



**COMELZ**

Sustainability Report 2022

# Content Index

Letter to stakeholders .....	2
Methodological note .....	3
1. The Comelz Group .....	4
1.1 Values and Mission .....	6
1.2 Profile and history of the Group .....	7
1.3 An international reality .....	9
2. Sustainability in Comelz .....	10
2.1 Materiality analysis .....	11
2.2 Future sustainability commitments .....	13
3. Governance of the Group .....	15
3.1 Governance of the Group .....	16
3.2 Ethics and Business Integrity .....	17
4. Comelz’s products .....	18
4.1 Innovation, Research & Development .....	19
4.2 Our products .....	20
4.3 Product certifications .....	21
5. Commitment to our people and the community .....	22
5.1 Our resources .....	23
5.2 Training and professional development .....	27
5.3 Employee’s well-being .....	27
5.4 Health and safety of workers .....	28
5.5 Social commitment .....	30
6. Our commitment to reducing the environmental impact .....	31
6.1 Energy consumption and emissions .....	32
6.2 Responsible waste management .....	37
6.3 Sale of products with reduced environmental impact: The <i>Targa Verde</i> .....	37
7. The value chain .....	38
7.1 “Made in Comelz” spirit .....	39
Appendix .....	40
GRI Standards .....	41
Material Topics and related impacts .....	49
Reconciliation table with GRI standards .....	53
GRI content index .....	54

## Letter to stakeholders

Dear readers,

Comelz is a leading company in the district of Vigevano, and it is recognized worldwide for its ability to innovate leather and fabric cutting and shaping methods. It supplies cutting systems and islands with high technological content, flexible, with the highest levels of productivity, suitable for all type of processing, around the world. Comelz designs and produces software, mechanics, electronics, and machine motors to provide for customization of every element.

In 2022, the Ukrainian conflict destabilized the European scene, leading the continent into an energy crisis. In this context, Comelz Group has managed to maintain its productivity rate without any significant loss. The Group has continued its activities in line with the developments of previous years, increasing its workforce, employee training and investing in the innovation of its products. Comelz has defined its ESG path, and it has also renewed its commitment to create a healthy working environment and spreading the criteria of ethics and business integrity. Starting with its updates on the 231 Model and the measures to improve health and safety standards, the Group confirms for the 2022 exercise its full commitment to social responsibility. Moreover, Comelz is aware of the proactive role it can play in the transition to a more circular and sustainable economy. For this reason, the quality and safety of Comelz products are based on the sustainability of the production process that guarantees durability and reliability for customers.

This fourth Sustainability Report outlines the objectives set by Comelz ever more clearly, namely, to contribute positively to the dissemination of a responsible business model and transparent reporting, aimed at communicating the commitment to all stakeholders. In this context, this document also presents a three-year action plan that will guide the company in the implementation of further initiatives and projects to achieve ESG objectives<sup>1</sup>.

As an international group, we are aware of our social responsibility and are committed to the highest international standards in relation to the fundamental rights of our workers, as well as contributing to the development of the community in which we operate through the support of cultural, educational and social activities. For this reason, sustainability for us at Comelz is a core guiding principle in creating sustainable products for our customers.

*Signature*

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<sup>1</sup> For more information, refer to the section “2.2 Future sustainability commitments”.

## Methodological note

This document, which represents the fourth Sustainability Report of the Comelz Group, aims to communicate the performance of the Group (in the document also “Group” or “Comelz” or “Comelz Group”) in the field of environmental, social and governance sustainability for the financial year 2022 (from 1<sup>st</sup> January to 31<sup>st</sup> December).

This annual Sustainability Report has been prepared by reporting on the “Global Reporting Initiative Sustainability Reporting Standards” defined by the Global Reporting Initiative (GRI), as shown in the “GRI Contents Index” table. The 2021 updated version of the Standards was adopted for the GRI 1 (Foundation) and GRI 2 (General Disclosures) universal standards.

In particular, the content reported was selected based on the results of the updated materiality analysis carried out between the end of 2022 and the beginning of 2023, which enabled the identification of Comelz’s positive and negative, actual and potential impacts on the economy, the environment and people, including those on human rights, as described in the “2.1. Materiality Analysis” section of this document.

The data and information perimeter are the same as the consolidated financial statements of the Comelz Group at 31.12.2022.

With regards to social and environmental data and information, the reporting perimeter includes the companies of Vigevano (Pavia) of Comelz S.p.A., Cormanò (Milan) of Camoga S.p.A., incorporated in Comelz S.p.A since 1<sup>st</sup> December 2022, Nanjing of Camoga Leather Machine Manufacturing Nanjing Ltd, Comelz do Brazil, Comelz India Private Limited, Comelz Myanmar and Developer S.r.l. located in Campi Bisenzio (Florence), which, despite not qualifying as a production site, has a significant impact on the Group's energy consumption as it is a software development center. Any further exceptions to the reporting perimeter are appropriately explained in the text of this document.

It should also be noted that no significant changes have occurred along the supply chain and the ownership structure of the Group.

To allow comparability of data over time, a comparison with the data for the previous year has been included where available. In addition, to ensure the reliability of the data, the use of estimates has been limited as far as possible, where unavoidable, the estimates are based on the best available and appropriately reported methodologies. Finally, the re-exposure of the data published in the previous Sustainability Report is appropriately indicated in this document.

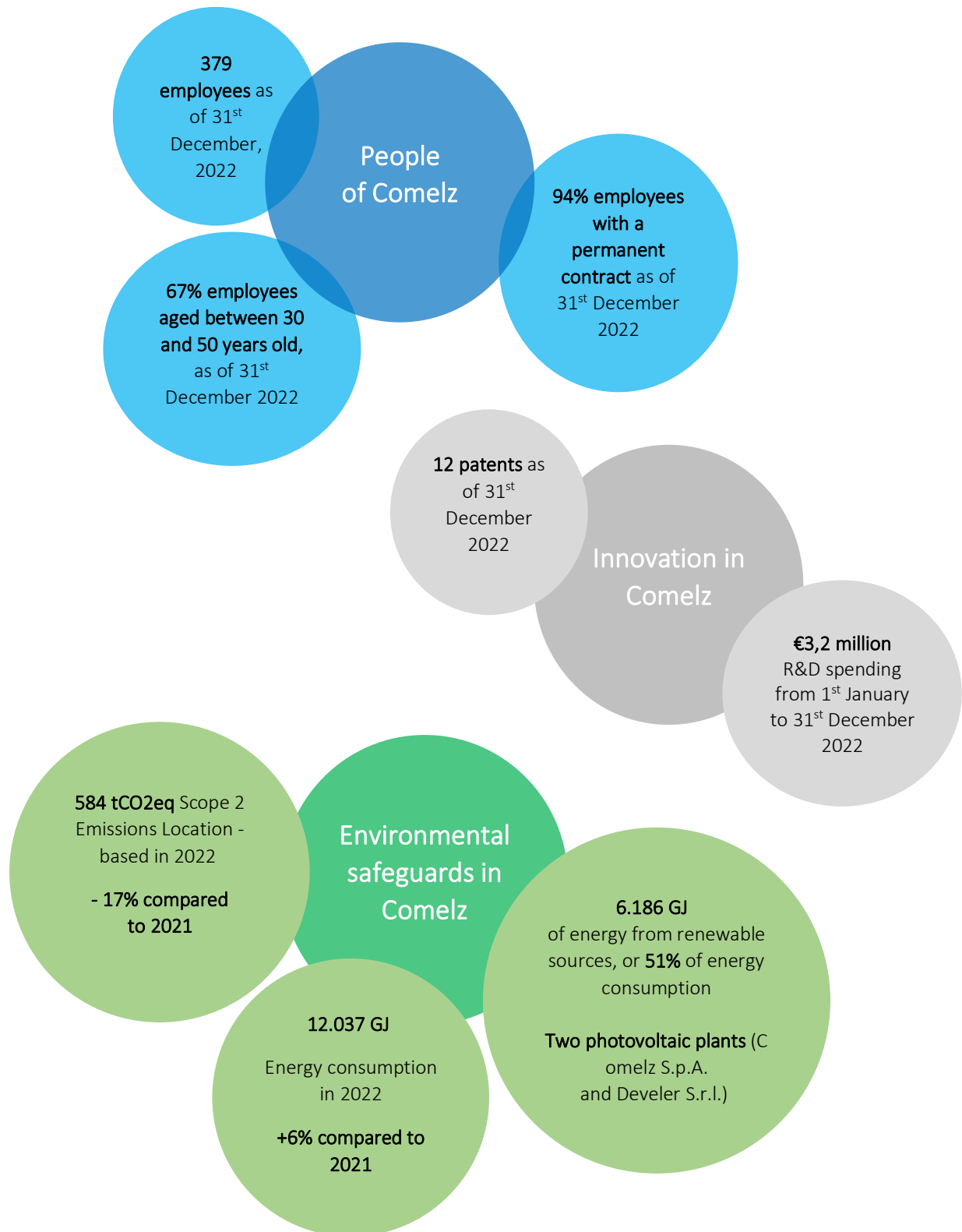
For further information and suggestions regarding the Comelz Group Sustainability Report, please contact [dlugnani@comelz.com](mailto:dlugnani@comelz.com)

This document is also available on the Comelz Group website at [www.comelz.com](http://www.comelz.com).



## 1. The Comelz Group

Highlights of the Group in 2022



## 1.1 Values and Mission

*Our mission is to grow every day in the global market as an Italian and European Company that offers high quality products with high technological content.*



**To KNOW:**  
Know the needs of customers and workers

**To SERVE:**  
Provide a quality service

**To TRUST:**  
Creating relationships of trust

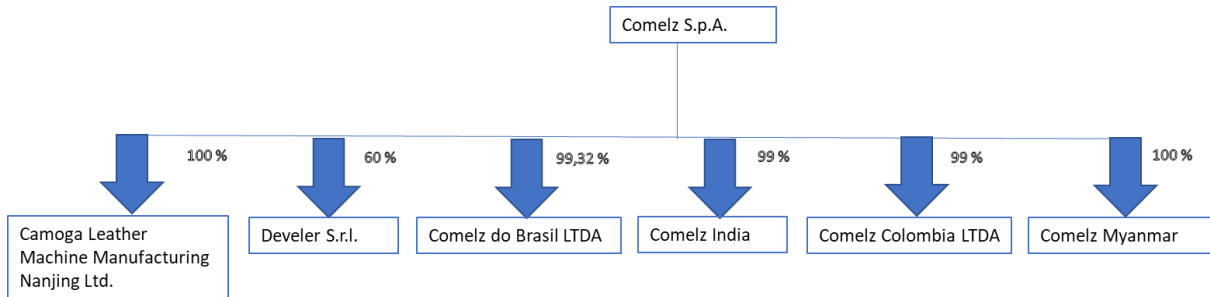
**To INNOVATE:**  
Create unique products to develop new technologies

**Striving for PERFECTION:**  
Always try to improve

## 1.2 Profile and history of the Group

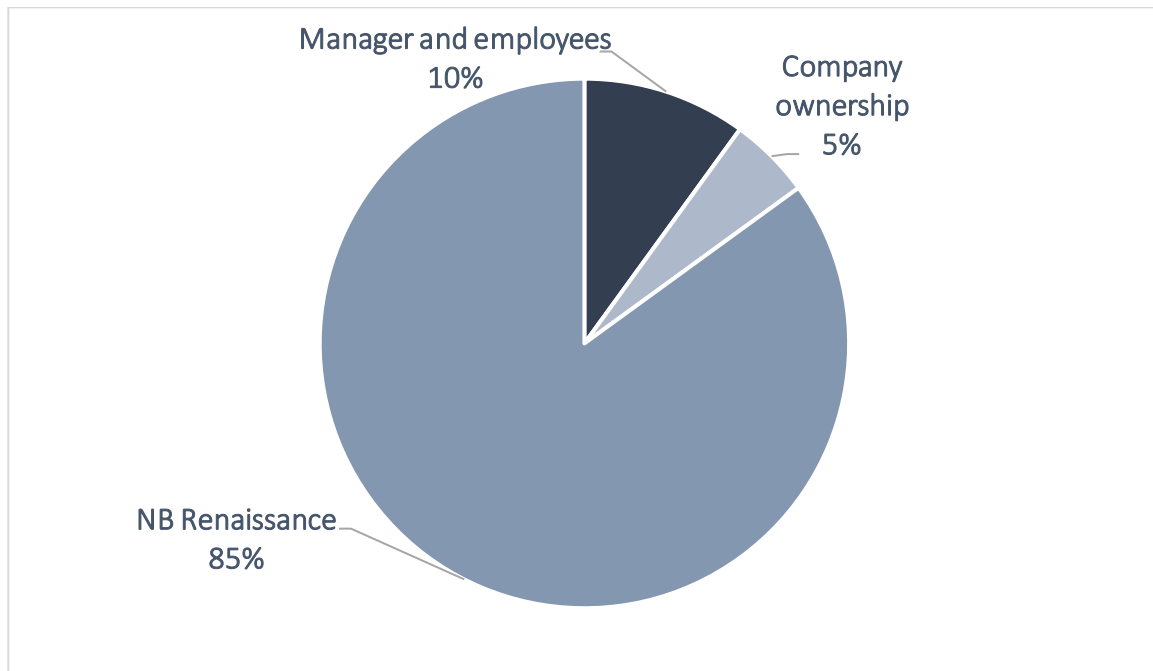
Located in Vigevano, a place of traditional leather processing, Comelz S.p.A. is the group leader of a network of plants located all over the world. The structure is divided as follows:

Corporate structure of Comelz Group as of 31<sup>st</sup> December 2022<sup>2</sup>



The Group's ownership structure is 85% represented by the Private Equity NB Renaissance Partners fund.

Ownership structure as of December 31<sup>st</sup>, 2022



<sup>2</sup> Since 2021, Comelz Colombia LTDA was wound up, it is no longer an active production site, but there are some credits pending.



