



ENVIRONMENTAL POLICY

by Eurodies Italia S.r.l.

Approved by the Board of Directors on 28.11.2025



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1. Foreword

Eurodies Italia S.r.l. (hereinafter also “Eurodies”, “Company” or “Company”) operates in the production of sheet metal components for prototypes and small series for the automotive industry, carrying out activities that require specialized technical skills, precision in production processes and attention to the quality of the final product. The Company recognises that its activities may have **an impact** on the environment, in particular in relation to the use of raw materials and metallic materials, energy consumption, waste production and management, the use of substances and products functional to production processes and emissions and other environmental aspects related to the processing and management of the plants.

Eurodies has already adopted in the past an Environmental Management System compliant with the ISO 14001:2015 standard and confirms its desire to maintain a **structured approach to environmental management**, through the progressive updating of its system, internal procedures and methods for controlling significant environmental aspects.

By defining its Environmental Policy in this document, Eurodies undertakes to operate in compliance with applicable environmental legislation, to prevent pollution, to promote a responsible use of resources and to improve its environmental performance over time, in line with the context in which it operates, with the needs of stakeholders and with the company’s strategic objectives.

2. Purpose of the document

The Environmental Policy defines the objectives, principles and commitments of Eurodies Italia S.r.l. for the **protection of the environment** and for the **responsible management of the environmental aspects** related to its production activities.

With this document, the Company intends to define a clear reference framework to guide its decisions and behaviors towards the continuous improvement of environmental performance. The Environmental Policy also defines roles, responsibilities and areas of application in the environmental management of company processes, assigning tasks consistent with the skills and functions involved, to ensure effective monitoring of the relevant environmental aspects.

In particular, the Policy aims to:

- **promote environmental protection** in Eurodies’ production and management processes, ensuring that activities are carried out with attention to the prevention of pollution, the reduction of waste and the containment of environmental impacts;
- promoting a **responsible use of resources**, with particular attention to energy efficiency, the conscious use of metal and auxiliary materials and the reduction of processing waste;



- ensure compliance **with applicable environmental legislation** and other **compliance obligations** relevant to business activities;
- promote **proper waste management**, enhancing, where possible, the recovery of materials and ensuring collection, storage and disposal methods consistent with current provisions;
- **to spread environmental awareness** among the people who work on behalf of the Company, through information, training and awareness-raising activities on responsible behaviour to be adopted in carrying out work activities;
- **support the continuous improvement** of environmental performance, through the monitoring of significant aspects, the definition of objectives consistent with the corporate context and the periodic review of the effectiveness of the actions taken.

3. Scope

The Environmental Policy applies to Eurodies Italia S.r.l. and to the activities carried out at the company headquarters in Avigliana (TO) and the production plants in Rivoli (TO) and Monte Urano (FM).

It concerns **all business processes that may generate direct or indirect environmental impacts**, including the use of metal materials and auxiliary products, energy consumption, waste production and management, plant management, maintenance activities, internal logistics and the operating methods adopted at the various company sites.

The principles and commitments defined in the document apply to **all persons** working for Eurodies or on behalf of the Company, as well as, where applicable, to third parties who have stable or temporary relationships with the organization, to the extent that their activities may affect the company's environmental aspects.

All recipients of the Policy are required to comply with its principles and to contribute, according to their role and area of activity, to the achievement of the company's environmental objectives and to the continuous improvement of Eurodies Italia's environmental performance.

4. Roles and responsibilities

The **Board of Directors** defines the strategic direction on environmental matters, approves this Policy and ensures the availability of the resources necessary for its implementation. The Management also promotes the continuous improvement of environmental performance, compliance with applicable compliance obligations and the integration of environmental protection into the Company's decision-making and operational processes.



The **Function and Plant Managers** have the task of promoting the application of environmental principles in their respective areas of competence, coordinating operational activities and contributing to the monitoring of relevant environmental aspects. They ensure that company procedures are understood and applied by the personnel involved and report any critical issues, needs for improvement or non-compliance.

Employees **and collaborators** are required to operate in compliance with the Company's Environmental Policy, procedures and indications received, adopting responsible behaviour aimed at preventing pollution, reducing waste, correctly managing waste and using energy, materials and resources efficiently. Suppliers, contractors, consultants, partners and other third parties operating on behalf of Eurodies Italia or at its sites are also required, where applicable, to comply with the principles of this Policy and the corporate environmental provisions relevant to the activities carried out. Eurodies promotes the **active involvement** of all the people who work on behalf of the Company, so that each one, in relation to their role and responsibilities, contributes to the prevention of pollution, the correct management of environmental aspects and compliance with company procedures. To this end, the Company promotes information, education and training initiatives aimed at strengthening knowledge of risks, impacts and correct environmental behaviour.

