

**MARVAL**  
**SUSTAINABILITY POLICY**

(Approved by the Board of Directors of the Marval Group on 16 December 2021)

## **PREMISE**

The Sustainability Policy (the "Policy") of the Marval Group (hereinafter also "Marval", or the "Company") was developed with the aim of disseminating the principles of environmental, social and governance sustainability (hereinafter also "ESG").

As part of the strategy that Marval has launched in order to pursue the defined objectives on sustainability, the integration of ESG principles is also particularly important.

These principles play an increasingly important role in the daily work of the Company that operates in the belief that sustainability is the "driver" of a process of continuous improvement that guarantees results over time and the strengthening of its economic performance, reputation and health and safety of its workers, as well as allowing it to achieve its objectives in the environmental field, social and governance.

The creation of "shared value" for stakeholders is one of the main characteristics of Marval's sustainability and compliance with the laws alone is not enough to guarantee its sustainability over time.

Marval is an important company specialized in precision machining.

Marval is aware that economic and business activity generates direct and indirect impacts on human rights, on the environment in which it operates and on society, therefore it has defined the areas of responsibility towards its stakeholders: employees, customers, suppliers and communities, through the sharing of a corporate culture that complies with current regulations and aligned with international best practices.

The Policy integrates the sustainability model and identifies the principles that inspire Marval for a responsible management of its impact, both towards the communities in which it operates and towards its own people.

Marval is committed to incorporating its Sustainability Policy into its business practices and relationships with different categories of stakeholders. In particular, this Policy is functional to the identification, evaluation and management of ESG factors, which may involve both risks and opportunities, for the achievement of corporate objectives.

Aware of the central role of the sector in which it operates for responsible growth, Marval pursues and supports respect for internationally established human rights and considers the protection of the integrity, health, rights and well-being of its employees, the environment, as primary and fundamental elements in the exercise and development of its activities.

Marval's sustainability strategies pursue a continuous improvement of environmental, quality and health and safety aspects at work in compliance with the Company's Values and Code of Ethics.

Marval, in fact, has been ISO 9001 certified since 1998 together with the AVSQ94 Automotive scheme.

In 2005 the company obtained ISO/TS 16949 certification, confirmed as IATF 16949 in 2018.

It also implements an Environmental Management System aimed at safeguarding the surrounding environment and works through a specifically signed Code of Ethics.

Compliance with these principles, together with the values already mentioned in the Code of Ethics, is essential both within Marval and towards the subjects with whom it enters into a relationship in its daily work for the purpose of creating value in the short, medium and long term.

Marval's activities comply with the Code of Ethics approved by the Board of Directors and the sustainable development strategies presuppose the commitment to a continuous improvement of the environmental, health and safety aspects at work related to its activities, in firm respect and support of the contents of the "Universal Declaration of Human Rights", of the "Declaration of the Int Organization International Labour Law on Fundamental Principles and Rights at Work", the "Rio Declaration on Environment and Development" and the "United Nations Convention against Corruption".

#### **MODALITIES AND SCOPE OF APPLICATION**

This Policy is effective from the date of issue and is valid indefinitely, unless there is a need to make changes and / or additions.

Marval undertakes to ensure the maximum dissemination of this Policy, through the use of adequate cognitive tools, training and awareness of its contents.

The Policy is issued by the Management, posted on the bulletin board and published on the company's website in the specific Section Corporate Governance <https://www.marval.it/it/corporate-governance.html> to ensure its dissemination at all levels and to external stakeholders.

It is also Marval's responsibility to maintain this Policy updated over time, and communicate and disseminate any changes to the Recipients.

Any changes are submitted to the Board of Directors for consideration, which resolves on the approval of the Policy and is responsible for compliance with the principles set out therein.

The Policy is subject to periodic annual review in order to maintain the validity of the sustainability aspects and to evaluate over time their adequacy and effectiveness in the face of internal or external changes in the organization or to ensure the commitment to continuous improvement.

## **OBJECTIVES, COMMITMENTS AND AREAS OF APPLICATION**

The objective of the Sustainability Policy is to define the strategies and guiding principles of sustainability, with a specific focus on:

- contrast to corruption;
- social and personnel issues;
- respect for human rights;
- environmental protection

To this end, Marval undertakes to:

- promote the use of the most advanced technologies to achieve excellence in the protection of workers' health, occupational safety and environmental protection;
- assess and reduce the environmental impact of its products and services throughout their life cycle
- use resources responsibly with the aim of achieving sustainable development that respects the environment and the rights of future generations;
- not tolerate any kind of corruption in any form or way, in any jurisdiction, even where such activities were in practice allowed, tolerated or prosecuted judicially;
- involve all levels of the organization and all Marval employees ensuring that responsibilities and operating procedures are precisely defined, appropriately communicated and clearly understood;
- identify, assess and prevent risks to health and safety at work aimed at a continuous reduction in the number and severity of accidents as well as occupational diseases, activating health surveillance plans in order to protect workers from the specific risks associated with their company duties;
- manage its supply chain responsibly including, in particular, respect for the environment and occupational health and safety issues in supplier selection criteria, contractual clauses and audit criteria. It also requires its suppliers to implement a similar management model in their supply chain that complies, for environmental and occupational health and safety issues, with international standards and the laws and regulations of the countries where they operate.

To maintain the alignment of the company's strategy with the sustainability approach, Marval periodically approves a Plan of sustainability objectives that cover a period of time corresponding to that of the Business Plan. These commitments are of course part of the broader scope of the Sustainable Development Goals (SDGs) defined in the United Nations 2030 Agenda.