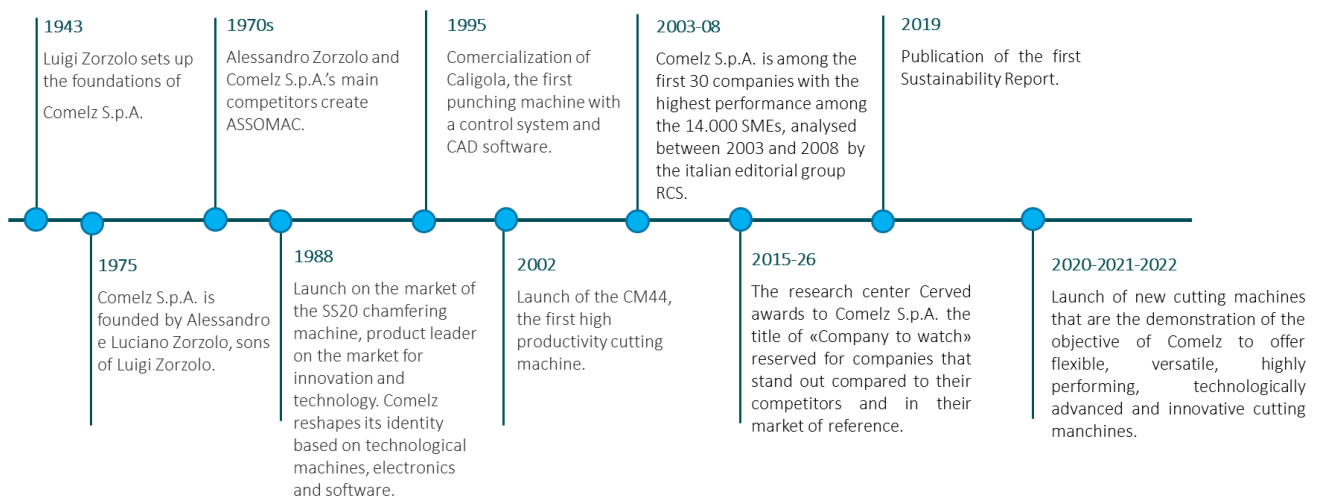
*The Comelz's spirit is a sum of skills and competences. It is the awareness of Made in Italy enriched by international experience.*

Founded in 1943 Comelz S.p.A. is an Italian company specialized in the design and construction of working machines for shoe factories, such as chamfers of leather, folding of uppers, pantographs, serving national and international markets.

The Company can be defined as one of the leaders of a generation of Italian companies that was able to interpret the needs of the footwear and leather goods markets that were then in strong expansion, giving life to a sector of mechanic-footwear of international excellence. Comelz S.p.A. manages the production of operating machines, provides for the design of the machine both mechanical and electrical and electronic parts and finally conducts the development of the related management software.

The Company broke into the market at the end of the 1960s with products with high innovative content and overtime it has established itself as one of the most significant players in the sector, assuming, among other things, a leading role in members association. In the 1970s, Alessandro Zorzolo, together with the main competitors of Comelz S.p.A., founded the National Association of Manufacturers of Technologies for footwear, leather goods and tannery (hereinafter ASSOMAC) with the aim of adopting a common approach toward the national and international market. At the end of the 1980s the Company was one of the first in the sector to initiate a new industrial season based on the diffusion of CAD systems and numerical control systems, reshaping its corporate identity on a strong integration of mechanical, electronic and software technologies.

### A history of innovation



### 1.3 An international reality

Since it produces and exports *Made in Italy* all over the world, the Comelz Group operates in a constantly and rapidly evolving institutional, economic, social and environmental context.

In this respect, the year 2022 closed with a consolidated turnover of 82,1 million euros, an increase of 37 % over 2021, and an EBITDA of 29,6 million euros. Net profit was positive for 17,6 million euros.

The Group's customers include the main players in the luxury industry, the main producers and suppliers of footwear operators, as well as operators related to the production of tanning materials for the automotive sector. Among the customers of the Group there are also small artisans and craftsmen oriented towards the search for quality and performance.

The international aspect of the market has allowed the Group to expand its sales network, which consists of subsidiaries as well as distribution and resale points in Europe, Asia, North and South America, as shown in more detail in the figure below.





## 2. Sustainability in Comelz

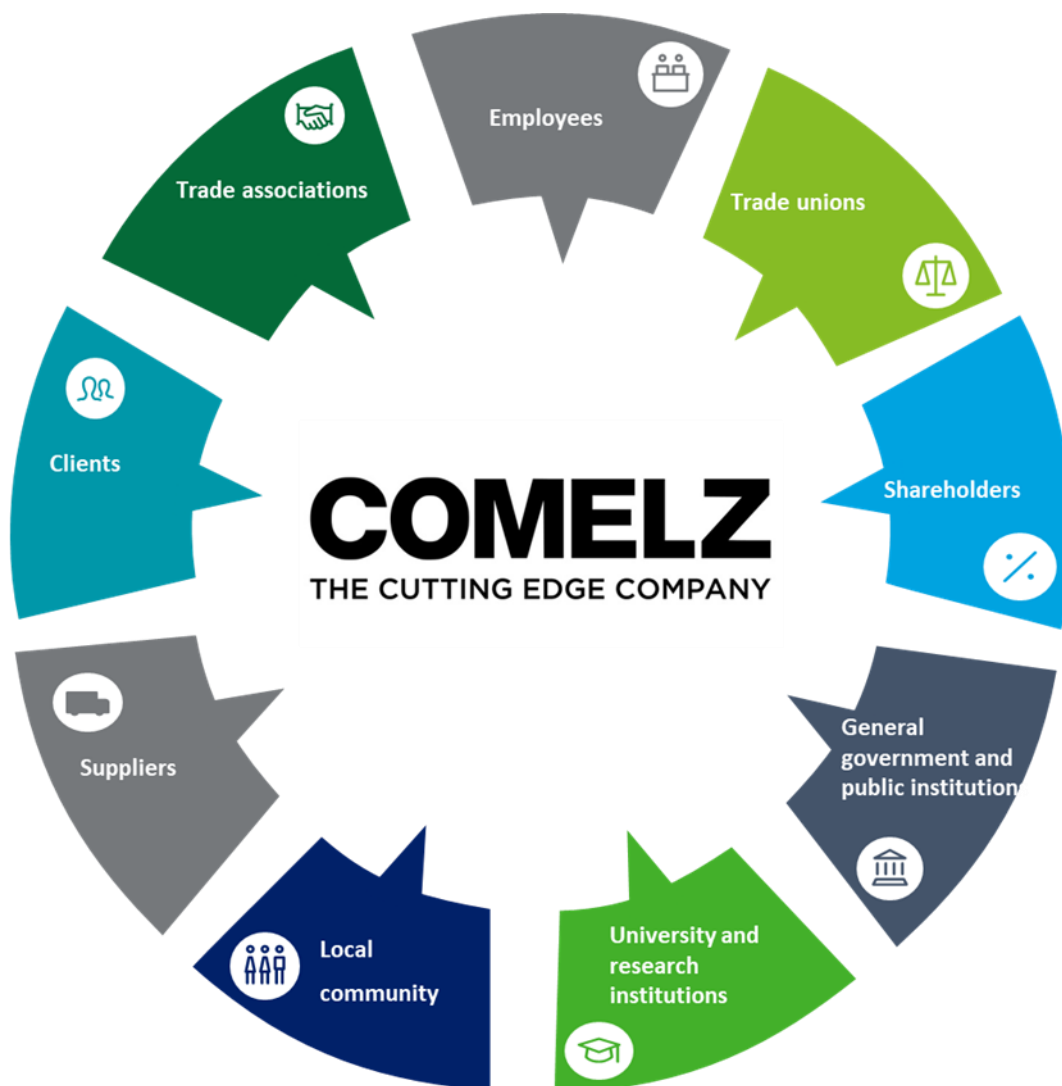
## 2.1 Materiality analysis

In 2019, Comelz embarked on a sustainability journey to strengthen the communication process with its stakeholders, with particular reference to its environmental, social and governance performance. Over the years the Group has continued to pursue this commitment, maintaining an open and continuous dialogue with its stakeholders to best to satisfy their needs and interests.

The identification of the Group’s stakeholders was developed in two phases: in the preliminary phase, a benchmark analysis was carried out, which considered the main peers and industry best practices, in order to define a sample of possible Group stakeholders; in the following phase, key business functions were involved to discuss and define the most relevant stakeholder categories.

This process has enabled the mapping of internal and external stakeholders who influence and are influenced by the Group's activities: the results were also confirmed with the updated Materiality analysis carried out between the end of 2022 and the beginning of 2023.

The stakeholders of the Comelz Group



The Group's Materiality analysis was updated with the aim of identifying the most important areas for business development with the identification of a number of ESG objectives. This analysis was carried out based on the GRI Standards (2021). Comelz identified sustainability aspects on which the Group has a significant economic, environmental and social impact, and which could significantly influence the assessments and decisions of its stakeholders.

Potentially relevant sustainability topics were identified through a benchmark analysis in the industrial machinery sector and a context analysis of the potential impacts generated by the Group along the ESG paradigm.

The evaluation of these issues and their impacts were in fact subject to a vote both by the management and by a selection of the main customers considered strategic by the Group, which have been involved through an online survey.

The evaluation process has resulted in a list of 13 topics relevant to the Group, approved by Top Management and presented below in order of priority. Please refer to the details of the impacts mapped for each of these themes in the section "Material Themes and related impacts" (Appendix).

#### Material themes for Comelz Group

- Cybersecurity and data protection and sensitive information
- Sustainable management of the supply chain
- Ethics & business integrity and anti-corruption
- Management of energy consumption and fight against climate change
- *Made in Italy*, uniqueness, and versatility of the product
- Quality, reliability and safety of the products
- Developing a positive work environment
- Sustainable development of value and business relations
- Relationship with the community
- Responsible management of material and waste
- Innovation, R&D
- Health & safety of employees
- Diversity and professional development


The review of the materiality analysis has helped to underline the importance of the "Sustainable Supply Chain Management" theme, which is increasingly at the center of peers and competitors' sustainability reporting, and of "Ethics & business integrity and anti-corruption", once again one of the most important topics for both stakeholders and employees. In the environmental field, the theme "Management of energy consumption and fight against climate change" is the topic in which the impact of the Group has been assessed as the most relevant. Moreover, "*Made in Italy*, uniqueness, and versatility of the product" and "Quality, reliability and safety of the products" are also confirmed among the themes considered important to the Group's business.

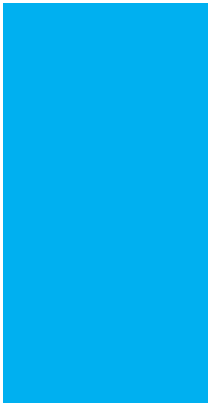
This process of Materiality analysis has led the Group to develop a greater sustainability awareness, identifying commitments and objectives of sustainability in line with the values and the reference context in which the Group operates.

## 2.2 Future sustainability commitments

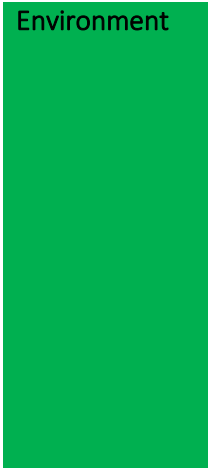
During 2022, the Group took a step further in its sustainability path. Based on previous years' achievements and growing commitment to lead a responsible business, Comelz has defined a set of ESG goals by identifying concrete and measurable targets for some of the Sustainable Development Goals that it intends to achieve by 2026.

The action plan, shared with the Top Management members of Comelz S.p.A. is as follows.

Macro-Area	SDGs	Objectives	Timeline
Cross-portfolio	N/A.	Define an internal sustainability committee where various function managers sit (e.g. operations, HR, legal, internal audit)	2 <sup>nd</sup> Semester 2023
		Identification of an ESG manager	2 <sup>nd</sup> Semester 2023
		Definition of MBO linked to the achievement of the ESG objectives defined within the Group Action Plan	2025
Governance		Promotion of induction and training activities in the field of sustainability to management bodies and internal sustainability committee	2025
		Extension of the Code of Ethics to the Group	2 <sup>nd</sup> Semester 2023
		Development and implementation of an ESG Code of Conduct and ESG screening and evaluation system for all the suppliers of the Group	2025
		Preparation of an ESG audit plan on the Group's suppliers	2026
		Implementation of ESG self-assessment questionnaire for all major suppliers of the Group	2024
Social		Development of refresher training courses in the areas of security, privacy policy, ethical behavior	2024



Definition and implementation of a MBO system at the Group management level 2024



**Environment**



Extension/development of a policy on product-end of life, with respective analysis on the environmental impacts of products; development ISO 14021 2024



Implementation of a management system relating to the quantification and reporting of greenhouse gas emissions by organization, according to ISO 14064-1 standard 2024-2025





### 3. Governance of the Group



### 3.1 Governance of the Group

The Group's governance system is based on the principles of transparency and accountability for all workers, regardless of their degree, to promote a healthy working environment and a competitive product on the market.

Composition of the Board of Directors as of 31 <sup>st</sup> December 2022	
Corsico Piccolino Alessandro	Chairman of the Board of Directors
Zorzolo Bruno	Member
Canè Fabio Cosmo Domenico	Member
Cerrina Feroni Marco	Member
Camisassi Giovanni	Member
Riccardi Paolo	Member
Loiacono Alice	Member

As of 31<sup>st</sup> December 2022, the Board of Directors of Comelz S.p.A. is composed of 7 people, of which one woman under the age of 30, one man between the age of 30 and 50 and the remaining are men over the age of 50.

#### Members of the Board of Directors, by gender and age as of 31<sup>st</sup> December 2021 and 2022

Gender	On 31 December 2022				On 31 December 2021		
	<30 years	30-50 years	>50 years	Total	30-50 years	>50 years	Total
Men	-	1	5	6	1	5	6
Women	1	-	-	1	-	-	-
<b>Total</b>	<b>1</b>	<b>1</b>	<b>5</b>	<b>7</b>	<b>1</b>	<b>5</b>	<b>6</b>

The Board of Statutory Auditors, as a supervisory body, is responsible for monitoring compliance with the law and corporate rules, as well as for monitoring the adequacy of internal controls and the organizational structure of the company. The Board of Statutory Auditors is composed of 3 men, over 50 years old. The composition has remained unchanged with respect to the previous year.

