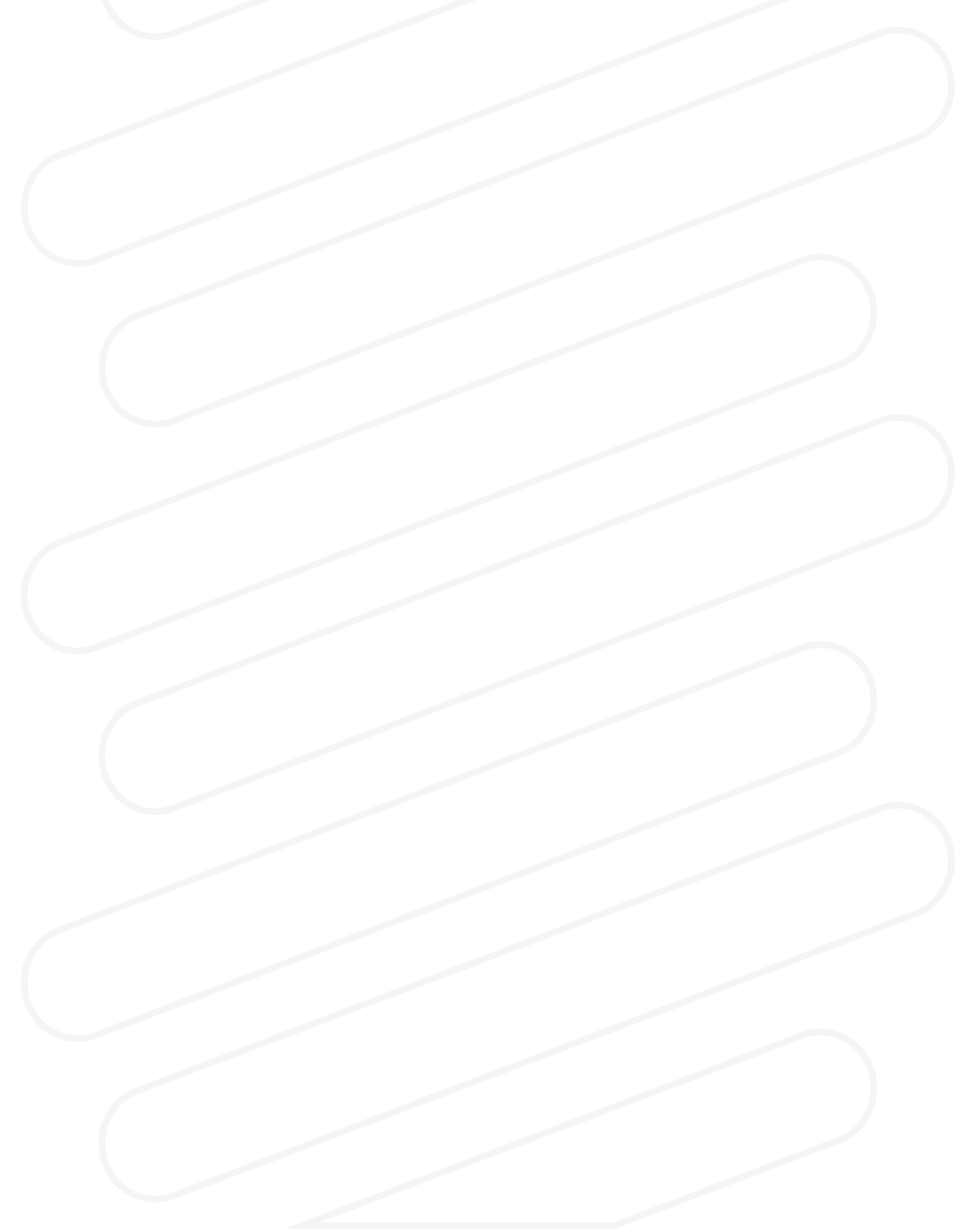




## SUSTAINABILITY REPORT 2024





## **SUSTAINABILITY REPORT 2024**

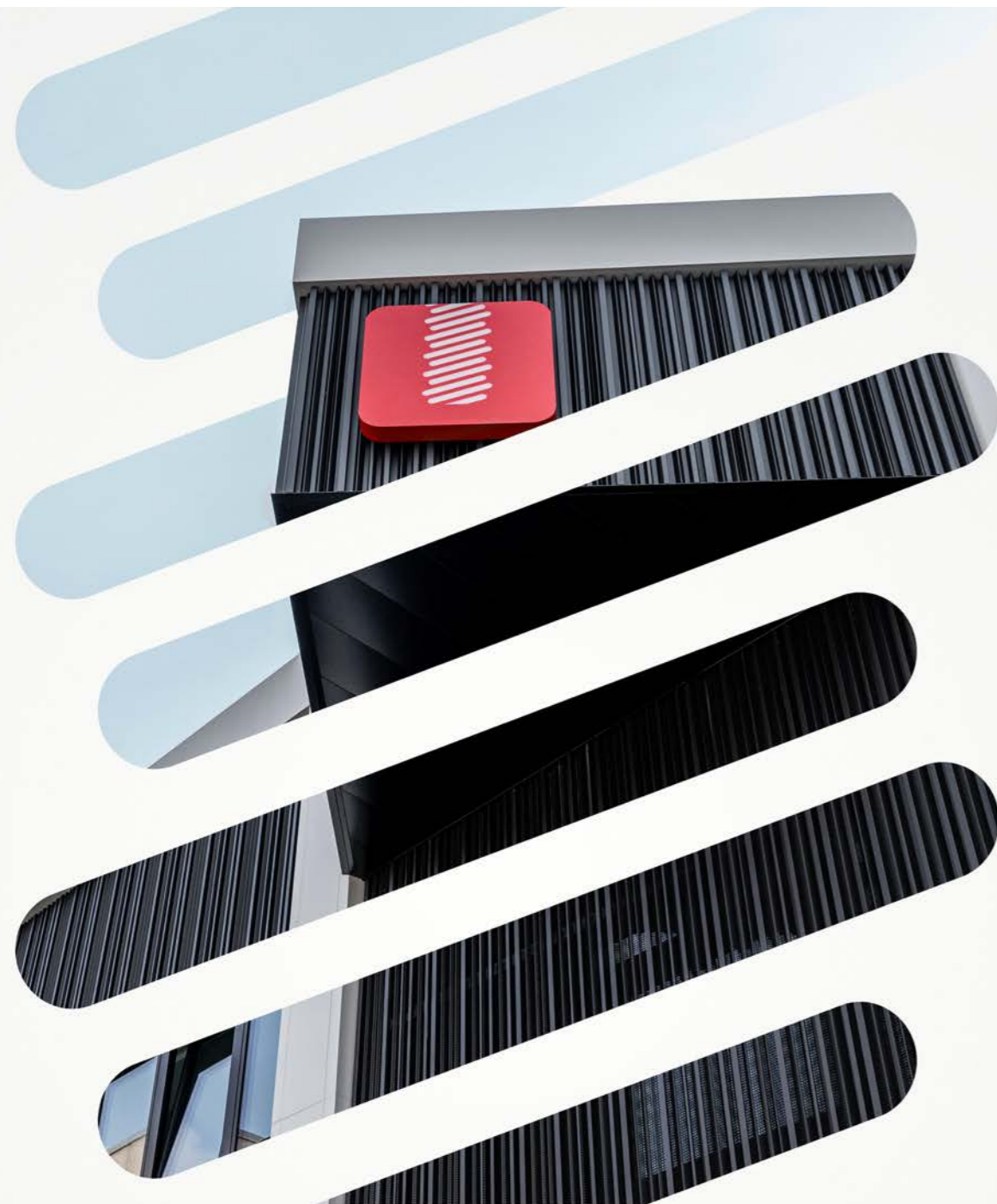


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01



## COMPANY OVERVIEW.

Comacchio S.p.A. is an Italian industrial company founded in 1986 in Castello di Godego (Treviso). It specialises in the design and production of ground drilling machines, used in various sectors related to soil drilling. The company's operations focus on the development of solutions for a range of application areas, including geotechnical engineering, foundations, water wells, tunnelling, geothermal energy, mineral exploration and ground consolidation.

Over the years, Comacchio has progressively expanded both its operational capabilities and corporate structure, culminating in the formal adoption of the joint-stock company model (S.p.A.) following its transition from a limited liability company.

Today, the company's production infrastructure includes several facilities, notably the main site in Riese Pio X, which has been operational since 2003, and the new industrial hub in Castello di Godego, inaugurated in 2016.

### PURPOSE

We help build a solid and stable future based on progress.

### VISION

Drilling technologies play a vital role in unlocking the potential of the underground: they help shape a sustainable future for communities, businesses and individuals.

### MISSION

We are a responsible company committed to design and manufacture the broadest range of durable and innovative drilling solutions, engineered to ensure safety and functionality while embracing the principles of regeneration, circularity, and recovery.

*Comacchio S.p.A. adheres to the principles of the Universal Declaration of Human Rights, the ILO Conventions, the OECD Guidelines for Multinational Enterprises, and the United Nations Sustainable Development Goals (SDGs).*

## Corporate values.

Passion has always been the driving force behind our work, and we base every action on five guiding values:



### INNOVATION

Comacchio fosters continuous innovation to enhance the performance and efficiency of its solutions. Innovation is a strategic driver that ensures alignment with technological advancements and evolving market demands;



### RELIABILITY AND EXCELLENCE

Reliability represents a daily commitment to the quality of the company's actions. Excellence is pursued at every stage of the production and commercial process, through the reliability and safety of the solutions offered;



### COHESION

Comacchio fosters a working environment built on collaboration, mutual respect and shared goals. The company promotes open dialogue and constructive engagement, recognising and valuing each individual's skills and contributions;



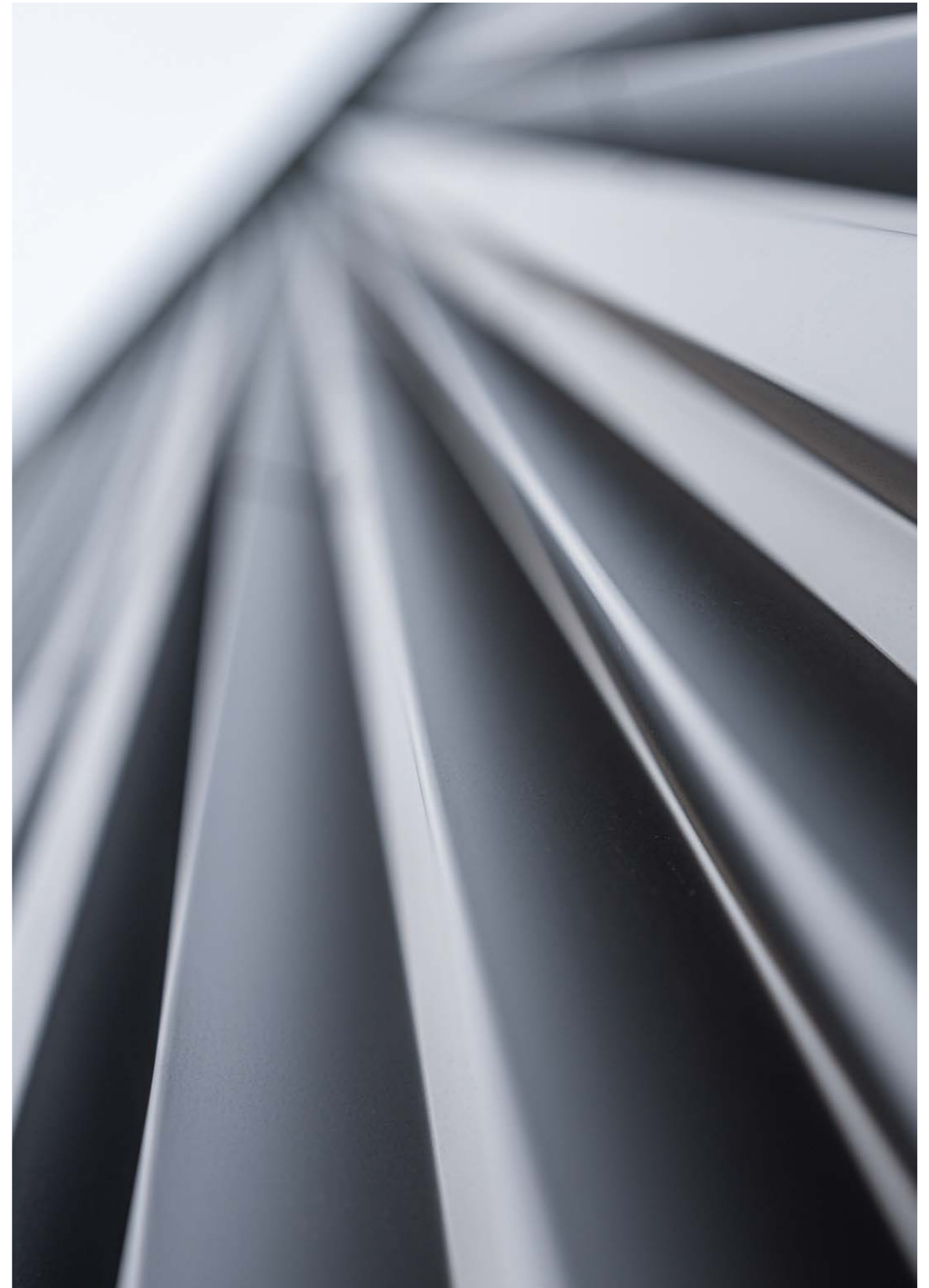
### FLEXIBILITY

The organisation designs solutions that are adaptable to a wide range of operational contexts. Its activities are focused on meeting customer needs through tailor-made, application-specific responses;



### SUSTAINABILITY

Comacchio considers sustainability a guiding principle and a strategic factor in ensuring the company's development. The company adopts responsible behaviour in its decisionmaking, integrating environmental, social and governance (ESG) criteria into its processes and day-to-day operations.





