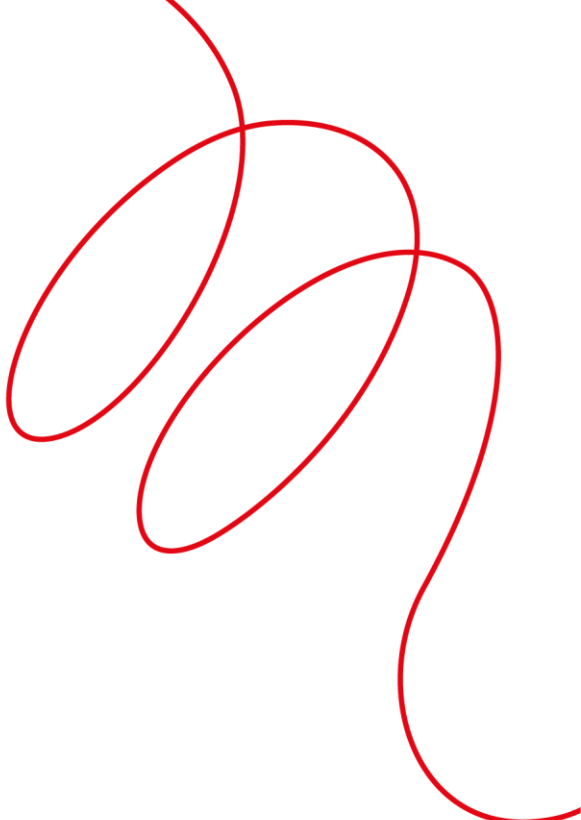
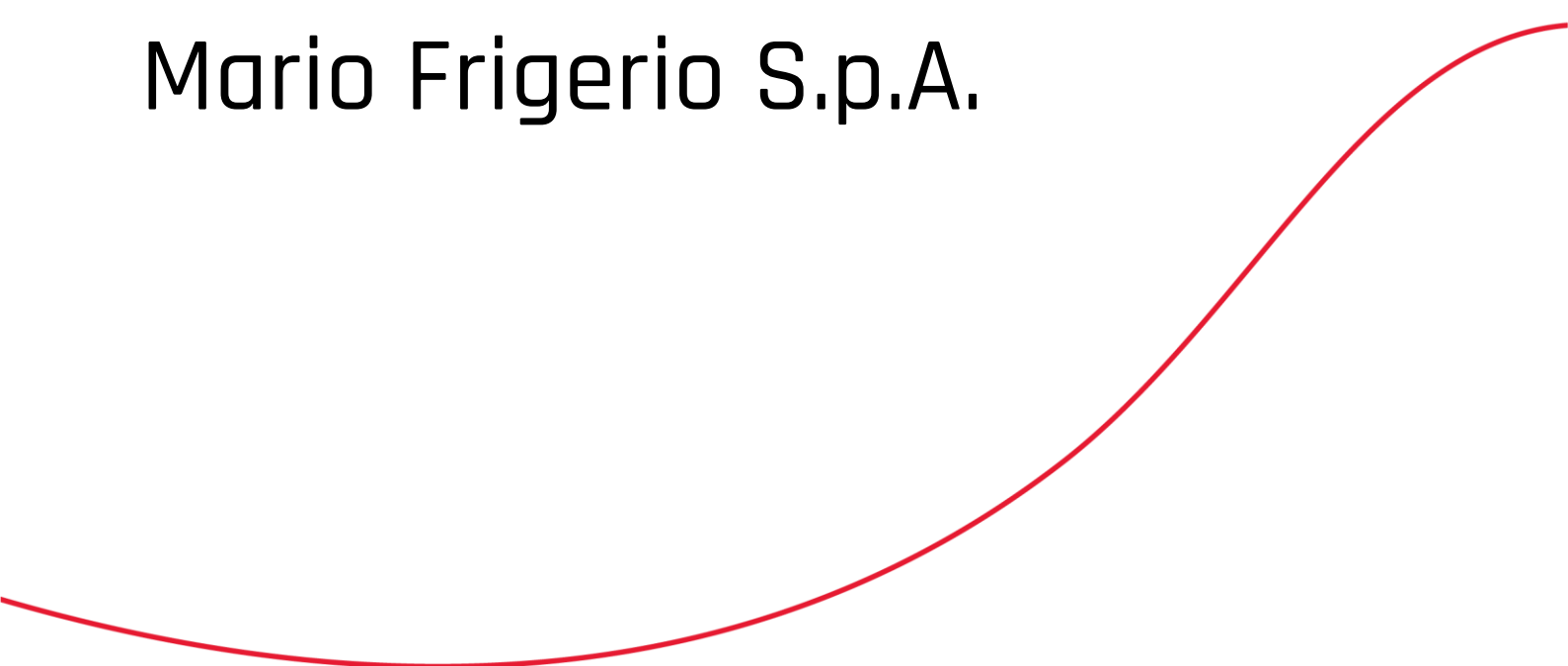