#### Members of the Board of Statutory Auditors, by gender, company, and age as of 31<sup>st</sup> December 2021 and 2022

Company	Gender	On 31 December 2022			On 31 December 2021		
		30-50 years	>50 years	Total	30-50 years	>50 years	Total
Comelz S.p.A	Men	-	3	3	-	3	3
	<b>Total</b>	<b>-</b>	<b>3</b>	<b>3</b>	<b>-</b>	<b>3</b>	<b>3</b>

Comelz draws 100% from the local community to select its managers and senior managers.

## 3.2 Ethics and Business Integrity

Comelz operates in a multiplicity of institutional, economic, political, social and cultural contexts that are constantly and rapidly evolving since it produces and exports *Made in Italy* all over the world. All the activities of the Group are carried out in compliance with the law, in a framework of fair competition on the market by all the entities operating in it. Business and operations are conducted with honesty, personal integrity, professional correctness, and good faith, in the effective protection of the environment, health and safety in the workplace, respecting the legitimate interests of all those who work in the company context and all stakeholders, such as Public Administration, customers, external collaborators and suppliers.

The Code of Ethics of Comelz S.p.A., adopted in 2020, defines the principles governing the functions and responsibilities of all those who work in the Company. From staff policies to relationships with third parties, the topics covered are an integral part of the contractual obligations assumed by employees. The Code is available and freely accessible by Comelz personnel and is also posted on the trade union boards (available also online) and on the company intranet. Any updates are disclosed through the same channels. The document also contains key health and safety elements, and terms of the relationship with suppliers (more details in the respective sections).

In addition to the Code of Ethics, Comelz S.p.A. is equipped with the Organisational and management Model in line with the provisions of Legislative Decree 231/2001. Following the identification of areas of the business activities in which the potential risk of offenses is higher, the Model indicates the measures for the prevention of these. In 2022 an update was carried out for the introduction of new offenses according to the law (art. 316-bis and 640-bis of the Italian criminal code).

### **Alert system**

In case complaints regarding the violation of the requirements of this Code, or the occurrence of the offenses referred to in Legislative Decree no. 231/2001, or practices that are not in line with the procedures and rules of conduct adopted by the Group, the concerned parties are required to make appropriate reports to the Monitoring Body, at the e-mail address: [odv@comelz.com](mailto:odv@comelz.com). For all the filed incidents, Comelz guarantees the confidentiality of the identity of the alerter.

The addition of new offenses in the 231 Model has enabled a general review of existing procedures to be carried out during 2022.

The channel of the website guarantees the confidentiality of the reporter's identity in every step of the management of the case.

The Monitoring Body evaluates the reports received with discretion and responsibility. To this end, it may listen to the author of the report and/or the person responsible for the alleged infringement, giving written reasons for the autonomous decision not to proceed. In any case, the signalers will be protected against any form of retaliation or penalty, and they will be guaranteed maximum confidentiality, without prejudice to the legal obligations and the protection requirements of the Company, and of persons accused in error or in bad faith.

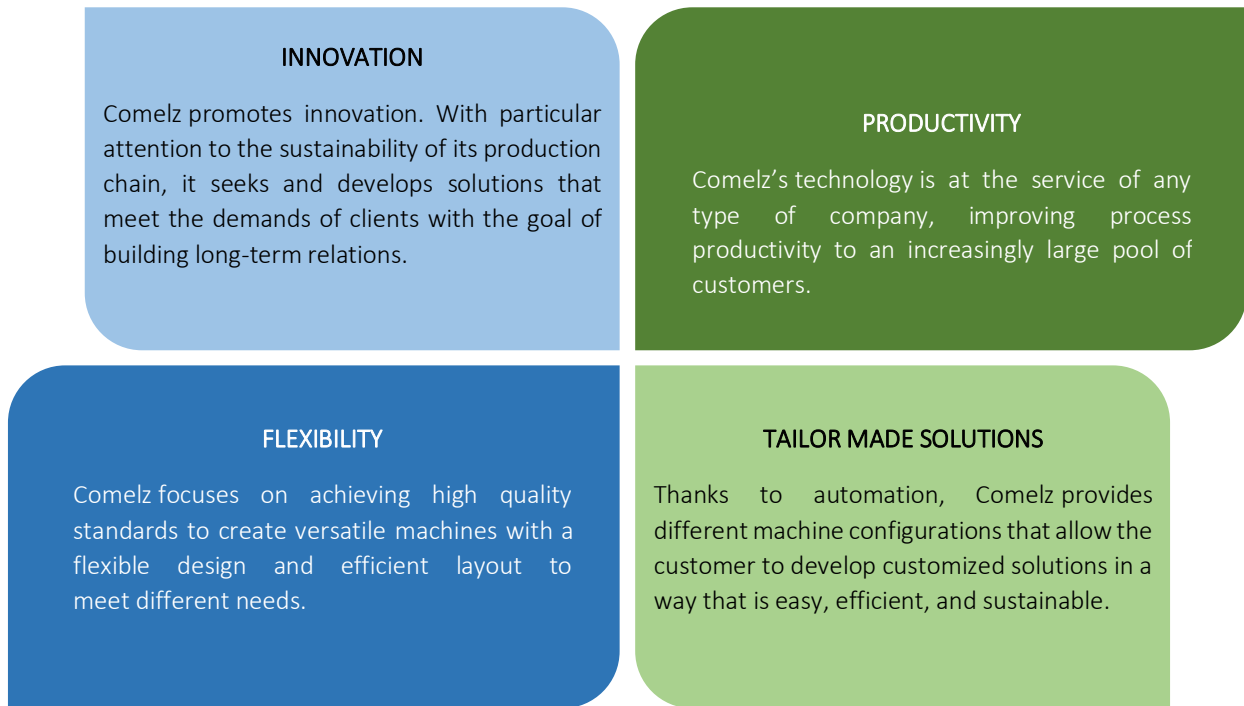
In this connection, direct or indirect acts of retaliation or discrimination against the signaling agent shall be prohibited for reasons directly or indirectly related to the reporting. In any event, any retaliatory or discriminatory measures taken against the reporting agent for reasons directly or indirectly related to the reporting are void.



## 4. Comelz's products

## 4.1 Innovation, Research & Development

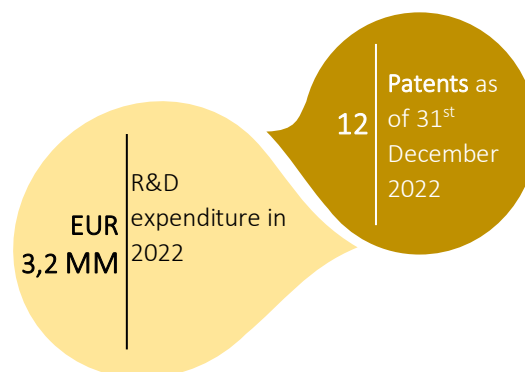
### The values of Comelz’s products



Since its foundation, the innovative spirit of Comelz has been reflected in the continuous development of technological solutions and in the obtainment of numerous patents. In addition to the 12 existing patents, in 2022 applications were made for the recognition of 3 new patents.

Comelz is renowned for being one of the first companies to integrate electronics into its production lines and among the first to use CNC machines and computerized production equipment. The company is working to digitalize cutting processes, combining sophisticated software and advanced technology to achieve an unprecedented level of performance.

During 2022, Comelz S.p.A. maintained its high commitment to research and development and continued the TUV certification, now also obtained for the new NEK+ table.



## 4.2 Our products

The products offered by the Group are mainly used in the following sectors:

# COMELZ



### FOOTWEAR

Production of machinery for both small companies and large multinationals, for cutting both leather and fabric materials.



### LEATHER GOODS

High precision systems for cutting both small and large leather material.



### AUTOMOTIVE

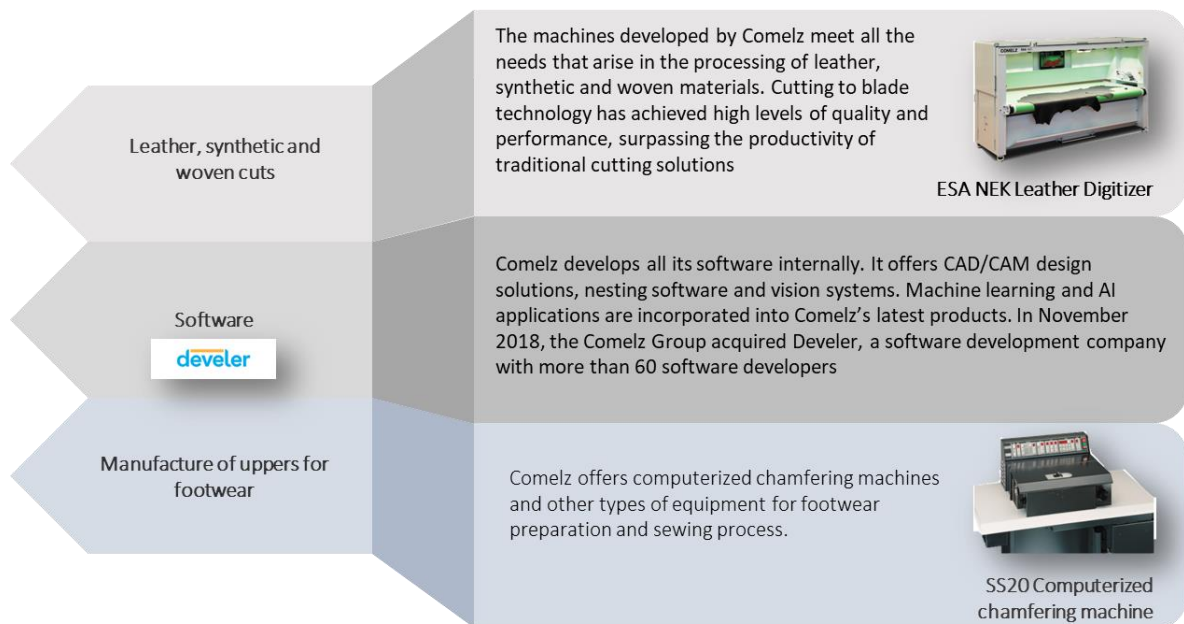
Machinery designed to cut different components of the automotive industry such as leather interiors and synthetic material.



### APPAREL

Solutions for the treatment of different materials used in the field of clothing.

Comelz's range of products is mainly distinguished in three branches: leather, synthetics and fabric cutting machines, software development and the creation of upper footwear manufacturing machinery for the preparation of the most modern and advanced tools for the splicing department.



## Built-in technology

Every component of a Comelz product is designed and developed from the very start, to better develop into one compact and efficient system. The R&D activity extends in fact to the complexity of all the technologies that characterize Comelz products, from mechanics, to electronics, and software, to then combine the parts with the most modern resources available in every sector.

## Precision structural sheets

Comelz has a sophisticated precision sheet metal technology, developed through a close and continuous collaboration with a highly qualified and experienced partner. The use of a module technology simplifies and makes the manufacture of the machines flexible, of increasing better quality and reliability with respect to the use of traditional carpentry and defining the distinctive compact and functional design.

All Comelz products are unique but at the core they share values related to quality and flexibility of use, in order to satisfy all the customer's needs.

## 4.3 Product certifications



The safety and reliability of Comelz products is fundamental to ensure the high quality as demonstrated by the achievement of the product certification by the TÜV body, in accordance with the Machinery Directive 2006/42/EC for the protection and safety of workers. In 2022, THE NEK+ table was added to the already certified CZ Plus, CJ, CT/M and CZ/XL. The company is also working to certify additional machinery. Globally recognized, the TÜV Süd certification mark is issued upon completion of its verification and inspection program and remains valid provided that a production control inspection is carried out annually. The achievement of certification demonstrates a company's commitment to protecting consumer health and increases the reliability of its products.



## 5. Commitment to our people and the community

## 5.1 Our resources<sup>3</sup>

For Comelz, its employees are the key to the success of the company and for this reason the Company is committed to guaranteeing working conditions and opportunities for professional development that enhance its employees.

The Comelz Group has **379 employees** as of 31<sup>st</sup> December 2022.

The Group hinders any form of discrimination by gender, nationality, sexual orientation, age or political and/or religious opinion with the aim of enhancing the concept of “diversity” as an opportunity for growth for the organization.

In compliance with the International Labor Organization Conventions and the current legislation to protect working conditions, the Company commits to respect fundamental human rights. In particular, Comelz:

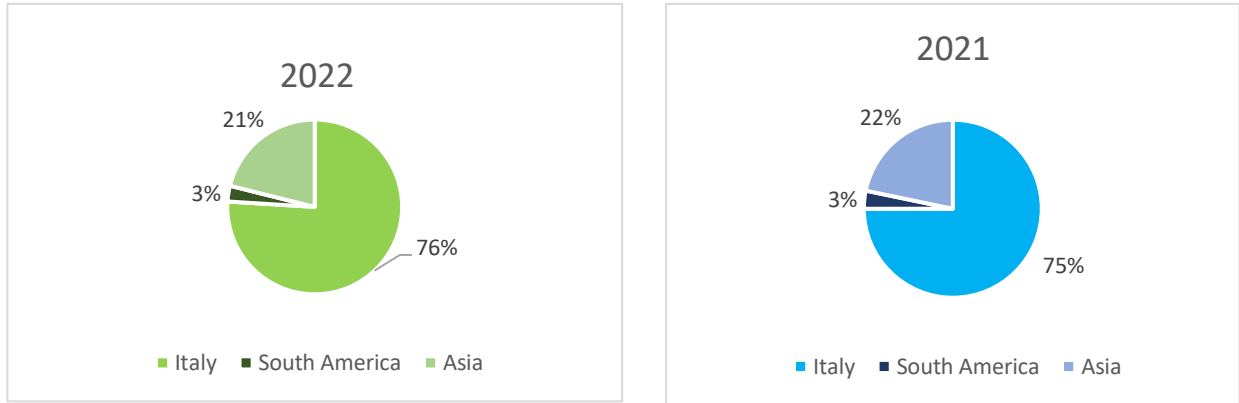
- Bases its policies of selection, management, remuneration and training of personnel to criteria of professionalism, competence and merit, in line with the relevant legal requirements, with the workers' Statute and the applicable CCLLs. Comelz rejects any form of discrimination or favoritism aimed at facilitating the recruitment of a candidate by adopting an evaluation process as objective as possible of the professional and psycho-aptitude profiles of candidates and offering all workers the same opportunities;
- creates a working environment in which the personal characteristics of the individual worker are valued and not penalized;
- ensures the protection of the privacy of the personnel and imposes the respect of the current legislation on privacy by prohibiting the dissemination of news about sensitive data acquired by reason of its job function, with the exception where prior authorization of the person concerned and a specific authorizations of the company's top management have been provided;
- ensures that no form of harassment is carried out in internal and external employment relations, particularly determined or related to age, sex, sexual orientation and gender identity, marital status, health status, disability, race, ethnicity, nationality, political and trade union affiliations and religious beliefs;
- commits to combat the phenomenon of the exploitation of workers' labor, including through the refusal to engage in commercial relations/to enter into contracts with third parties who make use of them;
- commits to ensure that staff are employed in accordance with compensation, contribution, working hours, rest periods, as well as other labor and trade union rights which are recognized to workers by laws, regulations in force and national and territorial collective bargaining.