02



# GENERAL DISCLOSURE.

[BP-1]

## General basis for the preparation of sustainability statements.

This Sustainability Report is prepared on an individual basis and has been voluntarily issued by Comacchio S.p.A. (hereinafter also referred to as "Comacchio"), VAT 02019450267.

The purpose of this document is to provide a clear and comprehensive account of the organisation's environmental, social and governance (ESG) performance.

The report has been prepared in accordance with the European Sustainability Reporting Standards (ESRS) issued by EFRAG (European Financial Reporting Advisory Group). The reporting period corresponds to the 2024 calendar year. Where available, data and information for the 2023 calendar year are also included, in order to provide a broader view of the company's development over time.

The reporting scope corresponds to the legal perimeter of the entity, as there are no differences with the scope covered by the statutory financial statements.

This Sustainability Report focuses on activities directly attributable to Comacchio and, where relevant, accessible and appropriate, it also includes supplementary information relating to the upstream and downstream value chain.

In accordance with the ESRS, the company has not made use of the option to omit information relating to intellectual property, know-how or innovation outcomes. Likewise, Comacchio has not applied the national legal exemption allowing the exclusion of content related to future developments or ongoing negotiations.



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## [BP-2]

### Disclosures relating to specific circumstances.

#### OTHER MEDIUM-TO LONG-TERM TIME HORIZONS.

This report is aligned with the provisions of Section 6.4 of ESRS 1 - "Definitions of short-, medium- and long-term". Specifically, the short term refers to the current reporting period; the medium term refers to the period between the current reporting year and the next five financial years; and the long term covers a time frame exceeding five financial years.

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#### ESTIMATED VALUE CHAIN METRICS BASED ON INDIRECT SOURCES.

No estimated data based on indirect sources or proxies were used in the metrics reported.

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#### SOURCES OF ESTIMATION AND MEASUREMENT UNCERTAINTY.

In line with Section 7.2 of ESRS 1 - "Sources of estimation and outcome uncertainty" - no estimation uncertainties or data limitations were identified.

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#### CHANGES IN THE PREPARATION AND PRESENTATION OF SUSTAINABILITY INFORMATION COMPARED TO THE PREVIOUS REPORTING PERIOD.

The organisation prepared a Sustainability Report for the 2023 calendar year in accordance with the GRI Standards. The current report covers the 2024 calendar year and has been prepared in compliance with the ESRS.

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#### MATERIAL ERRORS IN THE PREVIOUS REPORTING PERIOD.

No material errors have been identified in relation to previous reporting periods.

---

#### INFORMATION DERIVED FROM OTHER LEGISLATIVE FRAMEWORKS.

This Sustainability Report is based on the principles and disclosure requirements set out in the ESRS.

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#### OPTION TO OMIT DISCLOSURES REQUIRED UNDER ESRS E4, ESRS S1, ESRS S2, ESRS S3 OR ESRS S4, IN ACCORDANCE WITH APPENDIX C OF ESRS 1.

Based on the results of the materiality assessment, the company has not made use of the option to omit any of the required disclosures.

## [GOV-1]

### Role of governing, management and supervisory bodies.

Comacchio's governance is overseen by a Board of Directors, which holds ultimate responsibility for defining the company's strategic guidelines and key objectives, ensuring that operational decisions are aligned with the organisation's mission. The Board consists of three male members: Renzo Comacchio, Patrizio Comacchio and Pasqualino Comacchio. Renzo Comacchio serves as Chairman, while the roles of Chief Executive Officer are jointly held by Pasqualino and Patrizio Comacchio. All directors are executive members; there are no independent directors nor representatives appointed to act on behalf of employees.

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Another key governance body is the Board of Statutory Auditors, composed of three standing members and two alternates, all male. The standing auditors are Giuliano Giacomazzi (Chairman), Antonio Basso and Daniele Manente.

The alternates are Marco Celegon and Marco Ongarato. This body is responsible for overseeing the company's management, ensuring that operations comply with legal requirements, the company's bylaws, and sound management principles. It also monitors the adequacy and proper functioning of the company's organisational, accounting and administrative systems. Since 2024, the statutory audit function has been performed by Pietro Hyvoz.

Within the governance structure, the Management Board also plays a significant role. The Committee is composed of three male members: the General Manager, the Head of Operations, and the Technical-Commercial Manager. The Committee is responsible for making strategic decisions and defining the company's commercial strategies. Its remit focuses on overall business direction, with an important role in setting operational and commercial guidelines.

Regarding ESG (environmental, social and governance) competencies, the company has chosen to supplement its internal expertise by engaging a specialised sustainability consultancy. An internal ESG team has also been established to manage corporate sustainability matters.

Although not formally appointed by the Board, the ESG team effectively coordinates sustainability activities and monitors related initiatives.

In 2024, this team comprised three company functions: the Head of Shipping and Customs, the Chief Financial Officer (CFO), and the Head of the Prevention and Protection Service (RSPP). It should be noted that the RSPP left the ESG team during the course of the year.

## [GOV-2]

### Information provided and sustainability issues addressed by governing, management and supervisory bodies.

During the reporting period, sustainability issues were handled by the ESG team, which reports directly to the Board of Directors and the Management Board, the bodies responsible for making key sustainability decisions.

Depending on the topic's nature, updates to the management bodies may also be communicated directly by the respective area managers, who provide specific reports within their responsibilities.

No fixed schedule is established for updating the governance bodies. Communications take place flexibly, according to the relevance and urgency of the matters addressed.

In 2024, the main topics discussed by the senior management concerned health and safety, energy efficiency, and reducing environmental impact.

**[GOV-3]**  
**Integration of sustainability performance into incentive systems.**

In 2024, the organisation did not implement any incentive schemes or variable remuneration policies linked to achieving specific ESG objectives. Any future introduction of incentive measures will be preceded by defining specific KPIs (Key Performance Indicators), which will serve as the basis for measurement, ensuring they are clear, measurable, and aligned with the company’s strategy.

**[GOV-4]**  
**Statement on due diligence.**

According to Section 4 of ESRS 1, due diligence is “the process through which companies identify, prevent, mitigate, and account for how they address actual and potential adverse impacts on the environment and people connected to their activities”.

In the current context, marked by increasing stakeholder and market attention to the environmental and social impacts of business activities, adopting a responsible and aware approach to managing these aspects is increasingly important. This commitment applies not only to internal operations but also extends along the entire supply chain, involving all parties contributing to the final product.

In line with evolving external contexts, Comacchio intends to progressively integrate ESG principles into its strategic decisions, laying the groundwork for possible monitoring of corporate activities and their implications throughout the value chain.

Below is the table illustrating the main topics related to due diligence:

KEY ELEMENTS OF THE DUE DILIGENCE PROCESS	REFERENCE IN THE SUSTAINABILITY REPORT
Integrating due diligence into governance, strategy and the business model	GOV-2; GOV-3; SMB-3.
Engaging all relevant stakeholders during key stages of the due diligence process	GOV-2; SBM-2; IRO-1;
Identifying and assessing adverse impacts	IRO-1; SBM-3
Taking action to address negative impacts on people and the environment	ESRS E1; ESRS S1; ESRS S4; ESRS G1.
Monitoring the effectiveness of actions taken and communicating results	ESRS E1; ESRS S1; ESRS S4; ESRS G1.

**[GOV-5]**  
**Risk management and internal controls over sustainability reporting.**

To ensure effective oversight of the sustainability reporting process, the company has established a risk management and internal control system designed to ensure the accuracy, consistency and reliability of the information disclosed. To strengthen the internal structure and reduce risks related to data completeness, accuracy and timeliness, the organisation is supported by an external consultancy with specific expertise in ESG matters.

In addition, cross-functional engagement has been promoted across various business units to ensure a traceable and timely flow of information.



## [SBM-1]

### Strategy, business model and value chain.

#### CORE SOLUTIONS AND PRODUCTS.

Comacchio operates in the design, construction, maintenance and repair of mechanical equipment for ground drilling, offering specialised solutions across several sectors, including foundations and ground consolidation, geotechnics and mineral exploration, as well as water wells and geothermal drilling.

In the foundations and consolidation segment, the company supplies machinery for the construction of complex structural works. The product range includes both equipment for the installation of large-diameter piles - used in the construction of deep foundations - and microdrilling systems designed to operate in areas with limited access.

In the geotechnics and exploration segment, the equipment developed by Comacchio enables subsurface analysis in support of feasibility studies for construction projects. The company also supplies solutions for mineral exploration, designed to extract deep core samples essential for assessing the characteristics of mineral deposits.

In the water wells and geothermal product line, Comacchio provides dedicated solutions for geothermal drilling and for wells used to supply water.

Within its business model, Comacchio offers a comprehensive technical support and maintenance service. This includes remote assistance, predictive diagnostics, on-site interventions, and a network of authorised repair centres. Customer service is managed directly by technical personnel through dedicated channels (phone, digital, and video). Additional services include emergency response in the event of breakdowns, operator training, and rapid technical support in critical situations. The company promotes not only repair activities but also product regeneration.

This process, which is described in detail later in the report, includes the collection and recovery of used machines, technical assessment of components, and the replacement or repair of damaged parts.

#### COMPETITIVE CONTEXT.

An analysis of the 2024 income statement shows that net revenue amounted to €138,606,397, while the value of production totalled €141,561,371.

The geographical distribution of sales highlights the company's strong international presence, with active commercial operations across multiple continents. Comacchio trades with over 100 different countries. Europe is the company's primary market, accounting for 43% of total sales, followed by Italy with 26%.

The Americas represent the second-largest non-European market, contributing 21%, while Africa and the Middle East together account for 6%, and Asia and Oceania make up the remaining 4%. This positioning reflects a commercial strategy focused on market diversification.

Comacchio's international operations are conducted in full compliance with current European trade regulations. In line with EU Regulation 833/2014 and its subsequent amendments, and in accordance with the provisions issued by the European Union, the company has suspended all sales to the Russian Federation, Belarus, and those Ukrainian territories not under government control.

#### DESCRIPTION OF THE UPSTREAM AND DOWNSTREAM VALUE CHAIN.

Comacchio's value chain is the result of a system of processes and relationships involving both internal and external stakeholders, each contributing to the creation of corporate value.

The first link in the value chain is represented by suppliers, selected to ensure consistent quality and regulatory compliance. Strategic suppliers provide the raw materials and mechanical components required to manufacture the equipment produced by the company. Comacchio also relies on specialist suppliers for certain processing activities, such as painting and surface treatments of metals.

The supplier qualification process, regardless of the type of goods or services provided, includes an assessment of key criteria deemed relevant, such as service quality, compliance with technical specifications, environmental performance, and delivery punctuality.

Particular attention is paid to suppliers involved in operations with a higher environmental impact (e.g. painting, metal treatment). These suppliers are required to complete a dedicated questionnaire and undergo audits to verify compliance with applicable regulations and company standards on environmental protection and operational safety.

Another key component of the value chain is the workforce, which forms the operational backbone of the business. As at 31 December 2024, Comacchio employed 245 people.

