



OUR BRIGHT IMPACT

SUSTAINABILITY HIGHLIGHTS

[COMERINDUSTRIES.COM](https://www.comerindustries.com)

2025

TABLE OF CONTENTS

- 03 Letter from the President
- 04 Global Presence Worldwide
- 05 Products
- 06 Governance of Sustainability

- 07 The Sustainability Strategy
- 08 Sustainability Highlights
- 09 Sustainability Roadmap
- 10 Strategic Pillars

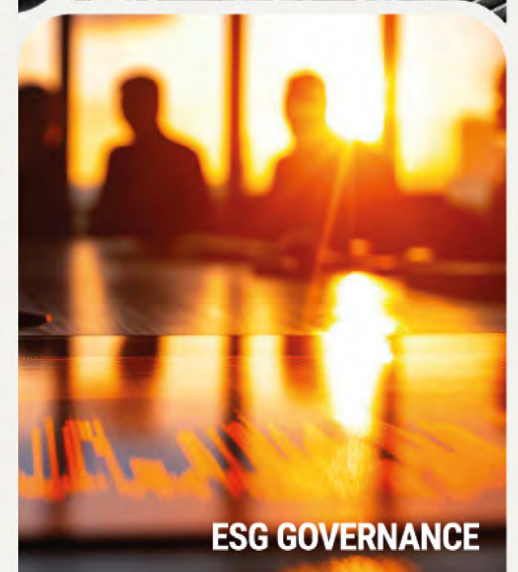
- 11 Climate Change
- 12 Energy Profile
- 13 2035 Decarbonization Roadmap

- 14 Circularity
- 15 Waste Management and Water Resources
- 16 Product Circularity

- 17 Human Capital
- 18 Trainings & Skills Development and Diversity & Inclusion
- 19 Health & Safety

- 20 ESG Governance
- 21 Code of Conduct
- 22 Supply Chain Engagement
- 23 Memberships, Ratings and Certifications

- 24 Annex
- 25 The 2035 Sustainable Development Plan



LETTER FROM THE PRESIDENT

Dear shareholders,

What is certainly an extraordinary and dynamic moment also presents aspects that everyday result in legitimate concerns. Everything is moving much more quickly. Geopolitical tensions, market volatility, natural events and rapid technological transformation are redefining the balances of individuals and businesses alike.

The time we are living in is both extraordinary and chaotic, one of those moments when great opportunities can arise.

In this complex scenario, the Group has managed not only to remain on its desired strategic path, but also to take a historic step for its development: the acquisition of the Hydraulic Equipment division of Nabtesco Corporation. This is a truly transformational operation, which further expands the Group's technological scope by integrating excellent skills in the high-range hydraulic sector and considerably strengthening our industrial presence in Asia. This acquisition places Comer Industries in a unique position in the international landscape, making it a premium-level integrated platform of mechanical, electrical and now hydraulic solutions.

Although the economic and financial results achieved in 2025 were affected by market trends, they confirm the Group's strength, its rigorous operations management and its ability to generate value even through periods of volatility. Further improvement in the net financial position bears witness to a disciplined approach to investments and working capital, preserving the flexibility required to take on new opportunities for development.

In 2025, we continued on our path of sustainability, already structurally integrated into the business model and strategic planning processes. The most evident recognition is the fact that, one year before expected in our road map, we obtained the EcoVadis gold medal, which places Comer Industries among the 5% of organizations with the best ESG performance evaluated globally.

These results are the fruit of the engagement of every one of our business functions in the sustainability development project and the structured management of governance, environmental and social impacts and risks.

Our Group pursues its goals by working on the various aspects of the decarbonization plan launched last year, through energy efficiency initiatives and the progressive increase in the share of electricity from renewable sources, which now represents 49% of overall electricity consumption.

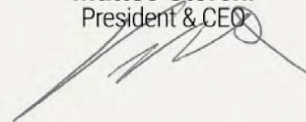
Our sustainable procurement results were also particularly remarkable: we completed our ESG risk mapping throughout the supply chain, anticipating some of the requirements of the Corporate Sustainability Due Diligence Directive (CSDDD). In parallel, the alignment of the value chain with the Company's ethics principles was reinforced, with the formal adoption of the Supplier Code of Ethics by 96% of suppliers, thus consolidating shared standards of responsibility and integrity.

Today, Comer Industries is a broader, more integrated and more international group, with a portfolio of solutions encompassing mechanics, electronics and hydraulics in pursuit of an increasingly synergistic approach. We look to 2026 with a sense of responsibility and confidence. International outlooks remain varied, but our business strategy - rooted in innovation, technological integration, operational excellence, sustainable growth and talent development - allows us to tackle the global scenario with awareness and a long-term vision.

We thank you for your renewed trust and for the support that you continue to provide us.

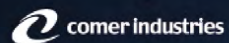
Reggiolo, March 16, 2026

Matteo Storchi
President & CEO




GLOBAL PRESENCE WORLDWIDE

Comer Industries is a global leader in the design and manufacture of advanced power transmission systems and mechatronic solutions designed for applications in the agricultural, industrial, and renewable energy sectors. Established in 1970 and grown over the years, Comer Industries now has 15 manufacturing sites and several Aftermarket and sales locations around the world. As of December 31, 2025, the Group has 3,226 people, including 2,806 employees, with a consolidated total turnover of 893.7 million euros.



*The information on sites, brands, and products reflects the organizational changes following the acquisition of Comtesco on January 1, 2026, which are not reported in the Sustainability Statement included in the 2025 Annual Report.

PRODUCTS

GEARBOXES



AXLES & DUJ



PTO SHAFTS & CLUTCHES



FAN CLUTCH



E-MOBILITY



TRACTOR ATTACHMENT SYSTEM (TAS)



PLANETARY DRIVES



DRIVESHAFTS



HYDROSTATIC TRACTION DRIVE (ICVD)



HYDRAULIC SYSTEMS*

EXTENDING PRODUCT LIFE



AFTERMARKET PARTS DISTRIBUTION
To more than 130 distribution partners around the globe.



VALUE ADDED SERVICES
Repair, exchange, modification, customizing and engineering of shafts and drivetrain solutions.



FIELD SERVICE & DIGITAL SOLUTIONS
Field service, preventative and predictive maintenance, condition monitoring and technical consultancy.