The Group has 379 employees and 18 external workers as of 31<sup>st</sup> December 2022. External workers are recruited through a third-party company.



The staff is mainly employed in Italy (76% with 288 employees), while the remaining share is distributed in Asia, in particular in China, India and Myanmar (21% with 80 employees) and in Brazil (3% with 11 employees), in line with the previous year.

### Geographical distribution of employees as of December 31<sup>st</sup>, 2022 and 2021



Of the total number of employees as of 31<sup>st</sup> December 2022, in line with the previous year, almost all of the Group’s employees are hired under a permanent contract (94%) and are employed full-time (97%).

### Employees of the Group by contract type and gender as of December 31<sup>st</sup>, 2021 and 2022

Type of contract	As of 31 <sup>st</sup> December 2022			As of 31 <sup>st</sup> December 2021 <sup>4</sup>		
	Men	Women	Total	Men	Women	Total
Permanent	314	43	357	303	46	349
Temporary	18	4	22	14	5	19
<b>Total</b>	<b>332</b>	<b>47</b>	<b>379</b>	<b>317</b>	<b>51</b>	<b>368</b>

### Employees of the Group by type of employment and gender as of December 31<sup>st</sup>, 2021 and 2022

Type of employment	As of 31 <sup>st</sup> December 2022			As of 31 <sup>st</sup> December 2021		
	Men	Women	Total	Men	Women	Total
Full-time <sup>5</sup>	326	42	368	308	46	354
Part-time	6	5	11	9	5	14
<b>Total</b>	<b>332</b>	<b>47</b>	<b>379</b>	<b>317</b>	<b>51</b>	<b>368</b>

<sup>4</sup> The data previously published in the 2021 report were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>.

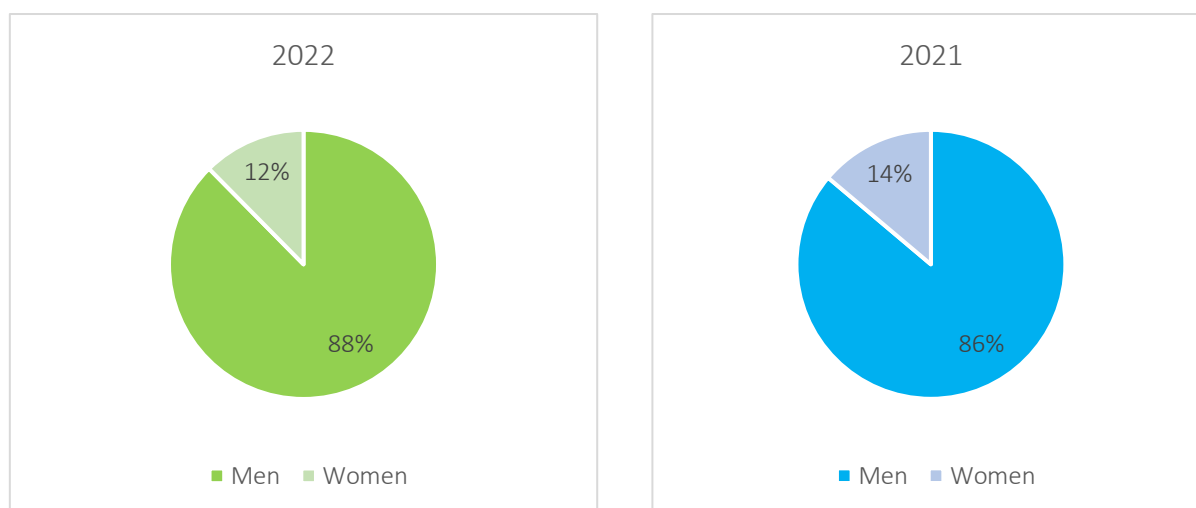
<sup>5</sup> The data previously published in the 2021 report were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>.

### Employees of the Group by geographical area and gender as of December 31<sup>st</sup>, 2021 and 2022

Geographical area	As of 31 <sup>st</sup> December 2022			As of 31 <sup>st</sup> December 2021		
	Men	Women	Total	Men	Women	Total
Italy <sup>6</sup>	266	22	<b>288</b>	251	25	<b>276</b>
China	52	21	<b>73</b>	52	22	<b>74</b>
Brazil	9	2	<b>11</b>	9	3	<b>12</b>
India	4	2	<b>6</b>	4	1	<b>5</b>
Myanmar	1	-	<b>1</b>	1	-	<b>1</b>
<b>Total</b>	<b>332</b>	<b>47</b>	<b>379</b>	<b>317</b>	<b>51</b>	<b>368</b>

Men account for 88% of the Group's staff, completing a 12% female presence, mainly in the category of employees. 67% of the Group's staff are in the age group between 30 and 50, followed by 22% of employees over 50 and 11% under 30.

### Percentage of employees by gender as of 31<sup>st</sup> December, 2021 and 2022



### Percentage of employees by professional category and by gender as of 31<sup>st</sup> December, 2021 and 2022

Professional category	2022		2021 <sup>7</sup>	
	Men	Women	Men	Women
Executives	80%	20%	100%	-
Middle management	90%	10%	77%	23%
Employees	72%	28%	70%	30%

<sup>6</sup> The data previously published in the 2021 report were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>.

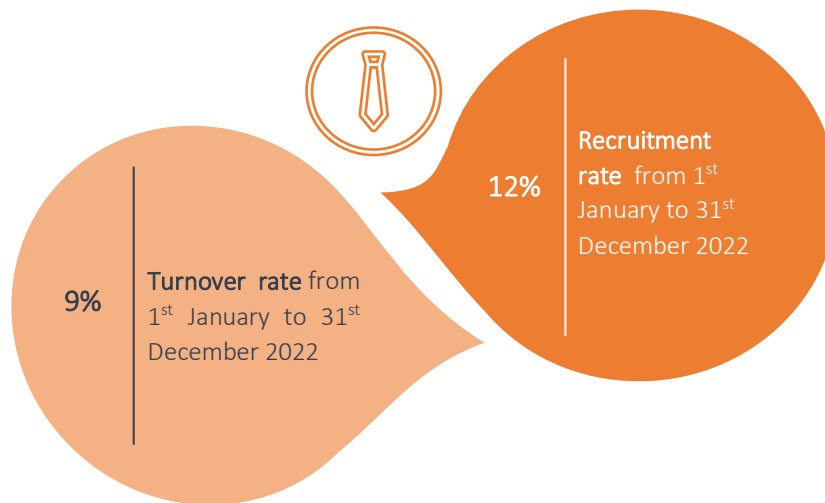
<sup>7</sup> The data previously published in the 2021 report were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>.

Workers	98%	2%	98%	2%
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Percentage of employees covered by collective bargaining agreements as of 31<sup>st</sup> December, 2021 and 2022<sup>8</sup>

Percentage	As of 31 <sup>st</sup> December 2022	As of 31 <sup>st</sup> December 2021
Employees covered by collective bargaining	98%	98% <sup>9</sup>

The employment rate for 2022 was 12%, up from 2021 (+10%); in terms of outgoing resources, the turnover rate rose from 7% in 2021 to 9% in 2022 (+28%).



The Comelz Group also has an impact on the territory and the community in which it operates. Aware of its role, with particular reference to economic development and the general well-being of the community, Comelz works with respect to local and national communities, supporting initiatives of cultural and social value. In fact, the manufacturing workers in Comelz S.p.A.'s make up a large part of the local population in the main office in Vigevano, one of the oldest industrial districts in Lombardy and famous for the production of footwear and machinery for the companies that make them. Within this unique reality, the Group seeks to contribute to the growth and development of the local district and to the continuous affirmation of the quality and experience of *Made in Italy*. To confirm this commitment, the Group has taken 100% of senior management from the local community<sup>10</sup>. Moreover, Comelz collaborates actively in the operations of the sector association ASSOMAC (headquartered in Vigevano), which brings together manufacturers of machines for footwear, leather goods and tannery. It takes care of the development of the manufacturing district which surrounds Vigevano, guaranteeing positive effects on the communities of the Municipality of Vigevano and the Province.

<sup>8</sup> With regards to the protection of workers' rights, the national rules of the different geographical areas in which the Group operates apply. There are no collective bargaining agreements in China, but workers are protected by national laws.

<sup>9</sup> The data previously published in the 2021 report were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>.

<sup>10</sup> Local community is defined as Italy for Comelz S.p.A., and Develer S.r.l.; India for Comelz India Private Limited, Brazil for Comelz do Brasil and China for Camoga Leather Machine Manufacturing Nanjing Ltd.

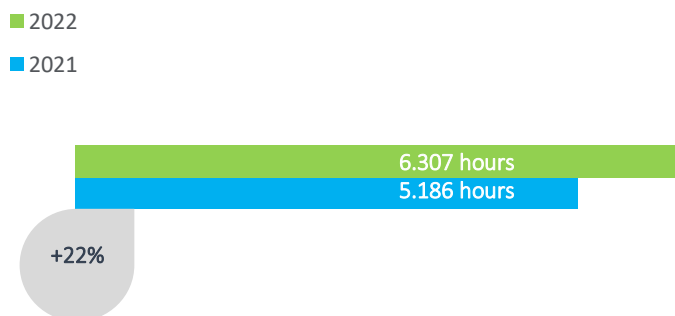
## 5.2 Training and professional development

Comelz identifies as a core objective the professional growth and the training of its employees through structured training plans that address the needs and demands of the different roles.

In particular, the corporate management of Comelz S.p.A. annually elaborates a training program for the current year with reference to the themes to be developed, the business areas involved and the times of realization. This program is also prepared starting from the training requirements identified and communicated by the function managers to the company management. The Company guarantees the training and development of its personnel, through specific courses in addition to compulsory ones. For the most qualified figures, in addition to the introductory courses, specific courses are offered to update competences.

6.307 hours of training were provided during 2022 to promote knowledge and awareness of health and safety regulations towards all employees of the Group and to meet the requirements of compliance with regulations and laws. The average annual training hours for women are 15 and for men 17. With reference to the training hours provided, there was an increase of 22% compared to the previous year. The increase in training hours in 2022 is also due to the hours of the courses interrupted by the health emergency.

### Number of training hours provided from 1 January to 31<sup>st</sup> December 2021 and 2022



## 5.3 Employee's well-being

Employees are the real assets of every company, especially in the current uncertain market where the most qualified resources are scarce and worker motivation and loyalty are essential.

The production premium which was introduced in 2020 was also renewed in 2022. In continuity with the successes of the past two years, Comelz is already considering maintaining and developing new rules and parameters for the awards in the future. The production premium is divided into two parts. The first is to recognize incentives related to the intensity and flexibility of the individual's role in the company. And the second considers business productivity as a whole.

In addition, Comelz has implemented a system of variable remuneration for determined key figures. This is obtainable upon achievement of personal performance goals. Moreover, the company has in place company welfare with tax concessions for employees and the company, as a result of a trade union agreement. Most of employees opted for monetization of this part of their salary, in the form of vouchers. In this way the company welfare combines corporate social responsibility with the incentive

plans of the workforce, directly associating benefits with the topic of compensation. To conclude, Comelz has set in place an MBO premium for managers that have bought shares in the company.

#### 5.4 Health and safety of workers

Comelz is committed to spreading and consolidating the culture of health and safety in the workplace, developing awareness of the risks, promoting responsible behavior on behalf of all staff, and working to guarantee, especially with preventive actions, the health and safety of workers.

To ensure the health of its workers in the workplace, Comelz S.p.A. organizes annual and bi-annual medical visits, with elements tailored to the role played in company<sup>11</sup>.

With regards to the health and safety of employees, at the end of 2022 Comelz S.p.A. conducted a risk assessment in accordance with the requirements of the Legal provision on health and safety of employees, Decree 81/2008, in conjunction with Legislative Decree 106/2009. The evaluation describes the measures to be taken, the objectives and the timing of their implementation. In addition, the frequency of recertification and audit reviews are indicated. To monitor the current protection measures and to ensure their development, the company has appointed persons prepared for the management and protection of the performance of work activities and for the fulfillment of the rules on the working environment, health and training of workers. Hence, the Company defined the roles of RLS (Workers' Safety Manager), RSPP (Prevention and Security Service Manager), and department managers. The latter receive specific training for first aid and firefighting, dealing with prevention directly in the working environment.

In the fourth quarter of 2022, work-environment surveys were carried out at the two offices of Comelz S.p.A. Specific checks on certain defined work units are in place and carried out regularly (such as lifts and overhead cranes).

Each year, meetings are held involving all the representatives in charge of health and safety management and workers' representatives, who can consult periodically with the company's RSPP and advice on the risk assessment document. In addition, to keep the RLS up to date, the company encourages informal meetings between the different figures.

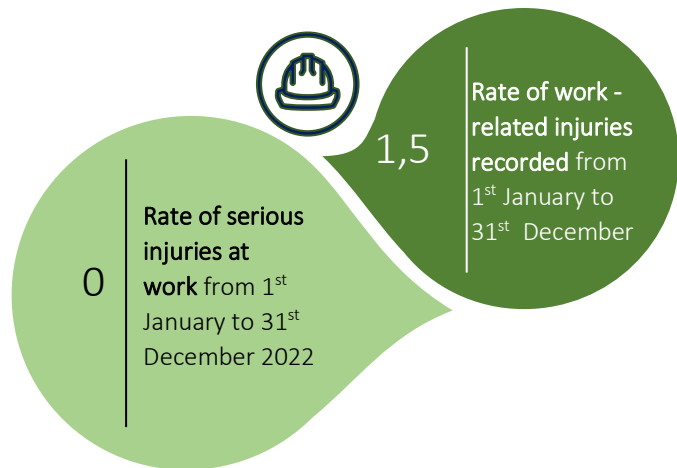
Specific safety training is provided in the workplace to enable the employees to carry out their work in the best possible way and to be able, if necessary, to report any dangerous situations through their designated representative or the workers' manager. Specific training and updates are provided for roles that include the use of the overhead lifting device and the truck.

