



INTERPUMP GROUP

OCCUPATIONAL HEALTH AND SAFETY, AND ENVIRONMENT POLICY

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Contents

1. Introduction	2
1.1. Objectives	2
1.2. Scope	2
1.3. Methods of adoption	2
1.4. Regulatory references	2
2. Roles and responsibilities for Policy management	3
2.1. Group Internal Audit, Risk & Compliance Function	3
2.2. Audit and Risk Committee of Interpump Group S.p.A.	3
2.3. Sustainability Committee of Interpump Group S.p.A.	3
3. The Group's Code of Ethics	3
4. Three-year ESG Strategic Plan 2023 - 2025	3
5. Occupational Health and Safety	3
5.1. Organisation of health and safety in the workplace	3
5.2. Worker participation	4
5.3. Risk assessment	4
5.4. Education and training	5
5.5. Minimum prevention measures	5
5.6. Management of contractors, visitors and external personnel present in the workplace	6
5.7. Transfer and secondment of employees	7
5.8. Health and safety within the supply chain	7
6. Environment	8
6.1. Atmospheric emissions	8
6.2. Water discharges, spills and environmental contamination	9
6.3. Waste	9
6.4. Respect for the environment within the supply chain	10
7. Reporting and Whistleblowing	10
8. Disciplinary measures and contractual remedies	10
9. Personnel training	11



1. Introduction

1.1. Objectives

The Interpump Group considers the protection and promotion of **occupational health** and **safety** and the safeguard of the **environment** to be indispensable for the benefit of the community and future generations. Interpump Group strives to disseminate a culture of safety and respect for the environment, promoting responsible and risk-aware behaviour and making available the organisational and economic resources needed, not only to prevent accidents and professional diseases, but also to improve health and safety conditions in the workplace and safeguard the surrounding environment.

The purpose of this Policy is to provide a set of rules, principles and measures on occupational health and safety and environmental protection in order to eliminate hazards and prevent the risk of accidents, injuries, occupational diseases and minimise the environmental and landscape impact of the Group's activities in compliance with the regulations in force in the countries where it operates.

This Policy also promotes a culture of accountability, in which the role and responsibility of each individual contribute to achieving the objectives contained in the Policy, also through the successful execution of sustainable initiatives.

1.2. Scope

This Policy was approved by the Board of Directors of Interpump Group S.p.A. and **its adoption and implementation are mandatory for all Group companies**. Consequently, it is binding for the conduct of all employees and as far as applicable to the workers from external firms who, for whatever reason and regardless of the type of contractual relationship, operate in the workplace or carry out their activities under the supervision of a Group company (hereafter "External Workers").

It is the duty of each company of the Interpump Group to make this Policy known to External Workers, even if they have discontinuous or temporary relationships with the company; to require External Workers, in the performance of their activities, to comply with the principles and obligations set out in this Policy; to take the necessary internal initiatives in the event of failure to comply or partial compliance with the commitment to observe the provisions contained in this Policy and related to them or, in the event of refusal, to consider appropriate action, including termination of the relationship.

1.3. Methods of adoption

Each Interpump Group company shall promptly adopt this Policy by a **resolution of the Board of Directors or the corresponding body** if the company does not have a Board of Directors. The resolution of the Board of Directors, or the corresponding body, approving this Policy must subsequently be forwarded to the Group Compliance Function in order to monitor its correct and prompt adoption.

1.4. Regulatory references

Interpump Group S.p.A. is the world's largest manufacturer of professional high-pressure piston pumps and one of the leading groups operating in international markets in the hydraulics sector. The company is listed on the stock market managed by Borsa Italiana, Euronext STAR segment. With more than two thirds of its turnover generated abroad, the Group distributes its products in more than 60 countries, in the markets of Western Europe and North America as well as in the emerging countries of Far East Asia and South America.

Since Interpump Group S.p.A. has its registered office in Italy, the company's employees, Directors and External Workers are obliged to comply with **Italian law**, and in particular with the provisions of Legislative Decree no. 231/2001, which governs the administrative liability of entities for administrative offences, including the violation of regulations on occupational health and safety and environmental protection.

As the Interpump Group is a multinational organisation, all employees, Directors and External Workers are subject to the **laws and regulations in force in the country in which they operate**.