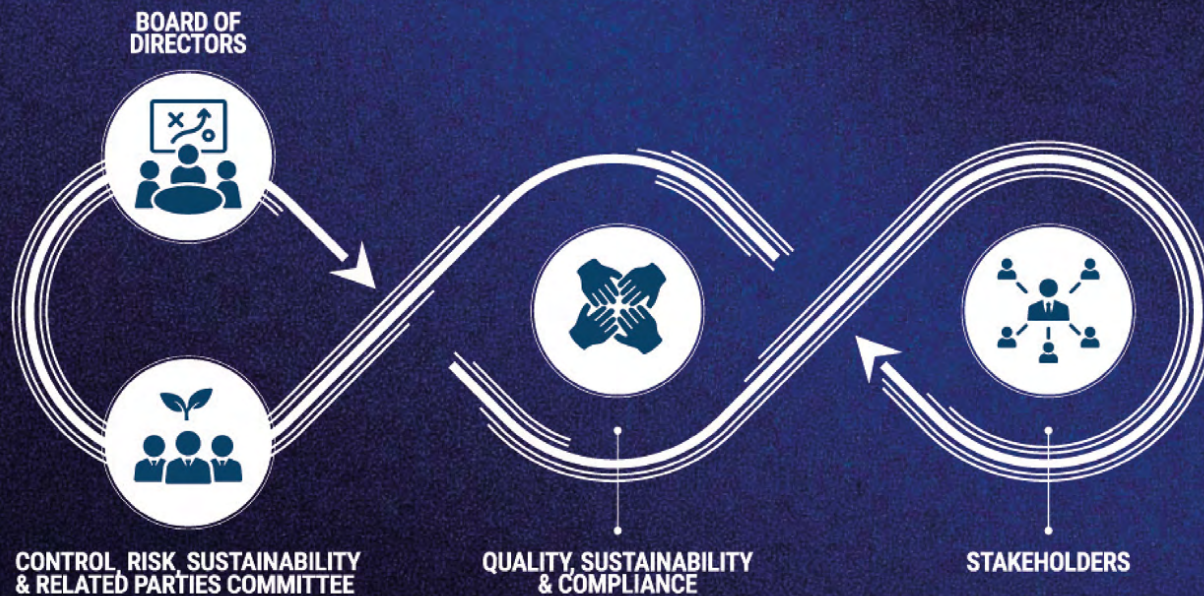
*The information on sites, brands, and products reflects the organizational changes following the acquisition of Comtesco on January 1, 2026, which are not reported in the Sustainability Statement included in the 2025 Annual Report.

GOVERNANCE OF SUSTAINABILITY

The Board of Directors is at the top of the sustainability governance structure, supported by the Control, Risk, Sustainability & Related Parties Committee (CRSRPC). The CRSRPC coordinates the sustainability development strategy, acting as a bridge between the Board of Directors and the various business functions.

The Quality, Sustainability & Compliance department manages the economic, environmental, and social impacts of the organization, working closely with other business functions. It implements concrete projects to turn sustainability goals into actions.

It regularly monitors the results of the sustainable development program and communicates them to management. In case of deviations from the goals, corrective actions are taken to align performance with the sustainability strategy.



our BRIGHT impact



OUR BRIGHT IMPACT: THE SUSTAINABILITY STRATEGY

Comer Industries shapes its sustainability development strategy around a clear horizon set to 2035. Growth is envisioned as a driver of shared value, creating lasting benefits for all stakeholders while strengthening environmental, social, and governance impact.

The 2035 Sustainable Development Plan gives direction to this commitment, defining global sustainability goals and translating them into qualitative and quantitative targets supported by a clear, structured roadmap.

The program is based on the Company's commitment to contributing to the achievement of the Sustainable Development Goals (SDGs) defined under the United Nations 2030 Agenda, adopted as the reference framework for strategic direction and for defining ESG priorities.



SUSTAINABILITY HIGHLIGHTS

-34%



ABSOLUTE REDUCTION OF SCOPE 1 AND SCOPE 2 GREENHOUSE GAS EMISSIONS

-9.5%



REDUCTION OF WATER INTENSITY

-9.3%



REDUCTION IN THE INTENSITY OF HAZARDOUS WASTE

+48.5%



INCREASE IN CONSUMPTION OF ELECTRICITY FROM RENEWABLE SOURCES

+2%



INCREASE IN FEMALE POPULATION

96%



OF SUPPLIERS HAVE SIGNED THE SUPPLIER CODE OF CONDUCT

+42.6%



DUE DILIGENCE OF THE SUPPLY CHAIN (TIER-1) USING ESG CRITERIA

THE HIGHLIGHT FIGURES REFER TO 2025 PERFORMANCE COMPARED TO THE SUSTAINABLE DEVELOPMENT STRATEGY BASELINES.



SUSTAINABILITY ROADMAP

INTEGRATING SUSTAINABILITY AMBITIONS INTO THE COMPANY'S BUSINESS MODEL

The "OUR BRIGHT IMPACT" program provides the framework for the structural integration of sustainability and corporate responsibility into the business model, aligning decision-making processes and operational activities with the United Nations 2030 Agenda SDGs. This strategic direction is executed through the 2035 Sustainable Development Plan, which acts as a bridge between high-level policies and annual operational plans by defining quantitative objectives, development levers, and the financial resources required for implementation. Strategy execution is organized into four strategic pillars linked to material topics, ensuring consistency across economic, environmental, and social dimensions through a structured monitoring system. These pillars function as the primary mechanism for implementation, converting strategic goals into a precise framework of qualitative and quantitative targets.



2025

The Company receives the EcoVadis Gold medal and confirms the CDP ratings of B for climate change and water security. Commitment along the value chain increases, with the achievement of the supply chain sustainability goals.

2023

Control, Risk, Sustainability & Related Parties Committee is established and approves the Sustainable Development Strategy with a 2030 horizon. The Company is recognized by La Repubblica as one of the Italian companies most attentive to sustainability.

2021

Commitment to the Global Compact initiative. The first Non-Financial Statement (NFS) is published in compliance with Legislative Decree 254/2016.

2019

Launch of the sustainable development program and commitment to the Agenda 2030 Sustainable Development Goals.

2024

The first Integrated Report is published in accordance with the new ESRS standards. Comer Industries extends its Sustainability Strategy to 2035 and updates its targets by adding new objectives. Its CDP rating improves, reaching level B for climate and water.

2022

The first Non-Financial Statement is published, prepared in accordance with GRI Standards (FY 2021). Achievement of EcoVadis Silver rating.