ESG

Policy

Mario Frigerio S.p.A.



Text approved by the board of directors of Semplice S.p.A. on 17 November 2025 and adopted by Mario Frigerio S.p.A. with resolutions of its board of directors dated 17 November 2025.

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1. INTRODUCTION

This ESG Policy (hereinafter referred to as the “Policy”) is intended to set out Mario Frigerio S.p.A.'s (hereinafter referred to as “Mario Frigerio”) approach to sustainability, understood as the implementation of a plan aimed at integrating environmental, social and governance principles into its corporate strategy and relationships with its key stakeholders.

As the lead company of the MFL Group, Mario Frigerio recognises the crucial importance of a continuous and consistent commitment to sustainability, social responsibility and transparency in its governance.

From an integrated and holistic sustainability point of view, Mario Frigerio adopts a Policy that summarises actions, goals and responsibilities related the main environmental, social and governance issues, both internally and externally.

2. PURPOSE

This Policy is the result of the firm intention of Mario Frigerio's Management to formalise a concrete and ongoing commitment to sustainability, with the aim of strengthening alignment between the Company's Mission and values, economic goals as well as social and environmental responsibility, as specified in the Code of Ethics.

This Policy applies to all companies, offices, activities and departments of MFL Group, acting as a strategic and operational reference for the integration of ESG principles into every business process. It is intended for all Mario Frigerio and MFL Group personnel, including collaborators, employees and management, and extends to all parties with whom we interact, including suppliers, partners, customers, investors and other stakeholders.

Mario Frigerio undertakes to actively disseminate this Policy to ensure transparent communication of its sustainability commitment, values and goals. This approach promotes an open and constructive dialogue with stakeholders and promotes greater awareness throughout the entire value chain.

Mario Frigerio is committed to reducing its environmental impact, promoting social well-being and ensuring responsible governance, in line with international sustainability best practices. The Company implements an integrated ESG strategy based on clear and measurable goals and concrete actions, to continuously improve its performance. This commitment is supported by certified management systems: ISO 9001 (Quality), ISO 14001 (Environment) and ISO 45001 (Occupational Health and Safety).

3. REGULATORY REFERENCES

This Policy has been drafted in compliance with the main European and national regulations on sustainability, corporate responsibility and the management of environmental, social and governance impacts. Furthermore, it refers to a series of internal documents listed below.

External regulations:

- Directive (EU) 2022/2464 (Corporate Sustainability Reporting Directive – CSRD) and its Italian transposition, Legislative Decree No. 125/2024. These references refer to the reporting of environmental, social and governance sustainability of companies.
- Regulation (EU) 2020/852 (EU Taxonomy Regulation). This Regulation refers to the taxonomy of sustainable business activities.
- Directive (EU) 2024/1760 (Corporate Sustainability Due Diligence Directive – CSDDD). This Directive introduces the obligation for companies to carry out due diligence in order to prevent, mitigate and remedy adverse impacts on human rights and the environment along the entire value chain.
- Relevant national and EU environmental regulations.
- Health and safety regulations, including Legislative Decree No. 81/2008, which establishes the obligations to protect workers' health and safety in the workplace.