The Interpump Group raises internal and external awareness on environmental initiatives and environmental impact and expects its business partners, such as suppliers and subcontractors, to commit to their own environmental responsibilities.

2. Roles and responsibilities for Policy management

2.1. Group Internal Audit, Risk & Compliance Function

The **Group Internal Audit, Risk & Compliance Function** ensures the updating and effectiveness of this Policy, i.e. it:

- monitors the correct adoption of this Policy by Group companies;
- supports the management/corporate functions of Group companies in adopting the measures and tools to prevent the risk of accidents at work, occupational diseases and environmental pollution, as provided for in this Policy;
- carries out, on the basis of an annual audit plan with a risk-based approach or in relation to events of particular significance, audits of compliance with this Policy by Group companies;
- supports training initiatives for the management/corporate functions of Group companies;
- draws up a half-yearly report on the results of its monitoring and audit activities to be submitted to the Audit and Risk Committee, the Supervisory Body and the Board of Statutory Auditors of Interpump Group S.p.A.

2.2. Audit and Risk Committee of Interpump Group S.p.A.

The **Audit and Risk Committee** of Interpump Group S.p.A. supports the Board of Directors' assessments and decisions relating to occupational health and safety and environmental protection issues or relating to serious violations of this Policy.

2.3. Sustainability Committee of Interpump Group S.p.A.

The **Sustainability Committee** of Interpump Group S.p.A. performs investigative, proposal-making and advisory functions for the Board of Directors in sustainability assessments and decisions, meaning the objectives, processes, initiatives and activities aimed at overseeing the company's commitment to the pursuit of sustainable success, including in ESG (Environmental, Social and Governance) matters.

3. The Group's Code of Ethics

The **Code of Ethics** constitutes a set of principles the observance of which is of fundamental importance for the smooth operation, the reliability of management and the image of the Interpump Group. These principles inspire the operations, behaviour and relationships, both internal and external, of the companies of the Interpump Group.

4. Three-year ESG Strategic Plan 2023 - 2025

Interpump Group's commitment to sustainable economic growth involves the adoption of an integrated strategy that combines the success of its business with the principles of sustainability and the creation of long-term value for its stakeholders. The Board of Directors of Interpump Group S.p.A. approved the **Three-year ESG Strategic Plan 2023 - 2025** (hereafter "ESG Plan"), which defines the Group's strategic vision on sustainability and corporate social responsibility.

RISK AREAS AND PRINCIPLES OF CONDUCT

5. Occupational Health and Safety

5.1. Organisation of health and safety in the workplace

Employees of Group companies must have a clear **understanding of their role, responsibilities and levels of authority** relevant to occupational health and safety, in order to ensure their own safety and that of every worker.

The Chief Executive Officer, the General Manager of the company or the person with the appropriate power of attorney for occupational health and safety matters is **obliged to draw up an organisation chart defining the duties, roles and responsibilities** of each individual worker involved in the occupational health and safety management process.

The company shall facilitate consultation by all workers by displaying the organisation chart on the various notice boards located on the premises and/or by publication on the company intranet. In particular, the company will be obliged to update the organisational chart following any organisational changes affecting the occupational health and safety management process.

5.2. Worker participation

The Interpump Group promotes the exchange of information and dialogue with the workers at every level in order to have the necessary information available in good time to prevent hazards and accidents at work.

Therefore, it is necessary to **ensure the participation of workers in the development, planning, implementation and evaluation** of actions to improve the **occupational health and safety management** system, especially with regard to the following issues:

- identification and assessment of hazards and risks;
- definition of actions to eliminate hazards and reduce risks;
- definition of the competence requirements necessary to perform prevention functions;
- training needs;
- participation in the analysis of accidents or near misses and determination of corrective actions.

Employees and collaborators must be enabled to report hazardous or potentially hazardous situations. Therefore, it is **expressly forbidden to threaten or implement disciplinary or retaliatory measures** against employees or External Workers who report risks, concerns or non-compliance with occupational health and safety to the competent authorities.