The final link in the value chain is represented by customers, including organisations operating in the fields of special foundations, mineral exploration, geotechnics, and water and geothermal well drilling. These are qualified operators engaged in national and international infrastructure projects. To serve these markets, the company adopts a multi-channel distribution model, which includes:

- Direct sales in Italy.
- A network of resellers and agents in selected countries, acting as intermediaries between local customers and Comacchio

#### ESG OBJECTIVES.

The organisation has identified a series of sustainability objectives it aims to achieve in the near future.

In the environmental sphere, several key initiatives are scheduled to launch in 2025. These include the development of a circularity plan aimed at defining strategies for resource reuse and waste reduction. The company also plans to initiate Life Cycle Assessment (LCA) for its products and to renew its corporate vehicle fleet over the medium term.

On the social front, the organisation plans to develop a workplace health management system, also within the medium term. In addition, Comacchio aims to obtain formal AEO (Authorised Economic Operator) certification by the end 2025.

With regard to cybersecurity, the company intends to draft an internal policy on the use of corporate IT devices and to develop a Cybersecurity Policy aligned with the NIS Directive, with completion scheduled for 2026.

Lastly, it should be noted that in 2024 the company launched the process of drafting its Code of Ethics, which is expected to be formally approved by 2025.

**[SBM-2]**  
**Stakeholder Interests and Perspectives - General Aspects.**

Comacchio recognises the strategic importance of stakeholder relationships, viewing them as an integral part of the value chain and key contributors to the definition of corporate priorities. Listening to their needs and expectations plays an important role in ensuring alignment between the evolution of the business model and the operational context in which the company operates.

Engagement with stakeholders currently takes place on an informal and non-regular basis. One key channel of interaction is represented by the “dealer meetings”, which provide opportunities for dialogue with external stakeholders. These meetings are used to communicate ongoing initiatives and achievements, as well as to gather requests, proposals, and feedback, which are then analysed and discussed internally. Outside of these occasions, stakeholders can share their needs or comments directly, either verbally or by email, by contacting their designated company representatives.

At present, no additional stakeholder engagement mechanisms are in place. However, the company considers every request and proposal received as an opportunity for improvement and a stimulus for strategic development. Feedback and input are forwarded to the relevant departments and taken into account in decision-making processes.

It should be noted that in 2024, Comacchio implemented a more structured stakeholder engagement process as part of its double materiality assessment. Specifically, as will be discussed in greater detail later, questionnaires were sent to both internal and external stakeholders, asking them to identify the issues they consider most relevant in terms of their potential impact on the company.

This assessment provided valuable insights into stakeholder expectations.



**[SBM-3]**  
**Material Impacts, Risks and Opportunities, and their Interaction with Strategy and the Business Model.**

In 2024, the organisation carried out a double materiality assessment, aimed at identifying the issues of greatest relevance to the business. The methodology adopted will be described in detail in a later section.

The table below presents the results of the analysis and highlights the topics identified as having dual material relevance:

IMPACT MATERIALITY		POTENTIALLY RELEVANT TOPIC	FINANCIAL MATERIALITY		
	IMPACT DESCRIPTION		RISK DESCRIPTION	OPPORTUNITY DESCRIPTION	
VERY HIGH	The company is directly responsible for the quality and safety of its products, which affect customer satisfaction, safety and user experience.	PRODUCT QUALITY AND SAFETY	Complaints, returns, lack of customer loyalty, low attractiveness and competitiveness.	-	VERY HIGH
VERY HIGH	Use of electricity and fuels (natural gas) for production activities.	RESPONSIBLE ENERGY PROCUREMENT AND CONSUMPTION	-	Cost savings on utilities, reduced exposure to energy price volatility, GHG emissions reduction, improved reputation.	HIGH
HIGH	The business model involves multiple suppliers and customers, with Comacchio acting as a strategic partner.	BUSINESS MODEL RESILIENCE	-	Improved ability to prevent and adapt the business model to changes in the external environment.	VERY HIGH
VERY HIGH	Employee exposure to workplace accidents and occupational illnesses.	EMPLOYEE HEALTH AND SAFETY	Loss of reputation and attractiveness (to creditors, customers, and communities), legal claims and compensation, low retention.	-	HIGH
HIGH	Definition and adherence to principles and policies governing ethical behaviour within the company and in dealings with business partners.	BUSINESS ETHICS	-	Improved employee retention and attraction, enhanced corporate image and reputation.	HIGH

IMPACT MATERIALITY		POTENTIALLY RELEVANT TOPIC	FINANCIAL MATERIALITY		
	IMPACT DESCRIPTION		RISK DESCRIPTION	OPPORTUNITY DESCRIPTION	
HIGH	Environmental and social impacts arising from failure to comply with applicable regulations.	LEGAL COMPLIANCE AND REGULATORY OVERSIGHT	Increased costs due to penalties, regulatory adjustments, reputational damage, and diminished competitive positioning.	-	HIGH
HIGH	Exposure to low probability, high-impact incidents with potential human, environmental and social consequences for the surrounding community.	MANAGEMENT OF CRITICAL INCIDENT RISK	Damage to company infrastructure, reputational loss, legal claims and compensation, low retention.	-	HIGH
HIGH	Potential incidents involving breaches or disclosure of sensitive data, with associated social impacts.	DATA SECURITY	Inadequate cybersecurity management leading to legal and reputational damage.	-	HIGH
LOW	Use and consumption of materials and resources (volume and scarcity).	PROCUREMENT OF RAW MATERIALS AND EFFICIENCY	-	Reduced exposure to raw material availability and cost, more resilient supply chain, new business opportunities through recycled or recovered materials.	HIGH
HIGH	Potential release of air pollutants during production processes.	AIR QUALITY	Penalties and legal claims from failure to meet regulatory thresholds or permitting practices, reputational damage.	-	LOW
HIGH	Water withdrawal and consumption, risk of resource scarcity.	WATER CONSUMPTION AND RECYCLING	-	Reduced water use, and consequently, reduced exposure to availability and cost of water.	LOW
LOW	Generation of waste and potential impacts on the environment.	WASTE AND SCRAP MANAGEMENT	Waste management and disposal costs, fines for improper waste handling.	-	LOW

IMPACT MATERIALITY		POTENTIALLY RELEVANT TOPIC	FINANCIAL MATERIALITY		
	IMPACT DESCRIPTION		RISK DESCRIPTION	OPPORTUNITY DESCRIPTION	
LOW	Direct GHG emissions generated during company operations.	GHG EMISSIONS REDUCTION	-	Lower offsetting costs, improved corporate reputation, better access to public funding or incentives.	LOW
LOW	Although the company does not have a direct impact on financial systems, it contributes to the national financial ecosystem.	IMPLEMENTATION OF STRATEGIES TO REDUCE RISKS ASSOCIATED WITH FINANCIAL CRISES	-	Increased trust from investors and stakeholders, enhanced reputation and competitive positioning.	LOW

Although not identified as having dual material relevance, the organisation has chosen to also report on the following topics:

- Repair and regeneration;
- Community relations;
- Employee well-being.

The table below presents the topics identified as having dual material relevance, as well as those the organisation has voluntarily chosen to report on, together with their connection to the ESRS principles and the Sustainable Development Goals (SDGs):

TOPIC	RELATED ESRS	RELATED SDGS
LEGAL COMPLIANCE AND REGULATORY OVERSIGHT	MDR	
RESPONSIBLE ENERGY PROCUREMENT AND CONSUMPTION	E1-2; E1-3; E1-4; E-5; E1-9	 
BUSINESS MODEL RESILIENCE	MDR	
EMPLOYEE HEALTH AND SAFETY	S1-14	
BUSINESS ETHICS	G1-1	
MANAGEMENT OF CRITICAL INCIDENT RISK	MDR	 
PRODUCT QUALITY AND SAFETY	S4	
DATA SECURITY	MDR	
REPAIR AND REGENERATION	MDR	
COMMUNITY RELATIONS	MDR	
EMPLOYEE WELL-BEING	MDR	 

## [IRO-1] Description of the Process for Identifying and Assessing Material Impacts, Risks and Opportunities.

In 2024, Comacchio carried out a double materiality assessment aimed at identifying the most relevant sustainability topics for the organisation.

The analysis was conducted in accordance with the requirements set out in ESRS 1 “General Requirements” developed by EFRAG, which provides the overarching framework for identifying and assessing material sustainability matters. In addition, the company drew on the guidance provided in IG 1 “Materiality Assessment Implementation Guidance”, which outlines methodological practices in line with ESRS provisions.

The assessment was based on two core dimensions. The first is impact materiality, which adopts an inside-out perspective, focusing on how the company’s activities generate environmental, social and governance impacts. The second is financial materiality, adopting an outside-in perspective, which assesses how sustainability-related topics may influence the company’s financial performance by giving rise to risks or opportunities.

The process began with a preliminary phase to identify potentially material topics, using a three-tiered filtering approach.

Firstly, the company reviewed the framework set out by the Sustainability Accounting Standards Board (SASB), which outlines statistically material topics for organisations operating within the same industry.

Secondly, a benchmarking analysis was conducted on peer and competitor companies with a similar business model, scale and geographical footprint, focusing on those that had undertaken comparable assessments. Lastly, the company considered any topics specific to Comacchio’s own business model, which may not have emerged in the previous steps.

Based on the list of potentially material topics, the company launched a stakeholder engagement initiative. Questionnaires were distributed to both internal and external stakeholders, asking them to assign a score from 1 to 5 based on the level of importance Comacchio should attribute to the impact of each potentially material topic.

Among the internal stakeholders involved in the process were:

- The Board of Directors;
- Senior management;
- Employees.

The external stakeholders included:

- Customers;
- Suppliers;
- Financial institutions and insurance providers;
- Public authorities;
- Regulatory bodies;
- Industry associations;
- The local community.

The responses collected through the questionnaires were assessed and weighted based on the role and influence of each stakeholder group in relation to the achievement of the company’s objectives. These results played a key role in determining impact materiality.

The potentially relevant topics were then evaluated from both an impact and a financial materiality perspective. With regard to impact materiality, two key elements were considered: magnitude and likelihood, each rated on a scale from 1 to 5. Magnitude refers to the extent of the positive or negative impact, which was assessed based on the questionnaire results.

Likelihood refers to the probability of the positive or negative impact occurring. To estimate this, the company used the World Business Council for Sustainable Development's "Vision 2050" trajectories, as well as climate scenarios, geoportals, industry studies and other recognised external sources (including ISTAT, WEF and the European Union).

In parallel, financial materiality was assessed by analysing the risks and opportunities associated with ESG topics, with the aim of identifying how these may affect the organisation's financial performance. Each potentially material topic was evaluated in terms of both magnitude and likelihood, using a 1-to-5 scale. In this context, magnitude indicates the scale of the potential financial risk or opportunity, while likelihood refers to the probability of it materialising.

Several key factors were taken into consideration, including, but not limited to, regulatory developments, the business model, the operational context, scenario analysis and potential geopolitical risks. This analysis enabled the company to map its priorities, highlighting areas where ESG issues could result in significant changes in cash flows, operating costs or reputational value.

The results of both the impact and financial materiality assessments were then used to identify the topics deemed double material to the organisation.

## [IRO-2] Disclosure Requirements under the ESRS Covered in the Sustainability Statement.

The table below sets out the topics disclosed in this document, along with references to the relevant sections in which each matter is addressed.

DOUBLE MATERIAL TOPIC	SECTION
Legal compliance and regulatory oversight	Legal compliance and regulatory oversight [MDR]
Responsible energy procurement and consumption	E1 Responsible energy procurement and consumption
Business model resilience	Business model resilience [MDR]
Employee Health and Safety	S1 Employee Health and Safety
Business ethics	G1 Business ethics
Management of critical incident risk	Management of critical incident risk [MDR]
Product quality and safety	S4 Product quality: user safety and data protection
Data security	S4 Product quality: user safety and data protection
Repair and regeneration	Repair and regeneration [MDR]
Community relations	Community relations [MDR]
Employee well-being	Employee well-being [MDR]



# E1 RESPONSIBLE ENERGY PROCUREMENT & CONSUMPTION.

## [E1-SBM-3]

### Material Impacts, Risks and Opportunities, and their Interaction with Strategy and the Business Model.

#### SCOPE OF THE ANALYSIS.

The purpose of the analysis is to assess the environmental and territorial vulnerability of the company's operational areas in relation to a range of climatic and natural factors. It includes hydrogeological and seismic assessments, soil quality studies and potential impacts from pollution events, with particular attention to land preservation and soil protective capacity. The adopted approach considers both the direct and indirect effects of climate change, including those linked to extreme weather variability and prolonged environmental stress.