2020

Publication of the first Sustainability Report (FY 2019).

STRATEGIC PILLARS

CLIMATE CHANGE

Management of climate change focuses on the decarbonization of production processes and value chain. Operational implementation is achieved through production and building efficiency, renewable energy integration, and electrification. The framework is further supported by the application of eco-design principles and the adoption of specific procurement policies.

CIRCULARITY

Circularity management centers on resource inflows and outflows and on the preservation of water resources. Key drivers for achieving these objectives include the reduction of water withdrawals and the implementation of projects aimed at reducing hazardous waste.

HUMAN CAPITAL

Human capital development addresses internal workforce management and corporate business conduct. Strategic direction is based on risk mitigation, Diversity & Inclusion, ESG trainings and Health & Safety preservation. The model ensures the maintenance of standardized working conditions and the integration of sustainable procurement processes.

ESG GOVERNANCE

The governance pillar establishes standards for business conduct and worker protection across the value chain. Monitoring is conducted through risk mitigation systems and ESG awareness initiatives. The structure ensures that institutional commitment translates into sustainable procurement practices and the enforcement of working conditions for all actors within the supply chain.



CLIMATE CHANGE

GREENHOUSE GAS EMISSION REDUCTION

SCOPE 1 & 2 ABSOLUTE REDUCTION

63% reduction of absolute Scope 1 & Scope 2 emissions combined by 2035



ABS

PROGRESS 2025: **54%**



Baseline: 29,274 tCO2eq

Target: -63%

SCOPE 1 & 2 INTENSITY REDUCTION

30% reduction in Scope 1 & Scope 2 emissions with respect to the hours worked by the machines by 2030



INT

PROGRESS 2025: **51%**



Baseline: 100.3 tCO2eq/machine hours

Target: -30%

ENERGY INTENSITY REDUCTION

30% reduction in energy consumption with respect to the hours worked by the machines by 2030



NO PROGRESS DURING THE REPORTED PERIOD



Baseline: 138.9 GJ/machine hours

Target: -30%

SCOPE 3 ABSOLUTE REDUCTION

63% reduction of absolute Scope 3 emissions by 2035



PROGRESS 2025: **32%**



Baseline: 375,739 tCO2eq

Target: -63%

INCREASE IN RENEWABLE ELECTRICITY

60% increase of the share of electricity from renewable sources by 2030



PROGRESS 2025: **80%**



Baseline: 33%

Target: +60%



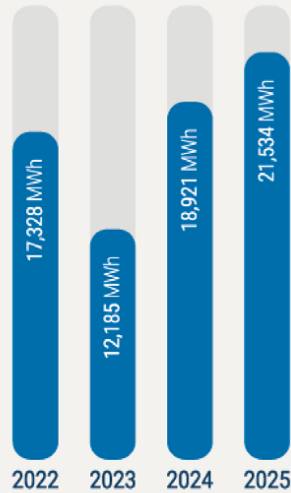
ENERGY PROFILE

By focusing on the most energy-intensive processes, Comer Industries integrates energy efficiency practices into both design and production phases, embedding them within its monitoring systems and continuous performance improvement approach. Optimization initiatives primarily target electricity and natural gas, which represent the energy carriers contributing most significantly to overall energy consumption.

Energy performance is continuously monitored through local data collection and measurement systems. Consumption analyses, aimed at identifying priority improvement areas, are supported by advanced digital tools capable of detecting the main sources of inefficiency. A dedicated digital dashboard aggregates and visualizes data in real time, highlighting deviations from predefined targets and enabling timely corrective actions to optimize overall performance.

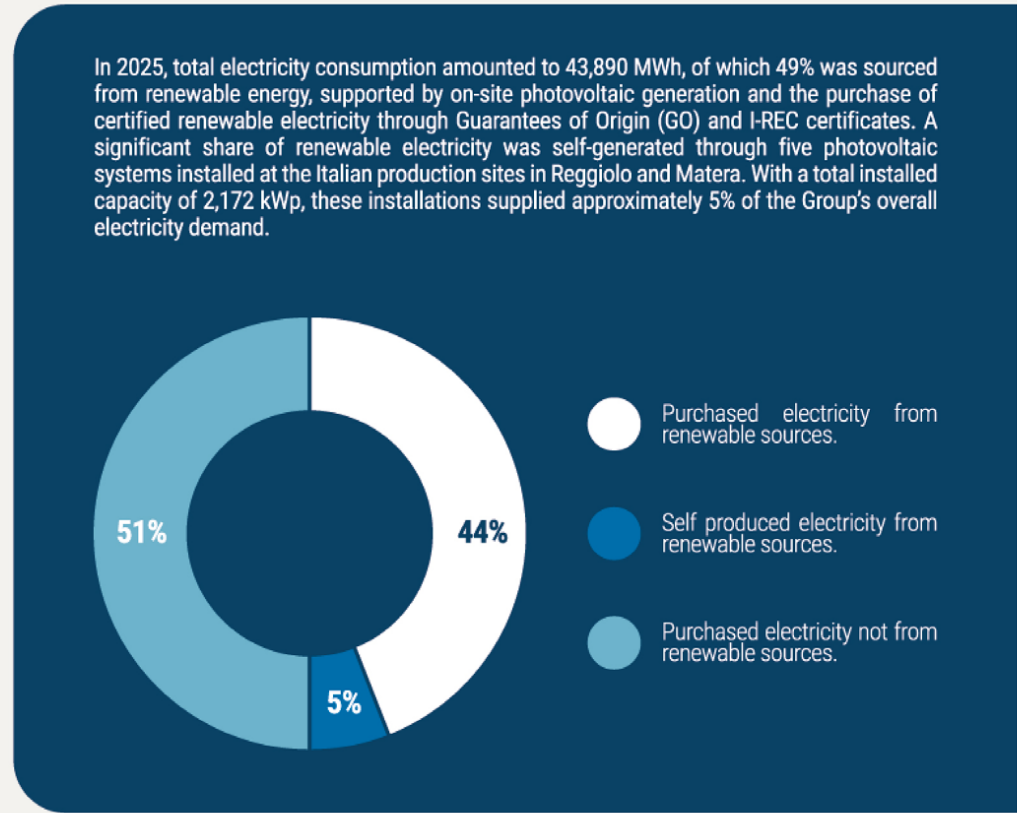
The Group cascades its energy and environmental objectives across all production sites, implementing improvement projects aimed at enhancing energy efficiency and overall environmental performance, while progressively reducing dependence on fossil energy sources.