Interpump Group companies shall:

- **elect** one or more **employee representative(s)**, or alternatively set up internal **committees or working groups** to facilitate the consultation and reporting process;
- hold a **meeting** at least once a year **with the employee representatives, internal committees or working groups** and the Chief Executive Officer, the General Manager of the company or the person with the appropriate power of attorney for occupational health and safety matters in order to discuss the issues listed in the previous paragraph;
- document and archive the outcomes of consultations and evaluations provided by employee representatives or internal committees/working groups arising during meetings.

5.3. Risk assessment

The risk assessment process helps to understand and recognise hazards to employees in the workplace at an early stage and supports the company in setting priorities for action to minimise health and safety risks.

Interpump Group companies must **establish one or more risk identification and assessment process(es)** that take(s) into account, as a minimum, the hazards arising from:

- routine or non-routine activities and situations within business processes;
- use of infrastructure, machinery, equipment, materials and chemicals;
- design, testing, production, assembly, construction, service provision, and maintenance activities;
- unplanned potential emergency situations;
- activities carried out by, or their own activities that could interfere with, those who have access to company premises such as contractors, visitors and maintenance workers and External Workers in general;
- activities performed off-site at customers, suppliers or other Group companies;
- changes in the organisation, operations or business processes.

The **risk assessment** must be **documented and must be approved** by the Employer and/or the person identified by the legislation in force in the country where the company operates.

Risk assessment must be subject to updating or revision following organisational changes that may have an impact on the occupational health and safety management system or in the presence of new risk and hazard situations.

5.4. Education and training

Occupational health and safety training enables employees to acquire the knowledge and skills they need to appropriately identify hazards and deal with risks associated with their tasks and the workplace where they work.

To this end, the companies of the Interpump Group are obliged to **ensure** that their employees receive an **adequate degree of instructions** on how to perform their duties safely and avoid situations that endanger their health and safety.

In particular, each Interpump Group company shall:

- **comply with the regulations** in force in the countries where they operate concerning the mandatory provision **of occupational health and safety education and training**;
- provide **training for newly recruited employees** on how to perform their duties safely. This training must be carried out prior to the commencement of the employee's assigned activities or no later than 15 days from the date of employment;
- provide **education and training to employees** whose duties have been changed prior to commencing the assigned activities or no later than 15 days from the date of commencement;
- set up **specific periodic training** courses for activities and tasks carried out by individual categories of employees (e.g. blue collar workers, white collar workers, seconded personnel, transferred workers). The participation of employees and the topics covered during training courses must be documented and archived by the personnel responsible for organising the training;
- provide timely **education and training for employees** in the event of **using new machinery or plants, chemicals or substantial changes to production processes**;
- **evaluate learning** on the subjects covered in training courses by submitting questionnaires or evaluation tests to employees, in order to identify the training areas that need more in-depth study;
- **keep track of education and training** in a special register, also in computerised form.

5.5. Minimum prevention measures

Within the scope of its corporate activities, each Group company is obliged to plan and establish preventive measures to ensure that hazards to employees are eliminated and health and safety risks are reduced to a reasonably acceptable level.

The Interpump Group is committed to pursuing the objectives of "zero injuries" in the workplace, through the continuous identification, assessment, prevention of and protection from health and safety risks, the timely removal of potential causes of accidents, and the implementation of health surveillance plans for personnel in relation to specific tasks.

Consequently, it is **expressly forbidden** to:

- **remove or modify** without authorisation **the safety, signalling** or control **devices** on machines, plants, equipment and workplaces in general;
- **carry out operations in the absence of** personal **protective equipment** where this is considered mandatory;
- **carry out** on one's own initiative **operations** or manoeuvres that are not within their competence or **that may endanger one's own safety or that of other workers**.

Therefore, the Group companies shall implement the following minimum prevention measures:

- **develop procedures and instructions** to support specific operational activities in order to ensure their safe execution;
- make available **adequate personal protective equipment** to employees, necessary to perform their tasks safely and provide appropriate instructions to use such equipment. The protective equipment supplied must comply with the safety standards required by international bodies (e.g. ISO standard, CE mark, etc.) and meet the requirements of the laws and regulations applicable in the countries where the company operates;

