowing channel available, allowing any behaviour contrary to business ethics or significant matters to be reported, including to external communities.

In addition, through its corporate foundation, IRSAPFoundation, **tools for listening and continuous dialogue** with the supported associations have been prepared, in order to guarantee the possibility of expressing concerns, needs and requests for support. Among the main **channels activated** are:

- the Foundation's dedicated e-mail address: irsap.foundation.ets@gmail.com, to which the beneficiary associations can write to receive clarifications or to make requests
- the direct relationship with the member of the Foundation's Board, who maintains regular contacts with the supported organisations.

These tools allow not only the communication of needs or critical issues, but also represent a useful tool to prevent risk situations and to activate, if necessary, **timely remedial mechanisms.**

To ensure the reliability of the entities supported and prevent potential negative impacts, IRSAP Foundation requires that partner organisations be correctly registered in the Italian National Register of the Third Sector (RUNTS).
This publicly verifiable requirement makes it possible to select entities that have already undergone institutional controls regarding transparency and administrative propriety.

The monitoring of the reported issues and the **quality of the dialogue with the affected communities** takes place through regular updates and dedicated meetings, with particular focus on the effectiveness of the tools activated. In addition, as specified in section G1-1 of the report, IRSAP Group adopts protective measures for individuals who use the channels made available, in order to prevent any form of retaliation against whistleblowers.

S3-4 Taking action on material impacts on affected communities and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions

IRSAP Group, through its corporate foundation **IRSAP Foundation,** adopts a structured approach to respond to the needs of the affected communities and generate a positive and tangible impact in the social, cultural and environmental fields. Once the contribution has been approved, IRSAP Foundation maintains a **continuous dialogue** with the beneficiaries: this approach allows the effectiveness of the interventions to be assessed and the selection of future projects to be improved, contributing to the identification of opportunities for collaboration in the local area, aimed at improving the social and economic conditions of the area in which IRSAP Group operates.

The Foundation's activities fall within the scope defined in the Third Sector Code[21] and are classified according to the ICNPO (International Classification of Non-Profit Organisations) taxonomy. Areas of intervention include:

- **social services** (4100): support for families in difficulty, assistance for the elderly and vulnerable people, as in the case of the project in collaboration with the SB San Cassiano
- **education and training** (2300 and 2200): professional, university and post-university education activities
- **environmental protection** (5100): support for projects for the protection of the territory
- **culture and art** (1100 and 1300): promotion of cultural, artistic and recreational initiatives
- **charity** (4300): disbursement of monetary contributions, goods or services to Third Sector entities and organisations committed to supporting disadvantaged people.

S3-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Throughout 2025, **IRSAP Foundation ETS** and the **iGreen** business project continued to be the main tools through which IRSAP Group manages the impacts on the affected communities. Although no quantitative objectives or performance indicators have been defined aimed at reducing negative impacts, the focus is on strengthening the positive impacts generated by the social, cultural and environmental activities supported.
For 2025, IRSAP Foundation ETS confirms its commitment to:

- **supporting projects with a social impact,** in particular in favour of fragile categories (families in difficulty, women victims of violence, children and the elderly)
- **prioritising local area initiatives,** with reference to the contexts in which the parent company and its intercompanies operate
- **consolidating multi-year projects** to guarantee a lasting and structured impact on the beneficiary communities
- **encouraging partnerships with third sector entities,** in compliance with the statutory purposes (art. 5 of Italian Leg. Decree 117/2017).

At the same time, the iGreen working group, which has been active for five years in IRSAP, has set targets for 2025 aimed at raising the environmental and social awareness of employees and their families. In particular, the group undertakes to:
- Promote **awareness-raising initiatives on environmental issues** related to the protection of the territory and natural resources, with a particular focus on local impacts
- Promote greater awareness of **health and well-being issues** through
information and prevention activities
- Strengthen attention**to relevant social issues**, including the fight against gender-based violence
- Encourage the **active participation** of employees in educational, cultural and voluntary activities.

[21] The reference is to Art. 5, paragraph 1, of Italian Leg. Decree no. 117 of 3 July 2017, which lists the activities of general interest that third sector entities may carry out exclusively or primarily.