Building on these initiatives, Comer Industries is committed to progressively increasing the share of renewable energy within its overall energy mix. The Company pursues this objective through a combination of on-site generation projects, long-term sourcing strategies for certified renewable electricity, and continuous evaluation of new technological solutions. Expanding renewable energy use represents a key lever within the broader decarbonization pathway, supporting emissions reduction targets while strengthening energy resilience and long-term operational sustainability.



+14%
RENEWABLE ELECTRICITY CONSUMPTION VS 2024

+12%
RENEWABLE ELECTRICITY SHARE VS 2024

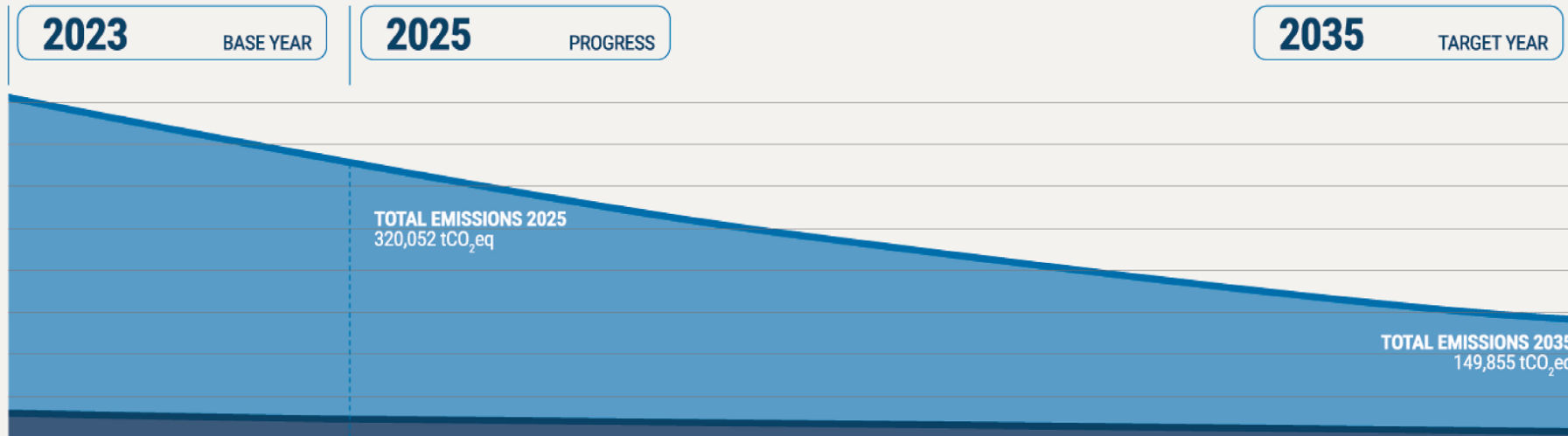


2035 DECARBONIZATION ROADMAP

Comer Industries is committed to supporting the transition toward a low-carbon economy by progressively reducing the environmental impact of its operations and value chain. The Company has defined a clear decarbonization pathway aligned with international climate objectives, setting ambitious targets to reduce greenhouse gas emissions across Scope 1, Scope 2, and relevant Scope 3 categories.

To translate these climate commitments into concrete actions, the Company has developed a structured Decarbonization Plan that operationalizes its emissions reduction targets through clearly defined initiatives, governance mechanisms, and dedicated financial resources, ensuring consistency between strategic objectives and day-to-day operational execution. The Plan is built on a structured approach to the climate transition, combining operational efficiency measures, technological transformation, sustainable sourcing, and product innovation.

Within this framework, each decarbonization lever contributes to lowering the overall emissions footprint and advancing the Company's absolute emissions reduction objectives. To ensure full alignment with business strategy and financial planning, the Board of Directors of Comer Industries has approved the Plan's targets, key actions, and the financial resources allocated for its implementation.



Comer Industries is committed to supporting the transition toward a low-carbon economy by integrating sustainability into its strategy, operations, and product development.

SCOPE 1 2025 EMISSION REDUCTION PROGRESS:
8,131 tCO₂eq

-7.8% VS 2023 BASELINE

SCOPE 2 2025 EMISSION REDUCTION PROGRESS:
11,234 tCO₂eq

-45.1% VS 2023 BASELINE

SCOPE 3 2025 EMISSION REDUCTION PROGRESS:
300,687 tCO₂eq

-20% VS 2023 BASELINE

SCOPE 1 AND SCOPE 2 DECARBONIZATION LEVERS:

Efficient production: optimization of manufacturing processes aimed at reducing overall energy demand through targeted efficiency measures, process improvements, and progressive renewal of machinery and equipment with higher energy-performance technologies.

Efficient buildings: enhancement of energy performance across industrial and office buildings through interventions on heating, ventilation and air conditioning (HVAC) systems, thermal insulation, and lighting infrastructure.

Renewable energy: progressive increase in the share of electricity consumed from renewable sources by combining on-site generation solutions with procurement strategies based on renewable electricity supply contracts supported by Guarantees of Origin or equivalent certification schemes.

Electrification: gradual replacement of fossil fuel-powered systems, equipment, and auxiliary processes with electric alternatives, enabling reduced direct greenhouse gas emissions and improved energy efficiency.

SCOPE 3 DECARBONIZATION LEVERS:

Sustainable procurement policies: integration of climate-related criteria into sourcing strategies by prioritizing suppliers, components, and raw materials with lower carbon footprints.

Ecodesign: development of products and packaging solutions designed to minimize lifecycle environmental impacts through material efficiency and low-carbon design principles, safety, and quality standards.

RESOURCES ASSIGNED TO THE LEVERS:

To implement the commitments outlined in the Decarbonization Plan, the Company has allocated a total investment of €6.5 million for the 2025–2035 period, aimed at the progressive deployment of a comprehensive set of emission reduction levers across the entire value chain. Overall, the planned investments represent a key enabler of the Company's climate strategy, supporting a structural reduction of Scope 1, Scope 2, and progressively Scope 3 emissions through an industrial transformation pathway aligned with the principles of energy efficiency, circular economy, and sustainable innovation.