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<sup>11</sup> This year, the company has been responsible for the renewal of the tetanus vaccine for 65 employees. In addition, the company also regularly carries out drug tests.

Comelz S.p.A. is also working towards ensuring compliance with the applicable legislation and the awareness of the staff with regards to the health and safety of risks related to the working environments in which it operates for the administered staff.

The sharing of the values of health and safety is also extended to external collaborators, where applicable, in view of the services covered by the business relationship and linked to Comelz S.p.A. by negotiation relationships, through the adoption of specific contractual clauses.



The Company, in view of its desire to create a healthy and comfortable environment for its employees and visitors, has provided for a ban on smoking in the workplace.

In 2022 there were 5 accidents at work, compared to 4 accidents in 2021, all of which are of a minor degree. The rate of recordable work-related injuries<sup>12</sup> is 1,5, up from the previous year (1,3 in 2021)<sup>13</sup>.

With the return to full production capacity, some good practices developed during the health emergency have been integrated into the smooth functioning of the company. Contract staff are entitled to 1 day of home-office working per week, while programmers are allowed 3 days of home-office and 2 days in the office. Within these parameters, flexibility is also recognized in line with the needs of the role.

<sup>12</sup> The accident rate was calculated as the ratio between the total number of recordable work-related injuries and the total hours worked, using a multiplication factor of 200.000.

<sup>13</sup> The data previously published in the 2021 report were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>.

## 5.5 Social commitment



After the long commitment towards the development of GreenApes, Develer sold its stake in July 2022. This platform was founded and established in Develer with the aim of providing its tech services in the field of sustainability. With its mission to promote an ethical lifestyle through the sharing of experience and certification of sustainable actions within the digital platform, Develer has won major awards for this initiative, including *B Corp certification*. The platform remains available for both Comelz and Develer employees.



## 6. Our commitment to reducing the environmental impact



## 6.1 Energy consumption and emissions<sup>14</sup>

Comelz places as a top priority in its production process the reduction of the environmental impact of its activities through active participation in the conservation of resources, compliance with applicable environmental regulations and the implementation of energy efficiency initiatives.

### Comelz S.p.A.'s commitment to sustainability

Comelz S.p.A. in Vigevano has developed a photovoltaic system of about 402 kWp, which has supplied electricity to the entire site.

In particular, Comelz S.p.A. formalizes its commitment to respect for the environment within the Code of Ethics, in which it also addresses all its employees asking to:

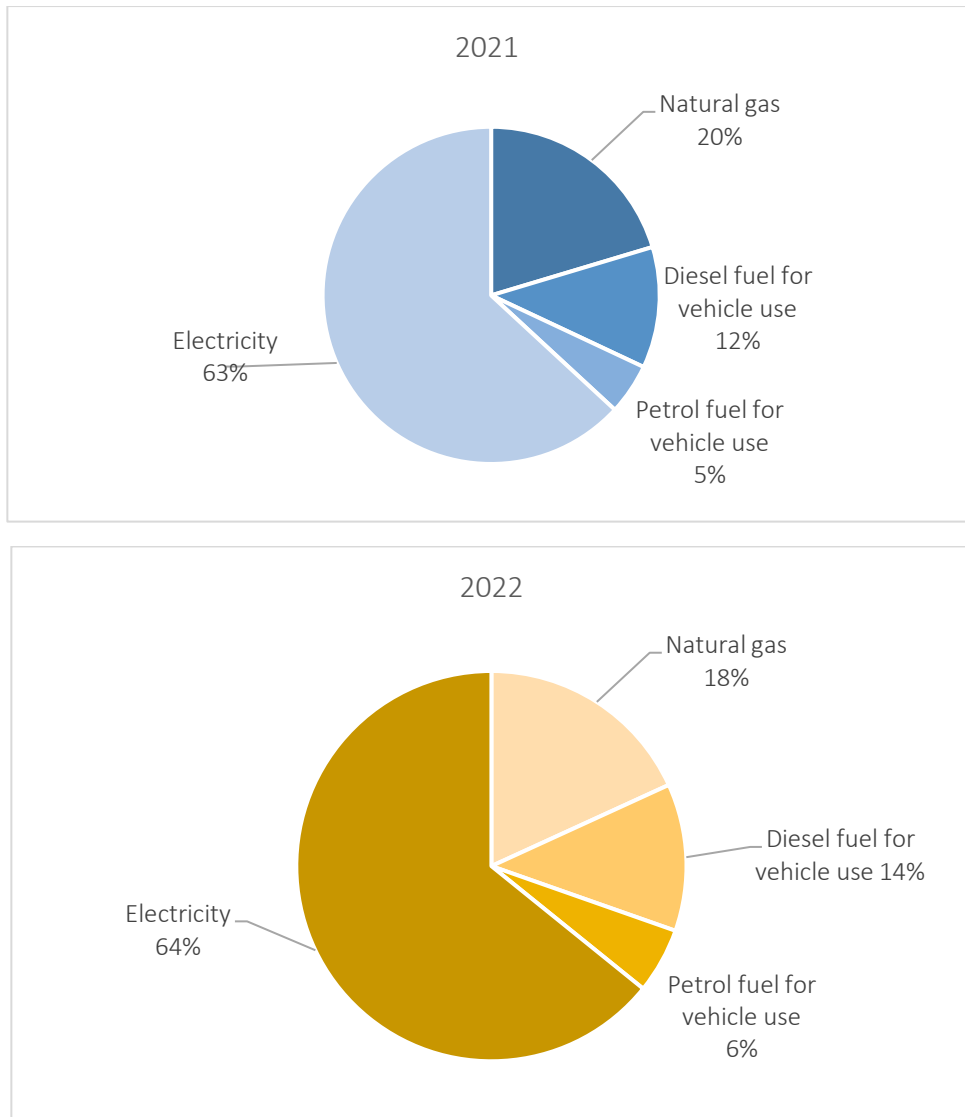
- contribute to the fulfillment of environmental protection obligations;
- always assess the effects of its conduct in relation to potential damage to the environment;
- avoid behaviors that could damage the environment.

Based on the commitments described above, in 2022 the Group consumed more than 12.000 GJ of energy, the main share of which is electricity, equal to 65% of total energy requirements, in line with last year. Although consumption has increased compared to 2021 (+6%), a part of this comes from renewable sources; 2022 is the second consecutive year in which Comelz S.p.A. has signed a supply contract with Repower, for the supply of electricity for the Vigevano site of a 100% energy from renewable sources.

This decision indicates a strong commitment of Comelz S.p.A. to make its production activity more sustainable, as it is the site with the highest consumption of electricity in the Group. Moreover, purchased energy covered by guarantees of origin amounts to 38% of the Group's total energy consumption. Similarly, Develer s.r.l., a software development branch, has met 27% of its energy requirements thanks to the photovoltaic system installed in 2020.

<sup>14</sup> The data previously published in the 2021 report were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>.

Energy consumed within the organization from 1<sup>st</sup> January to 31<sup>st</sup> December 2021 and 2022 (GJ)<sup>15</sup>



In 2022, the main items regarding energy consumption were confirmed. The Group recorded a decrease in natural gas consumption compared to 2021 and an increase in electricity. 59% of the electricity consumed is covered by guarantees of origin certifying the origin from renewable sources.

The increase in total petrol for vehicle use is given by the site in China which increased its consumption by 38% compared to 2021, while for diesel fuel both Camoga Leather Machine Manufacturing Nanjing LTD (+ 13%) and Comelz S.p.A. registered an increase (+10%), considering that Develer S.r.l has also started to contribute to the consumption of diesel this year, this has led to the increase of the total.

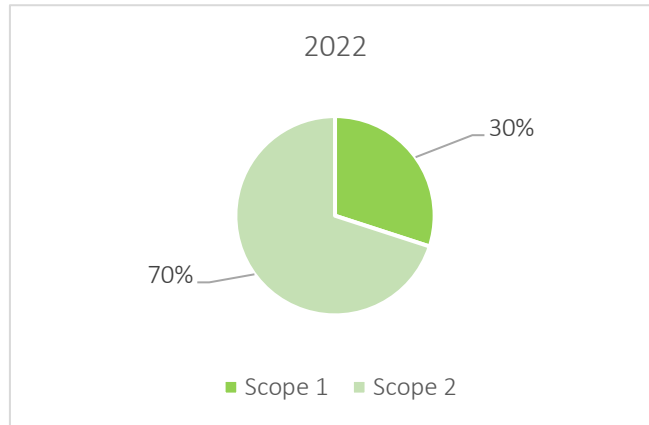
In 2022, the Group registered a total of 840 tCO<sub>2</sub>eq, of which 256 tons are direct emissions in tCO<sub>2</sub>eq, while 584 tCO<sub>2</sub> are indirect emissions of Scope 2 (calculated using the location-based method) due to the purchase of electricity. In light of the purchase of electricity from renewable sources, Scope 2 emissions, calculated with the market-based method, are equal to 213 tCO<sub>2</sub>. Scope

<sup>15</sup> The following conversion factors were used to calculate energy consumption in GJ:

- Electricity: For 2022 and 2021 0,0036 (International System);
- Natural gas: For 2022 0,0398 GJ/SMC (DEFRA 2022); for 2021 0,0397 GJ/SMC (DEFRA 2022);
- Diesel fuel for motor vehicles: For 2022 and 2022 0,0382 GJ/ton (DEFRA 2022);
- Automotive petrol: For 2022 0,0343 GH/ton (DEFRA 2022); for 2021 0,0344 GJ/ton (DEFRA 2022);

1 emissions account for 30% of total emissions and are mainly caused by the consumption of petrol and diesel fuel in the car fleet of Comelz S.p.A., and Camoga Machinery Manufacturing Nanjing Ltd.

### Scope 1 (tCO2eq) and 2 Location-based (tCO2) emissions from 1<sup>st</sup> January to 31<sup>st</sup> December 2022<sup>16</sup>



The GRI Sustainability Reporting Standards provide two methodologies for calculating Scope 2 emissions, the “Location-based method” and the “Market-based method”. In 2022, the total Group emissions of Scope 1 and Scope 2 calculated using the “Location-based” method were 840 tons of CO<sub>2</sub>eq, while the “Market-based” method accounted for 468 tons of CO<sub>2</sub>eq.

The “Location-based” method is based on average emission factors related to energy generation for well-defined geographical boundaries, including local, subnational or national boundaries (methodology used, with Italy 2022 emission factor: 315 gCO<sub>2</sub>/kWh - Source: AIB 2022; China: 609 gCO<sub>2</sub>/kWh – Source: TERNA 2019; Brazil: 139 gCO<sub>2</sub>/kWh- Terna 2019 source; India: 0,81 tCO<sub>2</sub>/MWh and for 2021, it is equal to 0,79 tCO<sub>2</sub>/MWh-source Ministry of Energy, Government India; Asia: 576 gCO<sub>2</sub>/kWh- source: TERNA 2019)

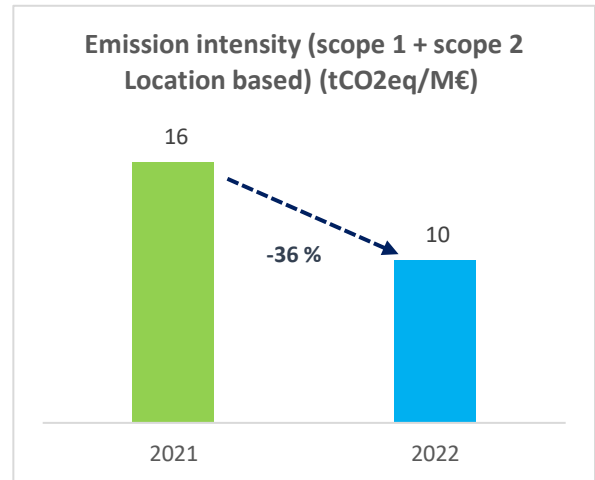
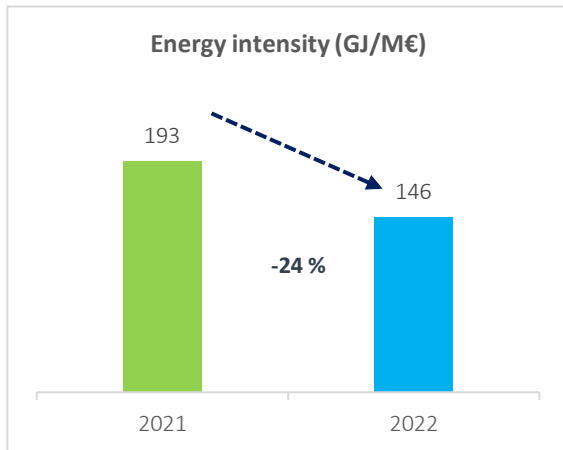
The “Market-based” is based on the CO<sub>2</sub> emissions emitted by the energy suppliers from which the organization buys electricity through a contract and can be calculated by considering: Certificates of guarantee of origin of energy and direct contracts with suppliers, supplier specific emission factors, emission factors relating to the “residual mix”, i.e. energy and emissions not monitored or not claimed (methodology used, with Italy 2022 emission factor: 457 gCO<sub>2</sub>/kWh - Source: AIB - European residual Mixes 2022; China: 609,00 gCO<sub>2</sub>/kWh TERNA source 2019; Brazil: 139,00 gCO<sub>2</sub>/kWh\_ TERNA source 2019; India: 0,81 tCO<sub>2</sub>/MWh, for 2021 it is equal to 0,79 tCO<sub>2</sub>/MWh. Source: Ministry of Energy, Indian Government; Asia: 576,00 gCO<sub>2</sub>/kWh TERNA 2019). Comelz buys certificates of guarantee of origin for the Vigevano headquarter.