## **RECIPIENTS**

The recipients of this Policy are the corporate bodies and all persons linked by employment relationships with the Company and with the companies belonging to the group headed by the same as well as all those who work for the Group, whatever the relationship that binds them to the same.

This policy is disseminated to all employees of the Group and made public, Marval is committed to the continuous improvement of the policy itself and its programs and to implement procedures, rules and instructions to ensure that the values expressed in this policy are reflected in the behavior of its employees and collaborators.

Marval, through the application of this policy, believes to contribute to ensuring the generations of today and tomorrow the conditions and tools for a better quality of life.

Marval undertakes to disseminate this Policy through its website ([www.marval.it](http://www.marval.it)) in order to ensure its observance and correct application by all employees within the organization and interested parties.

## **COMMITMENT**

The ESG principles outlined in this Policy are closely linked to the distinctive criteria that have always contributed decisively to Marval's success. On the basis of these premises, the principles underlying the Group's work from an environmental, social and governance point of view are presented below.

The Sustainability Policy is implemented through the following areas of activity:

### **Environmental**

Marval is committed to minimizing and optimizing the impact that its activities generate on the environment - directly and indirectly - in the short and long term and to constantly monitor the risk factors related to environmental aspects. In particular, Marval is active in the use of processes and technologies aimed at reducing consumption and greenhouse gas emissions, to contribute to the mitigation of climate change. With regard to direct impacts, the Group makes its employees aware of the responsible use of resources and the correct disposal of waste. Marval is also committed to monitoring its indirect impacts, closely related to its work, in an increasingly structured way.

These principles are to be considered valid both within the Group and externally, through the offer of products designed to generate positive environmental impacts and to trigger virtuous behavior.

In terms of corporate culture, the protection of the environment is one of the key values.

For this reason, Marval is committed to adopting Environmental Management Systems certified according to recognized standards, with the aim of continuously improving its performance and mitigating risks.

In accordance with principio Marval undertakes to:

§ minimize the environmental impact of its activities, reducing energy consumption, emissions into the atmosphere and waste production, also improving the quality and efficiency of its plants;

§ equip themselves with state-of-the-art technological infrastructures and equipment, with particular reference to advanced washing water treatment systems and energy-efficient process equipment

§ Investments in R&D to improve the environmental performance of products, with particular reference to the choice of materials, design and end of life;

§ Promotion of sustainability concepts among employees, collaborators, partners and stakeholders

§ Definition of a rational system for the collection and monitoring of ESG environmental performance data

### **Social Aspects**

Marval's sustainable approach is reflected in its policies for the protection and development of Human Capital and the achievement and maintenance of these principles are also pursued through the monitoring of compliance with internationally recognized principles.

In the awareness that the active contribution of all people is fundamental for the achievement of the objectives indicated above, Marval pursues a continuous and targeted information, awareness and training.

Relations between Marval people are based on the values of fairness, transparency, freedom, loyalty and trust.

In this context, Marval has always been committed to offering working conditions that respect personal dignity, human rights, equal opportunities and a professionalizing and participatory work environment.

The personnel selection process is conducted in full respect of diversity, equal opportunities, heterogeneity and non-discrimination, avoiding favoritism and facilitation of all kinds. Marval also promotes the management and development of its people by providing specific programs aimed at enhancing its talents in all roles and levels of responsibility. In the field of health and safety, the Group fulfils its legal obligations and is committed to ensuring the well-being of workers and preserving the balance between private and working life.

## **Governance**

Ethics and integrity in the management of relations with legitimate stakeholders are the foundations of our way of doing business. Maintaining and protecting its reputation is essential so that Marval can be properly perceived as an honest partner and entrusted to it by all its stakeholders. In particular, Marval undertakes to prevent corruption through a series of rules of conduct, control tools and procedures for ex ante and ex post verification of the methods of conducting business, in order to prevent and eliminate any type of unethical behavior or corruption.

To this end, Marval's activities comply with the laws and regulations of the individual countries in which it operates, in addition to international conventions on the subject, implementing measures to achieve and combat corruption and illegal practices.

In particular, it adopted:

- Organization and Management Model pursuant to Legislative Decree 231/01;
- Code of Ethics

in order both to mitigate operational and reputational risks, and to prevent the crimes provided for by Legislative Decree 231/2001, since it contains a series of principles of "corporate ethics" with which it aims to recommend, promote or prohibit certain behaviors, beyond and independently of what is provided for at the regulatory level.

To this end, Marval does not tolerate any form of corruption or unethical conduct, considering it a risk to an economy of sustainable development, good governance and good practices and undertakes to raise awareness and, where necessary, train all its people, suppliers and partners, as well as to develop appropriate procedures, in particular with regard to relations with the community, suppliers and customers.

Marval adopts a Governance system aimed at controlling business risks, transparency towards the market and balancing the interests of all stakeholders. Marval condemns any phenomenon of corruption, bribery, undue inducement to give or promise utility and takes all the most appropriate measures in order to prevent and avoid the commission of such crimes.

In the era of sustainability, Marval has decided to strongly communicate the path taken, in compliance with ESG (Environmental, Social, Governance) criteria, in line with the values of the Group.

The integration of ESG criteria into business management and investment processes is a necessity and a value that can create a positive impact on the world.

## **REPORTING**

Starting from 2021, the concrete implementation of the commitments undertaken will be illustrated in an annual sustainability report in which all the activities carried out by the company in the field of ESG will be described.