IRSAP protects consumers and end users with quality policies, listening, assistance, complaint handling, regulatory compliance, privacy and timely remedies, ensuring trust and satisfaction.

ESRS S4
Consumers and end-users

ESRS 2 SBM-2 Stakeholder interests and views

Information about stakeholder interests and views is described in section SBM-2.

ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

Information about material impacts, risks and opportunities and their interaction with strategy and business model is described in section SBM-3.

S4-1 Policies related to consumers and end-users

In the context of its production and commercial activities, the IRSAP Group recognises the strategic importance of the relationship with consumers and end-users. Their trust and satisfaction are fundamental elements for the continuity and reputation of the company, as well as key levers to promote innovation, quality and social responsibility.

IRSAP adopts an approach that focuses on the needs of its customers, which translates into procedures and tools to ensure quality, safety, and regulatory compliance throughout the value chain.
This approach is formalised in **IRSAP's Quality Policy**, shared across all levels of the organisation, made available via official company channels, and periodically updated, where the guiding principle is "maximum customer satisfaction". The main goals include continuous listening to customer needs, providing competent and timely services, continuous improvement of products and service level. The Policy is implemented through a structured process of monitoring based on internal audits and second-party audits of suppliers, customer satisfaction detection and quality control, consistent with the **ISO 9001 certificate management system.**

These values are also confirmed in the **Code of Conduct,** which establishes the commitment to guarantee the best performance in terms of appropriateness, timeliness, effectiveness, consistency and continuity required by the customer. IRSAP is also committed to complying with current regulations on safety, environmental impact and privacy in all the markets in which it operates, paying attention to the selection of raw materials and the responsibility of its supply chain.

Respect for consumer rights is also guaranteed through full compliance with internationally recognised standards, such as the United Nations Guiding Principles on Business and Human Rights and European legislation on the protection of personal data[22], governed by **IRSAP's** Privacy Policy. IRSAP, in fact, processes customer data transparently and in compliance with legal obligations, specifying the purposes, the legal basis, retention periods, parties involved and the rights of the data subject.

S4-2 Processes for engaging consumers and end-users about impacts

IRSAP Group recognises the importance of engaging consumers and end-users, both for the management of the impacts associated with its products and services, and to promote a continuous improvement of the relationship with the customer.

Currently, the Group manages any reports or critical issues on a **case-by-case basis,** with a pragmatic approach based on emerging priorities, in order to ensure effective and timely responses.

S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

IRSAP has put in place a structured system for the management of reports, complaints and requests for assistance from consumers and end-users, in order to promptly identify any negative impacts and activate effective remedial processes.

Through the **company website,** customers can directly contact the **Service Centres** or pre and after-sales services, submitting their requests through the Zendesk portal. Reports relating to problems or "defects" of the products are recorded in the system and are subsequently analysed in dedicated meetings between the **Customer Care department** and the **Quality department.**

If a complaint is founded, IRSAP proceeds to verify the non-conformity or defect, involving the relevant departments such as Quality Control or Marketing/Product Development, depending on the type of problem found. Remedies may include, where necessary, compensation or replacement of the product. In addition to official channels, the Group also offers **contact methods through corporate social media channels.**

[22] The regulatory reference is to the GDPR (General Data Protection Regulation) – EU Regulation 2016/679, which establishes rules on the protection of natural persons with regard to the processing of personal data, as well as on the free movement of such data.

To ensure effective monitoring of the issues raised, the **SAP** system is used to process quarterly reports, which are sent to the sales representatives of each area. These reports make it possible to systematically assess the effectiveness of the reporting management system.

To ensure the availability of channels on a local area level, IRSAP has also developed and outsourced a **network of Service Centres.** The maintaining and updating of the information accessible to customers also takes place through the official website, managed by a dedicated team.

However, the Group intends to further integrate additional safeguards in the broader context of the its customer relationship management policies, in line with the business conduct commitments described in section ESRS G1-1.