CIRCULARITY

OPTIMIZATION OF RESOURCE USE IN THE PRODUCTION PROCESS

WATER INTENSITY REDUCTION

10% reduction of water consumption with respect to the hours worked by the machines by 2030



PROGRESS 2025: **95%**



Baseline: 20 litres/machine worked hours

Target: -10%

WATER INTENSITY REDUCTION IN WATER STRESS AREA

15% reduction of water consumption in water stress areas with respect to the hours worked by the machines by 2030



NO PROGRESS DURING THE REPORTED PERIOD

Baseline: 14.3 litres/machine worked hours

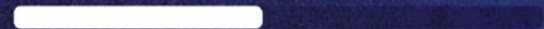
Target: -15%

HAZARDOUS WASTE INTENSITY REDUCTION

20% reduction in hazardous waste production with respect to the hours worked by the machines by 2030



PROGRESS 2025: **47%**



Baseline: 8.6 tons/machine hours

Target: -20%

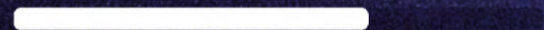
OPTIMIZATION OF RESOURCE USE IN THE PRODUCT

PRODUCT RECYCLED CONTENT

Estimate the quantity of the recycled content material inside the finished product by 2026



PROGRESS 2025: **67%**



Baseline: 4 over 9 products

Target: 9/9 products



WASTE MANAGEMENT

Responsible waste management represents a key pillar of the Company's environmental strategy, aimed at preventing environmental impacts and promoting circular economy principles across the entire production cycle.

The Company prioritizes waste prevention through process optimization, improved material efficiency, and enhanced operational practices. Recycling and recovery solutions are promoted to minimize disposal and reintegrate materials into production cycles where feasible.

Particular attention is dedicated to the management of hazardous waste generated by industrial activities. The Company applies strict management procedures in accordance with regulations and environmental standards. These waste streams are monitored and segregated to reduce risks to employees, communities, and ecosystems. Continuous improvement initiatives focus on reducing hazardous waste through process innovation, chemical substitution, and enhanced operational controls.

Group-wide monitoring system enables the tracking of waste performance across production sites, identifying improvement opportunities and reducing waste sent to landfill.

HAZARDOUS WASTE INTENSITY*



*Tons of hazardous waste over hours worked by the machines x 10,000

WATER RESOURCES

Water resource protection is a priority within the Company's environmental management, reflecting water's operational relevance and global scarcity challenges.

The Company promotes responsible use through initiatives to improve efficiency, prevent losses, and optimize processes. Recirculation, reuse, and maintenance programs support the reduction of water withdrawals while ensuring operational reliability and product quality.

A specific focus is dedicated to operations located in areas exposed to water stress. The Company assesses site exposure using internationally recognized water risk assessment tools and integrates water risk considerations into environmental management and operational planning. In water-stressed areas, targeted actions are implemented to minimize freshwater withdrawals, increase internal water reuse, and strengthen monitoring of consumption patterns.

Responsible wastewater management represents an additional priority. All discharges comply with local regulations, supported by treatment systems and monitoring to protect water bodies and ecosystems.

WATER CONSUMPTION INTENSITY*



*litres of water consumed over hours worked by the machines.



PRODUCT CIRCULARITY

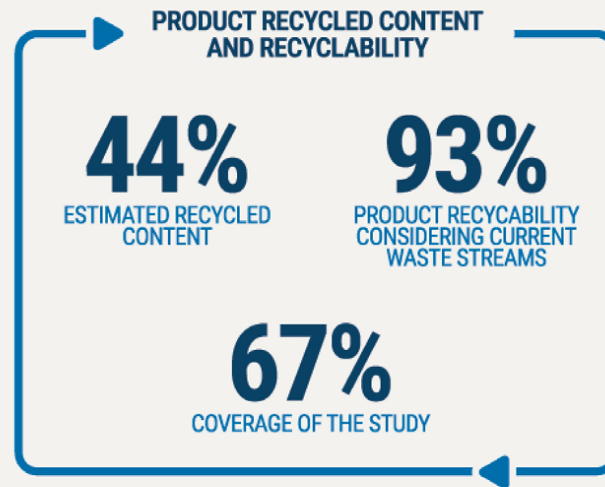
Product circularity represents a key element of the Company's approach to sustainable product development, supporting the transition toward more resource-efficient and low-impact industrial systems. The Company integrates circular economy principles throughout the product lifecycle, with particular focus on material selection, durability, and end-of-life recovery potential.

Materials play a central role in this approach. Product design activities prioritize the efficient use of raw materials, aiming to optimize performance while reducing material intensity and minimizing waste generated during manufacturing and use phases. The Company promotes solutions that enhance product longevity, facilitate maintenance and repair operations, and enable the recovery of valuable components at the end of their service life.

To strengthen its understanding of circular performance, the Company has initiated an internal assessment aimed at evaluating both the share of recycled material incorporated into products and the overall recyclability of materials used across key product families.

This analysis supports the identification of opportunities to increase circular material flows and to improve product design from a lifecycle perspective.

The results of these studies contribute to guiding future product development activities, enabling the Company to progressively increase the use of circular materials and enhance the potential for material recovery, reuse, and recycling at end of life. Through this approach, the Company seeks to reduce dependence on virgin resources and contribute to a more circular industrial value chain.



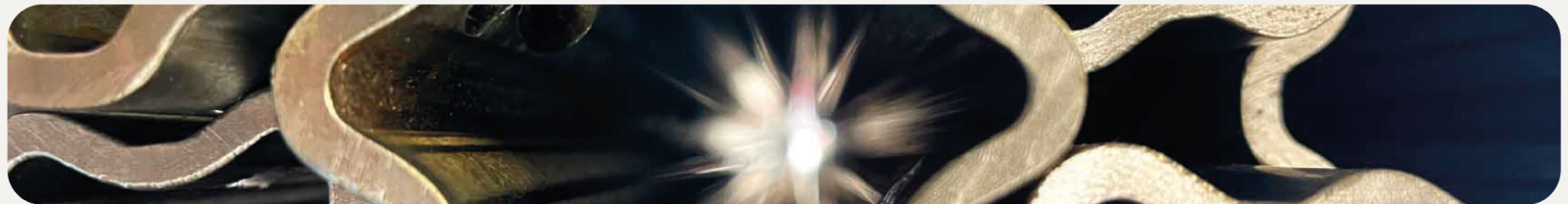
ECODESIGN GUIDELINES

In 2025, the Company formalized its Ecodesign Guidelines, establishing a structured framework to integrate environmental considerations into product development processes. The Guidelines support the systematic inclusion of sustainability criteria from the early design stages, enabling the reduction of environmental impacts across the entire product lifecycle.