The Company also intends to develop relationships with customers, suppliers and partners aimed at sharing principles of environmental responsibility, enhancing, where possible, dialogue with parties who adopt policies and practices consistent with a sustainable approach.

For aspects related to the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 and the relevant company procedures in environmental matters, the **Supervisory Body** exercises its control functions in accordance with the provisions of the Model itself, also by monitoring compliance with procedures and the management of any non-conformities or relevant reports.

5. Environmental commitments of Eurodies Italia S.r.l.

To prevent, reduce and mitigate the environmental impacts associated with its activities, Eurodies is committed to operating in compliance with the applicable environmental legislation, the relevant compliance obligations and the principles defined by this Environmental Policy, promoting an approach oriented towards the continuous improvement of its performance.

The Company recognises environmental **protection as an integral part of its corporate responsibility and pays particular attention to sustainable development**; is committed to reducing the environmental impact of its production and management activities **through industrial policies that are attentive to innovation, efficiency in the use of resources and the progressive integration of eco-compatible criteria into daily operations**.

Below are the Company's commitments, divided by theme:



Energy Consumption and Greenhouse Gas Emissions

Eurodies recognises that energy consumption and greenhouse gas emissions are important environmental aspects for its production activities, with particular reference to the use of electricity, the use of fossil fuels related to space heating and the use of company vehicles. In this context, the Company undertakes to **monitor the energy consumption of its sites** and to **promote the efficient use of energy resources**, encouraging responsible behaviour and evaluating measures to contain waste and improve environmental performance.

To confirm its interest in the issue of emissions, Eurodies draws up an annual **inventory of greenhouse gas emissions**, to quantify and report Scope 1 and Scope 2 emissions, in alignment with the main international reference standards. With this activity, the Company monitors the trend of its emissions over time, identifies the main areas of intervention and defines improvement actions consistent with its production context.

The commitment to more sustainable energy management is also concretely applied in the self-production of energy from photovoltaic systems, which contributes to increasing the share of renewable energy used at company sites, reducing the use of energy purchased from the grid and containing indirect emissions associated with electricity consumption. Eurodies also intends to promote more sustainable corporate mobility, raising awareness among employees about the **reduction of emissions related to home-work travel**. To this end, the Company undertakes to encourage initiatives such as *carpooling*, the sharing of journeys among colleagues and, when possible, the choice of means of transport with a lower environmental impact, thus encouraging behaviour consistent with the objectives of reducing emissions and improving overall environmental performance.

Use of materials and resources

Although Eurodies does not manage the direct supply of the main raw materials processed extensively, Eurodies recognizes the importance of a **responsible use** of the resources and materials used in its production processes and undertakes to oversee the environmental aspects related to the use of materials, promoting the reduction of waste, the optimization of processing waste, the correct management of production residues and the efficient use of resources necessary to carry out business activities.

In line with the best practices in the automotive sector, the Company promotes an approach oriented towards **process efficiency**, processing quality and the reduction of re-work and waste, aware that the improvement of production performance also contributes to the containment of environmental impacts. In this perspective, Eurodies promotes technical and organizational solutions that optimize the use of materials, improve the management of production flows and facilitate, where applicable, the recovery and enhancement of the residues generated. The Company is also committed to maintaining constant attention to the **responsible management of chemicals and auxiliary materials**



used in processes, ensuring their use consistent with production needs, applicable regulatory provisions and internal procedures regarding the environment, health and safety. The Company promotes the correct storage, use and disposal of these products, in compliance with the applicable safety data sheets and internal procedures. It thus promotes, where possible, the progressive reduction of substances with the greatest impact and the evaluation of safer alternatives compatible with production needs.

At the same time, Eurodies promotes the awareness of suppliers and customers along the entire value chain, encouraging the reduction of indirect environmental impacts both upstream and downstream of its activities and progressively introducing, where applicable, environmental criteria that are increasingly consistent with corporate sustainability objectives.