S4-4 Taking action on material impacts on consumers and end-users and approaches to mitigating material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

Over the years, IRSAP has demonstrated a commitment to managing impacts on consumers and end-users through an internal system that enables prompt intervention in the event of critical issues. In particular, it should be noted that in the past **recall** operations (withdrawal from the market) of certain products have been activated, thanks to the presence of internal monitoring, traceability and labelling tools. In 2025, there were no events that required the activation of extraordinary interventions or specific action plans for consumers.

IRSAP maintains active reporting and listening tools and channels through which it is possible to receive reports and assess any emerging risks. In the event of defects, the company is able to check the product, involve the relevant internal departments and, if necessary, proceed with remedial actions such as replacements, refunds or updates to the technical documentation. This confirms the Group's commitment to maintaining effective communication with its customers through a variety of channels. The **"Customer Care"** structure comprises over 100 in-house colleagues and 50 external associates, working to ensure constant, high-quality support. Among the main communication channels, the company offers:

- **targeted training** for designers, architects, installers and showroom operators, to ensure that all professionals who interact with IRSAP products have an in-depth and up-to-date understanding
- **interactive website,** always updated, which allows direct and constant access to information by customers and professionals
- **care of physical places,** with particular attention to showrooms.

This approach, geared towards **information transparency,** is embodied in the preparation of:
- **dedicated instruction sheets** for each product
- **price lists and detailed technical documentation,** including all certifications obtained from accredited third parties
- updated content on the **company website** and **on the social media channels**
- **video tutorials** and **technical training** aimed at showrooms, architects and other stakeholders in the sector.

This commitment aims to ensure the well-informed, correct use of products, thus reducing the risk of misuse and, consequently, repercussions on the safety of its end users. As confirmation of this, no incidents related to consumers or end users have been recorded.

In any case, the parent company continues to monitor complaints through the SAP system and to generate reports shared with commercial contacts, such as supervisory and prevention measure of the risks related to the quality perceived by customers.

S4-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Although IRSAP has not yet defined formalised and quantitative goals, the topic of the relationship with consumers and end users is already integrated into the Group's strategy, as illustrated in the ESRS 2 SBM-1 section. In this context, the **centrality of the customer is identified as one** of the fundamental pillars, and is pursued through an approach geared towards customisation, listening and continuous improvement of the use and purchase experience.

In fact, a series of **quality and target goals have been identified** which represent the strategic priorities to improve interaction with the final consumer:

- **development of a centralised CRM (Customer Relationship Management),** to ensure an integrated and structured management of customer relationships throughout all phases of the product and service life cycle.
- **enhancing of the customer experience,** through touchpoint analysis, the systematic collection of feedback and improving the customer journey, with particular attention to after-sales
- **creation of a qualified network of installers,** to improve the perceived quality of the service and strengthen the oversight of the end customer, also in terms of consultancy
- **optimisation of the product range,** aimed at simplifying the offer, making it more legible and more in line with consumers' needs.

These strategic objectives are complemented by **two evolving elements,** which represent important operational levers to strengthen the commitment to the customer:

- **management of complaints and critical issues:** the company adopts a reactive approach to the management of negative impacts, addressing the reported problems on a case-by-case basis, in close collaboration with the Quality department.
  As there are no defined standard deadlines, resolution also depends on the timeliness of response of the suppliers involved. However, a service KPI managed by the Customer Care team has been set up internally, which includes:
  - customer feedback within 24 hours
  - resolution of the issue within 48 hours
- **continuous improvement through the Lean project:** in 2024 a Lean process was launched in the production area that was extended in 2025 to the offices. This program, which is fully operational, aims to optimise internal processes, including those with an impact on the end customer, such as complaint management and efficiency in response times.

04

GOVERNANCE INFORMATION

ESRS G1
Conduct of companies

ESRS 2 GOV-1 The role of administrative, management and supervisory bodies

As Parent Company, IRSAP S.p.a. has adopted a traditional Governance model that aims to ensure the proper functioning of the Company and of the Group. The model includes the following bodies:

- the Shareholders' Meeting
- the Board of Directors (BoD)
- the Board of Statutory Auditors

The statutory audit is performed by an Auditing Firm, appointed by the Shareholders' Meeting.