- **protect workers from exposure to chemical or biological substances** indicated by international standards or conventions as **hazardous** to health. The containers of the chemical and biological substances used must bear the information required by the regulations in force in the countries where the company operates or, in the absence of these, at least a description of the hazardous characteristics, the storage methods and the preventive measures envisaged for use;
- implement, where necessary, all technical and organisational measures to **isolate workers from possible hazards**, such as guards and physical protection systems for machinery and equipment, adequate ventilation of premises, mechanised load movement, noise reduction in workplaces, protection from accidental falls from heights, limitation of solitary work;
- conduct **periodic inspections of environments, plants, machinery and equipment**, to verify their safety levels and establish periodic maintenance programmes for environments, equipment, plants, machinery, with particular regard to safety devices in accordance with the required legal standards and the manufacturers' instructions;
- draw up appropriate procedures for **reporting and monitoring any accidents, injuries or near misses**;
- document workplace injuries by noting the name, surname, job title of the injured person, the causes and circumstances of the injury, and the date of leaving and returning to work. In addition, corrective actions taken or to be taken to eliminate the hazard or minimise the risk of injury shall be reported;
- draw up a report (at least annually) on workplace injuries that occurred and occupational diseases recognised during the reporting period;
- as regards **emergency management**, it is necessary to:
 - define and document an **emergency plan/procedure** to be implemented in the event of first aid, fire, the need to evacuate workers or serious and immediate danger;
 - identify the **employees responsible for implementing the safety measures** set out in the emergency plans/procedures. Such employees must receive appropriate and regular training in emergency management;
 - equip premises and production areas with **first aid kits** that are easily accessible and identifiable by the personnel present in the company;
 - carry out **tests or drills**, at least once a year, to assess the company's responsiveness to emergency plans/procedures. The results of these tests shall be documented;
 - **communicate** the minimum information or **instructions** to be followed in case of emergency situations to contractors, visitors and external personnel present in the company's workplaces.

5.6. Management of contractors, visitors and external personnel present in the workplace

Activities carried out at the plants of Interpump Group companies by External Workers belonging to companies (so-called contractors) or third parties, such as plant and machinery maintenance activities, construction activities, cleaning services, security, must be performed by minimising health and safety risks both for workers belonging to such companies/third parties and for employees of one's own company.

Therefore, each Group company is **obliged to**:

- **provide External Workers**, prior to starting the activities, with **information on** the existing **hazards** in which they are to work, prevention measures and procedures to be adopted in the event of an emergency;
- **control the access** of the external personnel to work areas;
- promote **coordination** between **in-plant and contracted activities**, eliminating, where possible, the risk of interference with normal company activities.

In particular, the Interpump Group companies shall adopt the following minimum prevention measures:

- **contracted activities and services** shall be governed by a **contract or service order** that clearly defines the parties' responsibilities for occupational health and safety;
- contracted activities and services shall be **entrusted to parties or entities meeting appropriate technical and professional requirements**. The personnel in charge of relations with these parties will be responsible for verifying the documentation and information supporting the assessment of the aforementioned requirements;
- contractors or third parties shall submit a list of names and job titles of the personnel involved in carrying out the work;

- external **personnel** must be **registered before entering** company **premises**, presenting an official identity document. The company shall provide external personnel with an identification badge to be worn visibly throughout the duration of the activities;
- any **subcontracted** activities must be **authorised** in writing by personnel with appropriate proxy powers in the field of occupational safety;
- any **accidents or injuries occurring to personnel of the contractor or subcontractor shall be reported** to the company in writing no later than the day on which the event occurred, stating as a minimum the date, time, place and circumstances of the accident/injury;
- equipment and **personal protective equipment** used by external personnel must comply with the safety standards required by international bodies (e.g. ISO standard, CE mark, etc.) and with the requirements of the laws and regulations applicable in the countries where the company operates.

5.7. Transfer and secondment of employees

Group companies may require their employees to perform activities and tasks outside the location where they perform their work.

For the purposes of this Policy, a transfer consists of a temporary change, including abroad, of the original place of work for transitory and contingent service requirements; whereas, secondment means a permanent or long-term change of the geographical location to another location of the company, an Interpump Group company or a third party, in order to perform a specific work activity agreed upon by the parties. The secondment may take place between two parties based within the country where the company operates, or outside its national borders.