The Ecodesign Guidelines address key aspects of product circularity:

- PRODUCT LIGHTWEIGHT**
- USE RECYCLED RAW MATERIALS**
- DESIGN TO LAST**
- PRODUCT RECYCLABILITY**
- PROGRESSIVELY ELIMINATE OR REPLACE HAZARDOUS SUBSTANCES**

The adoption of these Guidelines represents an important step toward embedding sustainability into engineering and innovation activities, ensuring that environmental performance becomes an integral component of future product development.



HUMAN CAPITAL

STRENGTHEN EQUAL OPPORTUNITIES AND GENDER EQUALITY

FEMALE POPULATION

30% increase in female population with respect to the total Company employees by 2030



PROGRESS 2025: 6%



Baseline: 11%

Target: +30%

FEMALE IN LEADERSHIP ROLES

25% increase in female in management positions with respect to the total Company managers by 2030



NO PROGRESS DURING THE REPORTED PERIOD



Baseline: 12.2%

Target: +25%

INCREASE AND SPREAD AWARENESS OF ESG ISSUES

ESG TRAINING

20% increase in the number of training hours per employee by 2030



NO PROGRESS DURING THE REPORTED PERIOD



Baseline: 5.3 hours per employee

Target: +20%

TRAINING FOR EMPLOYEES

Achieve and maintain a training commitment involving 93% of the employees every year



Baseline: 89%

Yearly target: 93%

ESTABLISH A ZERO-INJURY CULTURE

HSE REPORTING DIGITALIZATION

Complete digitalization of the HSE reporting process in all sites of the Group within 2025



PROGRESS 2025: 100%



Baseline: partial - audit only

Target: 100%

HSE REPORT CLOSURE SPEED

50% increase in HSE report closure, including the resolution of the root cause and the implementation of the corrective action by 2030



PROJECT STARTED IN 2025



Baseline: 49.2 days

Target: -50%

WORKERS IN THE VALUE CHAIN

SUPPLY CHAIN DUE DILIGENCE

Due diligence process involving the 75% of the total tier 1 supply chain by 2026



PROGRESS 2025: 100%



Baseline: 54%

Target: 75%



TRAINING & SKILL DEVELOPMENT

Training at Comer Industries is structured on a comprehensive analysis of training needs, pursuing two objectives:

- developing skills at all levels
- reducing the risk of knowledge concentration in few individuals.

Courses are delivered through external vendors, e-learning platforms, and internal instructors, and their effectiveness is measured through learning and satisfaction tests at the end of each session. Mandatory safety training is managed through a computerized system that monitors deadlines. New hires receive a customized onboarding plan based on their area of responsibility.

In 2025, training on the Code of Ethics, Integrated Policies, and anti-corruption topics continued across all functions.

PERFORMANCE MANAGEMENT

The Group evaluates all white-collar workers through a structured Performance Management process, based exclusively on the achievement of quantitative and qualitative objectives. At the start of each year, managers assess performance and organizational conduct, then assign measurable objectives through a direct dialogue with the employee – creating space for feedback and professional development conversations. The evaluation forms the basis of the annual compensation system, applied consistently across all Group companies.

In 2025 the Performance Management process involved 712 employees, 25% of the company's entire workforce.

34,283

HOURS OF TRAINING IN 2025

93%

EMPLOYEES INVOLVED IN TRAINING ACTIVITIES IN 2025

DIVERSITY & INCLUSION

The Group promotes an inclusive workplace free from any form of discrimination based on gender, age, sexual orientation, disability, nationality, political opinions, or religious beliefs. This commitment is formalized in the Integrated Diversity and Inclusion Policy, which applies to all Group sites and every employee, ensuring equal treatment at every stage of the professional lifecycle – from recruitment to performance evaluation and compensation, based exclusively on meritocratic criteria.

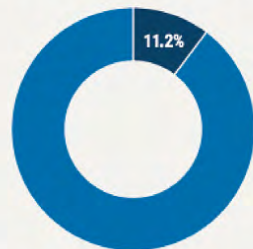


Carta per le pari opportunità e l'uguaglianza sul lavoro

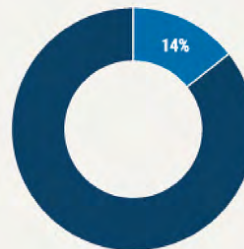
The Group has signed the Charter for Equal Opportunities and Equality at Work, reaffirming its commitment to building an equitable work environment where diversity is valued.

In 2025, no incidents of discrimination, harassment, or serious human rights violations were recorded.

The gender pay gap at Group level stands at -6.03%, meaning that on average female employees receive annual pay that is 6% higher than that of male colleagues.



● Female population



● Women in management roles



HEALTH & SAFETY

Occupational health and safety is managed through a proactive approach and an ISO 45001:2018 compliant Health and Safety Management System certified by accredited bodies.



The Management System involves 86% of workers and is founded on a risk-based approach with the aim to prevent incidents and identify prompt corrective actions in case they occur. Risk assessment includes hazards related to production processes, environmental conditions and regulatory changes.

Action plans are developed with the active involvement of workers through interdisciplinary working groups, following a clear hierarchy of prevention measures: from the elimination of hazards and replacement with less risky processes, to technical and organizational measures, and finally the use of personal protective equipment. The effectiveness of these measures is monitored through performance indicators and periodic audits.

A CULTURE OF PREVENTION

- Workers are actively involved in hazard identification through a dedicated warning system for dangerous or near-miss situations.
- Each report is analysed by a technical team to implement mitigation actions and share best practices across the company.
- New hires follow a structured training program designed to establish a culture of safety from day one.
- Visitors, suppliers, and temporary workers are also included in the Safety Management System.
- No cases of occupational diseases were recorded in 2025.



COMPLETE DIGITIZATION OF HSE REPORTING PROCESSES



50% INCREASE IN THE SPEED OF CLOSING HSE REPORTS

0

WORKPLACE FATALITIES

48

RECORDABLE INJURIES OVER 5M+ HOURS WORKED

-10%

RECORDABLE INJURY RATE IN THE WORKPLACE* (VS 2024)

-24%

DAYS LOST DUE TO INJURY** (VS 2024)

* $(\text{Number of recordable injuries} / \text{Number of hours worked}) \times 1,000,000$

**Number of days lost due to injury including the first full day and the last day of absence. Calendar days were considered for the calculation.



