

	<h1 style="text-align: center;">RESPONSIBLE SOURCING MANAGEMENT SYSTEM</h1>	
	<h2 style="text-align: center;">- Responsible Procurement Policy -</h2>	
		Rev. 02

Eural Gnutti S.p.A. respects the Human Rights of Employees and Local Communities and commits to promote these principles with its Suppliers/Subcontractors, identifying and managing the environmental, social and economic impacts within the supply chain and undertaking to purchase sustainable, ethical and responsible materials, goods and services.

Specifically, Eural Gnutti S.p.A. is committed to:

- avoid negative social and environmental impacts in the supply chain;
- reduce the environmental impact of operations by purchasing products that meet recognised environmental standards.

The sustainable procurement practices, to which Eural Gnutti S.p.A. is committed at all levels of its organisation, are as follows:

- Purchasing goods and using services in line with international principles to promote and protect Human Rights as recognised by the principles of the UN Global Compact (defined by the Universal Declaration of Human Rights) and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work for everyone involved in the corporate supply chain:
  - compliance with local and international laws regulating the minimum age for employment to combat child and youth labour;
  - the guarantee of decent and fair wages in line with current legislation;
  - to ensure that working hours comply with the relevant local, national and sectoral laws and regulations;
  - to ensure that there is no modern slavery or human trafficking in the supply or sub-supply chain;
  - to ensure freedom of association and collective bargaining;
  - to apply, internally, a fair, transparent and inclusive personnel management all workers involved in all stages of collaboration, starting from recruitment;
  - respect for the protection of shared data in terms of privacy and best practices in terms of IT security;
  - to ensure a fair market approach, avoiding conflicts of interest and anti-trust risk situations;
- Ensure the monitoring of the supply risk, particularly for raw materials, from conflict zones, to ensure responsible supplies following the approach based on the 'OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas';
- Inclusion, where possible, of sustainability criteria as part of the evaluation process of suppliers and subcontractors;
- Enforcement of environmental and safety legislation, including international obligations on climate change and sustainable development such as the reduction of CO2 emissions and the protection of biodiversity;
- Give priority, where possible, to Suppliers/Subcontractors who have embedded ethical and sustainable practices within their organisation and also pursue them within their supply chain;

- Promote a level of sustainability awareness among supply chain partners and encourage them to adopt sustainable practices;
- Purchase, where possible, goods and services that reflect appropriate and recognised environmental specifications or standards in order to pursue continuous improvement of internal procurement practices;
- Only buy products from sustainable sources whenever possible;
- Promote the substitution of potentially environmentally harmful products when a less harmful alternative is available;
- Avoid the use of potentially environmentally harmful products when a less harmful alternative is available;
- Use, where possible, products that have minimal impact on the environment, both locally and globally. Factors taken into consideration will include sustainability of production, transport, energy used, raw material consumption, waste generation and percentage of recycled content or a high recyclability factor;
- Reduce, where possible, the impact of deliveries and favour the sourcing of materials, products and services from local markets;
- Consume and purchase less where possible, identifying and eliminating wasteful practices in internal and external operations over which Eural Gnutti S.p.A. has impact.

In particular, Suppliers/Subcontractors are required to include sustainability criteria as part of the procurement process:

- give preference to RoHS compliant purchases of Electrical and Electronic Equipment in order to limit the presence of lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls and polybrominated diphenyl ethers in end products;
- requiring compliance with the REACH regulation for chemicals purchased, resulting in a reduction in the use of environmentally harmful substances;
- favour recyclable packaging, FSC-certified wood and paper by ensuring that the product comes from a responsibly managed forest and supply chain;
- prefer FSC-certified cellulose fibres;
- favour the purchase of steel materials from suppliers that produce by implementing measures for the health and safety of workers, energy efficiency, the use of renewable energy and the reduction of environmental pollution;
- ensure proper attention to any greenhouse gas emissions and other activities that may affect air quality, in compliance with applicable local and international regulations;
- ensure compliance in terms of water and soil quality, aiming at technologies that reduce water consumption and waste;
- provide for compliance with legislative requirements in terms of ethics, integrity and anti-corruption in supply/subcontracting contracts;
- reduce the impact of distribution by favouring the sourcing of materials, products and services from local companies close to the places of use (construction sites, etc.);
- promote the reuse and recycling of materials and products at the end of their life cycle and, where this is not possible, ensure disposal in the most proper way;