The corporate functions of the Group companies that are responsible for their employees on transfer or secondment shall take the following measures in order to guarantee the health and safety of their workers:

- request from the party/entity where risk activities will be carried out:
 - o a list of the risks and hazards present in the workplace where the personnel shall work;
 - o a list of Personal Protective Equipment useful for carrying out the tasks;
 - o the name of the contact persons in the workplace who will be responsible for the assistance and safety of employees in the event of an emergency;
- make Personal Protective Equipment available to employees, in accordance with local regulations and the indications provided by the counterparty, in case such equipment is not to be provided by the subject/entity where the activities will be carried out;
- provide adequate health and insurance coverage in relation to the destination country;
- provide specific training sessions, prior to starting the activities considered to be at risk, on the procedures for performing work tasks safely;
- inform employees of any hazards arising from socio-political and health situations in the destination country and take steps to ensure all minimum personal health and safety measures during travel and when carrying out work tasks;
- provide employees with reliable and secure means of communication, especially for destinations in remote or difficult-to-access locations.

5.8. Health and safety within the supply chain

The Interpump Group promotes the **sharing of the health and safety values and principles** contained in this Policy with all parties involved **within the supply chain**.

Therefore, **it is mandatory** for the parties that have **relations for the procurement and, in general, supply** of goods and/or services (hereafter "Suppliers") with the companies of the Interpump Group, **to comply with the occupational health and safety regulations** in force in the countries where they operate.

In particular, each Interpump Group company shall:

- **share** with its Suppliers, prior to starting the procurement and supply activities, **the principles and values contained in the Code of Ethics and**, exclusively for the Italian companies of the Group that have adopted an Organization, Management and Control Model pursuant to Legislative Decree no. 231/2001, **in the Model 231. Contracts with Suppliers**, which envisage the signing of specific legal and asset protection clauses for the procurement of goods or services, **shall necessarily contain a contractual clause** in which the Supplier declares that it has understood and **will comply with the**



principles and rules of conduct contained in the Code of Ethics and, exclusively for the Group's Italian companies that have adopted an Organization, Management and Control Model pursuant to Legislative Decree no. 231/2001, **in the Model 231**;

- **submit** to its Suppliers, prior to starting the procurement and supply activities, **a questionnaire** useful for **understanding the occupational health and safety management system** in place in order to assess the adequacy of such systems and compliance with the principles contained in this Policy. The questionnaire must be prepared by the company functions responsible for maintaining relations with Suppliers, taking care to file the results;
- **carry out audits and inspections**, in the places where Suppliers operate, **in order to ascertain compliance with the occupational health and safety regulations** in force in the countries where they operate and with the principles contained in this Policy. **These audits** shall be **conducted using a risk-based sampling methodology**, based on an annual audit plan or in relation to events of particular significance. It will be the responsibility of the individual company functions responsible for carrying out these audits to accurately document and file the audit findings.

The Interpump Group is committed to adopting a **supplier assessment model**, according to environmental and social criteria, in order to ensure an adequate level of compliance with the sustainability principles set out in the Code of Ethics and the ESG Plan. In particular, each company shall ensure alignment between the standards of the Interpump Group and the standards adopted by its Suppliers, taking into account the policies and objectives for improvement in the areas of ethical conduct, environmental protection, respect for human rights, personnel management and management of occupational health and safety and IT.

6. Environment

6.1. Atmospheric emissions

Atmospheric emissions of "greenhouse" pollutant gases (e.g. CO₂, methane, nitrous oxide "NO_x" and sulphur oxide "SO_x", PM₁₀) are considered, according to the United Nations Framework Convention on Climate Change (UNFCCC), the main cause of global warming. In the context of normal production activities, Group companies produce direct emissions, i.e. generated directly by industrial processes, and indirect emissions associated with side activities such as the use of electricity, heating, and cooling.

It is **expressly forbidden** for Interpump Group companies **to make emissions into the atmosphere without authorisation** from the local authorities of the country where the company operates.

The Interpump Group companies that generate atmospheric emissions by using equipment in their production and assembly plants **are obliged to prevent and minimise the impact** of polluting gases on air quality, ensuring that these **emissions do not exceed the limits set** by the regulations in force in the countries where the company operates. It will be the responsibility of the company functions in charge of managing environmental aspects to ensure compliance with the authorisation requirements issued by the competent local authorities, for all types of emissions into the atmosphere.

Atmospheric **emissions** of pollutant gases must be **channelled outside the company premises** by means of appropriately designed emission chimneys in order to avoid excessive ground-level concentrations.