The Company promotes ethical, compliant and responsible behaviour along the supply chain, requiring compliance with the principles of legality, fairness and environmental responsibility in its procurement system. To support these commitments, Eurodies has adopted an Organisation, Management and Control Model pursuant to Legislative Decree no.lgs. 231/2001 and a whistleblowing reporting system, as tools for the prevention, control and management of any non-compliant conduct.

Waste management

Eurodies is committed to managing the waste generated by its production and operational activities in full compliance with applicable environmental legislation and internal procedures, ensuring correct methods of identification, collection, temporary storage, traceability and delivery to authorised parties.

The Company promotes responsible **management of waste deriving from processing**, with particular attention to metal residues, packaging, auxiliary materials and any hazardous waste produced in the various sites. In this context, Eurodies is committed to encouraging, where possible, the reduction of waste at source, the correct separation of materials and the recovery or recycling of recyclable fractions, thus contributing to the containment of environmental impacts and a more efficient use of resources. Eurodies also promotes the **awareness** of the personnel involved in waste management, so that the activities are carried out with care, responsibility and consistency with the company's environmental objectives

Water resources

Eurodies promotes a **responsible and conscious use of water resources for all its employees**, in line with the principles of environmental protection and waste prevention. Although water is not a resource directly used in the company's production processes, the Company is committed to monitoring its consumption and encouraging behaviour oriented towards efficiency and correct management of the resource, including through specific **awareness-raising and training initiatives**.



Air, water and soil pollution

Eurodies is committed to **preventing and containing all possible forms of** air, water and soil pollution related to its activities, ensuring compliance with applicable environmental legislation and internal procedures.

With particular reference to **air pollution**, the Company promotes careful management of activities and plants that may generate emissions into the atmosphere, including those deriving from production processes, heating systems, the use of products and auxiliary substances and the movement of company vehicles.

The Company also ensures responsible management of the products used, waste, storage areas and operational activities, with the aim of reducing the risk of spills, accidental contamination or impacts on water and soil matrices. In this perspective, Eurodies promotes responsible behaviour, control activities and prevention measures consistent with the nature of its processes and with the aim of protecting the environment and the territory in which it operates.

Noise

Eurodies undertakes to monitor and manage the **noise impacts associated with its production activities**, both in relation to the protection of the external environment and the territorial context in which it operates, and with reference to the health and safety of the people present on the company sites. The Company ensures compliance with the applicable regulations, noise assessments and measures identified in the Risk Assessment Document, promoting prevention, control and maintenance activities aimed at containing noise emissions, reducing exposure to noise and preventing any disturbance or non-compliance situations.

Product use and end-of-life management

Eurodies recognises the importance of considering the environmental impacts associated with the use and end-of-life of products along the value chain, with particular reference to the automotive sector, in which the durability, quality, recoverability and recyclability of components are increasingly important elements.

In consideration of its operating model, Eurodies does not directly manage the use, maintenance, disassembly or end-of-life phases of the final product, but undertakes, within the scope of its competence, to contribute to the reduction of indirect environmental impacts related to the life cycle of the products, ensuring **processes that comply with the technical specifications received, promoting product quality, the reduction of non-conformities and the containment of waste and rework**.

The Company is also committed to collaborating with customers, where required and applicable, to promote production solutions consistent with the principles of efficiency



in the use of materials, durability, recoverability and recyclability of components, in compliance with the technical, qualitative and environmental requirements defined by the customer and the automotive sector.

Eurodies therefore intends to oversee the issue of product use and end-of-life through an approach consistent with its role in the value chain, contributing responsibly, within the limits of its sphere of influence, to the objectives of circular economy and reduction of environmental impacts promoted by customers and the reference market.

Customer health and safety

Eurodies recognizes that the **quality and conformity of the components** manufactured are fundamental elements also for the protection of the health and safety of customers and end users. While operating mainly on the basis of technical specifications defined by customers, the Company is committed to ensuring accurate processing, adequate controls and compliance with applicable requirements, contributing, within its competence, to the creation of safe, reliable products that comply with the quality standards required by the automotive sector. Eurodies also promotes the **timely management of any non-conformities, complaints or critical issues** reported by customers, favoring an approach oriented towards prevention, traceability and continuous improvement.