The emission factors used for the calculation of Scope 1 are:

- Natural gas: for 2022 2,0174 kgCO<sub>2</sub>eq/m<sup>3</sup> (Source DEFRA 2022); for 2021 it is 2,0213 kgCO<sub>2</sub>eq/m<sup>3</sup> (Source: DEFRA 2021);
- Diesel fuel for vehicle use: for 2022 it is equal to 2,76 kgCO<sub>2</sub>eq/liter (Source DEFRA 2022); for 2021 it is equal to 2,512 kgCO<sub>2</sub>eq/liter;
- Petrol fuel for vehicles use: for 2022 it is equal to 2,16 kgCO<sub>2</sub>eq/liter (Source: DEFRA 2022); for 2021 it is equal to 2,19 kgCO<sub>2</sub>eq/liter (Source: DEFRA 2021);

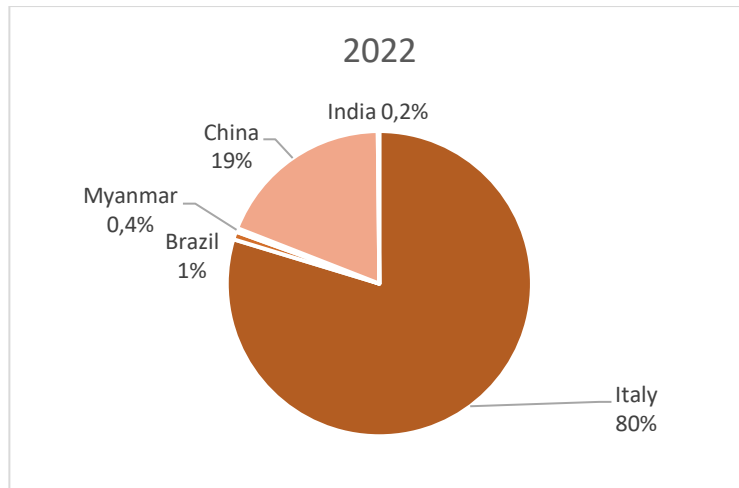
Scope 2 emissions are expressed in tons of CO<sub>2</sub>, however the percentage of methane and nitrous oxide has a negligible effect on total greenhouse gas emissions (CO<sub>2</sub> equivalents) as can be deduced from the technical reference literature.

Energy and emission intensity, 2021 and 2022

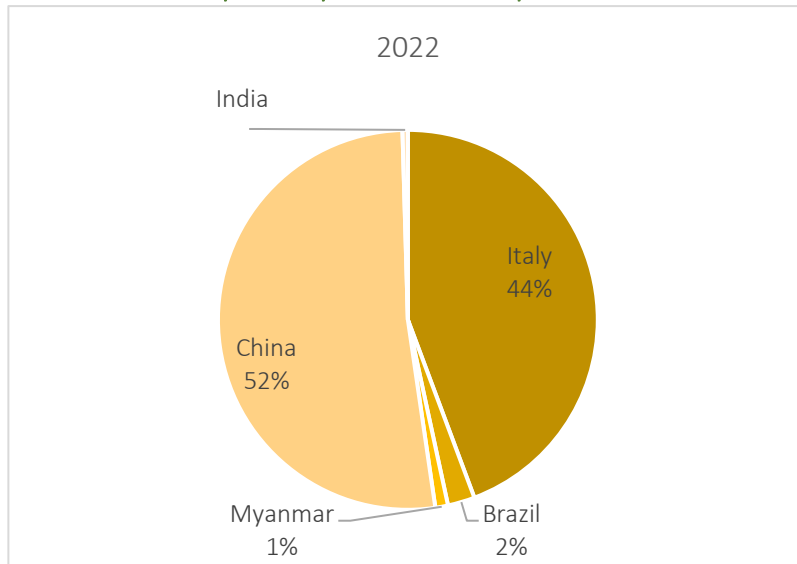


From 193 GJ/M€ in 2021, energy intensity decreased by 24%, given a slight increase in consumption and an increase in revenues. In a similar way, the emission intensity, which reflects the emissions produced with respect to the Group's revenues, improved in the two-year period 2021 and 2022, thanks to the reduction in the location-based Scope 2 emissions.

Scope 2 location-based emissions per country from 1<sup>st</sup> January to 31<sup>st</sup> December 2022 (tCO<sub>2</sub>)



Scope 2 market-based by country from 1<sup>st</sup> January to 31<sup>st</sup> December 2022 (tCO<sub>2</sub>)



## 6.2 Responsible waste management<sup>17</sup>

The Group is committed to the correct management and disposal of waste, as provided for by the regulations in force in the environmental field and is aware that the proper conduct of these activities has a considerable impact in relation to public health.

In 2022, Comelz produced around 255 tons of waste, up 28% from 2021. As far as the parent company's production site is concerned, the main waste, which is then preserved or recycled, is wood and mixed packaging.

Compared to the company's growth, the intensity of waste generated decreased by 7% between 2021 and 2022, namely from 3,4 (t/M€) to 3.2 (t/M€).



## 6.3 Sale of products with reduced environmental impact: The *Targa Verde*

Comelz always seeks improvement and innovation in its products, with particular attention to detail, while at the same time aiming to minimize the environmental impact of its activity.

The sector of instrumental mechanics in Italy plays an important role in the economy of the country and therefore ASSOMAC promotes technological solutions with the goal of bringing awareness about the reduction of the consumption of resources during the various activities of the company to create a manufacturing process, that is efficient and reliable but also sustainable.

This commitment has been maintained and renewed, with the intention of renewing the *Targa Verde* for machines produced in 2022.

<sup>17</sup> The data previously published in the 2021 report were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>



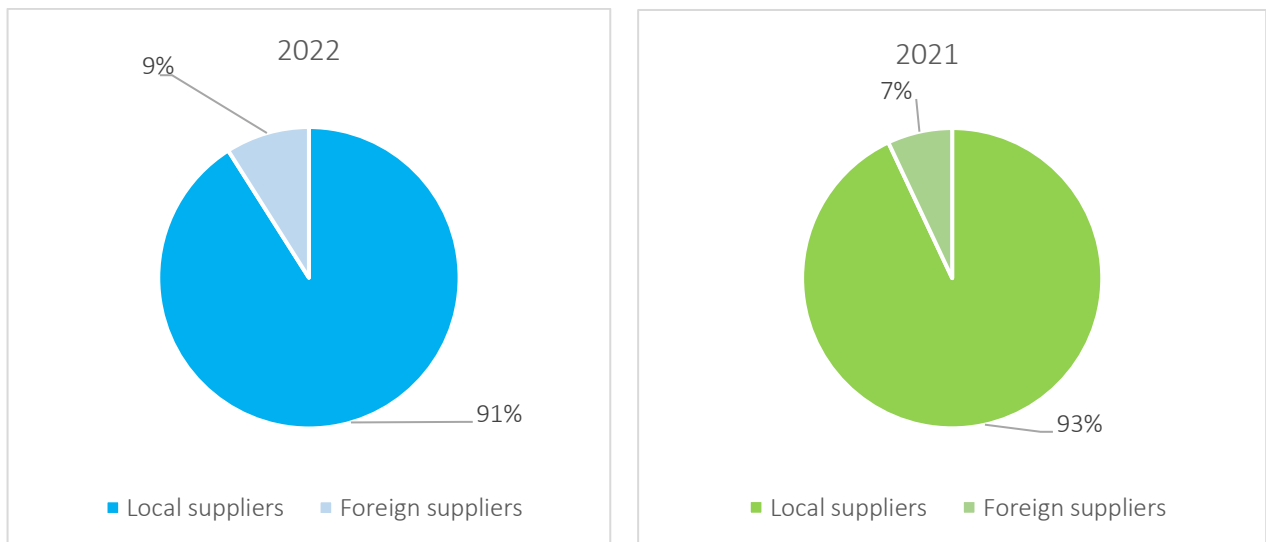
## 7. The value chain

## 7.1 “Made in Comelz” spirit

At the heart of the “Made in Comelz” spirit remains the combination of skill and experience developed through out a long tradition based on the continuous improvement of the manufacturing techniques and abilities in the Italian territory. On this premise, Comelz is the champion of the *Made in Italy* brand.

Comelz S.p.A.'s products aim to promote innovation and the Italian manufacturing quality within the mechanic and footwear district of Vigevano, favoring the supply of resources coming from the Italian market and, in particular, from the local territory in which the Group operates, ensuring high standards of quality and product safety. The total expenditure to local suppliers<sup>18</sup> in the reporting period is illustrated below in terms of percentage volume. In this perspective, Comelz is committed to favoring local production, where possible, to preserve product quality and production standards.

**Expenditure by local suppliers from 1<sup>st</sup> January to 31<sup>st</sup> December, 2021 and 2022<sup>19</sup>**



<sup>18</sup> The purchase is identified as local in the country in which the Group company is located (Italy, China and Brazil).

<sup>19</sup> The data refer to the following companies: Comelz S.p.A., Developer S.r.l., Camoga S.p.A., Camoga Leather Machine Manufacturing Nanjing Ltd, Comelz do Brazil. Local suppliers are the suppliers with registered office in Italy for Comelz S.p.A., Developer S.r.l., Camoga S.p.A., in China for Camoga Leather Machine Manufacturing Nanjing Ltd and in Brazil for Comelz do Brazil.





## Appendix

## GRI Standards

### Our people <sup>20</sup>

#### GRI STANDARDS 2-7

Total number of employees by contract type and gender:

Type of contract	As of 31 <sup>st</sup> December 2022			As of December 31 <sup>st</sup> 2021		
	Men	Women	Total	Men	Women	Total
Permanent	314	43	357	303	46	349
Temporary	18	4	22	14	5	19
<b>Total</b>	<b>332</b>	<b>47</b>	<b>379</b>	<b>317</b>	<b>51</b>	<b>368</b>

Number of employees by contract type, region and gender:

Type of contract and region	As of 31 <sup>st</sup> December 2022			As of 31 <sup>st</sup> December 2021		
	Men	Women	Total	Men	Women	Total
<b>Italy</b>						
Permanent <sup>21</sup>	255	22	277	244	5	269
Temporary	11	-	11	7	-	7
<b>Total Italy</b>	<b>266</b>	<b>22</b>	<b>288</b>	<b>251</b>	<b>25</b>	<b>276</b>
<b>Asia</b>						
Permanent	50	19	69	50	18	68
Temporary	7	4	11	7	5	12
<b>Total Asia<sup>22</sup></b>	<b>57</b>	<b>23</b>	<b>80</b>	<b>57</b>	<b>23</b>	<b>80</b>
<b>South America</b>						
Permanent	9	2	11	9	3	12
Temporary	-	-	-	-	-	-
<b>Total South America</b>	<b>9</b>	<b>2</b>	<b>11</b>	<b>9</b>	<b>3</b>	<b>12</b>
<b>Group Total</b>						
Permanent	314	43	357	303	46	349
Temporary	18	4	22	14	5	19
<b>Total Group</b>	<b>332</b>	<b>47</b>	<b>379</b>	<b>317</b>	<b>51</b>	<b>368</b>

<sup>21</sup>The previously published 2021 reporting year data were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>.

<sup>22</sup>The previously published 2021 reporting year data were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>.

Number of employees by type of employment and gender:

Employment type	As of 31 <sup>st</sup> December 2022			As of 31 <sup>st</sup> December 31 <sup>st</sup> 2021		
	Men	Women	Total	Men	Women	Total
Full-time <sup>23</sup>	326	42	<b>368</b>	308	46	<b>354</b>
Part-time	6	5	<b>11</b>	9	5	<b>14</b>
<b>Total</b>	<b>332</b>	<b>47</b>	<b>379</b>	<b>317</b>	<b>51</b>	<b>368</b>

Number of workers who are not employees by region and gender:

External workers	To 31 December 2022			To December 31, 2021		
	Men	Women	Total	Men	Women	Total
<b>Italy</b>						
Workers administered	10	-		3	-	<b>3</b>
Self-employed	1	-		1	-	<b>1</b>
<b>Total Italy</b>	<b>11</b>	<b>-</b>		<b>4</b>	<b>-</b>	<b>4</b>
<b>Asia</b>						
Workers administered	-	1	<b>1</b>	-	1	<b>1</b>
Self-employed	-	-	-	-	-	-
<b>Total Asia</b>	<b>-</b>	<b>1</b>	<b>1</b>	<b>-</b>	<b>1</b>	<b>1</b>
<b>South America</b>						
Workers administered	-	-	-	-	-	-
Self-employed	4	1	<b>5</b>	4	1	<b>5</b>
<b>Total South America</b>	<b>4</b>	<b>1</b>	<b>5</b>	<b>4</b>	<b>1</b>	<b>5</b>
<b>Other groups</b>						
Workers administered	10	1	<b>11</b>	3	1	<b>4</b>
Self-employed	5	1	<b>6</b>	5	1	<b>6</b>
<b>Total groups</b>	<b>15</b>	<b>2</b>	<b>17</b>	<b>8</b>	<b>2</b>	<b>10</b>

## GRI STANDARDS 2-30

Percentage of employees covered by collective bargaining agreement:

Percentage	As of 31 <sup>st</sup> December 2022	As of 31 <sup>st</sup> December 2021
Employees covered by collective bargaining	<b>98%</b>	<b>98%</b> <sup>24</sup>

<sup>23</sup> The previously published 2021 reporting year data were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>.

<sup>24</sup> The previously published 2021 reporting year data were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>.

**GRI STANDARDS 401-1**

New employee hires and employee turnover by age group, gender and region:

Categories	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2022			From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2021		
	Men	Women	Total	Men	Women	Total
Italy	12%	8%	12%	10%	8%	9%
<30 years old	13	1	40%	12	1	38%
30-50 years old	14	1	9%	7	-	4%
>50 years old	5	-	6%	5	1	8%
Asia	12%	2%	11%	7%	26%	13%
<30 years old	-	-	-	1	3	80%
30-50 years old	7	1	11%	3	3	8%
>50 years old	-	-	-	-	-	-
South America	22%	-	18%	33%	0%	25%
<30 years old	2	-	67%	1	-	25%
30-50 years old	-	-	-	2	-	25%
>50 years old	-	-	-	-	-	-
Total Group	12%	6%	12%	10%	16%	11%
<30 years old	15	1	38%	14	4	42%
30-50 years old	21	2	9%	12	3	6%
>50 years old	5	-	6%	5	1	8%

New employee hires and employee turnover by age group, gender and region:

Region	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2022			From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2021		
	Men	Women	Total	Men	Women	Total
Italy	6%	19%	7%	6%	13%	6%
<30 years old	5	-	14%	4	1	15%
30-50 years old	7	3	6%	5	-	3%
>50 years old <sup>25</sup>	5	1	7%	6	2	7%
Asia	12%	9%	11%	4%	22%	9%
<30 years old	-	-	-	-	3	60%
30-50 years old	6	2	11%	2	2	5%
>50 years old	1	-	-	-	-	-
South America	22%	50%	27%	11%	-	8%
<30 years old	2	1	100%	1	-	25%
30-50 years old	-	-	-	-	-	-
>50 years old	-	-	-	-	-	-
Total Group	8%	15%	9%	5%	16%	7%
<30 years old	7	1	19%	5	4	21%
30-50 years old	13	5	7%	7	2	4%

<sup>25</sup> The previously published 2021 reporting year data were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>.