The current Administrative Body, appointed by the Shareholders' Meeting, consists of a **Board of Directors (BoD), currently composed of three members.** The Board of Directors has all the powers of ordinary and extraordinary administration and, in accordance with the Articles of Association, has delegated part of its powers to two directors.

The **CEOs,** in particular, **develop the strategies,** evaluate the **economic, social and environmental performance** of the Group, perform **risk analysis and opportunities** and assess **compliance with the regulations and codes of conduct.**

As at 31 December 2025:

- the Board of Directors is composed of three members, of which two executive and one independent
- the term of office of the governing body is three financial years
- the Board of Directors is composed entirely of male members.

No specific diversity policies have been adopted in relation to the composition of the Board of Administration, but forms of discrimination are excluded based on considerations of ethnicity, nationality, country of origin, sex, sexual orientation, religion, political or other opinions.

ESRS 2 IRO-1 Description of processes to identify and assess the relevant impacts, risks and opportunities

The information on the description of the processes to identify and assess material impacts, risks and opportunities is described in the IRO-1 section.

G1-1 Business conduct policies and corporate culture

IRSAP Group bases its business culture on principles of transparency, integrity and responsibility, promoting ethical behaviour in all its activities and relationships, both internal and external. To ensure the effective implementation of these principles, the company has adopted an integrated system of safeguards and regulatory instruments, including the **Organisation, Management and Control Model** pursuant to **Leg. Decree 231/2001,** the **Code of Ethics,** the **Code of Conduct** and the **Anti-Corruption Guidelines.**

The **Code of Ethics,** approved by the Board of Directors, constitutes the fundamental reference for the conduct of all the people operating in the Group. It establishes the prohibition of any corrupt practice, including improper payments, donations of benefits or gifts to public or private entities, whether direct or indirect. The Code is publicly available in the *"Policies and Documents"* section of the company website.

To complete the internal regulatory framework, the IRSAP Group has also adopted a **Code of Conduct,** already imple-

IRSAP adopts transparent and responsible governance, based on ethics, integrity and tools such as Code of Ethics, Model 231 and whistleblowing. The Board of Directors guides strategies and checks, while reports and risks are managed through structured safeguards and processes.

mented in all IRSAP Group companies. The document includes the contents of the Parent Company's Code of Ethics, excluding, however, the regulatory references to Leg. Decree 231/2001, and during 2025 it was progressively extended to the other Group companies (Irgroup S.a.r.l. and BEMM GmBH.), thus promoting a uniform approach to corporate culture in the international arena.

IRSAP also draws inspiration from the main **international standards,** including the the International Bill of Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work, the UN Rio Declaration on Environment and Development and the ten principles of the UN Global Compact, integrating these principles into its internal codes and the Supplier Code of Conduct.

To promote correct behaviour and to intercept any illegal conduct, IRSAP has implemented a **multilingual whistleblowing portal,** accessible by all Group companies. The portal guarantees the anonymity of the whistleblower and compliance with European regulations on the matter. Refresher training sessions dedicated to the operation of the tool are planned for 2026.

Alongside whistleblowing, IRSAP has activated several channels for managing reports:

- **health, safety and environment:** through dedicated software, the reports are evaluated by the HSE Manager and the Prevention and Protection Service Manager and discussed during the periodic reviews, pursuant to art. 35
- **cybersecurity:** internal e-mail box for the reporting of phishing and spam attempts
- **customer care:** three dedicated channels depending on the business units (Heat, Smart, Air), which allow customers to report problems and be directed to the competent office.

Lastly, **the IRSAP Supervisory Body** (SB) is responsible for monitoring the application of Model 231 and receives periodic updates on the reports and corrective actions taken through summary reports. The Board of Directors and Board of Statutory Auditors are also constantly informed about the activities of the Body.