ESG GOVERNANCE

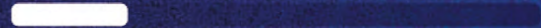
STRENGTHEN THE COMPANY'S ESG COMMITMENT

CODE OF ETHICS TRAINING PROGRAM

Involve more than 95% of the employees in the Code of Ethics training within 2026



PROGRESS 2025: **22%**



Baseline: 4% of the employees

Target: +95%

ESG RATING

ECOVADIS RATING

Achieve and maintain Gold rating within 2026; Achieve and maintain Platinum rating within 2030



2022

2025

2030

SILVER

GOLD

PLATINUM

Baseline: Silver

Target: Platinum

CDP RATING

Achieve and maintain B rating within 2026; Achieve and maintain A rating within 2030



2022

2025

2030

C

B

A

Baseline: C

Target: A

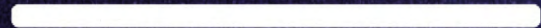
SUSTAINABLE PROCUREMENT

Supply chain commitment

More than 95% of tier 1 suppliers comply with the Supplier Code of Conduct by 2026



PROGRESS 2025: **100%**



Baseline: NA

Target: +95%



CODE OF CONDUCT

CODE OF CONDUCT

The Code of Conduct is the primary reference of the system of values and principles guiding the conduct of the Group and its people. It defines the ethical commitments and shared responsibilities of all those acting in the name of or on behalf of the Company, promoting a culture based on integrity, transparency, respect, and legality across all Company activities. It supports trust among customers, partners, employees, and stakeholders and strengthening the Group's reputation as a key intangible asset.

Developed through an in-depth analysis of corporate values, strategy, regulations, and stakeholder interests by the Quality, Sustainability & Compliance function with external expert support, the Code contributes, together with other corporate Policies, to managing ethical and compliance risks and supporting a responsible, sustainable business model.

All employees are required to read and explicitly accept the Code of Conduct during the onboarding phase.

To strengthen the Group's commitment to adopting a business model based on ethics and transparency, the Company has prepared a dedicated training session on the Code of Conduct, setting the goal of involving the entire workforce by 2026. Working with the Quality, Sustainability & Compliance function, the Academy function launched a training plan with a two-year development horizon, delivered through digital and in-person platforms in different languages.

The plan is aimed at all Group staff and covers the Code of Conduct alongside related topics such as Integrated Policies, anti-corruption, diversity and inclusion, human rights, and sustainable sourcing. Each session concludes with a learning test to verify understanding and identify areas for improvement.



FOR MORE
INFORMATION
SCAN THE
QR CODE



TRAINING ON ANTI-CORRUPTION AND BRIBERY

The adoption of effective anti-corruption safeguards enables the Group to mitigate legal, reputational, and financial risks while fostering a corporate culture grounded in shared ethical principles and full compliance with applicable regulations. On this basis, the Group has established a structured framework of policies, controls, awareness initiatives, and training activities addressed to its employees.

In particular, a dedicated digital training course was developed for employees operating in functions most exposed to corruption risks, including Human Resources, Purchasing, and Administration and Control, achieving full coverage of Executive positions.

Delivered in 2025, the training program aims to enhance awareness of corruption-related risks, promote conduct aligned with the Code of Ethics, and strengthen employees' ability to identify and properly manage potentially critical situations.

100%

COVERAGE OF
ANTI-BRIBERY AND
CORRUPTION TRAINING
ACROSS HIGH-RISK
DEPARTMENTS

SUPPLY CHAIN ENGAGEMENT

DUE DILIGENCE

Through a supplier due diligence, the Company assesses and monitors compliance and ESG maturity across its supply chain, promoting responsible practices aligned with its values and standards. The assessment covers social, environmental and governance aspects both during supplier onboarding and throughout the business relationship.

The evaluation focuses on respect for human rights and fair labour practices, including the prohibition of child and forced labour, health and safety protection, non-discrimination and fair working conditions. The process also considers suppliers' management of environmental impacts, such as resource efficiency, waste management, emissions control and initiatives aimed at improving environmental performance.

Regarding governance, the assessment analyses ethical conduct, anti-corruption measures and transparency. The results support the identification of potential risks and improvement actions, enabling the integration of ESG criteria into procurement processes and strengthening a responsible and resilient value chain.

77%

SUPPLIERS ENGAGED IN DUE DILIGENCE ACTIVITIES

SUPPLIER CODE OF CONDUCT

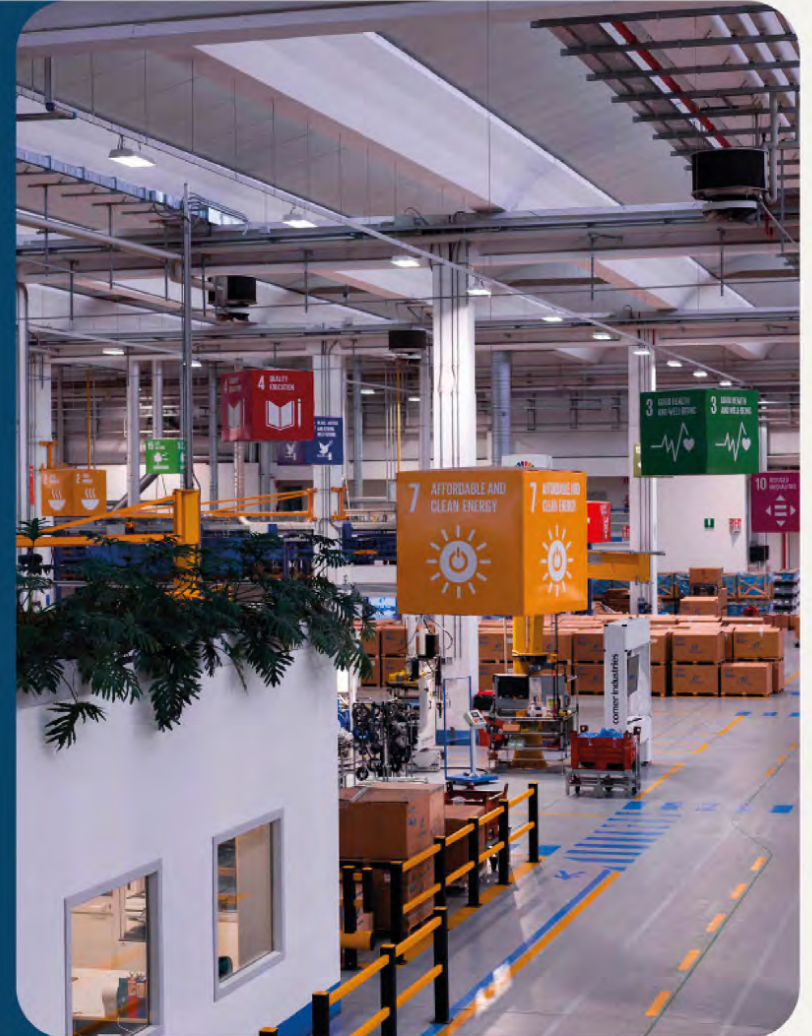
The Group has developed a Supplier Code of Conduct that extends the principles of the Code of Conduct to all suppliers, subcontractors, and business partners. Its adoption is a binding condition for establishing any contractual relationship with the Group, and covers human rights, working conditions, health and safety, responsible sourcing, energy and emissions, water, waste, and pollution. It is grounded in the UN Guiding Principles, the OECD Guidelines, and the ILO Core Standards.