- participate in sustainable development programmes (e.g. Ecovadis, UN Global Compact, etc.);
- give preference to Suppliers/Subcontractors that implement sustainable development practices; the specific selection procedure, internal to the IMS, includes the pre-qualification, qualification and monitoring activities of suppliers that take place through the sending of the dedicated qualification questionnaire; in this way, the actions of Stakeholders aimed at a social commitment are known, including through the possession of voluntary certifications, such as
  - ISO 9001 - as an objective to ensure customer satisfaction through, for example, cost control, reduction of waste, increased productivity and effectiveness of internal processes, resulting in a reduction of inefficiencies;
  - ISO 14001 - as its main objective is to ensure that all activities, production and non-production, carried out by the organisation are environmentally friendly; in fact, it enables the organisation to pursue objectives and implement policies that take into account legal requirements and information regarding significant environmental aspects;
  - ISO 45001 - its main objective is to ensure that the working environments in which all company activities take place are safe and healthy, preventing work-related injuries and illnesses and proactively improving OSH performance;
  - ISO 37001 - helps to prevent, detect and manage situations of corruption (active or passive) on the part of the organisation, its staff and business associates by promoting a set of measures and controls and providing supporting guidance for their implementation;
  - UNI/PdR 125 - promotes the adoption of gender equality and women's empowerment policies at company level and thus aims to improve women's access to the labour market, leadership and life-time harmonisation;
  - SA8000 - 'Social Accountability Management System' - aims to improve working conditions and to protect and develop a company's staff. It is based on three key points which are the improvement of personnel, the fair treatment of employees and the inclusion of international conventions. It is a benchmark that, by its very nature, involves the entire company and requires attention and participation from management, top management, employees, suppliers, subcontractors and customers;
  - ISO 20400 - the guideline that enables the company's Procurement (Budget Managers, Purchasing Department) and Social Responsibility (CSR) Functions to conform to the Principles of Sustainability, mitigating the risks associated with inappropriate choices (e.g. non-compliance, climate-damaging production activities, etc.) while also gaining reputational benefits.

In this way, Eural Gnutti S.p.A. chooses its suppliers/subcontractors with a preference for those who pay special attention:

- to environmental issues and the impacts (waste management, etc.) that their products have on the environment throughout their life cycle;

- social issues of fairness, equal opportunities, inclusion, absence of exploitation, economic treatment and working hours of employees in accordance with the relevant 'National Collective Bargaining Agreements';
- ethical issues related to the fight against corruption and respect for human rights.

In order to acquire these guarantees of commitment, Eural Gnutti S.p.A. transfers these Principles to Suppliers by attaching to each supply/subcontracting contract the "Supplier Quality Manual" and the "General Contract Terms and Conditions" containing specific prescriptions that are understood to be accepted by the contractor by signing the contractual document.

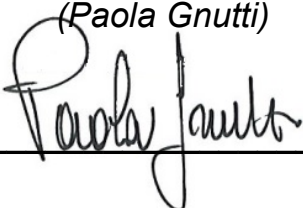
This document is subject to an annual assessment of its adequacy during the Management Review, where quantitative targets are also defined and set over time, and may be amended and supplemented on the basis of the evidence that emerges during the monitoring activities, national and international regulatory indications on the subject, as well as suggestions from the Company Functions/Units

Any variation or addition is approved by the Board of Directors of Eural Gnutti S.p.A. and subsequently communicated to all Addressees.

This Policy is shared with all stakeholders, in particular suppliers/subcontractors; the document is in fact, made available to all interested parties both at the Company's workplaces and through publication on the corporate website; finally, the promotion and dissemination of this document also takes place through the provision of training sessions differentiated according to the areas of operations, roles and responsibilities.

*Rovato, 20/03/2025*

*The General Management  
(Paola Gnutti)*



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