#### TIME HORIZON.

The analysis covers:

- The current and historical situation (2020–2024);
- Short- and medium-term projections to 2030, in connection with the commissioning of new facilities, infrastructure upgrades, and changes in energy and production consumption profiles;
- Periodic updates based on evolving environmental and regulatory developments.

#### CLIMATE-RELATED RISKS CONSIDERED.

The analysis identified the following material risks:

- Hydraulic risks (flooding hazards classified as P0 and P1);
- Heatwaves and extreme temperatures, with impacts on energy resilience and system efficiency (including the replacement of air conditioning systems with heat pumps);
- Seismic risk (zone 2, medium-level events);
- Heavy rainfall (2024 was the second-wettest year since 1992);
- Indoor air quality and radon exposure;
- Contamination of water and soil by nitrates and hydrocarbons.

#### KEY FINDINGS.

The resilience analysis supported the identification of priority environmental and infrastructure initiatives, including:

- Installation of photovoltaic systems with capacities of 349.65 kWp and 99.71 kWp;
- Replacement of air conditioning and heating systems with heat pump technologies;

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- Closed-loop treatment plants for industrial washing;
- Charging stations and the adoption of electric/hybrid company vehicles;
- Energy retrofit of buildings through new windows and thermal insulation;
- Introduction of environmental KPIs to monitor water, gas, electricity, paper, and oil consumption.

### STRATEGIC INTEGRATION AND ADAPTATION MODEL.

Comacchio has incorporated the outcomes of the resilience analysis into its corporate strategy and business model through:

- Structured energy monitoring and optimisation processes;
- Machinery regeneration policies aimed at waste reduction and resource efficiency;
- Internal awareness initiatives on environmental and climate-related issues;
- Investments in low-impact technologies to enhance the sustainability of logistics and production.

## [E1 - IRO-1] Description of Processes to Identify and Assess Climate-Related Impacts, Risks and Opportunities.

### COMPANY IMPACTS ON CLIMATE CHANGE.

Comacchio's production process, as an advanced manufacturing activity in the hydraulic drilling and quarrying/ construction machinery sector, includes elements that contribute significantly to environmental impacts. In particular, greenhouse gas emissions result from:

- Electricity and natural gas consumption to power equipment and heat production facilities;
- The use of fossil fuels during functional testing of diesel engines;
- The use of chemical substances in the production cycle;
- Logistics-related traffic generated by suppliers, customers and carriers.

These activities give rise to direct (Scope 1) and indirect (Scope 2 and partially Scope 3) greenhouse gas emissions, significantly contributing to global warming. The production and transport of raw materials used in the company's processes also play a substantial role in the overall environmental footprint.

### ASSESSMENT OF CLIMATE-RELATED RISKS AND OPPORTUNITIES.

Comacchio has adopted a structured process for identifying and assessing climate-related risks and opportunities, in line with key international standards such as the ESRS and SASB.

This approach is based on the active engagement of both internal stakeholders (e.g. department heads, QHSE area, finance team) and external stakeholders (customers, strategic suppliers, local authorities), through the use of questionnaires, interviews and workshops.

The topics gathered were assessed in terms of environmental significance, expected impact, likelihood of occurrence, and financial relevance. The outcomes were analysed using a double materiality matrix, which enabled the prioritisation of key factors and their alignment with mitigation and adaptation strategies.

### ASSESSMENT ALONG THE VALUE CHAIN.

The organisation is exposed to physical climate-related risks, particularly extreme weather events such as heavy rainfall, flooding, heatwaves, heavy snowfall or abnormal seasonal variations. These phenomena may negatively impact business continuity, causing disruptions to production processes, damage to buildings, equipment downtime or logistical inefficiencies.

Along the value chain, such events may lead to transport delays, supply disruptions or increased procurement costs, especially for highly specialised mechanical components.

Comacchio has integrated the assessment of physical risks into its environmental management systems and industrial planning, implementing targeted investments to:

- Reduce the infrastructural vulnerability of operational sites;
- Improve energy efficiency;
- Support the transition to electric mobility;
- Strengthen logistical resilience.



### USE OF CLIMATE SCENARIO ANALYSIS.

To identify and assess physical climate-related risks in the short, medium and long term, the company adopted a forward-looking approach based on climate scenario analysis. This activity drew on the following sources:

- Historical weather data provided by ARPA Veneto;
- Municipal land-use planning analyses (PAT);
- Hydraulic, geological and urban development assessments;
- Sector-specific regional risk reports.

By integrating these data sources, the company was able to classify the most significant climate threats to its geographical area and production infrastructure. The analysis informed the planning of both preventive and corrective actions, incorporated into the organisation's ESG strategy, and strengthened its overall capacity to adapt to climate change.

A detailed table of climate-related physical risks is provided below:

TYPE OF HAZARD	CATEGORY	DESCRIPTION	EXPOSED BUSINESS ACTIVITY	TIME HORIZON	LEVEL OF EXPOSURE	CLIMATE SCENARIO / SOURCE
FLOODING / HEAVY RAINFALL	Acute (physical)	Extreme weather events with risk of flooding affecting production areas and road access.	Production sites; inbound/outbound logistics.	Short to Medium	Moderate (P1 - low-hazard zone)	ARPA data, PAT scenarios, hydraulic risk analysis.
HEATWAVES	Chronic (physical)	High temperatures impacting productivity and equipment efficiency.	Production departments, offices, air conditioning systems.	Medium to Long	High	ARPA historical series, regional temperature trends.
DROUGHT	Chronic (physical)	Reduced water availability for operations and cleaning processes.	Industrial use; machine washing.	Long	Low	Regional climate trends; longterm projections.
COLD AND SNOW	Acute (physical)	Potential disruptions to logistics and delays in transport.	Logistics; supplies.	Short	Moderate	ARPA historical data; shortterm extreme weather forecasts.

### MANAGEMENT OF TRANSITION RISKS IN OPERATIONS AND ALONG THE VALUE CHAIN.

Comacchio has assessed climate-related transition risks as strategically significant factors for ensuring business continuity and maintaining long-term competitiveness. These risks may affect the company across several dimensions, including:

- The evolving regulatory and policy landscape, particularly with the introduction of new EU directives on greenhouse gas emissions, ESG disclosures, and environmental sustainability criteria;
- Increasing costs associated with the technological upgrades required to comply with more stringent environmental standards;
- Mounting pressure from stakeholders, institutional clients and international markets for low-impact products and processes;
- Volatility in energy and raw material markets, exacerbated by geopolitical tensions and the global shift towards clean energy.

These factors may influence operating costs, investment decisions, corporate reputation management, and access to global value chains that are increasingly focused on the climate performance of their suppliers.

### CLIMATE SCENARIO ANALYSIS FOR THE ASSESSMENT OF TRANSITION RISKS.

The identification and assessment of transition risks were carried out by integrating European regulatory references (notably the ESRS standards and the directives introduced under the CSRD) with external forward-looking data, such as industry benchmarks and the Vision 2050 pathways. The use of these scenarios enabled the company to:

- Understand the potential impacts of decarbonisation in regulated and climateexposed sectors;
- Anticipate the effects of new environmental thresholds imposed by lenders, clients or competent authorities;
- Estimate the adequacy of its infrastructure and technological investments from a low-carbon perspective.

This assessment was conducted across three distinct time horizons: short term (up to 3 years), medium term (by 2030), and long term (beyond 2030), in order to support the planning of a consistent energy transition and sustainability pathway.

### ALIGNMENT WITH CLIMATE ASSUMPTIONS INCORPORATED IN FINANCIAL STATEMENTS.

The scenarios considered are aligned with the main climate trajectories recognised at the European level and are consistent with the assumptions adopted in the company's financial statements in terms of sustainability and strategic planning. The analysis specifically considered:

- The direct and indirect financial impacts of emerging environmental policies;
- The opportunities for cost savings and innovation associated with the replacement of obsolete technologies;
- The company's ability to access EU funding or preferential finance instruments supporting the ecological transition.

This consistency ensures that business decisions are based on integrated climate assessments and that the company's business model can evolve towards a climateresilient approach.

The table below provides a detailed overview of climate-related transition risks:

TYPE OF TRANSITION EVENT	DESCRIPTION OF RISKS ASSOCIATED WITH THE TRANSITION EVENT	EXPOSED BUSINESS ACTIVITY	TIME HORIZON	LEVEL OF EXPOSURE	CLIMATE SCENARIO / SOURCE
REGULATORY	New European regulations on emissions, ESG reporting and resource use may lead to increased compliance burdens and administrative costs.	Compliance, administration, strategy.	Short to Medium	High	CSRD, ESRS, EFRAG guidelines.
TECHNOLOGICAL	The need to update facilities and processes with low-emission technologies to remain competitive.	Production, Research and Development.	Medium to Long	Moderate	Vision 2050 – WBCSD scenarios, low emission technology trends.
MARKET	Growing customer demand for more sustainable solutions and "green procurement".	Sales, marketing, business relations.	Short to Medium	High	Client and supplier benchmarks, international standards (SASB).



TYPE OF TRANSITION EVENT	DESCRIPTION OF RISKS ASSOCIATED WITH THE TRANSITION EVENT	EXPOSED BUSINESS ACTIVITY	TIME HORIZON	LEVEL OF EXPOSURE	CLIMATE SCENARIO / SOURCE
REPUTATIONAL	Loss of competitiveness or image among stakeholders due to failure to meet environmental expectations.	Communication, institutional relations, stakeholder engagement.	Short	Moderate	Context analysis and market ESG expectations.
ECONOMIC-FINANCIAL	Changes in energy costs and access to finance linked to environmental performance.	Operating costs, financial management.	Medium term	Moderate	EU energy transition scenarios, sustainable finance criteria.

### ASSETS AND BUSINESS ACTIVITIES NOT FULLY ALIGNED WITH CLIMATE TRANSITION OBJECTIVES.

Comacchio has launched a structured review of assets and operational activities that are partially misaligned with the decarbonisation goals of the economy and the climate neutrality requirements set out in European and national policies.

Certain areas of the business require significant action to achieve full alignment with the principles of the ecological transition. These include:

- The use of diesel engines in test benches for equipment commissioning, which results in direct greenhouse gas emissions and calls for mitigation strategies such as emission reduction, offsetting, or conversion to lower-impact solutions;
- The use of fossil fuels for heating in certain production areas, which requires a phased replacement plan with systems powered by renewable sources, such as electric heat pumps and green district heating networks;
- The presence of energy-intensive processes, for which technological efficiency measures, automation and digitalisation are a priority;
- The use of materials and chemical products that are not always compliant with low environmental impact criteria, necessitating a more rigorous supplier selection process and the adoption of more sustainable alternatives, including eco-design solutions.

These areas represent not only significant challenges, but also opportunities for innovation and competitive repositioning. Comacchio is progressively integrating these considerations into its investment plans and the revision of its operating model.

The table below provides a detailed overview of climate-related transition opportunities:

TYPE OF TRANSITION EVENT	DESCRIPTION OF RISKS ASSOCIATED WITH THE TRANSITION EVENT	EXPOSED BUSINESS ACTIVITY	TIME HORIZON	LEVEL OF EXPOSURE	CLIMATE SCENARIO / SOURCE
REGULATORY	Access to grants and incentives for energy transition and the digitalisation of production processes.	Engineering, Production, Finance.	Short to Medium	High	CSRD, NRRP, EU Green Deal regulations.
TECHNOLOGICAL	Adoption of efficient and sustainable technologies (e.g. heat pumps, photovoltaic systems, refurbished machinery).	Production plants, facilities, maintenance.	Short to Medium	High	Vision 2050, industrial technology trends.
MARKET	Growing demand for equipment with lower environmental impact from sustainability-conscious clients.	Sales, Research & Development.	Medium to Long	High	Client ESG benchmarks, evolving green procurement practices.
REPUTATIONAL	Enhanced corporate image and stakeholder loyalty through alignment with climate objectives.	Communication, CSR, Management.	Short	Moderate	Integrated ESG scenarios, EFRAG guidelines.
FINANCIAL	Easier access to sustainable financing and better conditions for companies engaged in ecological transition.	Management control, Investor Relations.	Medium term	Moderate	EU Taxonomy criteria, market ESG ratings.

## [E1-2] Policies on Climate Change Mitigation and Adaptation.

### KEY CONTENT OF THE POLICY.

The policy adopted by Comacchio systematically integrates quality and environmental considerations, with the aim of ensuring both customer satisfaction and environmental protection. It promotes the continuous improvement of company performance, compliance with applicable regulations, efficient resource use, reduction of emissions and pollution, and the prevention of environmental risks. The policy encourages sustainable and responsible behaviour, promoting these principles both within the organisation and across the entire value chain.