Burning hazardous and non-hazardous solid **waste** as a method of disposal is **expressly forbidden**.

No new plant or machinery **may be installed** that emits into the atmosphere chemicals classified as **harmful to the stratosphere and ozone**, according to the parameters defined by the Montreal Protocol, such as CFCs, trichloroethane, HBFCs.

Atmospheric emissions must be measured and monitored by means of random sampling in order to detect any concentrations of pollutant gases above the limits set by local regulations. It will be the task of the company functions in charge of managing environmental aspects to document and file the results of the measurements and sampling carried out.

The Interpump Group has set a goal to **reduce** carbon dioxide emissions into the atmosphere **by 45%** by 2032 and to achieve carbon neutrality by 2050. To achieve this goal, the Interpump Group is investing its resources in the installation of photovoltaic systems, in order to increase the share of electricity produced and self-consumed, and in the signing of a renewable electricity supply agreement through the Power Purchase Agreement formula and in the increase of the purchase of certified green electricity.

6.2. Water discharges, spills and environmental contamination

It is **expressly prohibited** for Interpump Group companies **to discharge water into the soil, subsoil, groundwater and in general on lakes, rivers or seas without authorisation** from the local authorities of the country in which the company operates.

Group companies are **obliged to comply with water discharge limits in accordance with the regulations** in force in the countries where the company operates. It will be the responsibility of the company functions in charge of managing environmental aspects to ensure compliance with the authorisation requirements issued by the competent local authorities for all types of water discharges.

Surface water produced by manufacturing and production processes must undergo **treatment to separate and collect pollutants** before being discharged. The collected pollutants must then be disposed of as waste according to their type and hazard level.

Stormwater and primary rainwater discharges must be **separated from discharges** from processing or sewage into the drainage system. Stormwater and primary rainwater must not come into contact with waste or materials that could generate contamination of this surface water; therefore, waste and goods stored outside the company premises shall be covered and protected from the weather.

Group companies **have an obligation to prevent accidental spills** of pollutants such as **oils and contaminated processing residues** into soil, subsoil, groundwater and in general on lakes, rivers or seas. Any accidental spills **shall be promptly reported to the competent local authorities**, informing the Group Internal Audit, Risk & Compliance Function. Following these accidental spills, the company shall take appropriate action to restore the environment and prevent further future occurrences.

Washing and cleaning activities whose discharges are **not authorised** in advance by the competent local authorities **or whose water is not treated** by filtration and separation facilities **are not permitted**.

The volumes of water discharges produced **shall be measured and monitored** by means of random sampling in order to detect any concentrations of pollutants above the limits set by local regulations. It will be the task of the company functions in charge of managing environmental aspects to document and file the results of the measurements and sampling carried out.

With the aim of increasing awareness of **water consumption**, the Group companies are committed to implementing the best efficiency and monitoring strategies in the use of water resources and to ensuring proper management of discharges into the external environment. The Interpump Group promotes the importance of water protection and sustainable water management as a value in the corporate culture of the Group companies. Employees should always consider the best use of water and, when possible, identify how to reduce water consumption in the workplace.

6.3. Waste

As part of their normal corporate activities, especially during production and assembly processes, the Group companies produce different types of waste. Some of this waste is considered hazardous to health or the environment as a result of its physical, chemical and biological characteristics.

Therefore, Interpump Group companies shall:

- **classify the waste generated in accordance with the regulations** in force in the countries where they operate and according to its composition, quantity produced and type of disposal envisaged;
- replace, where possible, materials and products used in operational processes with materials that are less toxic or hazardous to health or the environment;
- **use only qualified suppliers for the disposal of the waste produced**, ensuring that such parties hold permits and licences issued by the relevant government bodies of the country where the company operates;
- **separate hazardous waste** in such a way as to prevent any accidental contamination of soil, water and the atmosphere. **Mixing hazardous waste** with waste of a different type is **expressly forbidden**;
- protect storage and waste storage from rain, snow, wind and direct sunlight.

Hazardous and non-hazardous waste must be handled within the perimeter of the premises where the company operates in an adequate manner and with appropriate means to prevent any leakage or spillage. Containers used for transporting waste must be labelled with the information required by the applicable regulations or, in their absence, the type and hazard level of the waste.