The Policy is also inspired by voluntary references and internationally recognised standards, including: the United Nations Sustainable Development Goals (SDGs), the principles of the UN Global Compact, the standards of the Global Reporting Initiative (GRI), the European Sustainability Reporting Standards (ESRS), the guidelines of the Science-Based Targets initiative (SBTi) and the Task Force on Climate-related Financial Disclosures (TCFD), as well as the main ISO reference standards.

Internal regulations:

- Code of Ethics.
- Model 231.
- Reference policies.

4. ESG COMMITMENT

4.1 Environmental Commitment

L Mario Frigerio's activities are driven by the principles of precaution, prevention, protection and continuous improvement of environmental performance, through a proactive approach as envisaged by the ISO 14001 management system. Its environmental strategy revolves around three pillars.

1. Climate change and energy efficiency

Climate risk analysis. Given the current situation that requires adapting to the challenges posed by climate change, Mario Frigerio has conducted a climate risk analysis for its facilities, in order to assess the best strategies to address present and future challenges.

Emission reduction and environmental impact. Mario Frigerio is committed to quantifying and reducing its greenhouse gas (GHG) emissions, optimising its machinery efficiency and reducing energy and water consumption.

Energy consumption monitoring. The implementation of an energy consumption monitoring system enables Mario Frigerio to adopt effective solutions to improve consumption and implement strategies with a lower environmental impact.

Energy efficiency. Through consumption monitoring and the adoption of heat recovery solutions, the Company improves its energy efficiency and reduces overall demand. The Molteno site was designed following eco-design principles and has installed photovoltaic systems to generate renewable energy, thus converging a significant portion of its energy needs.

2. Resource management and pollution

Water saving. Mario Frigerio optimises water use through constant consumption monitoring and recovering water for irrigating green areas located in the Company premises.

Pollution and natural resource management. Mario Frigerio has adopted the UNI EN ISO 14001 certified Environmental Management System, reducing the use of hazardous chemicals in its processes and products. Furthermore, the optimisation of energy, water and natural gas consumption is monitored through an integrated system for resource conservation.

Sustainable waste management. Mario Frigerio has implemented policies for waste reduction, reuse and recycling through an integrated management system that promotes separate waste collection and ensures regulatory compliance. The Company is committed to reducing its waste generation and promoting recycling practices, working with local stakeholders to improve the territory.

Sustainable mobility. The Company encourages the use of electric and hybrid vehicles for its corporate fleet. Furthermore, logistics partners are selected based on their use of eco-friendly transport solutions.

3. Biodiversity and Ecosystems

Protection of biodiversity. Mario Frigerio recognises the value of biodiversity and ecosystems and is committed to reducing the ecological impact of its operations. The Company promotes solutions that enable the reduction of soil sealing and encourage the implementation of eco-friendly infrastructures that improve urban environmental quality.

Environmental offsetting projects. The company is committed to supporting reforestation projects and other initiatives that strengthen biodiversity at global level.

4.2 Social Commitment

Mario Frigerio acknowledges the importance of promoting decent working conditions and respect for human rights; its goal is the improvement of the well-being of its employees, customers and the communities in which it operates. The company has taken concrete actions to ensure a fair, inclusive and safe work environment. Its social commitment is based on four main pillars.

1. Occupational health and safety

Improving health and safety conditions. Mario Frigerio has implemented an ISO 45001 certified Health and Safety Management System, which ensures high safety standards for its employees. In addition, the Company invests in voluntary measures to improve health and safety conditions, such as the use of electric forklifts and the introduction of awareness campaigns on safe behaviours.