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## SCOPE AND BOUNDARIES.

The policy applies across all of Comacchio's activities, products and processes, with no specific exclusions. It covers all operating sites and all activities directly managed by the company.

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## ORGANISATIONAL LEVEL RESPONSIBLE FOR IMPLEMENTATION.

Primary responsibility for implementing the policy lies with Company Management. Management ensures the allocation of necessary resources, monitors continuous improvement targets, and provides strategic direction aligned with the defined environmental and quality principles.

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## RECOGNITION OF EXTERNAL STANDARDS.

Implementation of the policy is aligned with international standards and certified management systems, in particular:

- ISO 9001 for quality management;
- ISO 14001 for environmental management.

These certifications demonstrate the organisation's commitment to adopting compliant and progressive ESG practices.

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## CONSIDERATION OF STAKEHOLDER INTERESTS.

In defining the policy, Comacchio took into account the interests and expectations of key internal and external stakeholders, including customers, suppliers, employees, regulatory authorities and local communities.

The policy is based on principles of transparency and dialogue, and recognises service quality and the reduction of environmental impacts as two central pillars in building shared value and sustainable relationships.

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## POLICY DISSEMINATION METHODS.

Comacchio ensures that the policy is available to all interested parties through transparent and accessible channels. In particular, the policy is disseminated through:

- Publication on the company website;
- Display in areas accessible to the public and staff;
- Internal communications, newsletters and emails addressed to employees and collaborators.

This dissemination approach enables full awareness and active participation by the stakeholders involved in its implementation.

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## [E1-3]

## Actions and Resources in Relation to Climate Change Policies.

### IMPLEMENTATION OF CLIMATE MITIGATION AND ADAPTATION MEASURES.

Comacchio has launched a structured strategy to reduce greenhouse gas emissions, acting on various operational levers including the electrification of internal transport, renewable energy production, energy upgrades of buildings, and the adoption of tools to measure the environmental impact of its products.

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## ACTIONS TAKEN.

Over the past three years, the company has implemented a number of significant initiatives:

### 1. Installation of a 350 kWp photovoltaic system at the Riese Pio X plant:

- Decarbonisation lever: use of renewable energy
- Commissioning date: 17/06/2024
- Estimated avoidable emissions:
  - Location-Based: 45.27 tCO<sub>2</sub>eq
  - Market-Based: 101.28 tCO<sub>2</sub>eq

### 2. Installation of a 99.71 kWp photovoltaic system:

- Decarbonisation lever: renewable energy
- Completion date: 2021
- Avoidable emissions: data not available

### 3. Energy upgrade of the office building (external thermal insulation and window replacement):

- Decarbonisation lever: energy efficiency
- Planned date: August 2024
- Avoidable emissions: 3.95 tCO<sub>2</sub>eq (Location- and Market-Based)

### 4. Installation of heat pumps and decommissioning of traditional boilers:

- Decarbonisation lever: use of renewable energy for heating
  - Planned date: August 2024
  - Avoidable emissions: currently being quantified
- 

## PLANNED ACTIONS.

In addition to the measures already implemented, the company has scheduled a series of new initiatives in support of its climate objectives:

### 1. Renewal of the company vehicle fleet (2025)

- Purchase of 2 electric cars, 6 hybrid vehicles and 4 efficient diesel models; decommissioning of 8 outdated diesel vehicles
- Decarbonisation lever: electrification
- Date: May 2025
- Estimated reduction: 22.65 tCO<sub>2</sub>eq

### 2. Adoption of a Circularity Plan in line with UNI/TS 11820

- Decarbonisation lever: circular economy and waste reduction
- Planned date: Summer 2025

### 3. Implementation of Product Carbon Footprinting

- Decarbonisation lever: ESG transparency and eco-design
- Planned date: by 2026

### 4. Investments and economic indicators



At present, specific CapEx and OpEx data for the individual initiatives are not yet available. These figures will be disclosed in future reporting periods in line with the phased adoption of ESRS E1 standards. Nonetheless, the company has confirmed a multi-year financial commitment to energy efficiency, sustainable mobility, and renewable energy self-generation.

## [E1-4] Climate Change Mitigation and Adaptation Targets.

### CURRENT STATUS OF CLIMATE TARGET DEFINITION.

While Comacchio has not yet formalised specific quantitative targets for the reduction of greenhouse gas emissions, the company has initiated an internal assessment process aimed at defining mitigation and adaptation objectives aligned with European and international standards. It has launched systematic activities to measure its carbon footprint, regarded as a key technical and managerial prerequisite for the subsequent planning of emissions reduction targets.

#### Year 2024:

ISO 14064-1 CATEGORY		LOCATION BASED TOTAL [tCO <sub>2</sub> eq]	MARKET BASED TOTAL [tCO <sub>2</sub> eq]
1	DIRECT EMISSIONS	462,97	462,97
1.1	Direct Emissions from Stationary Combustion	286,43	286,43
1.2	Direct Emissions from Mobile Combustion	176,37	176,37
1.3	Direct Emissions from Industrial Processes	0,18	0,18
1.4	Direct Fugitive Emissions	0,00	0,00
1.5	Direct Emissions from Land Use, Land-Use Change, Forestry	-	-
2	INDIRECT EMISSIONS FROM IMPORTED ENERGY	91,67	243,67
2.1	Indirect Emissions from Imported Electricity	91,67	243,67
2.2	Indirect Emissions from Imported Energy	0,00	0,00
TOTAL EMISSIONS		554,64	706,65

#### Year 2023:

ISO 14064-1 CATEGORY		LOCATION BASED TOTAL [tCO <sub>2</sub> eq]	MARKET BASED TOTAL [tCO <sub>2</sub> eq]
1	DIRECT EMISSIONS	410,62	410,62
1.1	Direct Emissions from Stationary Combustion	264,07	264,07
1.2	Direct Emissions from Mobile Combustion	146,15	146,15
1.3	Direct Emissions from Industrial Processes	0,40	0,40
1.4	Direct Fugitive Emissions	0,00	0,00
1.5	Direct Emissions from Land Use, Land-Use Change, Forestry	0,00	0,00
2	INDIRECT EMISSIONS FROM IMPORTED ENERGY	103,12	230,69
2.1	Indirect Emissions from Imported Electricity	103,12	230,69
2.2	Indirect Emissions from Imported Energy	0,00	0,00
TOTAL EMISSIONS		513,74	641,31

EMISSION INTENSITY	"LOCATION BASED"		"MARKET BASED"	
	2023	2024	2023	2024
EMISSIONS [tCO <sub>2</sub> eq]	513,74	554,64	641,31	706,65
TURNOVER [M€]	129,24	138,64	129,24	138,64
TIEe [tCO <sub>2</sub> eq/ M€]	3,98	4,00	4,96	5,10

### METHOD FOR DEFINING GREENHOUSE GAS EMISSIONS REDUCTION TARGETS.

Comacchio has initiated a structured process to set greenhouse gas emissions reduction targets, aligned with the European climate transition pathway. Although specific quantitative targets have not yet been formally established, the company has conducted simulations using the Science Based Target (SBT) tool, which helps outline emissions scenarios that are compatible with decarbonisation trajectories. Based on this analysis, the company has developed a medium-term plan focused on energy efficiency measures, technological transition, and renewable energy self-generation.

### ALIGNMENT OF TARGETS WITH THE EMISSIONS INVENTORY SCOPE.

The definition of the climate targets is consistent with the methodological scope of the company's GHG inventory, developed in accordance with UNI EN ISO 14064-1:2019 and the principles of the GHG Protocol. The inventory includes Scope 1 and Scope 2 emissions (both location-based and market-based) and is updated on an annual basis. Future targets will therefore refer exactly to these categories, ensuring alignment between baseline data, performance metrics, and mitigation actions.

### ALIGNMENT OF TARGETS WITH THE ORGANISATIONAL BOUNDARIES OF THE INVENTORY.

The greenhouse gas emissions inventory has been constructed using the operational control approach, covering only activities directly managed by Comacchio. The reduction targets under development will remain consistent with these boundaries, ensuring comparability over time and traceability of avoided emissions. Furthermore, the organisation plans to progressively extend monitoring to certain Scope 3 categories in the future.

### CHANGE IN BASELINE YEAR AND IMPLICATIONS FOR TARGETS.

Comacchio has adopted 2024 as the baseline year for defining its climate strategy. Any change to this reference value will be considered only in the event of substantial changes in organisational boundaries, calculation methodologies, or material errors. Any revision will be duly documented, including an indication of its impact on the set targets, target achievement, and the representation of progress over time.

### COMPATIBILITY OF TARGETS WITH THE SBTi SCENARIO AND 1.5°C LIMIT.

Although Comacchio has not yet set formally approved targets with the Science Based Targets initiative (SBTi), it has conducted an internal analysis using the relevant forecasting tool. The results show that the projected reduction trajectory is not yet fully aligned with the SBTi requirements for limiting global warming to 1.5°C, but it is close to an intermediate trajectory. Technical and economic assessments are currently underway to gradually align the company's strategies with internationally recognised climate standards.

## [E1-5] Energy consumption and mix.

Comacchio systematically monitors its energy consumption to assess the efficiency of production activities, reduce environmental impact, and improve ESG performance. The table below provides a summary of total energy consumption, broken down by source and energy carrier:

CATEGORY	Unit	2023	2024
Non-renewable fuel consumption	MWh	1.714,33	1.950,48
Renewable fuel consumption	MWh	0,00	0,00
Imported electricity	MWh	460,50	486,79
On-site renewable energy generation	MWh	128,32	298,14

Energy sold	MWh	-67,33	-142,95
Total energy consumed within the organisation	MWh	2.235,81	2.592,46

## Product Repair and Refurbishment [MDR].

### STRUCTURE AND SCOPE OF ACTIVITIES.

Comacchio operates a structured system for technical assistance, machine refurbishment, and post-sales support, with the goal of ensuring product functionality, extending their useful life, and reducing environmental impact. This approach has developed over time through practice, although no formal corporate policy has been defined to date.

The activities span the entire lifecycle of the machine, including: ordinary and extraordinary technical assistance, on-site emergency interventions, remote support, spare parts management, refurbishment of machines and components, technical training, and updates to existing solutions.

This approach is applied both in Italy and abroad. Machines that no longer comply with safety standards or are technically irrecoverable are excluded from the scope of operations. Management is entrusted to the Technical Department and, operationally, to the Head of Service and Refurbishment.

### REGULATORY FRAMEWORK, STAKEHOLDERS AND POLICY DISSEMINATION.

Activities comply with CE standards during re-certification and are managed with a focus on traceability and safety. The collection of used batteries, metals and components is carried out in line with environmentally responsible practices.

Operational decisions have been developed through the continuous involvement of key stakeholders: customers, dealers, technicians, external workshops, and suppliers. Training and operational dialogue are essential tools for ensuring consistency and continuous improvement. Access to services is provided through the COM.NECT portal, dedicated phone lines, digital channels (chat, video), on-site technical support, and technical-operational documentation.

### IMPLEMENTED ACTIONS, OPERATIONAL SCOPE AND RESULTS.

Comacchio has developed a structured system of interventions that includes:

- Free multichannel technical support;
- On-site emergency service with deployment within 24 hours;
- Predictive maintenance and remote diagnostics;
- Technical training for operators and dealers;
- Collection, analysis and refurbishment of machines and components;
- Software and hardware upgrades for existing machines.

These activities form a structural and ongoing component of the company's management practices. The results achieved over the past two years reflect a progressive strengthening of this system.

## Quantitative Indicators (2023–2024).

Comacchio has stepped up its regeneration and repair activities, as shown in the following summary:

### CUSTOMER-OWNED MACHINES.

YEAR	SMALL DIAMETER	LARGE DIAMETER	MAN-HOURS	VALUE (€)
2023	39	2	3.405	970.044,00 €
2024	58	2	5.245	1.236.017,00 €

### MACHINES PURCHASED AND RESOLD.

YEAR	SMALL DIAMETER	LARGE DIAMETER	MAN-HOURS	VALUE (€)
2023	12	2	3.135	-
2024	13	2	2.375	-

### CUSTOMER-OWNED COMPONENTS.

YEAR	SMALL DIAMETER	LARGE DIAMETER	MAN-HOURS	VALUE (€)
2023	450	7	735	411.027,00 €
2024	344	4	1.070	453.343,00 €

### RESOURCES AND REPORTING DEVELOPMENTS.

At present, there is no formal accounting separation between operating costs (Opex) and investments (Capex) relating to these activities. Comacchio plans to introduce more detailed and disaggregated reporting in future financial statements, in line with ESG transparency standards.