G1-2 Management of relationships with suppliers

IRSAP Group recognizes the strategic importance of a responsible supply chain based on sustainability, transparency and legality. In line with the principles enshrined in the Code of Ethics and Model 231, relationships with suppliers are managed on the basis of shared ethical principles, formalised in the **Supplier Code of Conduct,** which formalises the commitment to promote sustainable practices throughout the value chain. The document recalls and extends the contents of the Code of Ethics, including minimum standards that suppliers - as well as their subcontractors and representatives - are required to comply with in terms of: human rights, health and safety at work, environmental protection, anti-corruption, compliance with current regulations, prevention of discrimination and enhancement of human capital.

IRSAP requires suppliers to adopt environmental management systems, in particular in cases of activities with significant environmental impacts, as well as a commitment to act in compliance with the principles of impartiality, integrity, transparency and legality. Periodically, the Group sends self-assessment questionnaires to suppliers to monitor their ESG performance and consistency with company values. If breaches of the Code are found, IRSAP reserves the right to request corrective measures and, in the absence of agreement, to terminate the contractual relationship.

All suppliers, including employees, agents and subcontractors, are required to comply with these standards and share their principles. IRSAP promotes partnerships based on mutual trust, believing that a sustainable supply chain is a key element for competitiveness and business resilience.

In 2025, the company continued to monitor the sustainability practices of its suppliers through the dissemination of an **ESG questionnaire,** mainly aimed at suppliers of direct and indirect goods and materials. The tool is used to gather information on the environmental, social and governance policies adopted and represents a useful lever to guide future choices in the phase of selection, assessment and management of supply risk.

ENTITY SPECIFIC: Quality and product innovation

MDR-P **Policies adopted to manage sustainability matters**

Quality and innovation are fundamental strategic levers for IRSAP Group to ensure long-term competitiveness and to respond effectively to the needs of a constantly evolving market. This translates into the need to promote the continuous improvement of its products and services, the digitalisation of processes and the training of people, in order to consolidate long-lasting relationships with customers, collaborators and suppliers.

To this end, the parent company has adopted a policy, drawn up in compliance with the requirements of **ISO 9001** as an integral part of its Quality Management System, aimed at guaranteeing the quality of products, promoting innovation and seizing opportunities related to sustainability, placing active customer listening and continuous improvement at the centre. This policy reflects the commitment to generate **lasting value** along the entire value chain, at the same time ensuring the responsible management of risks and related opportunities, which is integrated into business processes and performed at least annually, through analysis of the context and the application of structured methodologies that produce dedicated documentation.

The **Quality Policy** is based on several key principles:

- constant listening to customer needs
- delivery of services in a competent and timely manner
- continuous improvement of products and service levels
- enhancement of skills and training of personnel
- search for operational efficiency to ensure competitiveness
- building of long-term relationships with customers, suppliers and collaborators.

Based on these commitments, IRSAP has identified six strategic areas of development that guide its activities: **Growth, Sustainability, Customer, Innovation and Design, Efficiency and People.**

The policy, whose implementation and implementation is entrusted to the CEOs, applies to the entire production of radiators and accessories of the Group, and takes into account the interests of the organisation's main stakeholders – customers, employees, collaborators and suppliers – whose involvement is considered essential for the achievement of company objectives. In fact, the Quality Policy is available and accessible online on the IRSAP website and it is displayed on all company bulletin boards, in order to ensure its full internal dissemination.

MDR-A **Actions and resources in relation to material sustainability matters**

Thanks to the new strategic plan, the first product in the **TESI 3** range was certified in 2024 under the **ISO 14067** standard (Product Carbon Footprint); this process involved estimating the radiator's carbon footprint based on a product life cycle assessment (LCA – Cradle-to-Grave). This has allowed IRSAP to identify the main phases that impact the environment and provide customers with an increasingly transparent emission estimation service. Annex C of ISO 14067 provides guidance for the application of a systematic approach to the calculation of a product's carbon footprint (CFP). This approach considers the entire life cycle of the product, from the extraction of raw materials to the end of its life cycle, including the stages of production, transport, use and disposal. This certification, obtained for the first time by the company, represents an important step towards greater transparency and environmental responsibility in the domestic heating sector.

The work team dedicated to the implementation of the issues CFP is composed of the Sustainability Manager, HSE Manager, Strategic Marketing Manager and, in addition, makes use of the help and primary data provided by the data owners. During the data collection, several actors in the supply chain were involved, mainly suppliers.