>50 years old	6	1	9%	5	2	9%
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**GRI STANDARDS 403-9<sup>2627</sup>**

Health and Safety Indicators – employees:

Work-related injuries (employees)	From January to December 2022	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2021
Total number of hours worked <sup>28</sup>	668.914	621.755
Number of fatalities as a result of work-related injury	-	-
Number of accidents at work with serious consequences (excluding fatalities)	-	-
<b>Number of recorded work-related injuries</b>	<b>5</b>	<b>4</b>
Rate of fatalities as a result of work-related injury	-	-
Rate of high-consequence work-related injuries (excluding fatalities)	-	-
Rate of recordable work-related injuries <sup>29</sup>	1,5	1,3

It is noted that in 2022, in line with the previous year, no recorded accidents and deaths occurred among outside workers, compared to a total of hours worked of 25.137 and 22.290 in 2021. The increasing trend in hours worked is due to the smooth running of the plants and the increase in client orders in 2022.

It should be noted that no recourse was made to the Integration Fund during 2022.

<sup>26</sup> The calculation of injury indices was based on 200.000 hours worked, according to the following formulae:

- Rate of fatalities as a result of work-related injury: Number of fatalities as a result of work-related injury/number of hours worked\*200.000
- Rate of high-consequence work-related injuries (excluding fatalities): Number high-consequence work-related injuries (excluding fatalities)/ number of hours worked \*200.000
- Rate of recordable work-related injuries: Number of recordable work-related injuries / number of hours worked \*200.000;

<sup>27</sup> Recordable injuries: All accidents (whether or not leading to death), days out of work, job limitations or transfer to another job, medical care beyond first aid or unconsciousness, major injury or diagnostic illness by a physician or other authorized health care provider, even if it does not cause death, days out of work, job limitation or transfer to another job, medical care beyond first aid or a state of unconsciousness.

Recordable accidents with serious consequences: Accidents leading to damage from which the worker (employee) cannot recover, resume or it is unrealistic to expect that it will recover completely back to the state of health before the accident within 6 months (excluding deaths).

<sup>28</sup> The previously published 2021 reporting year data were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>.

<sup>29</sup> Following the update on hours worked, as marked in the note above, the calculation for the accident rate has also been updated.

**GRI STANDARDS 404-1**

Average hours of training per capita per gender and employee category:

Employee category	Average hours per capita					
	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2022			From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2021		
	Men	Women	Total	Men	Women	Total
Executives	4	1	4	-	-	-
Middle management	3	-	3	2	1	2
Employees	38	17	32	33	11	27
Workers	7	8	7	6	9	6
<b>Total</b>	<b>17</b>	<b>16</b>	<b>17</b>	<b>15</b>	<b>11</b>	<b>14</b>

**GRI STANDARDS 405-1**

Percentage of employees by employee category and age group:

Employee category	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2022				From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2021			
	<30 years old	30-50 years old	>50 years old	Total	<30 years old	30-50 years old	>50 years old	Total
Executives	-	40%	60%	1%	-	20%	80%	1%
Middle management	-	40%	60%	3%	-	46%	54%	4%
Employees	14%	69%	18%	39%	17%	67%	16%	40%
Workers	10%	68%	22%	57%	9%	70%	21%	55%
<b>Total</b>	<b>11%</b>	<b>67%</b>	<b>22%</b>		<b>12%</b>	<b>67%</b>	<b>21%</b>	

Percentage of employees by employee category and gender:

Employee category	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2022		From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2021	
	Men	Women	Men	Women
Executives	80%	20%	100%	-
Middle management	90%	10%	77%	23%
Employees	72%	28%	70%	30%
Workers	98%	2%	98%	2%

Percentage of employees belonging to the protected categories broken down by professional framework and gender:

Employee category	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2022	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2021
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	Men	Women	Total	Men	Women	Total
Executives	-	-	-	-	-	-
Middle management	-	-	-	-	-	-
Employees	1%	4%	4%	1%	4%	1%
Workers	3%	-	4%	3%	-	2%
<b>Total</b>	<b>4%</b>	<b>4%</b>	<b>4%</b>	<b>4%</b>	<b>4%</b>	<b>4%</b>

## Our commitment to reducing the impact on the environment

### GRI STANDARDS 302-1<sup>30</sup>

Energy consumption within the organization (GJ) <sup>31</sup>	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2022	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2021	Δ
Natural gas	2.188	2.311	-5%
Diesel fuel for automotive use	1.469	1.319	11%
Automotive gasoline	654	555 <sup>32</sup>	18%
<b>Electricity</b>	<b>7.726</b>	<b>7.164</b>	<b>8%</b>
<i>of which renewable (self-produced)</i>	1.610	162	+891
<i>of which renewable (self-produced and sold on the net)</i>	480	35	1254
<i>of which renewable (purchased certified)</i>	4.576	4.445	7%
<b>Total</b>	<b>12.037</b>	<b>11.349</b>	<b>6%</b>

### GRI STANDARDS 302-3

Energy intensity ratio for the organization, calculated on internal consumption within the organization and turnover

Energy intensity (GJ/ M€)	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2022	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2021	Δ
<b>Total</b>	146	193	-23%

<sup>30</sup> The previously published 2021 reporting year data were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>. The 2021 figures have been updated since the 2021 Sustainability Report to include Comelz Myanmar and Comelz India Private Limited.

<sup>31</sup> The following conversion factors were used to calculate energy consumption in GJ:

- Electricity: for 2022 and 2021 0,0036 (International System);
- Natural gas: for 2022 it is 0,0398 GJ/kWh (source: DEFRA 2022); for 2021 it is 0,0397 GJ/SMC (source: DEFRA 2021);
- Diesel fuel for motor vehicles: For 2022 it is 0,0382GJ/ton (source: DEFRA 2022); for 2021 it is 0,0382 GJ/ton (Source: DEFRA 2022);
- Petrol for motor vehicles: for 2022 it is 0,0343 GJ/ton (source DEFRA 2022); for 2021 it is 0,0344 GJ/ton (source: DEFRA 2022).

<sup>32</sup>The previously published 2021 reporting year data were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>. The figure of the 2021 automotive gasoline has been updated in relation to the 2021 Sustainability Report to include the Group's consumption.

### GRI STANDARDS 305-1 AND 305-2 <sup>33</sup>

Direct (tCO <sub>2</sub> eq) and indirect GHG (t CO <sub>2</sub> ) emissions <sup>34</sup>	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2022	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2021	Δ
Scope 1	256	246	4%
Scope 2 - Location based	584	705	-17%
Scope 2 - Market based	213	364	-41%
Total Scope 1 and Scope 2 (Location-based)	840	951	-12%
Total Scope 1 and Scope 2 (Market-based)	468	610	-23%

### GRI STANDARDS 305-4

Intensity of greenhouse gas emissions (GHG) within the organization (tCO<sub>2</sub>eq/M€), calculated on the Scope 1+ Scope 2 location-based and revenues.

GHG Emission intensity (tCO <sub>2</sub> eq/M€)	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2022	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2021	Δ
<b>Total</b>	10	16	-36%

<sup>33</sup> The 2021 figures have been updated from the 2021 Sustainability Report to include Comelz Myanmar and Comelz India Private Limited.

<sup>34</sup> The GRI Sustainability Reporting Standards provide two methodologies for calculating Scope 2 emissions, the “Location-based method” and the “Market-based method”. In 2022, the total Group emissions of Scope 1 and Scope 2 calculated using the “Location-based” method were 840 tons of CO<sub>2</sub>eq, while the “Market-based” method accounted for 468 tons of CO<sub>2</sub>eq.

The “Location-based” method is based on average emission factors related to energy generation for well-defined geographical boundaries, including local, subnational or national boundaries (methodology used, with Italy 2022 emission factor: 315 gCO<sub>2</sub>/kWh - Source: AIB 2022; China: 609 gCO<sub>2</sub>/kWh - Source: TERNA 2019; Brazil: 139 gCO<sub>2</sub>/kWh- TRIAD source 2019; India: 0,81 tCO<sub>2</sub>/MWh and for 2021, it is equal to 0,79 tCO<sub>2</sub>/MWh-source Ministry of Energy, Government India; Asia: 576 gCO<sub>2</sub>/kWh- source: TERNA 2019)

The Market-based is based on the CO<sub>2</sub> emissions emitted by the energy suppliers from which the organization buys electricity through a contract and can be calculated by considering: Certificates of guarantee of origin of energy and direct contracts with suppliers, supplier specific emission factors, emission factors relating to the “residual mix”, i.e. energy and emissions not monitored or not claimed (methodology used, with Italy 2022 emission factor: 457 gCO<sub>2</sub>/kWh - Source: AIB - European residual Mixes 2022; China: 609,00 gCO<sub>2</sub>/kWh TERNA source 2019; Brazil: 139,00 gCO<sub>2</sub>/kWh-TERNA source 2019; India: 0,81 tCO<sub>2</sub>/MWh, for 2021 it is equal to 0,79 tCO<sub>2</sub>/MWh. Source: Ministry of Energy, Indian Government; Asia: 576,00 gCO<sub>2</sub>/kWh TERNA 2019). Comelz buys certificates of guarantee of origin for the headquarters of Vigevano.

The emission factors used for the calculation of scope 1 are:

- Natural gas: For 2022 2,0174 kgCO<sub>2</sub>eq/m<sup>3</sup> (Source DEFRA 2022); for 2021 it is 2,0213 kgCO<sub>2</sub>eq/m<sup>3</sup> (Source: DEFRA 2021);

Diesel fuel for motor vehicles: For 2022 it is equal to 2,76 kgCO<sub>2</sub>eq/liter (Source DEFRA 2022); for 2021 it is equal to 2,512 kgCO<sub>2</sub>eq/liter;

Petrol for motor vehicles: For 2022 it is equal to 2,16 kgCO<sub>2</sub>eq/liter (Source: DEFRA 2022); for 2021 it is equal to 2,19 kgCO<sub>2</sub>eq/liter (Source: DEFRA 2021);

Scope 2 emissions are expressed in tons of CO<sub>2</sub>, however the percentage of methane and nitrous oxide has a negligible effect on total greenhouse gas emissions (CO<sub>2</sub> equivalents) as can be deduced from the technical reference literature.



**GRI STANDARDS 306-3, 306-4 AND 306-5<sup>35</sup>**

Waste products– production sites (ton)	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2022	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2021
<b>Waste intended for disposal<sup>36</sup></b>	<b>1</b>	<b>1</b>
<i>of which hazardous waste</i>	-	-
<i>of which non-hazardous waste</i>	1	1
<b>Waste not intended for disposal</b>	<b>254</b>	<b>199</b>
<i>of which hazardous waste</i>	24	21
<i>of which non-hazardous waste</i>	230	178

Waste diverted from disposal by recovery operation:

Waste diverted from disposal	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2022			From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2021		
	On-site	At an external site	Total	On-site	At an external site	Total
<b>Hazardous waste</b>	-	24	24	-	21	21
<i>Preparation for reuse</i>	-	-	-	-	-	-
<i>Recycling</i>	-	24	24	-	21	21
<i>Other recovery operations</i>	-	-	-	-	-	-
<b>Non-hazardous waste</b>	-	230	230	15	163	178
<i>Preparation for reuse</i>	-	-	-	-	-	-
<i>Recycling</i>	-	230	230	-	163	163
<i>Other recovery operations</i>	-	-	-	15	-	15
<b>Total</b>	-	254	254	15	184	199

Waste intensity (ton/ M€)	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2022	From 1 <sup>st</sup> January to 31 <sup>st</sup> December 2021	Δ
<b>Total</b>	3,4	3,2	6%

<sup>35</sup> The previously published 2021 reporting year data were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>. It should be noted that the 2021 figures have been updated in relation to the 2021 sustainability report to include the companies Developer S.r.l., Comelz Myanmar and Comelz India Private Limited.

<sup>36</sup> The previously published 2021 reporting year data were redisclosed following an improvement in the reporting process. For the previously published data, please refer to the 2021 Sustainability Report, published on the website <https://www.comelz.com/en/sustainability-report-comelz-group-2021/>. This figure was updated in relation to the 2021 budget, in which 0.8 tons of waste from Brazil had not been included.