6. Business Objectives

Eurodies intends to prevent and reduce its environmental impacts, through the following qualitative objectives, in line with the principles and commitments established in this document:

- **Reduction of GHG emissions (Scope 1):** The Company is committed to limiting direct greenhouse gas emissions generated mainly by stationary combustion and mobile combustion. The goal is a reduction in its **direct emissions** by 5% by 2030 compared to the 2023 baseline.
- **Increase in electricity produced by photovoltaic systems (Scope 2 GHG emissions):** Eurodies is committed to progressively increasing the share of self-consumption of electricity produced by photovoltaic systems, with the aim of reaching at least 10% self-consumption by 2028.
- **GHG emissions reporting (Scope 3):** the Company intends to launch a procedure for the systematic collection of the data necessary for the reporting of emissions generated indirectly throughout the supply and distribution chain in order to consider the entire supply chain for the reporting of greenhouse gas emissions by 2028.
- **Transparency and control of raw materials:** Eurodies is committed to strengthening its control over the materials used in its production processes, also in consideration of its role as a company operating mainly on a tolling basis. By 2028, the Company intends



to establish an internal tracking system dedicated to monitoring materials received, processed and returned to customers, with the aim of improving the transparency of flows, promoting the control of processing waste and supporting a more efficient and responsible management of resources.

- **Waste management:** Eurodies is committed to progressively improving the management of waste generated by its production activities, with particular attention to processing waste, metal residues, packaging and any hazardous waste. By 2030, the Company intends to reduce the amount of waste produced per unit of activity, through the improvement of process efficiency, the reduction of waste and rework, the correct separation of materials and the increase of the quotas sent for recovery or recycling, where technically possible.
- **Environmental training:** the company undertakes to communicate, train and/or keep at least 30% of employees updated on environmental issues every year.

7. Referrals

Eurodies promotes a corporate environment based on **integrity, responsibility and transparency** by encouraging the timely reporting of any unlawful conduct, violations of the Organisation, Management and Control Model pursuant to D.lgs. 231/2001, non-compliance with company procedures or **conduct that may generate negative impacts on the environment** or compromise compliance with the commitments undertaken in this Environmental Policy.

The Company has made available to the Recipients an **internal channel** for reporting significant unlawful conduct pursuant to Legislative Decree 231/2001 or violations of the Model, as well as other situations potentially detrimental to the Company, including any violations or critical issues related to environmental management, pollution prevention, proper waste management, responsible use of resources and compliance with applicable environmental legislation.

This channel operates in compliance with Legislative Decree 24/2023 on Whistleblowing.

Reports can be made, even anonymously, in the following ways:

- **in written form**, through a dedicated Whistleblowing platform, which can be reached through the dedicated link on the company website and at the following address: <https://eurodies.integrity.complylog.com>;
- **orally**, by recording, in accordance with the procedures laid down in the company procedure.

These reports are transmitted and managed in accordance with the procedures described in the paragraph "Reports" and in the paragraph "Measures in application of the regulations referred to in D.lgs. 24/2023" of the general part of the Model itself and, in particular, on the basis of the "Procedure for the management of reports pursuant to D.lgs. 24/2023" adopted for this purpose by the Company.



Eurodies guarantees the **confidentiality of the identity of the whistleblower**, the persons involved and the content of the report, in compliance with the applicable regulations. The **protection of the whistleblower from any form of retaliation**, discrimination or penalization related to the report made in good faith is also ensured, without prejudice to the possibility of making anonymous reports in accordance with the procedures provided for by the company procedure.

8. Updating, dissemination and communication

The Board of Directors of Eurodies ensures that this Environmental Policy is disseminated to all employees, collaborators and, where applicable, suppliers, partners and third parties involved in the company's activities, in a manner that ensures that it is known and effectively applied.

The Policy is **reviewed at least annually** and, in any case, whenever updates are necessary due to regulatory changes, evolution of applicable environmental requirements, updates of the best practices of reference, changes in production processes or significant organizational, technological and operational changes.

Any updates to this document are approved by the Chairman and **promptly communicated to the relevant recipients** through the channels deemed most appropriate, including:

- sending by email to employees;
- posting or publication on the company bulletin board;
- delivery or sharing when hiring new staff;
- sharing when entering into or renewing contracts with suppliers, partners or other relevant third parties.

Eurodies is also committed to promoting understanding of the contents of the Environmental Policy through appropriate communication, information and awareness-raising initiatives, so that all the people involved are aware of the principles, commitments and responsibilities related to environmental protection, pollution prevention, responsible use of resources and continuous improvement of environmental performance.

Avigliana (TO), 28.11.2025

The Management