The carbon footprint management system according to ISO 14067 – Annex C (so-called **Systematic Approach**) was implemented for the first time in IRSAP in 2025 and was subject to a third-party audit with the accredited body Bureau Veritas® during the month of May 2025.
The Carbon Footprint management system (so-called CFP) is based on the primary product data provided by the different company departments and uses 2023 as its base year for measurement. IRSAP's application of Annex C for the Tesi range indicates that the company:

- defined the **boundaries of the system** and the**functional unit:** clearly identifying which life cycle stages have been included in the assessment and the declared functional unit
- collected specific data: acquiring **site-specific data** relating to energy consumption, materials used, production processes and logistics to quantify the greenhouse gas emissions associated with the core and downstream phases.
  Data from typical product scenarios were employed for the use phase and end of life
- used **appropriate emission factors**: converting activity data into CO2 equivalent emissions using relevant emission factors
- calculated **the carbon footprint:** adding up the greenhouse gas emissions for the entire life cycle of the Tesi radiator
- identified areas for **improvement:** analysing the results to identify the phases with the greatest impact and define strategies for reducing emissions.

Furthermore, the **Close the Loop** project concerning heat-shrinkable film was implemented and is fully operational as of 2025 involving different actors in the supply chain.

Since 2025, the Close the Loop project has fully recovered polyethylene waste, transforming it into new recycled films, promoting a circular economy.

An initiative that breaks new ground in the circular economy: Crocco S.p.A. SB, IRSAP S.p.A. and Aliplast (HERA Group) have worked together to implement a **new recycling process** whereby all polyethylene waste originating from IRSAP's production process is completely recovered and transformed into new heat-shrinkable films. Every kilogram of production scrap generated by IRSAP's plastic packaging, recovered by Aliplast, finds new life in Crocco's products, with no waste or residues to be disposed of. The process is based on a simple and innovative circuit, completely made in Italy. IRSAP uses polyethylene films to package its designer radiator products; the scrap generated by this process, which is considered waste in all respects, is collected by Aliplast, which collects, sorts, washes and transforms it into post-consumer plastic granules.

By 2025, 95 tons of films containing IRSAP waste recovered from Aliplast (approximately 45 tons) were produced, thus absorbing all of IRSAP's production waste. The project also guarantees cost stability: the use of 50% recycled material does not imply price increases compared to traditional solutions, offering a concrete possibility of transition to more sustainable production processes.

The synergy between Crocco, IRSAP and Aliplast, all based in Veneto but destined to inspire other companies, shows that plastic can be managed in a virtuous way, limiting waste as much as possible and with tangible advantages for the environment and for industrial competitiveness. Through the film obtained from closed loop it is therefore confirmed that, with the right collaboration and appropriate technologies, the circular economy can become the basis of a new development model.
During 2025, the project was also extended to IRSAP Industrie, specifically regarding the use of recycled film sourced from the same supply chain.

The financial resources are guaranteed through a budget dedicated to the sustainability projects described in this report and follows the established budgeting processes.

MDR-T Tracking effectiveness of policies and actions through targets

The IRSAP Group has started a structured process of *strategy deployment* for the definition of measurable and results-oriented objectives.
The goals are in line with the six strategic guidelines defined in section SBM-1, and are divided into the following areas:

- **growth:** increase in the order book and ordered volumes
- **sustainability:** reduction of CO_2 emissions
- **customer:** reduction of complaints received
- **innovation and design:** increase in the number of new products and technical changes placed on the market
- **efficiency:** reduction of labour hours per battery produced and containment of waste and rework
- **people:** improvement in the effectiveness of selection processes and training.

These goals apply to the entire IRSAP Group, including the production of radiators, accessories and controlled mechanical ventilation (CMV) systems, and are valid across all operating sites. The baseline is set at 2025, the year from which progress was measured and the results obtained were evaluated. The monitoring process will be carried out using specific quality and quantity indicators for each area, and will be subject to periodic analysis as part of the Management Review.