## Material Topics and related impacts

Material Topic	Relative impact	Description of the impact
Cybersecurity & Data Protection and sensitive Information	<b>Negative impact:</b> Failure to respect stakeholder privacy	Incorrect management of stakeholder data and non-compliance with applicable legislation and information management procedures
	<b>Negative impact:</b> Loss of sensitive organization information	Information breaches caused by failure to implement cyber security systems and resulting in vulnerabilities to cyber attacks
Sustainable management of the supply chain	<b>Positive impact:</b> Improved supplier ESG performance	Insertion of ESG policies and criteria for the selection of suppliers in order to improve their procurement practices
	<b>Positive impact:</b> Business activities aimed at local suppliers	Support for the local community and greater environmental sustainability through the selection of local suppliers
	<b>Negative impact:</b> Inefficient supply chain management	Indirect reputational risk for the company due to the non-compliance of the social and environmental standards by the suppliers, with indirect disadvantages for the workers and commercial partners
Ethics & business integrity and anti-corruption	<b>Negative impact:</b> Non-compliance with laws, regulations and standards, and adoption of non-virtuous behavior	Non-compliance with laws and regulations due to poor definition of a system of company policies and procedures
	<b>Negative impact:</b> Communication practices not aligned with Company values	Communication activities and campaigns that are not in line with business values and objectives that are detrimental to reputational behavior
	<b>Negative impact:</b> Non-compliance with laws, regulations and standards and poor adoption of virtuous behavior	Violation of workers' fundamental rights, possible fines and economic and reputational risk to the company due to non-disclosure of rules and conduct
Management of energy consumption and fight against climate change	<b>Negative impact:</b> Use of energy from non-renewable sources with greenhouse gas emissions	The use of energy from non-renewable sources, during production processes and daily activities, generates greenhouse gas emissions into the atmosphere
<i>Made in Italy</i> , uniqueness	<b>Positive impact:</b> Increased customer satisfaction	Promote unique and versatile products that meet customer expectations

and versatility of the product		
	<b>Positive impact:</b> Promotion of <i>made in Italy</i> and Italian excellence in design and technologies	Products with a high quality <i>Made in Italy</i> and excellence in the technologies and design employed
Quality, reliability and safety of the product	<b>Positive impact:</b> Production of safe and high quality products	Manufacture of products with high quality standards and highly personalized, according to customers' needs
Developing a positive work environment	<b>Positive impact:</b> Inclusive and fair working environment	Promotion of an inclusive, equal and impartial work environment that protects all employees through the use of best practices training activities
	<b>Positive impact:</b> Implementing benefits for employees	Promotion of well-being in the workplace, through the promotion of benefits for all employees of the company
	<b>Positive impact:</b> Promoting employee health and <i>well-being</i> activities	Promotion of employee health and well-being activities, including through a dedicated training path
	<b>Negative impact:</b> Remuneration and/or work activities not attractive to new generation	Non-competitive remuneration and work activities that disincentive the recruitment of new generations that generate business continuity and stakeholder expectations issues
	<b>Negative impact:</b> High turnover of staff and consequent loss of key knowledge	Unattractive working environment that generates high turnover rates for staff, resulting in loss of key knowledge of the company and its activities
Sustainable development of value and business relations	<b>Positive impact:</b> Development of fair, transparent and constructive relations with stakeholders	The promotion of fair and transparent trade relations, with a particular focus in the ESG field, generates an improvement in the process of value creation along the entire production chain
	<b>Positive impact:</b> Direct generation of economic value and stakeholder-related distribution	Business plan that points to generating economic value and sharing it with stakeholders
Relationship with the community	<b>Positive impact:</b> Hiring workers from the local community	Recruitment of workers from the territory, favoring a higher rate of local employment

	<b>Positive impact:</b> Investments in locally supported infrastructure and services	Promotion of investments aimed at the purchase or maintenance of infrastructure and services that support the local community
Responsible management of materials and waste	<b>Positive impact:</b> Promoting a circular economy	Reuse and re-entry of waste in the production cycle following recovery and recycling operations
	<b>Negative impact:</b> Soil pollution	Soil contamination as a result of incorrect waste management, in particular hazardous chemical waste
	<b>Negative impact:</b> Production of hazardous and non-hazardous waste	Production activities generate hazardous and non-hazardous waste which, if not managed properly, can cause the deterioration of the surrounding territory
	<b>Negative impact:</b> Use of Raw materials and depletion of natural resources	Continuous supply of raw materials which causes the depletion of natural resources
	<b>Positive impact:</b> Promotion of sustainable waste disposal techniques	The company uses sustainable practices for the disposal of waste from its business
Innovation and R&D	<b>Positive impact:</b> Promotion of R&D activities for industrial development	Investments in Research and development activities aimed at promoting industrial development in the relative market
	<b>Positive impact:</b> Sustainable applications	Promotion of activities and investments in Research and development for possible new sustainable applications of the company's products and services
	<b>Positive impact:</b> impact of new technologies	Identification of new technologies whose production processes result impacting on the environment and the resources employed, at the very first stages of development
Employee health and safety	<b>Positive impact:</b> Prevention and mitigation of risks related to the health and safety of workers	Activities and policies aimed at the prevention and protection of the health and safety of workers carrying out any activity of the business process
	<b>Negative impact:</b> Occupational diseases of employees	Long-term illness in employees due to unsafe or unsafe manufacturing processes
	<b>Negative impact:</b> Employee injury	Increased risk of accidents during work due to risky or poorly managed production processes

Professional development <sup>37</sup>	<b>Positive impact:</b> Development of workers' skills and careers	Promote stimulating career paths and improve skills within the organization through training and creating a feedback culture
Diversity and inclusion	<b>Negative impact:</b> Discrimination incidents between employees	Incidents of discrimination between workers that do not allow the creation of an inclusive and respectful working environment
	<b>Negative impact:</b> Discrimination in remuneration between men and women	Cases of discrimination in remuneration between men and women which do not allow the creation of a fair and inclusive working environment
	<b>Positive impact:</b> Diversity in government bodies and among employees in respect of the principle of equality	Commitment to ensure diversity in the composition of government bodies and among employees, aimed at establishing the affirmation of a principle of equality in the composition of the company's staff

<sup>37</sup> Following the evaluation of the topics, the themes of “professional development” and “diversity and inclusion” have been merged for the list of material themes on p.12.

## Reconciliation table with GRI standards

Material themes	Standard GRI	Impact boundary	Type of impact
Cybersecurity and data protection and sensitive information	CONSUMER PRIVACY (418)	Comelz Group	Caused by the Group
Sustainable management of the supply chain	ENVIRONMENTAL ASSESSMENT OF SUPPLIERS (308) SOCIAL EVALUATION OF SUPPLIERS (414)	Comelz Group	Caused by the Group
Ethics & business integrity and anti-corruption	ANTICORRUPTION (205) ANTICOMPETITIVE BEHAVIOR (206)	Comelz Group and Partners	Caused by the Group
Management of energy consumption and fight against climate change	ENERGY (302) EMISSIONS (305)	Comelz Group and electricity suppliers	Caused by the Group and directly connected through a business relationship
<i>Made in Italy</i> , uniqueness and versatility of the product	-	Comelz Group	Caused by the Group
Quality, reliability and safety of the product	CUSTOMER HEALTH AND SAFETY (416)	Comelz Group	Caused by the Group
Developing a positive work environment	MANAGEMENT OF LABOR AND TRADE UNION RELATIONS (402) FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING (407)	Employees of the Comelz Group	Caused by the Group
Sustainable development of value and business relations	-	Employees of the Comelz Group	Caused by the Group
Relationship with the community	LOCAL COMMUNITIES (413)	Employees of the Comelz Group	Caused by the Group
Responsible management of material and waste	WASTE (306) MATERIALS (301)	Comelz Group	Caused by the Group and directly connected through a business relationship
Innovation, R&D	-	Employees of the Comelz Group	Caused by the Group
Health and safety of employees	HEALTH AND SAFETY AT WORK (403)	Comelz Group	Caused by the Group

Diversity and professional development	DIVERSITY AND EQUAL OPPORTUNITIES (405) NON-DISCRIMINATION (406) TRAINING AND EDUCATION (404)	Comelz Group	Caused by the Group
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## GRI content index

This material refers to the following Disclosure GRI:

GRI CONTENT INDEX			
Declaration of use	The Comelz Group reported the information mentioned in this GRI content index for the period from 1 <sup>st</sup> January 2022 to 31 <sup>st</sup> December 2022, with reference to the GRI Standards.		
GRI 1 used	GRI 1: Foundation 2021		
GRI Standards	Information	Page number and notes	Omissions
<b>GRI 2: GENERAL DISCLOSURE (2021)</b>			
<b>The organization and its reporting practice</b>			
2-1	Organizational details	7, 8	
2-2	Entities included in the organization's sustainability reporting	3,7	
2-3	Reporting period, frequency, and contact point	3	
2-4	Restatement of information	3	
2-5	External Assurance	The document is not subject to external assurance	
<b>Activities and workers</b>			
2-7	Employees	23, 24,41,42	
2-8	Workers who are not employees	23	
<b>Governance</b>			
2-9	Governance structure and composition	16	
<b>Strategy, policies and practices</b>			
2-22	Statement on sustainable development strategy	14,15	

GRI CONTENT INDEX			
<b>Declaration of use</b>	The Comelz Group reported the information mentioned in this GRI content index for the period from 1 <sup>st</sup> January 2022 to 31 <sup>st</sup> December 2022, with reference to the GRI Standards.		
<b>GRI 1 used</b>	GRI 1: Foundation 2021		
<b>GRI Standards</b>	<b>Information</b>	<b>Page number and notes</b>	<b>Omissions</b>
2-25	Processes to remedy negative impacts	11	
2-26	Mechanisms for seeking advice and raising concerns	17	
2-27	Compliance with laws and regulations	In 2022, no fines or non-monetary sanctions were recorded for non-compliance with laws and regulations.	
<b>Stakeholder engagement</b>			
2-28	Ethics and Anti-Corruption	17	
2-29	Approach to stakeholder engagement	11	
2-30	Collective bargaining agreements	26,42	
<b>GRI 3: MATERIAL TOPICS (2021)</b>			
<b>Information on material topics</b>			
3-1	Process of determining material themes	12	
3-2	List of material themes	12	
<b>Sustainable value creation and business relationships</b>			
GRI 3: Material themes (2021)			
3-3	Management of material themes	9	
GRI 201: Economic performance (2016)			
201-1	Economic value directly generated and distributed	9	
<b>Sustainable management of the supply chain</b>			
GRI 3: Material themes (2021)			
3-3	Management of material themes	39	



<b>GRI CONTENT INDEX</b>			
<b>Declaration of use</b>	The Comelz Group reported the information mentioned in this GRI content index for the period from 1 <sup>st</sup> January 2022 to 31 <sup>st</sup> December 2022, with reference to the GRI Standards.		
<b>GRI 1 used</b>	GRI 1: Foundation 2021		
<b>GRI Standards</b>	<b>Information</b>	<b>Page number and notes</b>	<b>Omissions</b>
<b>GRI 204: Procurement practices (2016)</b>			
204-1	Proportion of expenditure to local suppliers	39	
<b>Business ethics and integrity and anti-corruption</b>			
<b>GRI 3: Material topic (2021)</b>			
3-3	Management of material themes	17	
<b>GRI 205: Anti-corruption (2016)</b>			
205-1	Operations assessed for risks related to corruption	17	
205-3	Confirmed incidents of corruption actions taken	No cases of corruption were confirmed during 2022.	
<b>GRI 206: Anti-competitive behavior (2016)</b>			
206-1	Legal actions for anti-competitive behavior, anti-trust activities and monopoly practices	No legal action was taken in 2022 for anti-competitive behavior, antitrust and monopoly practices.	
<b>Innovation and R&amp;D</b>			
<b>GRI 3: Material topic (2021)</b>			
3-3	Management of material topics	20, 21	
<b>Quality, reliability and safety of the products</b>			
<b>GRI 3: Material topics (2021)</b>			
3-3	Management of material topics	20, 21	
<b>GRI 416: Customer Health and Safety (2016)</b>			
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	There were no incidents of non-compliance with regard to the health	

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<b>GRI Standards</b>	<b>Information</b>	<b>Page number and notes</b>	<b>Omissions</b>
		and safety impacts of products and services during 2022.	
<b>Cybersecurity &amp; Data Protection and sensitive Information</b>			
GRI 3: Material themes (2021)			
3-3	Management of material themes	12	
GRI 418: Customer Privacy (2016)			
418-1	Substantiated complaints concerning breaches of customer privacy and loss of data	There were no complaints about privacy violations during 2022.	
<b>Management of energy consumption and fight against climate change</b>			
GRI 3: Material themes (2021)			
3-3	Management of material themes	32	
GRI 302: Energy (2016)			
302-1	Energy consumption within the organization	32,33, 46	
302-3	Energy intensity	35, 46	
GRI 305: Emissions (2016)			
305-1	Direct emissions (Scope 1) of greenhouse gases (GHG)	34,35, 36, 47	
305-2	Indirect emissions (Scope 2) of greenhouse gases (GHG)	34, 35,36,47	
305-4	Intensity of greenhouse gas emissions (GHG)	35, 47	
<b>Responsible management of materials and waste</b>			
GRI 3: Material topics (2021)			
3-3	Management of material topics	38	

<b>GRI CONTENT INDEX</b>			
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<b>GRI 1 used</b>	GRI 1: Foundation 2021		
<b>GRI Standards</b>	<b>Information</b>	<b>Page number and notes</b>	<b>Omissions</b>
GRI 306: Waste (2020)			
306-1	Waste generation and significant waste-related impacts	37,48	
306-3	Waste generated	37,48	
306-4	Waste not delivered to landfill	48	
306-5	Waste delivered to landfill	48	
<b>Diversity and professional development</b>			
GRI 3: Material themes (2021)			
3-3	Management of material themes	27	
GRI 401: Employment (2016)			
401-1	Hiring new employees and changing employees	26, 43	
GRI 404: Training and education (2016)			
404-1	Average number of training hours per year per employee	27, 45	
401-2	Benefits for full-time employees, not available for part-time employees	27	
GRI 405: Diversity and equal opportunities (2016)			
405-1	Diversity in government bodies and among employees	16	
GRI 406: Non-discrimination (2016)			
406-1	Incidents of discrimination and corrective measures taken	There were no incidents of discrimination during 2022.	
<b>Health and safety of employees</b>			
GRI 3: Material topics (2021)			
3-3	Management of material topics	28	
GRI 403: Occupational health and safety (2018)			

<b>GRI CONTENT INDEX</b>			
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<b>GRI 1 used</b>	GRI 1: Foundation 2021		
<b>GRI Standards</b>	<b>Information</b>	<b>Page number and notes</b>	<b>Omissions</b>
403-1	Occupational health and safety management system	28,29	
403-2	Hazard identification, risk assessment and incident investigations	28,29	
403-4	Worker participation, consultation and communication on occupational health and safety	28,29	
403-5	Worker training on health and safety	27	
403-6	Promotion of worker health	27,28, 29	
403-9	Work-related injuries	29, 44	
<b>Human rights</b>			
GRI 3: Material themes (2021)			
3-3	Management of material themes	23	
<b>Relationship with the local community</b>			
GRI 3: Material themes (2021)			
3-3	Management of material themes	12	
GRI 202: Market presence			
202-2	Proportion of senior management hired from the local community	16	
<b>Made in Italy, uniqueness and versatility of the product</b>			
3-3	Management of material themes	39	