Supplier selection incorporates assessments of ethical and sustainable conduct, followed by qualification audits evaluating quality, environmental, social, and health and safety aspects.

Periodic audit mechanisms verify ongoing compliance, and, in case of violations or non-conformities, corrective measures and remediations are agreed upon the parties.

96%

OF SUPPLIERS HAVE SIGNED THE SUPPLIER CODE OF CONDUCT



MEMBERSHIPS RATINGS & CERTIFICATIONS

RATINGS



GOLD

**GOLD MEDAL AWARDED
(TOP 5% OF ALL COMPANIES ASSESSED)**



B

**B RATING IN CLIMATE CHANGE AND WATER SECURITY (CDP)
AT "MANAGEMENT" LEVEL IN 2024 AND CONFIRMED IN 2025**

CERTIFICATIONS



QUALITY MANAGEMENT SYSTEM

ISO 9001:2015

ENVIRONMENTAL MANAGEMENT SYSTEM

ISO 14001:2015

OCCUPATIONAL HEALTH AND SAFETY
MANAGEMENT SYSTEM

ISO 45001:2018

MEMBERSHIPS



Since December 2021, the Company has been a member of the United Nations Global Compact, committed to its Ten Principles on human rights, labour standards, environmental protection, and anti-corruption, values embedded in the Group's Code of Conduct and applied across all operations.
















**Carta per le
pari opportunità
e l'uguaglianza
sul lavoro**

Comer Industries has signed the Charter for Equal Opportunities and Equality at Work, reaffirming its commitment to building an inclusive, discrimination-free workplace where diversity is valued and equal opportunities are ensured for all employees.

ANNEX

THE 2035 SUSTAINABLE DEVELOPMENT PLAN

OBJECTIVES	GOALS	UNIT	BASE YEAR	BASELINE	PERFORMANCE 2025	TARGET VALUE	TARGET YEAR	SDG _s
CLIMATE CHANGE								
Reduction of greenhouse gas emissions	30% reduction in emission intensity (Scope 1 & Scope 2 market-based tCO ₂ eq)	tCO ₂ eq/machine hours	2022	100.3	85.0	70.2	2030	
	Reduction of Scope 1 and Scope 2 emissions by 63%	tCO ₂ eq	2023	29,274	19,365	10,831	2035	
	Reduction of Scope 3 emissions by 63%	tCO ₂ eq	2023	375,739	300,687	139,023	2035	
	30% reduction in energy intensity	GJ/machine hours	2022	138.9	139.0	97.2	2030	
	60% increase in consumption of electricity from renewable sources	% electricity from renewable sources	2022	33%	49%	53%	2030	
CIRCULARITY								
Optimization of resource use in the production process	20% reduction in the intensity of hazardous waste	tons/machine hours	2022	8.6	7.8	6.9	2030	
	10% reduction in water consumption intensity	m ³ /machine hours	2022	20	18.1	18	2030	
	15% reduction in water consumption intensity in high water stress areas	m ³ /machine hours	2023	14.3	16.4	12.2	2030	
Optimization of resource use in the product	Estimate the quantity of recycled materials inside the product	% of recycled content	2025	Not applicable	Project under way	-	2026	
HUMAN CAPITAL								
Strengthen equal opportunities and gender equality	30% increase in the female population	% of employees	2022	11.0	11.2	14.3	2030	
	25% increase in women in positions of responsibility	% of managers	2023	12.2	11.9	15.2	2030	
Increase and spread awareness of ESG issues	Achieve and maintain training commitment >93%	% of employees involved	2022	89%	93%	+93%	2030	
	20% increase in the number of ESG training hours per employee	Hours/employee	2022	5.3	3.5	6.36	2030	
Establish a zero-injury culture	Complete digitization of HSE reporting processes	%	2023	Partial – audit only	100%	100%	2025	
	50% increase in the speed of closing HSE reports	days	2025	49.2	49.2	24.6	2030	
Workers in the value chain	Due diligence of 75% of the supply chain (tier 1) using ESG criteria	% tier 1 suppliers	2024	54%	77%	+75%	2026	
ESG GOVERNANCE								
Strengthen the company's ESG commitment	Involve more than 95% of employees in training on the Code of Ethics	% employees involved	2024	4%	24%	+95%	2026	
ESG rating	EcoVadis "Gold" and CDP "B" ratings earned and maintained	Rating	2023	Silver; C	Gold; B	Gold; B	2026	
	EcoVadis "Platinum" and CDP "A" ratings earned and maintained	Rating	2023	Silver; C	Gold; B	Platinum; A	2030	
Sustainable procurement	Supply chain involvement: more than 95% of tier 1 suppliers comply with the Supplier Code of Conduct	% tier 1 suppliers	2024	Not applicable	96%	+95%	2026	



comer industries

ABOUT THIS REPORT

This report is a sustainability highlights document, designed to present the most significant achievements and initiatives of Comer Industries in the area of sustainable development. It is intended to engage stakeholders as active participants in a continuous dialogue about sustainability and responsible business conduct, offering a focused overview of the Group's progress and goals as defined in the 2035 Sustainable Development Plan.

All data and information presented in this document are drawn from the Sustainability Statement, part of the 2025 Annual Report. The Company's goal is to offer transparent, comprehensive, and accessible information, reflecting the priorities of both internal and external stakeholders.

sustainability@comerindustries.com