

This document defines the Integrated Management System Policy of RADIATORI 2000 S.p.A., a formal expression of the strategic commitments undertaken by the Management regarding quality, environment, occupational health and safety, and energy efficiency. This Policy serves as a reference framework for the entire organization, guiding the definition of objectives, activity planning, and the implementation of actions in line with the requirements of international standards (e.g., ISO 9001, ISO 14001, ISO 45001, etc.).

Through this Policy, RADIATORI 2000 S.p.A. is committed to ensuring continuous improvement of the Management System, compliance with mandatory and voluntary requirements, and the promotion of a company culture based on prevention, sustainability, and shared responsibility at all organizational levels.

The Policy is the dynamic process through which Management (top management of the organization) directs and guides RADIATORI 2000 S.p.A. and its Management System toward the ongoing improvement of the organization and its processes, taking into account the applicable standards.

The Management of Radiatori 2000 S.p.A. fully assumes responsibility for:

Analyzing the business context and expectations of relevant stakeholders to implement a consistent, effective, and appropriate Management System that aligns with the organization's processes and size. This allows the system to meet internal and external needs in a targeted and continually updated manner.

Satisfying customer requirements and increasing their loyalty by ensuring compliance with quality, quantity, delivery time, and value-for-money expectations, in line with contractual agreements.

Promoting the continuous improvement of the Management System, with a specific focus on the effectiveness of quality processes, to achieve objectives and optimize business performance.

Protecting the environment by preventing negative effects through careful waste, discharge, and emission management, optimizing resource use, and applying the best available technologies.

Optimizing the use of raw materials by promoting recovery and recycling, in line with the principles of sustainability and the circular economy.

Preventing injuries and occupational illnesses and continuously improving health and safety management through preventive and corrective actions and ongoing training.

Eliminating hazards and reducing risks to workers' health and safety by continually assessing risks and improving working conditions to ensure safe and healthy environments.

Protecting workers from retaliation following the reporting of incidents, hazards, risks, and opportunities, ensuring a discrimination-free work environment.

Ensuring active worker participation by implementing regular consultation processes to gather feedback and promote continuous improvement.

Aligning business strategies with internal and external expectations to prevent conflicts and misunderstandings and improve transparency and dialogue with all stakeholders.

Complying with ISO standards and local and international legal requirements, ensuring full adherence to applicable legal obligations.

Identifying and understanding stakeholder needs and expectations, identifying opportunities and threats to the Management System.

Purchasing and designing energy-efficient products and services, aiming to continuously improve environmental and energy performance.

Implementing actions aimed at improving energy performance, optimizing energy use, and reducing waste.

Complying with legal and other applicable requirements, particularly those related to environmental aspects, energy efficiency, and occupational health and safety.

Promoting continuous training programs for staff at all levels, tailoring training to corporate needs to optimize human resource development and growth.

Ensuring the availability of necessary resources to achieve the established objectives by constantly monitoring the effectiveness of implemented actions.

Continuously improving the Management System's effectiveness at all levels by fostering a culture of continuous improvement, monitoring processes through internal audits, data analysis, stakeholder feedback, and corrective actions. Active staff involvement and targeted training help identify optimization opportunities and consolidate good practices throughout the organization.

For over 25 years, Radiatori 2000 S.p.A. has embraced a concrete and consistent approach to the principles of the circular economy, fully integrating them into its industrial and environmental strategy, making the circular economy its business model. The company manufactures die-cast radiators and semi-finished products using only 100% recycled aluminum from recovery processes and internal remelting within the Group, creating a closed, traceable, and fully sustainable production cycle. Through this integrated supply chain, Radiatori 2000 ensures maximum efficiency in resource use, significantly reducing raw material extraction and related emissions. Each product placed on the market is the final link in a virtuous circular economy chain where nothing is wasted and everything is reintegrated into the production cycle. This approach not only improves the company's environmental performance but also reinforces its commitment to ecological transition and industrial responsibility, leveraging sustainability as a driver of innovation and competitiveness.

The Management considers it of primary importance to responsibly manage all processes that may have social, environmental, and ethical impacts on people and the territory. In addition to quality, environmental, and safety requirements, Radiatori 2000 S.p.A. has chosen to implement ethical requirements (e.g., Code of Ethics and Conduct) to protect and value all personnel within the organization's sphere of control and influence, committing to the following principles of social ethics:

No use of child or underage labor

No use of forced or compulsory labor

Freedom of association and the right to collective bargaining

Respect for personal freedoms of each worker

Fair management of wages and working hours

In this regard, the Management continuously commits to:

Fostering an atmosphere of collaboration and organizational cohesion by promoting cooperation and a sense of belonging among all company members.

Maintaining positive and constructive relationships between staff and the company through a participatory model that encourages dialogue and transparent communication. The Management regularly holds internal meetings and informal breaks with staff to monitor and continuously improve workplace well-being and address specific needs.