Reducing accidents. Mario Frigerio implements proactive measures to reduce workplace accidents by conducting periodic incident analyses and implementing corrective solutions. In addition, ongoing employee training, as well as legal requirements, ensures a safe work environment.

2. Workplace well-being and climate

Promoting workplace well-being. Mario Frigerio periodically analyses workplace climate to ensure a work environment that fosters dialogue, respect for workers' rights and fair working conditions. The company is committed to creating an inclusive and positive environment, aimed at ensuring a healthy work-life balance for all its employees.

Employment stability and professional growth. The Company is committed to prioritise permanent contracts and invests in continuous training programmes to support the professional development of its employees. These actions aim at reducing personnel turnover and ensure long-term career opportunities.

3. Diversity and Inclusion

Promoting diversity and inclusion. Mario Frigerio adopts policies that promote diversity and inclusion, ensuring a workplace that is inclusive and free from any discrimination. The company has implemented a policy on workplace harassment and violence.

4. Responsible supply chain

Sustainability in the supply chain. The company actively collaborates with its suppliers to ensure their compliance with sustainability and social responsibility principles. In addition, Mario Frigerio promotes ethical and sustainable practices along the entire supply chain.

4.3 Commitment to Governance

Mario Frigerio has adopted an ethical and transparent governance, with the goal of ensuring regulatory compliance as well as compliance with social and environmental responsibility principles. The company promotes a culture of accountability and transparency, supported by a structured system of internal controls and continuous communication with its stakeholders.

1. Compliance and transparency

Promoting regulatory compliance and ethical behaviour. Mario Frigerio promotes transparency, ethics and compliance with legal and international regulations. The Company has implemented a Corporate Code of Ethics that sets clear, lawful behaviours, with a strong commitment against corruption. The Organisational Model 231 (being an internal control system) has been implemented to prevent unethical behaviour and ensure operational integrity.

Whistleblowing system. To promote transparency and accountability, Mario Frigerio has established a whistleblowing system that enables its employees and all stakeholders to report any misconduct securely and confidentially.

2. Innovation and research

Supporting innovation and research. Mario Frigerio collaborates with academic institutions, research centres and technology partners to promote innovation and develop new sustainable solutions. The Company invests in scientific and technological research to improve its production processes and offer innovative solutions to its customers, strengthening its market competitiveness.

3. Communication and stakeholder engagement

Dialogue and transparency with stakeholders. Mario Frigerio maintains a constant and structured dialogue with its stakeholders, ensuring transparency in its operations and strategic decisions. Communication is made easier by the Sustainability Report, which provides detailed information on ESG progress, and through regular stakeholder meetings to gather feedback and suggestions.

4. Governance and ESG Integration

Strengthening governance and integration of ESG topics. Mario Frigerio has assigned specific ESG governance responsibilities to Board Member Emilia Tentori, ensuring that environmental, social and governance issues are integrated in all corporate strategies. ESG governance is an

integral part of the company's decisions and is monitored at management level to ensure ongoing attention to the social and environmental impacts of its activities.

5. UPDATING AND COMMUNICATION

This Policy is approved by Mario Frigerio's Management and periodically updated in compliance with regulatory developments, company goals and stakeholder expectations. The implementation of the principles contained herein is monitored through specific indicators and corrective actions where necessary.

This Policy is communicated to all employees via the corporate intranet and is publicly available on the Company website, social media channels and information campaigns. Sustainable initiatives undertaken, such as environmental transition and personnel policies, will be promoted; periodic updates on ESG progress will be also published, which encourages an open dialogue with stakeholders, including satisfaction surveys and dedicated listening sessions.

6. CONCLUSION

With this Policy, Mario Frigerio reinstates its commitment to the sustainable management of its activities, combining competitiveness, innovation and responsibility. Each collaborator is expected to actively contribute to its daily implementation.

Molteno, 17/11/2025

The Employer

Emilia Tentori



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