### MONITORING, INDICATORS AND SYSTEMS.

Performance is assessed using the following metrics:

- Volume of interventions and components regenerated
- Logged working hours
- Response times
- Remote resolutions
- Operational feedback from customers and dealers

Data is tracked via the **COM.NECT** system and technical logs. Although no external validation is currently in place, the company is assessing the possibility of introducing third-party verification in the future.

### OBJECTIVES AND FUTURE OUTLOOK.

To date, Comacchio has not yet defined formalised measurable objectives (KPIs) or environmental indicators. However, the company recognises the strategic importance of this area and is committed to:

- Developing a set of quantitative and qualitative targets;
- Establishing a baseline starting from 2024;
- Building a three-year monitoring framework with annual milestones;
- Structuring environmental goals based on technical evidence.

### TOWARDS MEASURING CIRCULARITY.

Comacchio has begun developing a corporate circularity plan, which will be aligned with UNI/TS 11820:2022, the technical standard issued by the Italian Standards Body (UNI). This standard provides a recognised framework for objectively assessing the level of circularity of an organisation or process.

The plan will be implemented progressively over the coming financial years, with the direct involvement of technical and operational functions. Related targets and KPIs will be publicly disclosed starting from subsequent reporting periods.





04



## EMPLOYEE WELL-BEING [MDR].

Comacchio places human capital at the heart of its operations, recognising it as essential to the company's continuity, growth, and long-term success. The organisation is committed to enhancing individual skills and promoting an inclusive, fair and collaborative working environment, free from discrimination based on age, background, religion, sexual orientation, political or trade union affiliation. Recruitment, hiring, and personnel management policies are merit-based, ensuring equal opportunities for all employees.

In 2024, the company stepped up its investment in training and professional development, delivering a wide range of courses, both mandatory and recommended by department heads, to support continuous learning and skills enhancement.

In parallel, a skills matrix was implemented, compiled by function managers, to monitor and highlight the capabilities within the organisation.

In 2024, Comacchio provided employee welfare benefits totalling approximately €554,000, distributed proportionally to each employee's gross annual salary. Key welfare initiatives included:

### FAMILY DAY

An event involving around 720 participants, giving employees and their families the opportunity to visit the workplace, discover the machines produced, and enjoy social moments with children's entertainment, a buffet and live music.

### BABY BONUS

A gross €3,000 payment per newborn, in support of parenting.

## "TRE CUORI" WELFARE PLATFORM

A system enabling employees to request reimbursements or direct payments for healthcare, sports, educational services and other personal needs.

## OFF-THE-JOB ACCIDENT INSURANCE

Voluntary insurance cover to protect employees outside the workplace.

## SEASONAL FLU VACCINATIONS

The opportunity to receive flu vaccines on site.

## LOCAL DISCOUNTS

Special deals with local retailers and service providers.

The company fosters a respectful and cooperative workplace, encouraging internal cohesion through social initiatives and shared experiences, including corporate events and recurring celebrations.

### LOOKING AHEAD, COMACCHIO HAS SET THE FOLLOWING OBJECTIVES:

- Launch a new initiative under the Welfare Care programme.
- Organise a team-building activity, potentially a beekeeping-themed experience, already successfully trialled during the company's Open House event.
- Introduce a digital company noticeboard by 2026 for employees to post classified ads (e.g. sales, purchases, babysitting, etc.).
- Continue expanding the workforce in line with revenue growth, with the aim of reducing production lead times and supporting technological innovation.



# S1 EMPLOYEE HEALTH AND SAFETY.

## [S1-SBM3]

### Material Impacts, Risks and Opportunities, and their Interaction with Strategy and the Business Model.

Within the scope of Standard S1, which focuses on an organisation's own workforce, employee health and safety has emerged as a topic of double materiality.

This materiality was assessed from both an impact perspective, evaluating the actual and potential effects of business activities on employees' health and safety (inside-out logic), and a financial perspective (outside-in logic), considering the risks poor management could pose to the company as well as the opportunities that could arise from a well-governed approach.

From an impact standpoint, the assessment considered employees' exposure to workplace accidents and occupational illnesses. Such incidents could also present financial risks for the company, should employees decide to pursue legal action against the employer.

Mitigating this risk requires a structured and systematic approach to workplace safety, entrusted to highly qualified and competent personnel.

This includes role-specific training for all employees on work-related risks, as well as fostering a company-wide culture that encourages open reporting of issues as part of a continuous improvement process.

A structured approach to employee health and safety can also create opportunities for the company, potentially generating positive financial outcomes. Low accident frequency and severity rates not only protect the company from costly legal disputes, but also serve as a source of pride and recognition, strengthening stakeholder appreciation.

As a result, a strong reputation for workplace safety - and thus for employee wellbeing - becomes a key asset in today's volatile labour market, supporting both talent retention (and the preservation of internal know-how) and talent attraction.

The following sections will examine the company's approach to this issue in greater detail, beginning with an overview of the employee population.

The company's commitment to protecting health and safety is not only a regulatory requirement, but a cornerstone of its long-term sustainability and success.

## [MDR-P], [S1-1] Policies on Own Workforce.

In 2024, Comacchio adopted a structured, dedicated occupational health and safety policy, consistent with the provisions of Italian Legislative Decree 81/2008. The policy outlines the company's operating context and sets out responsibilities and expectations in the area of workplace health and safety. It applies to all company personnel, including employees, external collaborators, and all individuals involved, directly or indirectly, in the company's operational activities. The policy is binding at all levels of the organisational hierarchy and across all sites and facilities under Comacchio's control.

Strategic responsibility for this area rests with the Board of Directors, which defines the guidelines, oversees the implementation of corporate policies, and ensures their alignment with the overall governance framework. In line with the principles of participation and active listening, Comacchio values the input of its workforce through structured consultation mechanisms such as regular meetings, Toolbox talks, and formal discussion sessions, aimed at gathering feedback, identifying concerns, and collecting suggestions for improvement. This approach enables effective and proactive risk management by ensuring that operational issues are surfaced and addressed in a timely manner.

Whenever a new company policy or official document is introduced or revised, the full content is shared with all employees. Each individual is required to review and sign the documentation, thereby acknowledging full awareness of the related obligations and responsibilities. This process is supported by ongoing information and

training activities, delivered through dedicated sessions, hands-on courses, and targeted meetings, aimed at embedding a widespread culture of health and safety across the organisation.

Reflecting Comacchio's integrated and responsible approach, the company also initiated the drafting of its own Code of Ethics in 2024. In line with existing corporate policies, the Code will formalise the company's commitment to the protection of human and labour rights.

Its principles are grounded in the United Nations Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organization (ILO), reinforcing Comacchio's social responsibility framework and promoting an ethical, inclusive and sustainable working environment.

## [S1-2] - [S1-3] Processes for Engaging Workers and Their Representatives Regarding Impacts. Processes to Address Negative Impacts and Channels for Workers to Raise Concerns.

Comacchio adopts a structured and proactive approach to managing occupational health and safety, placing particular emphasis on the identification, analysis, and remediation of any negative impacts, whether potential or actual. When issues arise, the company promptly implements corrective measures tailored to the nature and severity of the incident. Where appropriate, these actions include targeted training and informational sessions, such as Toolbox meetings, designed to analyse root causes (including near misses) and prevent future occurrences.

To support this preventive strategy, Comacchio ensures access to a variety of official communication channels for reporting issues related to safety and wellbeing at work. All personnel have the opportunity, depending on the context, to engage either informally (via verbal discussions) or formally (through written communications, including emails) with the Workers' Safety Representatives (RLS), the Head of the Prevention and Protection Service (RSPP), or with their departmental manager.

Complementing this system is a dedicated whistleblowing channel. Governed by an internal procedure in line with current legislation, this tool guarantees the anonymity of the whistleblower and protects them from any form of retaliation.

At the annual periodic meeting, the RLS formally present a report to the RSPP and company management that details the collected reports, highlights the main issues identified, and summarises the feedback received from workers. In parallel, team leaders - as part of their operational oversight role - play a crucial part in promptly identifying specific needs expressed by staff, thereby contributing to the implementation of preventive measures and the creation of a safe, collaborative working environment.

The Human Resources Department is also involved in managing these reports, particularly when they raise

issues of an organisational, relational, or managerial nature. The process can be triggered either directly by the employee or via a report from the RSPP, fostering an integrated and multidisciplinary approach to problem resolution.

Consistent with its corporate values, Comacchio promotes an organisational model based on transparency, dialogue, and active participation.

These elements are considered essential for effective and shared management of health and safety at work. In this spirit, function managers, the Human Resources Department, and the Management Board remain constantly available to listen and provide support.

Although there is no systematic tracking of routine reports or a mandatory formalisation of responses, the company continuously monitors internal reports to evaluate and resolve identified issues.

In most cases, feedback to the reporter is provided verbally, while ensuring promptness, attention, and consistency with the principles of responsibility and care that guide the company's actions.

## [MDR-A], [S1-4] Measures taken regarding material impacts on the workforce, approaches to managing relevant risks and pursuing material opportunities, and the effectiveness of such actions.

Comacchio has undertaken two main initiatives, both related to health and safety. The first, as previously mentioned, is the occupational health and safety policy, which covers all relevant aspects of this area. The policy is scheduled to be shared during the first months of 2025. In addition, Toolbox Meetings on health and safety have been introduced, such as the one held in July 2024 on the proper use of lifting accessories.

## [MDR-T] - [S1-5]

### Targets related to the management of significant negative impacts, the advancement of positive impacts, and the management of material risks and opportunities.

Comacchio has identified the implementation of a workplace health management system as a strategic objective for 2026, in line with the highest applicable regulatory and organisational standards.

## [S1-6]

### Characteristics of the workforce.

Quantitative data relating to the internal workforce, defined as all employees with a direct employment contract, were extracted from IT systems in Excel format. The entire company population is covered by the Italian National Collective Labour Agreement for the Metalworking Industry. Headcount figures refer to the number of individual employees. All Comacchio personnel operate exclusively within the territory of the Italian Republic.

All data presented in this document correspond to the official figures reported in the statutory financial statements and refer to the financial year ended 31 December 2024.

For further quantitative details on the workforce, please refer to the tables below:

GENDER	
WOMEN	32
MEN	213
<b>TOTAL</b>	<b>245</b>
AVERAGE NUMBER OF EMPLOYEES	
WOMEN	30
MEN	207
CONTRACT TYPE	
TEMPORARY CONTRACT	25
PERMANENT CONTRACT	220
PART-TIME	14
FULL-TIME	231

MEN		WOMEN		% TURNOVER <sup>1</sup>
HIRES	DEPARTURES	HIRES	DEPARTURES	
23	16	8	4	8,44%

<sup>1</sup> Departures/average headcount

## [S1-7]

### Characteristics of non-employee workers in the company's own workforce.

The data below refer to non-employee personnel at Comacchio and reflect a point-in-time snapshot as at 31 December 2024. The information is presented in terms of headcount (individual unit count) and was extracted from an internal Excel file.

For further quantitative insights into the company's workforce, please refer to the table below:

	MEN	WOMAN
INTERNS	11	0
EXTERNAL TECHNICAL OFFICE STAFF	2	0
<b>TOTAL</b>	<b>13</b>	<b>0</b>

## [S1-14]

### Health and safety metrics [MDR-M] Description of the metrics used to assess performance and effectiveness in relation to material impacts.

In 2024, Comacchio continued to strengthen the occupational health and safety activities launched in 2021, with a primary focus on reducing the incidence of workplace accidents and reinforcing preventative measures, particularly those aimed at preventing occupational illnesses.

Training has remained a key tool in promoting a culture of safety. During the reporting year, the Head of the Prevention and Protection Service (RSPP), Dr Gianfranco Savinelli, organised and delivered a total of 108 hours of training, involving 116 participants across various courses.

The training activities carried out included: forklift operation courses; general and rolespecific health and safety training for employees; training on the use of category III personal fall protection equipment; and PES-PAV-PEI certification courses (electrical work qualification in Italy). In addition, a 6-hour refresher course on First Aid – Group A – was delivered.

As mentioned earlier, Comacchio also continued its programme of short meetings (lasting approximately 15–20 minutes), known as "Toolbox Meetings", targeting key operational departments (Assembly, Machine Tools, Warehouse). These sessions, led by the RSPP, were aimed at accident prevention, with a particular focus on identifying near misses and proactively managing risks. Comacchio has also invested in the technical inspection and regular verification of operating equipment. Over the years, the company has undertaken significant efforts to align and systematise the monitoring of forklifts, overhead cranes, jib cranes and mobile elevating work platforms (MEWPs), thereby ensuring regulatory compliance and operational safety.