Ensuring equal opportunities at all corporate levels by adopting fair, transparent hiring, training, development, and promotion criteria that respect the rights of all employees.

Preventing any form of discrimination and marginalization by promoting an inclusive work environment and equal growth opportunities for all employees.

Progressively involving suppliers in the company's ethical journey, treating them as strategic partners in social responsibility and aiming to align their conduct with shared ethical principles.

Radiatori 2000 S.p.A. is firmly convinced that its commitment to anti-corruption positively impacts contractual and commercial relationships, fostering a broader diffusion of ethical principles and corporate values among all internal and external stakeholders. The company formally commits to:

Prohibiting all forms of corruption by adopting a zero-tolerance approach toward both direct and indirect corrupt acts.

Complying with all national and international anti-corruption laws, including Legislative Decree 231/2001 and other applicable provisions.

Monitoring the application of the internal Code of Ethics, which governs business conduct and professional relationships, through audits and periodic evaluations.

Making this Policy public and accessible at all corporate levels via bulletin board postings, publication on the corporate website, and ongoing personnel training.

Encouraging and protecting the reporting of suspicious behaviors or irregularities, ensuring confidentiality and protection from retaliation for whistleblowers acting in good faith.

Periodically updating the anti-corruption policy to reflect regulatory changes, industry developments, and insights from system analyses and continuous improvement.

Radiatori 2000 S.p.A. is also committed to involving all interested parties (suppliers, business partners, consultants, etc.) in promoting ethical behavior, constantly monitoring the effectiveness of anti-corruption actions.

The QAES Management System, defined and implemented by the organization and compliant with the UNI EN ISO 9001, UNI EN ISO 14001, and UNI EN ISO 45001 standards, will, through its natural and continuous evolution, ensure the tangible realization and measurement of the commitments outlined in this Policy by setting and monitoring specific objectives defined by Management.

Management Reviews play a key role in this process. At least once a year, during the periodic Management Review, the appropriateness of the current Policy is analyzed and updated as needed to ensure it remains relevant and appropriate to the organization. During these reviews, business objectives (in quality, environment, energy, health and safety, ethics, and Legislative Decree 231/2001 areas) are established and reviewed to integrate them with operational management and corporate development programs.

When defining and reviewing Management System objectives, and during the analysis and update of this Policy, the Management of RADIATORI 2000 S.p.A. considers the following key elements:

Reviewing service and process requirements in relation to regulatory, legislative, and contractual updates

Evaluating the needs and expectations of relevant stakeholders (customers, suppliers, workers, regulators, local communities, etc.)

Analyzing customer satisfaction data, market needs, and emerging opportunities

Identifying and managing risks and opportunities in line with strategic directives and commitments defined by the Integrated Management System (SGQAES)

Reviewing framework contracts and contractual standards in accordance with the directives and objectives set by Management

Monitoring operational efficiency and effectiveness levels, assessing potential for improvement

Evaluating the capabilities, reliability, and engagement of suppliers, especially those providing outsourced services, encouraging adherence to company policy principles

Assessing workforce size and qualification, alongside active participation in implementing and improving the Management System

Ensuring the availability and adequacy of structural, technological, and financial resources

Monitoring environmental, energy, and health and safety performance, with a focus on impact prevention, risk reduction, and resource use efficiency

Assessing the degree of achievement of objectives and targets defined in business plans

|  |  |                     |
|--|--|---------------------|
|  <b>Radiatori 2000</b><br>Sustainable Heating Comfort | <b>Integrated Management System Policy</b> | MOD.DG.POL - Rev. 9 |
|  |  | of 08-05-2025       |
|  |  | Pag. 5 di 5         |

Reviewing internal audits, conformity assessments, and the status of corrective, preventive, and improvement actions

Evaluating the outcomes of the previous Management Review, including any significant changes in internal and external context

The Management assumes full responsibility for communicating, disseminating, and implementing this Policy within the Organization, ensuring its updated version is available through posting on bulletin boards, publishing on the corporate website, and, where required, distributing it to external stakeholders in the appropriate languages.

To ensure understanding, sharing, and effective implementation at all levels, Management involves Process Owners through system documentation, periodic meetings, and specific awareness activities. These Owners are responsible for conveying the Policy's contents and principles to their teams, supporting its adoption through targeted communication, training, coaching, and comprehension verification.

The Management also commits to periodically reviewing the Policy to ensure it remains suitable, consistent with the company's context, strategic objectives, and stakeholder requirements.

All employees and collaborators, according to their roles, functions, and responsibilities, are called upon to actively support this corporate Policy, embracing its principles and contributing concretely to the development and consolidation of the Management System. Broad and conscious involvement of all resources is essential to achieving corporate objectives and continuous performance improvement. This requires a constant commitment to applying good operational practices, reporting issues, and adopting a proactive approach that prioritizes prevention over mere correction. Only through responsible and shared participation can the system's effectiveness and sustainability over time be ensured.

  
The Management