The delivery and transport of waste outside the company premises must be **entrusted to qualified suppliers**. It will be the task of the company functions in charge of managing environmental aspects to ensure that the suppliers used to dispose of the waste produced have valid permits, licences and qualifications issued by the competent local authorities.

The **delivery of waste** for transport and disposal by qualified suppliers must be accompanied **by the issuance of a document (form)** indicating as a minimum the type of waste, quantity, destination and method of disposal.

The **weight** of hazardous and non-hazardous waste produced must be **measured and the content monitored** by means of random sampling in order to detect any concentrations of pollutants above the limits set by local regulations. It will be the task of the company functions in charge of managing environmental aspects to document and file the results of the measurements and sampling carried out.

The Interpump Group pursues a strategy of reducing the amount of waste, with the aim of improving the environmental performance of products, as well as increasing competitiveness according to a sustainability logic that allows new systems and components with a low environmental impact. This strategy involves the **valorisation of waste and production waste, where possible, into by-products with a view to the circular economy**, with the creation of a network for the exchange of production residues within the territory and with partner companies.

6.4. Respect for the environment within the supply chain

The Interpump Group promotes the **sharing of the values and principles regarding environmental protection** contained in this Policy **with all the parties involved within the supply chain**.

Therefore, the parties that have **relations for the procurement and, in general, the supply** of goods and/or services (hereafter "Suppliers") with the companies of the Interpump Group are **obliged to comply with the environmental regulations** in force in the countries where they operate.

In particular, each Interpump Group company shall:

- **share** with its Suppliers, prior to starting the procurement and supply activities, **the principles and values contained in the Code of Ethics and, exclusively for the Italian companies of the Group that have adopted an Organization, Management and Control Model pursuant to Legislative Decree no. 231/2001, in Model 231 – the latter exclusively for companies that have adopted Model 231. Contracts with Suppliers**, which envisage the signing of specific legal and asset protection clauses for the procurement of goods or services, **shall necessarily contain a contractual clause** in which the Supplier declares that it has understood and **will comply with the principles and rules of conduct contained in the Code of Ethics and**, exclusively for the Group's Italian companies that have adopted an Organization, Management and Control Model pursuant to Legislative Decree no. 231/2001, **in Model 231**;
- **submit** to its Suppliers, prior to starting the procurement and supply activities, **a questionnaire** useful for **understanding the environmental management system** in place in order to assess the adequacy of such systems and compliance with the principles contained in this Policy. The questionnaire must be prepared by the company functions responsible for maintaining relations with Suppliers, taking care to file the results;
- **carry out audits and inspections**, in the places where Suppliers operate, **in order to ascertain compliance with the environmental regulations** in force in the countries where they operate and with the principles contained in this Policy.

7. Reporting and Whistleblowing

Any suspected or known violation of this Policy or of the occupational health and safety and environmental regulations in force in the countries where the Interpump Group operates, as well as any behaviour in violation of the provisions contained in this Policy, must be immediately **reported** to the company managers and/or through the dedicated channels set out in the Group Whistleblowing procedure.

8. Disciplinary measures and contractual remedies

The Interpump Group is committed to preventing conduct in violation of occupational health and safety and environmental laws and the provisions contained in this Policy. The Interpump Group will take appropriate

disciplinary measures against employees and collaborators of the Group companies, in accordance with the relevant national collective labour agreements or applicable regulations, (i) whose conduct violates occupational health and safety and environmental regulations or the provisions contained in this Policy, and/or (ii) who unreasonably fail to detect or report such violations or who threaten or retaliate against others who report such violations.

The Interpump Group will take appropriate measures, including but not limited to termination of the contract and claims for damages against contractual counterparties whose conduct violates the aforementioned regulations or this Policy.

9. Personnel training

Interpump Group employees and collaborators shall be **informed and trained** on the importance of compliance with occupational health and safety and environmental laws and the rules contained in this Policy. In particular, the employees and collaborators most exposed to risk activities will receive a copy of this Policy; in addition, the Group Internal Audit, Risk & Compliance Function will set up periodic training sessions on the principles and measures contained in this Policy.

Fabio Marasi
Chief Executive Officer of Interpump Group
S.p.A.