All company employees are covered by an occupational health and safety management system fully compliant with the requirements of Italian Legislative Decree 81/2008. For further information and related quantitative data, please refer to the table below:

2024	
Number of deaths in the company's workforce due to workrelated injuries or illnesses	0
Number of deaths of other workers operating on the company's sites due to work-related injuries/illness	0
Number of recordable work-related injuries (employees)	6 direct employees zero external collaborators
Rate of recordable work-related injuries (employees)	Frequency rate 14.99% Incidence rate 2.53%
Number of recorded cases of occupational illnesses (employees)	0
Number of lost days due to work-related injuries, workrelated illnesses or fatalities	96

To assess the effectiveness of its occupational health and safety policies and measures - and to guide potential corrective or improvement actions - Comacchio applies the following objective performance indicators:

- Number of workplace accidents
- Number of occupational illness cases
- Accident frequency rate
- Accident incidence rate
- Number of near misses
- Percentage of lost hours in relation to total hours worked

## [S1-17] Incidents, complaints and severe impacts on human rights - general.

The grievance mechanisms and reporting procedures adopted by Comacchio form part of a structured, systematic framework designed to ensure full compliance with corporate ethical principles, safeguard workers' rights, and foster an organisational culture based on transparency, fairness and integrity.

With regard to incidents of discrimination and complaints received during 2024, it should be noted that no cases or formal reports of this nature were recorded. This result confirms the effectiveness of the prevention measures implemented during the reporting year.

# COMMUNITY RELATIONS [MDR].

Every company grows thanks to the region in which it is rooted. For Comacchio, giving back to the community means opening its doors, building relationships and investing in people. Through dialogue with the education system, partnerships with training institutions, events open to families and the public, and participation in environmental awareness projects, the company maintains an authentic and ongoing relationship with the area in which it operates. These initiatives stem from a desire to share expertise, create opportunities and support the social fabric that, day after day, sustains and accompanies Comacchio's growth.

## RELATIONS WITH EDUCATIONAL INSTITUTIONS.

Comacchio recognises the strategic value of engaging younger generations in the world of work and, each year, welcomes groups of students from local technical schools to its facilities. These visits are valuable opportunities to introduce the company to potential future talent. In the same spirit, a company delegation visited the Istituto Tecnico Industriale Statale (ITIS) in Castelfranco Veneto to present Comacchio's business to an audience comprising several of the institute's classes. Comacchio is also the promoter of the Kindness Project, launched in 2023 and aimed at primary schools in the municipalities of Castello di Godego and Loria. Under this initiative, each child enrolled in their first year of primary school receives a book on kindness, with the aim of encouraging values such as courtesy and respect from an early age.

## PARTNERSHIPS WITH TRAINING INSTITUTIONS - DRILLING OPERATOR COURSE.

Comacchio collaborates with two regional vocational schools specialising in the construction sector: the Scuola Edile di Belluno (Centro per la Formazione e la Sicurezza – CFS) and the Scuola Edile di Padova.

The collaboration with the Scuola Edile di Belluno is structured as an indirect partnership: the company has provided a small-diameter foundation drill on free loan, which the school uses independently for courses leading to the drilling operator licence. Comacchio is not involved in course delivery or participant selection, nor does it hold specific data on attendance or the number of sessions. Due to the characteristics of the machine provided, only small-diameter drilling training is available at this site.

The partnership with the Scuola Edile di Padova, by contrast, is more comprehensive. The school is responsible for the organisation and management of the entire training programme, in line with official protocols for the issuance of operator licences. However, the practical test - a prerequisite for the final examination - is held at Comacchio's plant in Castello di Godego. In this context, the company provides:

- A dedicated area for practical exercises;
- A small-diameter foundation drill;
- A large-diameter foundation drill;
- A company technician responsible for introducing machine operation and supporting the school instructor during the practical test.

Four practical sessions with the Scuola Edile di Padova were held in 2024.

This collaboration serves a dual purpose: on the one hand, to support the training pathway with particular focus on safety and maintenance, using next-generation equipment with the latest technologies (such as advanced remote controls, safety devices, etc.); on the other hand, to promote the company's image by welcoming trainees to its production site, offering them the chance to experience the Comacchio environment, its quality standards and its products first-hand. In many cases, the participants already work with Comacchio's customers; in others, this experience represents a first introduction to the company.

### OPEN HOUSE 2024.

In October 2024, Comacchio organised a major international Open House event at its manufacturing facility in Castello di Godego. The initiative welcomed over 1,000 customers and dealers from 40 countries, offering them the opportunity to tour the production site and view a display of 24 drilling rigs prepared specifically for the event.

During the five-day event, approximately 2,200 meals were served, reflecting the high level of attendance and the strong organisational effort behind the initiative. As part of the event, Saturday 19 October was dedicated to Comacchio employees and their families, with the organisation of a special Family Day. The Open House concluded on Sunday 20 October with a day open to the public.


On this occasion, Comacchio offered guided tours of the plant and hosted a convivial gathering with refreshments, further strengthening ties with the local community. An estimated 400 to 450 people attended the public event.

### ENVIRONMENTAL AWARENESS INITIATIVES.

As part of the 2024 Open House, Comacchio also promoted an environmental awareness initiative focused on the vital role of bees and other pollinating insects in maintaining ecological balance. A beekeeper from the Asiago area explained to visitors the importance of these insects in preserving biodiversity and the risks posed by their gradual extinction. The activity was accompanied by the display of a small beehive and the distribution of a jar of honey to each participant - a symbolic gift and a gesture of environmental consciousness.

### ASSOCIATIONS SUPPORTED IN 2024.

As further evidence of its ongoing commitment to social responsibility and sustainability, Comacchio supported a number of local and international non-profit organisations throughout 2024. The following is a list of the organisations that benefited from corporate donations, underscoring the company's continuous contribution to collective well-being and to the promotion of socially valuable initiatives.

ASSOCIATIONS SUPPORTED IN 2024	DESCRIPTION
	Donation in support of medical research
	Sponsorship aimed at combating gender-based violence and online crimes such as human trafficking, child pornography, sextortion, cyberstalking, cyberbullying, identity theft, revenge porn, victim blaming, rape culture, slut shaming, and hate speech
	Organisation that helps fulfil the dreams of young people affected by oncological illnesses
	Donation to support social inclusion projects for children and young people with autism and disabilities
	Donation of a vehicle to support the transport of patients

## S4 PRODUCT QUALITY: USER SAFETY AND DATA PROTECTION.

Customer safety and the protection of personal data are jointly addressed under Standard S4, which regards both as fundamental aspects of the relationship with consumers and end users. This integrated approach reflects the organisation's commitment to transparency, the safeguarding of rights, and the responsible management of information, treating safety and privacy not as separate issues, but as essential components of a single sustainability strategy.

### [S4-SBM3] Material Impacts, Risks and Opportunities, and their Interaction with Strategy and the Business Model.

Product quality and safety, together with data protection, are core topics for the company within the framework of Standard S4 concerning consumers and end users. These issues have emerged as particularly significant, both due to their direct impact on customer satisfaction and safety, and because of the financial consequences linked to their effective or inadequate management.

The company recognises its responsibility to ensure products are high-quality and safe, as shortcomings in this area can undermine customer trust, lead to complaints and product returns, and ultimately damage corporate reputation. At the same time, data security is considered a critical issue: inadequate protection of sensitive information could result in breaches with serious legal, social, and reputational repercussions. From a financial perspective, key risks include potential litigation arising from defective products or data breaches, loss of customers, and reduced market competitiveness. Conversely, a robust approach in these areas can translate into greater customer loyalty, a stronger brand, and lower costs associated with penalties or compensation claims.

### [S4-1] Policies on Consumers and End Users.

For Comacchio, product quality and safety, in all their forms, are essential and nonnegotiable values. The company adopts an integrated, systematic approach aimed at ensuring high performance standards, data protection, and compliance with applicable regulations, with a consistent focus on product reliability and stakeholder protection.

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The company's commitment to quality is formalised in its Quality and Environmental Policy, a document that sets out Comacchio's values and objectives in line with ISO 9001 and UNI EN ISO 3834-2:2021 certifications. This policy also ensures that production processes are traceable, compliant, and geared towards continuous improvement.

In the area of information security, Comacchio has implemented a structured set of cybersecurity measures designed to safeguard the integrity of corporate data and IT systems:

- **24/7 monitoring with a specialised partner:** A continuous service is provided by an external company specialising in cybersecurity, tasked with monitoring network traffic and the corporate perimeter to promptly detect and address potential threats.
- **Network infrastructure upgrade:** The company has completely renewed its network architecture - including firewalls, switches and access points - to enhance resilience and protect against unauthorised access.
- **Antivirus software:** The antivirus system was updated, replacing Symantec Endpoint Protection with SentinelOne, an advanced solution capable of proactively detecting and neutralising cyber threats.
- **Staff training and awareness:** All employees received specific cybersecurity training, supported by simulated phishing campaigns aimed at testing their responsiveness and awareness in the face of potential attacks.
- **Red team vs. blue team exercises:** Advanced simulations were conducted through "red team vs. blue team" exercises to test the effectiveness of existing cybersecurity defences via simulated attacks carried out by an external third party.

In addition, a privacy notice is available on the company's website, clearly outlining how customers' and visitors' personal data are processed in accordance with Regulation (EU) 2016/679 (GDPR).

All the documents referenced above, including policies, apply without exceptions and are binding across the entire organisation. Responsibility for their implementation lies with the Management Board, which ensures their integration into the governance system and continuous oversight.

Dissemination and communication of these documents are carried out through channels appropriate to their nature: publicly relevant documents, such as the Quality and Environmental Policy, are published on the company's website, while internal-use documents are shared with personnel via official company communication channels.

## **[S4-2] - [S4-3] - [MDR-M] Processes to Engage Consumers and End Users Regarding Impacts. Processes to Remediate Negative Impacts and Channels for Consumers and End Users to Raise Concerns. Description of the Metrics Used to Assess Performance and Effectiveness in Relation to Material Impacts.**

### **DATA SECURITY AND USER INTERACTION.**

With regard to data security, Comacchio has not yet implemented a structured process for directly engaging consumers or end users. However, the company provides opportunities for anyone wishing to share comments or request information to do so via the dedicated "Contact Us" section on the corporate website or by writing to the email addresses published

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online. These channels represent a permanent and open point of contact for submitting questions or concerns regarding data protection.

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### **PRODUCT QUALITY AND SAFETY – CUSTOMER SUPPORT AND COMPLAINT MANAGEMENT SYSTEM.**

Comacchio has traditionally placed great emphasis on the quality and safety of its products, complementing technical supply with prompt and highly professional after44 sales support. In this regard, the company has developed a comprehensive technical support system available to customers and dealers, which includes:

- Dedicated phone lines
- Messaging and video call services
- Email support

In addition to providing operational assistance, these tools are also regularly used to submit complaints. Reports may be directed to the service department or to the relevant area manager. Once a complaint is received, the service department initiates an internal case management process, which includes opening a case file and notifying the relevant department heads, depending on the nature of the issue. In addition, depending on the type and severity of the complaint, the company assesses the most appropriate solution, which may involve sending a replacement part (in coordination with the spare parts/returns office), authorising a repair to be carried out by the customer, or defining commercial arrangements such as discounts or compensation.

Where the dealer has its own technical service, Comacchio's service department liaises directly with the designated contact person; otherwise, the owner of the client company is involved.

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### **COMPLAINT TRACKING AND PERFORMANCE MEASUREMENT.**

Currently, Comacchio tracks complaints using an Excel-based system, limited to the small-diameter machine line. For the CH line (large-diameter machines), no formal complaint monitoring was carried out in 2024. However, the service department has set the introduction of a structured tracking system as a 2025 objective, with the aim of harmonising management practices across all product lines. The company uses the number of complaints received as a performance indicator and a metric to assess the effectiveness of the measures adopted in terms of product quality and technical support, as part of a continuous improvement approach to service delivery and customer satisfaction.

## **[S4-4] Adoption of measures regarding material impacts on consumers and end users, as well as approaches to managing relevant risks and pursuing material opportunities relating to consumers and end users, and the effectiveness of such actions.**

Throughout 2024, Comacchio implemented a broad range of initiatives to ensure and strengthen the quality and safety of its products, identifying technical training as one of the key tools for achieving these objectives. Training activities involved both internal personnel, particularly technicians and assembly operators, and mechanics and operators from dealers and direct customers, with a specific focus on international markets.