Annexes to the Sustainability Report

List of Disclosure Obligations made public

ESRS	DISCLOSURE REQUIREMENT	DESCRIPTION OF THE DISCLOSURE REQUIREMENT
ESRS 2	BP-1	General basis for preparation of sustainability statements
ESRS 2	BP-2	Disclosures in relation to specific circumstances
ESRS 2	GOV-1	The role of the administrative, management and supervisory bodies
ESRS 2	GOV-2	Information provided to the administrative, management and control bodies of the company and matters of sustainability addressed by these
ESRS 2	GOV-3	Integration of sustainability-related performance in incentive systems
ESRS 2	GOV-4	Statement on due diligence
ESRS 2	GOV-5	Risk management and internal controls over sustainability reporting
ESRS 2	SBM-1	Strategy, business model and value chain
ESRS 2	SBM-2	Interests and views of stakeholders
ESRS 2	SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model
ESRS 2	IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities
ESRS 2	IRO-2	Disclosure requirements in ESRS covered by the company's sustainability statement
ESRS E1	E1-1	Transition plan for climate change mitigation
ESRS E1	E1-2	Policies related to climate change mitigation and adaptation
ESRS E1	E1-3	Actions and resources in relation to climate change policies
ESRS E1	E1-4	Targets related to climate change mitigation and adaptation
ESRS E1	E1-5	Energy consumption and mix
ESRS E1	E1-6	Gross scopes 1, 2, 3 and Total GHG emissions
ESRS E3	E3-1	Policies related to waters and marine resources
ESRS E3	E3-2	Actions and resources in relation to climate change policies
ESRS E3	E3-3	Objectives related to waters and marine resources
ESRS E3	E3-4	Water consumption
ESRS E5	E5-1	Policies related to resource use and circular economy
ESRS E5	E5-2	Actions and resources related to resource use and circular economy
ESRS E5	E5-3	Targets related to resource use and circular economy
ESRS E5	E5-4	Resource inflows
ESRS E5	E5-5	Resource outflows
ESRS S1	S1-1	Policies related to own workforce
ESRS S1	S1-2	Processes for engaging with own workers and workers' representatives about impacts
ESRS S1	S1-3	Processes to remedy negative impacts and channels that enable the workforce itself to raise concerns
ESRS S1	S1-4	Taking action on material impacts on own workforce and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions
ESRS S1	S1-5	Targets related to managing material impacts, advancing positive impacts, as well as risks and opportunities
ESRS S1	S1-6	Characteristics of the company's employees
ESRS S1	S1-7	Characteristics of non-employee workers in the company's own workforce
ESRS S1	S1-13	Training and Skills Development Metrics
ESRS S1	S1-14	Performance of health and safety system
ESRS S1	S1-15	Work-life balance
ESRS S3	S3-1	Policies related to affected communities
ESRS S3	S3-2	Processes for engaging with affected communities about impacts
ESRS S3	S3-3	Processes to remedy negative impacts and channels that allow affected communities to express concerns
ESRS S3	S3-4	Interventionson relevant impacts on the communities concerned and approaches to manage relevant risks and to achieve relevant opportunities for the communities concerned, as well as the effectiveness of such actions
ESRS S3	S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
ESRS S4	S4-1	Policies related to consumers and end-users
ESRS S4	S4-2	Processes for engaging consumers and end-users about impacts
ESRS S4	S4-3	Processes to remedy negative impacts and channels that enable consumers and end users to express concerns
ESRS S4	S4-4	Interventions on relevant impacts for consumers and end users and approaches for the mitigation of relevant risks and the achievement of relevant opportunities in relation to consumers and end users, as well as the effectiveness of such actions
ESRS S4	S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
ESRS G1	G1-1	Business conduct policies and corporate culture
ESRS G1	G1-2	Management of relationships with suppliers
Entity specific: Product quality and innovation	MDR-P	Policies adopted to manage material sustainability matters
Entity specific: Product quality and innovation	MDR-A	Actions and resources in relation to material sustainability matters
Entity specific: Product quality and innovation	MDR-T	Tracking effectiveness of policies and actions through targets

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