Whenever a technical issue arises involving components installed on drilling machines, Comacchio promptly organises targeted training sessions for the operators involved, to ensure they acquire and consolidate correct installation and intervention procedures. These actions are complemented by an annual update session for the entire group of field service technicians, led by a senior figure responsible for sharing procedural updates, operational experiences, and technical clarifications.

In parallel, an intensive five-day technical course was structured and delivered to technicians from dealers and more established direct customers. The course was offered free of charge, excluding travel costs, with board and lodging covered by the company.

Each session involved two participants, supported by a Comacchio technician, and followed a comprehensive training programme that included in-depth sessions on the machines' hydraulic and electrical systems, a day and a half of training at the remote control supplier's premises, and a final day dedicated to maintenance, troubleshooting, and direct discussion with operators.

To support the training process, a technical manual was also prepared in-house by the service department. In 2024, twelve such courses were organised, involving a total of twenty-eight operators, all from foreign dealers, amounting to fifty-four training days overall.

In addition to in-house training, Comacchio also promoted training activities at the premises of its international dealers. In particular, during the year, six courses were held in the United States, along with two sessions in Chile and Brazil for direct customers. User companies with more structured organisations sent their specialised operators to the respective dealer locations, where they received technical training directly from qualified Comacchio personnel. This operating model effectively took the form of a travelling "Comacchio School", aimed at the widespread dissemination of technical and operational know-how. Overall, these initiatives resulted in an additional forty-four training days.

The company's ongoing investment in technical training has delivered tangible benefits both for customers - who have gained greater autonomy in the day-to-day operation of the equipment - and for Comacchio itself, which has recorded a reduced workload for its service department thanks to fewer assistance requests from worksites.

Further confirming the company's commitment to strengthening the cross-functional skills of its personnel, in 2024, Comacchio launched an English language course for two of its technicians, with the aim of enhancing their language proficiency and supporting their work in increasingly complex and demanding international contexts.

## [S4-5] Targets related to the management of significant negative impacts, the advancement of positive impacts, and the management of material risks and opportunities (consumers and end-users).

In the 2025–2026 period, Comacchio aims to strengthen its cybersecurity framework and digital governance in a structured and systematic manner, through a series of coordinated initiatives aligned with the company's priorities in data protection, business continuity, and regulatory compliance.

In 2025, the company plans to implement a Mobile Device Management (MDM) system to ensure the secure and efficient management of corporate mobile devices, with a particular focus on safeguarding sensitive data and customer-related information.

Also in 2025, an internal policy governing the use of corporate IT systems and tools will be drafted, the result of collaboration between the ICT (Information and Communication Technology) department and the Human Resources Department.

The aim of this document is to prevent user behaviours, even if unintentional, that could lead to vulnerabilities or threats to the integrity of the company's IT systems and the data processed, partly by raising user awareness.

To support alignment with European security standards, a compliance assessment with the NIS2 Directive is also planned for completion within the same year, with the aim of identifying potential areas for improvement and preparing targeted corrective measures.

From a broader perspective and in line with the outcomes of the assessment, the ICT department will be tasked with defining and adopting an official Cybersecurity Policy by 2026, in order to formalise the company's approach to managing cyber risk in an integrated and systematic way.

As part of the company's 2026 development plan, the following additional initiatives are also envisaged:

- The allocation of dedicated budget resources for specialised technical training, in support of the development of in-house digital skills;
- The formalisation of an internal complaints management procedure, aimed at strengthening accountability, transparency, and continuous improvement across corporate processes.





06



# G1 BUSINESS ETHICS.

## [G1-1] Business Conduct.

Comacchio fosters a corporate culture based on integrity, responsibility, and compliance with applicable regulations. The Board of Directors, as the highest governing body, holds ultimate responsibility for approving policies relating to ethics and integrity, ensuring their alignment with the company's core values.

It is worth noting that a whistleblowing procedure is currently in place and accessible directly via the company's website. The system allows the confidential reporting of unlawful conduct and is compliant with the provisions of Legislative Decree 24/2023, which transposes Directive (EU) 2019/1937.

The reporting mechanism is open to both internal and external stakeholders. Its main objective is to protect the identity of the whistleblower and to prevent any form of discrimination or retaliation, while ensuring a proper process for the review, management, and resolution of reports received.

Comacchio has drawn up an action plan with clear objectives and defined timelines, with the aim of developing and formalising a shared system of values through the adoption of corporate policies to guide employee conduct in the performance of their duties. Specifically, the plan includes the following:

- Drafting a Code of Ethics by 2025. This document will outline the ethical principles and values to which the company is committed. To ensure broad internal engagement and participation, a company-wide survey will be conducted in 2025 to identify which values are perceived as most important.
- Developing a corporate IT usage policy by 2025. More specifically, the company intends to introduce a document that, through the application of specific rules, governs the correct and responsible use of corporate IT equipment, with the aim of mitigating cybersecurity and data management risks. The policy will be jointly developed by the Human Resources and ICT (Information and Communication Technology) departments and will first be shared with senior management, who will act as ambassadors in cascading the information to all staff.
- Developing an Internal Code of Conduct by 2026. This document will serve as a reference framework for defining expected behaviours within the organisation, promoting a workplace culture grounded in compliance with corporate rules, individual accountability, and consistency with shared values. Its content will be defined in consultation with the relevant corporate functions and subsequently communicated to all personnel.

## Legal compliance and regulatory oversight [MDR].

The organisation is committed to promoting responsible behaviour in relation to corporate compliance, understood as the set of policies, procedures, and operational practices designed to ensure compliance with applicable laws and regulations, prevent legal risks, and uphold the integrity of corporate activities.

Comacchio is committed to maintaining a competitive and transparent environment, free from anti-competitive behaviour and in line with antitrust regulations. The company operates in compliance with applicable national and EU legislation, with particular - though not exclusive - attention to health and safety in the workplace (Legislative Decree 81/2008), environmental protection, anti-corruption, and integrity in business relations.

It is important to note that the company does not currently have a formally established in-house legal department. Compliance with legislative requirements is ensured by each business function, which is responsible for compliance within its respective area of competence. The highest level of responsibility for regulatory compliance rests with the Board of Directors.

In addition, the company has adopted a dedicated "Internal Compliance Programme" (ICP) Policy, developed within the regulatory framework defined by Regulation (EU) 2021/821 and Recommendations (EU) 2019/1318 and 2021/1700. The programme is designed to ensure compliance with EU export control regulations, particularly in relation to dual-use items.

These items are products that may be used not only for civil purposes but also for military applications. The ICP consists of a set of procedures and operational measures aimed at identifying, assessing, and managing risks associated with the company's international operations.

Key components of the programme include:

- The appointment of an Export Control Officer, based in the Customs Office, responsible for defining and maintaining the company's export control policy.
- The establishment of an Export Control Office, reporting to the Export Control Officer.
- The cross-functional involvement of key departments (Procurement, Sales, Spare Parts, Administration, Technical, Shipping), which are required to collaborate with the Export Control Office to ensure effective risk management and traceability across the entire operational chain.

The adoption of the ICP is intended to prevent potential negative impacts resulting from violations of dual-use regulations, including risks to international security or inadvertent involvement in illicit trade. At the same time, it reinforces the company's reputation with supervisory authorities, clients, and commercial partners.

In line with its corporate compliance programme, in 2024 the company continued its efforts toward obtaining AEO - Customs (Authorised Economic Operator) certification. The goal is to achieve formal recognition in 2025. This certification confirms compliance with customs-related regulatory, organisational and documentary requirements, and serves as a tool to enhance transparency, reliability, and operational efficiency on an international scale.

Lastly, the organisation has signed an agreement with the Veneto Region to ensure compliance with Law No. 68/1999, which governs the right to employment for people with disabilities. The initiative aims to promote the inclusion and integration of individuals with disabilities into the workforce.

## Management of critical incident risk [MDR].

The organisation views the management of critical incident risk as a key component of its overall strategy. Comacchio is fully aware of the potential consequences associated with its production activities, including fires, accidental spills of hazardous substances, and operational anomalies, all of which could endanger worker safety, compromise the integrity of facilities, impact the environment, and affect the wellbeing of the surrounding community. Such events not only pose threats to business continuity but may also lead to legal liabilities and reputational damage.

It is important to note that the organisation holds ISO 14001 certification, which attests to the robustness of its environmental management system. Comacchio has developed a comprehensive set of policies and operational procedures aimed at preventing, mitigating, and managing the potential ESG-related impacts of adverse events.

Strategic responsibility for this area lies with the Board of Directors, while operational responsibility is assigned to the QHSE Manager (Quality, Health, Safety, Environment). Comacchio has implemented not only a workplace health and safety policy, but also an emergency and evacuation plan in accordance with Legislative Decree 81/2008. This plan includes:

- A policy outlining fire risk assessment, role assignment, evacuation procedures, and communication protocols with external authorities;
- The identification of emergency teams and fire-fighting equipment maintained in operational condition;
- Emergency drills involving fire outbreak scenarios and the simultaneous management of evacuation and plant shutdown procedures.

The organisation has also introduced dedicated policies for managing accidental spills. Specifically, the operational procedures define the steps to be taken in the event of spills involving chemicals or effluents from the water treatment system, which may contain hydraulic oil or diesel fuel. These procedures include the use of absorbent materials, source containment, deployment of high-resistance personal protective equipment (PPE), and proper disposal of contaminated materials. All risk management activities are designed in alignment with an assessment of environmental and industrial vulnerabilities, taking into account the nature of operations, building layout, and the presence of hazardous substances.

Preventive activities are monitored using internal parameters, including, but not limited to, the number of drills conducted, percentage of trained personnel, evacuation times, and the outcomes of post-drill safety checklists. At present, the company has not yet defined formal objectives or quantitative metrics. However, studies are planned to introduce measurable targets in the medium term, covering aspects such as drill frequency, training coverage, and reduced evacuation times.

In the absence of defined targets, Comacchio continues to monitor internal performance indicators to ensure ongoing assessment of the company's ability to respond to critical events and minimise their impact. The results of this monitoring activity will serve as a foundation for future updates to company plans and policies.

## Business model resilience [MDR].

Comacchio adopts a business model designed to ensure the continuity of its operations and adaptability to evolving market dynamics. Responsibility for defining the strategies and key objectives underpinning operational resilience lies with the Board of Directors.

First and foremost, the Integrated Quality and Environmental Policy plays a vital role in providing a coherent framework for managing business processes. Its strategic value lies in its ability to guide corporate decision-making towards a balance between efficiency and quality outcomes, thereby laying the foundation for responsive and stable management. The policy establishes a reference framework of shared values and principles, which steer the organisation in its operational choices and pursuit of business goals.

Resilience is also fostered through geographical and sectoral diversification, supported by an extensive international distribution network and a product range suited to multiple industries. Internally, Comacchio relies on an organisational structure capable of effectively coordinating resources and expertise to respond promptly to customer operational needs.

Another key resilience lever is supply chain management. The company adopts a procurement strategy that prioritises local suppliers, fostering long-standing, stable relationships. For critical components, Comacchio actively seeks alternative suppliers. Furthermore, to mitigate potential disruptions caused by delays in international shipments, the company operates a warehousing system designed to ensure continuity of production.

Importantly, the company recognises digitalisation as a strategic enabler of operational efficiency and responsiveness to market shifts. It is committed to the digitalisation of production processes and the development of systems to monitor its products through technologies that enable remote data transmission and diagnostics. In parallel, the protection of IT systems is being pursued through the development of a cybersecurity policy, scheduled for the medium term, in line with the NIS2 Directive.

This directive introduces measures to strengthen the cyber resilience of businesses, setting out specific requirements in terms of risk management, business continuity, and incident reporting. The policy will be developed by the company's ICT (Information and Communication Technology) department.

As part of efforts to enhance the resilience of its business model, Comacchio plans to integrate, during 2025, the analysis of risks and opportunities, already developed in compliance with ISO 9001, by expanding it to include the assessment of environmental aspects, in line with ISO 14001. This document will serve as a critical tool for evaluating not only process quality and, moving forward, environmental factors, but also topics such as information security, business continuity, human resources, and the supply chain. The assessment aims to analyse internal and external critical factors, identify stakeholder needs, and classify risks and opportunities based on objective parameters such as likelihood and impact.

The objective is twofold: to prevent events that could compromise corporate stability or compliance, and to seize opportunities for improvement and enhanced competitive positioning.





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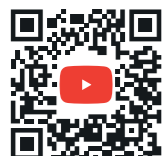
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